



# South Coast Air Quality Management District

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January 20, 2009

Mr. James Goldstene  
Executive Officer  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Dear Mr. Goldstene:

SCAQMD Staff Comments Regarding the Plug-In Hybrid Electric Vehicle Test  
Procedure Amendments and Aftermarket Parts Certification Requirements Adoption

The South Coast Air Quality Management District (AQMD) staff appreciates this opportunity to provide comments on the California Air Resources Board (CARB) staff proposed amendments to the Plug-in Hybrid Electric Vehicle (PHEV) Test Procedure and Aftermarket Parts Certification Requirements. The South Coast AQMD has long-supported the development of plug-in hybrid electric vehicles and encourages efforts to help commercialize near-zero and zero emission vehicles. We have been pleased to participate in CARB staff's initial emission study of early plug-in hybrid electric vehicles and plan to continue to provide support as needed.

The AQMD staff supports the efforts of CARB throughout its public process to streamline the proposed plug-in hybrid electric vehicle test procedures and aftermarket parts certification requirements to reduce the time and cost of PHEV testing and provide flexibility requested by automakers, while preserving the essential emission characterization elements, and ensuring that developers and manufacturers will provide the warranty necessary to make certain that emission reductions continue. Amending emission test procedures to appropriately address PHEV testing is an important step to provide certainty to

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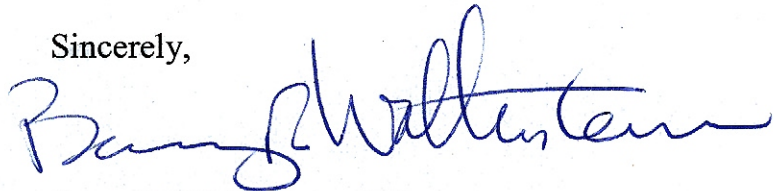


automakers finalizing PHEV design and production plans to commercialize near-zero emission vehicles that can qualify for enhanced Advanced Technology Partial Zero Emissions Vehicle (AT PZEV) credit provided in the recently adopted Zero Emission Vehicle regulation.

Given that hybrid systems are relatively new and especially, with plug-in systems, we recommend that the CARB Board include in its resolution for staff to conduct a review of the test procedures, perhaps every three years and report back to the CARB Board on any necessary amendments.

In conclusion, we strongly urge the CARB Board to adopt staff's proposed amendments to the PHEV test procedure and aftermarket parts certification requirements. We look forward to continued working with CARB and participating in the ongoing regulatory process. Together, we need to aggressively accelerate the reduction of criteria pollutant emissions, which is so desperately needed in nonattainment regions such as the South Coast Air Basin.

Sincerely,



Barry R. Wallerstein, D.Env.  
Executive Officer

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