

September 23, 2009

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

Re: Proposed Amendments to New Passenger Vehicle Greenhouse Gas Emission Standards

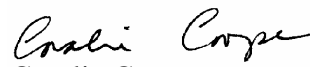
Dear Clerk:

The Northeast States for Coordinated Air Use Management (NESCAUM) is writing in support of the California Air Resources Board *Proposed Amendments to New Passenger Vehicle Greenhouse Gas Emission Standards*. NESCAUM is an association of the air pollution control programs in the eight northeast states, including: Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NESCAUM has provided technical and policy support to our member states on air pollution issues for over 40 years.

The Air Resources Board proposal, once implemented, will allow manufacturers to demonstrate compliance with the passenger vehicle greenhouse gas emission standards by combining or “pooling” California and Section 177 state vehicle sales. The proposal, once finalized, will reduce overall compliance costs for automobile manufacturers. NESCAUM supports the pooling approach and urges California to finalize it as proposed. NESCAUM also supports the Air Resources Board proposal to allow the use of data from the federal CAFE program to demonstrate compliance with the Pavley regulations. This change will reduce costs to manufacturers by reducing the number of tests that must be conducted for the purpose of compliance with California’s regulations.

With this proposal, the Air Resources Board is fulfilling part of California’s commitment made in an agreement with the federal government and with automobile manufacturers on May 19, 2009. With the recent announcement of the joint EPA-DOT proposed rule to reduce vehicle GHGs and improve fuel economy, the federal government is also carrying out its commitment. The onus is now on the automobile industry to fulfill its part of the agreement by taking the actions agreed to, namely, to drop current and forego similar future legal challenges in California and the Section 177 states so that this critical program can move forward.

Very truly yours,



Coralie Cooper
Transportation Program Manager