

November 1, 2013

Mike Tollstrup  
Chief, Project Assessment Branch  
1001 I Street  
California Air Resources Board  
Sacramento, California 95814

**Subject: AB32 Scoping Plan Update – Passenger Vehicle In-Use Efficiency and Fuel Efficient Tires**

Dear Mr. Tollstrup:

Thank you for the opportunity to provide comments on the discussion draft AB32 Scoping Plan update. We encourage you to build on California's leadership reducing transportation emissions by including passenger vehicle in-use efficiency in the update.

In particular, we recommend that the update include a pathway for deployment of fuel efficient passenger vehicle replacement tire and engine oil technology. We recommend including fuel efficient tire incentives for a limited time period, ratings, and then standards to permanently shift the market. These programs would allow drivers of every income level to participate directly in the benefits of AB32 with fuel savings of 4% when installing replacement tires. We estimate that fuel efficient replacement tires would achieve greenhouse gas (GHG) reductions of three to four million metric tons carbon dioxide equivalent (MMTCO<sub>2</sub>e) per year (tailpipe and upstream GHG baseline emissions from vehicles with replacement tires are about 100 MMTCO<sub>2</sub>e per year). We also encourage evaluation of potential measures for improved engine oil technology for the in-use fleet.

We have attached suggested language for the scoping plan update and appreciate your consideration of our comments. Please contact me or have your staff contact me at [epike@energy-solution.com](mailto:epike@energy-solution.com) or (510) 482-4420 x239 if you have any questions.

Sincerely,



Ed Pike, P.E.  
Senior Project Manager

## Attachment

### Suggested Text for AB32 Scoping Plan Update

We recommend the following revisions to the discussion draft AB32 scoping plan update:

#### 1) Table 16

We recommend adding one line to Table 16 “Funding of Specific Areas to Support AB32”:

“• In-use passenger vehicle efficiency.”

#### 2) Executive Summary

We recommend revising page ES-2 by adding the following underlined sentence:

“... The transition to a fleet of lower-emitting, more-efficient vehicles in California will continue beyond 2020 as the result of a package of advanced clean car regulations adopted by ARB in 2012, covering model years 2017–2025. California will also continue efforts to improve in-use vehicle efficiency including reducing tire frictional energy losses. These regulations will ultimately drive down GHG emissions by about half, compared to today’s average vehicle.”

#### 3) Transportation Measures Table

We recommend revising Table 5 by replacing the existing language under “status of measures/board consideration dates” with the following underlined language:

**Table 5: Status of Transportation Measures**

Transportation Measures		Status of Measure/Board Consideration Dates
T-4	Vehicle Efficiency Measures	
	1. Tire Pressure	March 2009 (early action items)
	2. Fuel Efficiency Tire Program	<u>Under development, adoption 2014/2015</u>
		<u><del>Under consideration by United States Department of Transportation</del></u>
	3. Low Friction Oil	<u>Pending further evaluation</u>
	4. Solar Reflective Automotive Paint and Window Glazing	Part of Advanced Clean Cars program

#### 4) Transportation Measures Narrative

We recommend adding an in-use passenger vehicle efficiency program narrative on page 24 and have provided two options below. We note that our report to the South Coast Air Quality Management District will be available soon, prior to the next draft of the AB32 Scoping Plan update.

Option A: “*In Use Passenger Vehicle Efficiency Program*”

In use passenger vehicle efficiency is a significant opportunity to achieve immediate benefits and complement new vehicle, fuels, and travel activity

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measures. For instance fuel efficient replacement tire incentives, ratings and standards have the potential to reduce three to four MMTCO<sub>2</sub>e per year state-wide, build on the tire inflation program ARB has already adopted, and set a precedent for a planned federal rating program. A recent study for the South Coast Air Quality Management District found that fuel efficient tires have a very high benefit to cost ratio. One pathway is a demonstration incentive program followed by ratings and regulations under AB844 to achieve fuel efficiency levels comparable to tires sold on new vehicles. Fuel efficient replacement oil is an additional opportunity that will be analyzed further. These programs would provide an opportunity for drivers of every income level, including low income drivers, to participate directly in the energy savings and other benefits of AB32.”

Option B: “*In Use Passenger Vehicle Efficiency Program*

In use passenger vehicle efficiency is a significant opportunity to achieve immediate benefits and complement new vehicle, fuels, and travel activity measures. Fuel efficient replacement tire programs have the potential to reduce three to four MMTCO<sub>2</sub>e per year state-wide and build on the tire inflation program ARB has already adopted. One pathway is a demonstration incentive program followed by ratings and regulations under AB844 to achieve fuel efficiency levels comparable to tires sold on new vehicles. Fuel efficient replacement oil is an additional opportunity that will be analyzed further.”