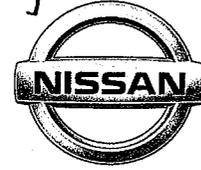


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## LEVIII GHG

- Nissan has been an active participant in the GHG National Program and remains committed to the regulatory program as set forth in the notices of intent and proposed rule.
- As a complimentary policy, Nissan supports the ARB GHG program as it recognizes the importance of a National program and judges compliance with it as demonstrating compliance with the CA requirements.

## ZEV

- Nissan supports the Staff proposal and agrees it improves several aspects of the ZEV program.
- Specifically, Nissan strongly supports the 177 state phase-in agreement reached on January 23, 2011. This optional provision will assure the early introduction of BEVs and TZEVs into the 177 states while establishing a more gradual ramp up to a program that fully matches California.

Equally important, it will introduce "pooled" compliance so that local areas with lower acceptance of advanced technology vehicles do not jeopardize the over all program.

## CFO

- Nissan is strongly committed to the concept of zero emission vehicle technology as demonstrated by the commercial introduction of the Nissan LEAF. However, Nissan is also developing and planning for the introduction of the Fuel Cell Vehicle.
- The CFO is a mechanism to assure hydrogen becomes more broadly available over the up coming years and Nissan supports this goal.

## LEVIII Precursor Emissions

- The LEVIII program as it applies to precursor emissions is very detailed and technical. Nissan supports the program as proposed and has worked with the industry and ARB Staff to reach a well balanced plan which includes a significant reduction in emissions. The program also provides meaningful flexibility to allow manufacturers to phase-in the lower standards in conjunction with their product plans.