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Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Comments on Amendments to the LEV III Criteria Pollutant Requirements for Light- and Medium-Duty Vehicles, the Hybrid Electric Vehicle Test Procedures, and the Heavy-Duty Otto-Cycle and Heavy-Duty Diesel Test Procedures ("15-Day Notice")

Air Resources Board Members:

The Alliance of Automobile Manufacturers (Alliance)¹ and Association of Global Automakers, Inc. (Global Automakers),² representing nearly every car and light-truck manufacturer and nearly 99% of the new vehicle market in California, supports the amendments in the LEV III 15-Day Notice with the exceptions noted below.

First, we would like to once again thank the Air Resources Board's (ARB) staff for its ongoing willingness to work with industry throughout this process in an open, transparent, and cooperative manner. ARB staff have been diligent and thorough in its review and update of the regulatory requirements, and the 15-Day Notice helps to bring LEV III and the Environmental Protection Agency's Tier 3 program closer into alignment, while continuing to achieve important and significant reductions of criteria pollutants to near-zero levels.

Harmonization: Harmonizing LEV III and Tier 3 continues to be a top priority for automakers because it reduces redundancies, allows for more efficient and streamlined implementation of the regulations, and maximizes resources necessary to comply with criteria pollutant and greenhouse gas standards, in addition to the Zero Emission Vehicle program. While we recognize that there are certain areas where full alignment may not be possible, we believe those should be the exception and that further alignment is still possible and necessary.

The perception seems to be that the remaining issues that are not aligned will not create undue hardship or burden and therefore alignment is not necessary. Using this same logic, if there is little impact or burden, then the regulations should be aligned. Any divergences between the programs can create unforeseen hardships at a later time. Consequently, we strongly recommend

¹ Alliance members are BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen, and Volvo.

² Global Automakers' members include Aston Martin, Ferrari, Honda, Hyundai, Isuzu, Kia, Maserati, McLaren, Nissan, Subaru, Suzuki, and Toyota. For more information, please visit www.globalautomakers.org.

ARB align those items described in Attachment 1, during this rulemaking, or if for some reason they cannot be included at this time, then they should be addressed in the next rulemaking opportunity.

In addition to our recommendations related to regulatory harmonization, we have identified a few additional items that should be included in the final regulations in Attachment 1.

Plug-In Hybrid Electric Vehicle Test Procedures: Attachment 2 contains comments on the plug-in hybrid electric vehicle (PHEV) test procedures. These are very complex procedures, and we have had a very short time to review them. In general, we appreciate the very thorough job ARB staff did incorporating a large number of industry comments and believe that the revised procedures offer a significant improvement over the previous versions.

While we offer several changes in Attachment 2, one correction alone warrants a second 15-Day Notice. The test procedures appear to allow the battery to supplement the internal combustion engine during emissions test cycles, which was not ARB's intent. We believe this should be corrected before finalizing the regulations. Attachment 3 contains a graphic of the PHEV test procedures to illustrate the flow of the different elements. Obviously, the other recommendations in Attachments 1 and 2 should also be addressed in a second 15-Day Notice.

Thank you for your consideration of our comments. If you have any questions or need additional information, please feel free to contact us. As always, we look forward to continuing to work with you.

Sincerely,



Steven Douglas
Senior Director, Environmental Affairs



Julia Rege
Director, Environment & Energy

Copy: Richard Corey
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Attachments