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ATTACHMENT 1

Summary of South Coast Air Quality Management District Staff's Recommendations on the "Advanced Clean Car" Program

The following summarizes the South Coast Air Quality Management District (SCAQMD) staff comments and recommendations on the "Advanced Clean Car" Program for the California Air Resources Board consideration on January 26-27, 2012. Please refer to the main body of the SCAQMD staff's comment letter for more detailed discussions of the recommendations.

General Recommendations

- Begin discussions on incentive mechanisms that will bring zero emission vehicles (ZEVs) and other near-zero emission vehicles into the market as early as possible.
- Closely monitor the sales of ZEVs and make necessary revisions to ensure that the full emission reduction benefits are achieved.
- Closely monitor the amount of credits generated and their use in producing vehicles that do not necessarily meet applicable criteria pollutant or greenhouse gas standards.

LEV III Program

- Implement a NO_x cap standard for diesel-powered light-duty vehicles and medium-duty vehicles, to be equal to half of the proposed NMOG + NO_x fleet average standards.
- Implement a three-year lead time and three-year phase-in subsequent to full implementation of the 2017 recommended end date for the 0.003 g/mi PM standard. Specifically, the 0.001 g/mi PM standards should be implemented from 2020 to 2022.
- Tighten the proposed NMOG + NO_x emission standards for medium-duty vehicles by 50 percent to truly implement technology forcing emission standards for medium-duty vehicles.
- Propose an "optional" emissions standard for greenhouse gas emissions as part of the 15-day process to incentivize earlier introduction of cleaner vehicles (ZEVs,

near-ZEVs, and alternative fueled vehicles). (This is similar to the NMHC + NOx heavy-duty exhaust standards prior to 2007.)

- Limit credit trading between vehicle categories for both criteria and greenhouse gas emissions in the proposed LEV III regulation.

ZEV Amendments

- Work with air districts to develop mechanisms that could significantly increase these incentive levels to facilitate the sales of these cleaner vehicles prior to 2023.