

September 21, 2012

Via Email (ndolney@arb.ca.gov)

Ms. Nicole Dolney
Manager, Off-Road Diesel Analysis Section
Planning and Technical Support Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Comments on CARB's "Vision for Clean Air:
A Framework for Air Quality and Climate Planning"**

Dear Ms. Dolney:

The Truck and Engine Manufacturers Association ("EMA") appreciates the opportunity to submit comments on CARB's "Vision for Clean Air: A Framework for Air Quality and Climate Planning" (hereinafter, the "Framework"). The Framework was initially released on June 27, 2012, and an appendix containing the underlying "Vision Model" documentation and inputs was made available on August 20, 2012. In addition, CARB conducted a series of workshops on August 21-23 to discuss the Vision Model and how CARB staff used it to generate the Framework.

EMA has retained Air Improvement Resource, Inc., ("AIR") to conduct an initial review of the Vision Model and Framework. The initial comments that AIR has prepared are attached for consideration by CARB staff in finalizing the Framework for presentation to the CARB Board in October. Among the key comments noted by AIR are the following:

- (i) The Framework postulates massive infrastructure transformations to convert California's transportation and goods movement system to one that relies on electric, hydrogen and battery-powered vehicles and equipment. Despite the enormity of the postulated transformation, none of the emissions that necessarily will be associated with such a complete overhaul of the State's infrastructure is included in the Vision Model. That omission needs to be addressed.
- (ii) The upstream emissions associated with power generation and the production of fuels for vehicles and equipment in the future are not fully or consistently accounted for in the Vision Model. In some instances, it is simply assumed that there will be no upstream emissions. That inconsistency needs to be addressed.
- (iii) The Vision Model's assumptions regarding future vehicle miles traveled and fuel economy appear to be flawed and internally inconsistent. Those issues also need to be corrected.

In addition to addressing the attached comments that AIR has prepared, and perhaps more importantly, CARB staff needs to ensure that the Framework states very clearly and up-front what it is and what it is not. Specifically, the Framework needs to state in the Executive Summary, Introduction and Conclusion sections that it is not a regulatory document, nor is it a recommendation of any particular regulatory strategy, action plan or series of control measures. Rather, as CARB staff have stated publicly during the workshops, the Framework is simply an exercise to assess the scope and types of programs that might be required over the next several decades to meet certain air quality goals. Accordingly, the Framework should include in the Executive Summary, Introduction and Conclusion sections of the report a very clear statement that the Framework is intended solely as a methodological exercise to test the utility of the Vision Model in running potential future scenarios and in scoping the magnitude of future air quality programs that may need to be undertaken.

Similarly, the Framework should spell out up-front that the Board will not "adopt" the Framework as a regulatory or policy blueprint, but rather will simply be "accepting" the Framework for what it is -- an initial exercise to scope the potential magnitude of future air quality issues using a new and modified modeling tool, which scenario-running tool may prove useful to CARB down the line. In that regard, the Framework should emphasize that it is not a report about any specific policy choices, recommendation or regulations to address air quality issues, and that it includes no consideration whatsoever of costs, cost-effectiveness, feasibility or necessity, or any of the myriad other factors that would go into the consideration of actual policy and regulatory alternatives. Thus, the Framework needs to be absolutely clear that it is not the type of specific planning document that is intended to serve in any way as a regulatory template or action plan. Providing those clear and unambiguous caveats up-front and throughout the Framework document will help to prevent any potential mischaracterization or misuse of the Framework in future years.

Thank you in advance for your careful consideration of EMA's and AIR's comments, and please do not hesitate to contact us if you have any questions regarding this matter.

Very truly yours,



Timothy A. French

cc: Carol Sutkus (csutkus@arb.ca.gov)
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