

Shankar Prasad



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SUBMITTED ELECTRONICALLY

California Air Resources Board

Dear Chairman Nichols and Members of the Board,

We are generally in support of the staff proposal that you would be considering to adopt at the upcoming Board meeting on January 26, 2012. The three sets of Clean Cars regulations have been crafted keeping in mind that the eventual success of these programs requires deployment of large volumes of clean cars that use electricity or hydrogen to power them and can only be accomplished through a matching national program. Together, they will reduce foreign oil dependency; improve air quality; and advance technology.

For more than 30 years we have observed that the vehicle emission standards adopted in California, eventually lead to similar standards at the national and international level. In addition, these regulations have also proved to be a stimulus for developing newer, cheaper and safer technologies that have eventually spread worldwide. The staff has a similar vision for these regulations that would shape the future light-duty vehicle fleet across the world.

We concur with the opinion of many groups that the proposal can be strengthened by increasing the threshold set for over-compliance and placing a cap on the total percentage vehicles that can be allowed into this crediting program. However, we recognize that the agreement between Federal Government, Air Resources Board, automakers and lack of support from many automakers may be a limiting factor to address this issue.

In contrast, we believe that there are no such limiting factors and urge you to modify the compliance date of particle emissions standard (1mg/mile) in the Low Emissions Vehicles regulation to be phased-in from model year 2022 (instead of 2025) as had been originally planned. The Board is fully aware of the magnitude of mortality and other adverse health impact of particulate pollution and the number of air basins violating the fine particle standard. Thus, we feel it is imperative that you take actions to reduce particulate pollution as early as feasible. In addition, we feel that providing extra lead time to gasoline engines and to the gasoline direct injection technology is against the principle of the Board being fuel and technology neutral.

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We acknowledge the fact that current measurement and monitoring technologies may have some limitations to assure compliance. However, in our opinion, providing a 10-year lead time is adequate to develop technologies that would ensure proper certification and compliance. In addition, ARB can choose to conduct a review of technologies in the 2017 timeframe and modify if necessary the final form, stringency, or the compliance timing of the particle emissions standard.

We have learned from our conversations with the Manufacturers of Emission Controls Association (MECA) that our recommended time line is reasonable and is in fact, more in line with the recent European Commission decision to establish a particle number emission standard for light-duty vehicles powered by gasoline direct injection (GDI) engines as a part of their upcoming Euro 6 light-duty emission standards. Many auto manufacturers that sell into the European market are working with MECA members on potential applications of particulate filters on gasoline direct injection vehicles. We concur with MECA's suggestions that ARB needs to make sure that the same ultra-low PM, Euro 6 GDI engines/technologies developed in Europe are also utilized in California.

We urge you to maintain the Board's history, leadership and neutrality in setting technology forcing emission standards with respect to light-duty vehicle particulate emissions.

Sincerely,

Shankar Prasad
Coalition for Clean Air