



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

January 24, 2012

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

Re: California Air Resources Board's Proposed Amendments to the Low Emission Vehicle Program (LEV III) and the Motor Vehicle Greenhouse Gas Emissions Standards for Model Years 2017-2025

Dear Sir or Madam:

The Pennsylvania Department of Environmental Protection (DEP) is submitting comments on the proposed amendments to California's low emission vehicle program (LEV III) and greenhouse gas (GHG) emissions standards for new passenger motor vehicles and test procedures for light-and medium-duty vehicles that are scheduled for a public hearing before the California Air Resources Board (CARB) on January 26, 2012. Under the authority of Section 177 of the federal Clean Air Act, Pennsylvania adopted and incorporated by reference California's Low Emission Vehicle (CA LEV) regulations in 1998, except for the California Zero Emission Vehicle and emissions control warranty systems statement provisions.

Motor vehicles fueled by liquid petroleum remain a significant source of air emissions in Pennsylvania and this fact poses challenges to us in meeting and maintaining federal clean air standards. We are, however, seeing some promise from the dramatic increase in supplies and availability of domestic natural gas of swapping out our vehicle transportation fuel from imported foreign oil to domestic natural gas either directly or via electricity generated from domestic natural gas fuel. Indeed, this is the most significant opportunity we have had in our lifetime to clean our air, especially in urban areas where the burning of imported liquid transportation fuels is the most concentrated. This would dramatically improve the air quality of Pennsylvania and would, at the same time, significantly enhance our national security and energy independence to boot.

**The DEP supports CARB's efforts to harmonize the proposed emission limits with current and future federal light-duty vehicle emission requirements in order to ease compliance for manufacturers and encourage the production of cleaner vehicles nationwide. These efforts include:**

- Reducing fleet average emissions from new light-duty vehicles to super-ultra-low emission vehicle (SULEV) standards by 2025
- Changes to the certification fuel for test procedures, such as octane rating and ethanol content which will test vehicles on a fuel that is used more in the real world. We also

support proposed changes to the Supplemental Federal Test Procedures which would more accurately reflect actual driving by motorist while certifying a vehicle.

- Allowing compliance with federal fuel economy and environmental labeling requirements to be in compliance with CARB's regulations

**The DEP supports CARB's provision which provides flexibility to manufacturers, since flexibility will allow manufacturers to continue to provide a mixed fleet that meets standards. These provisions include:**

- Combining the non-methane organic gas (NMOG) and oxides of nitrogen (NO<sub>x</sub>) standards (NMOG + NO<sub>x</sub> standards)
- Allowing pooled compliance of new vehicles delivered to California and jurisdictions that have adopted California's standards under Section 177, including revisions to the credit and debit requirements
- Additional credits for improved efficiency, leak reduction, and lower global warming potential refrigerant, allowing manufacturers to use the best technology for each vehicle produced

**The DEP supports CARB's efforts to reduce actual emissions, which provide environmental benefits in Pennsylvania, while improving the value to the consumer. These include:**

- Changes proposed by CARB to the on-board diagnostic (OBD II) regulations that will be needed to ensure compliance when model year 2013 vehicles are certified
- CARB's proposal to extend the full useful life durability requirement from 120,000 miles to 150,000 miles to ensure longer functioning emission control systems and lower in-use emissions as the vehicles age
- Proposed revisions to its Zero Emission Vehicle (ZEV) program that migrate partial zero emission vehicles (PZEV) to the low emission vehicle (LEV) program, so that manufacturers that supply cleaner vehicles in Pennsylvania can receive more credit for lower emission vehicles when calculating fleet average emissions
- DEP supports CARB's decision to not adopt additional incentives for advanced technology electric vehicles. These vehicles need not be incentivized in this way because the multipliers unfairly promote particular types of alternatively fueled vehicles over others

The DEP requests that CARB provide adequate guidance to Section 177 states and the District of Columbia on how the credit and debit system relates to the pooling option for fleet emission standards for criteria pollutants and evaporative emissions. CARB should also identify the circumstances and/or timeframe under which particulate measurement technology would be reevaluated to ensure the technology is capable of supporting its proposed more stringent particulate matter standards.

Thank you for your consideration of our comments on California's proposed amendments to the criteria pollutant and GHG emissions standards for new light-duty and medium-duty motor vehicles. Should you have questions or need additional information, please contact Vincent J. Brisini, Deputy Secretary for Waste, Air, Radiation and Remediation, by e-mail at [vbrisini@pa.gov](mailto:vbrisini@pa.gov) or by telephone at 717.772.2724, or Joyce E. Epps, Director of the Bureau of Air Quality, by e-mail at [jeepps@pa.gov](mailto:jeepps@pa.gov) or by telephone at 717.787.9702.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Krancer", with a stylized flourish at the end.

Michael L. Krancer  
Secretary