



October 20, 2014

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Support for Proposed Revisions to the Low Emission Vehicle (LEV III) Standard

Dear Chairman Nichols,

On behalf of the American Lung Association in California and the Center for Energy Efficiency and Renewable Technologies (CEERT), we are writing to express our support for the proposed modifications to the California's Low Emission Vehicle (LEV III) Standards for criteria air pollutants. We support the revisions to the LEV III program because they maintain California's commitment to improving public health and air quality by requiring significant reductions in the emissions of smog and particle pollution from the state's passenger vehicles. Due to the serious health dangers of particle pollution we remain especially supportive of California's leadership with the LEV III program's stronger particle pollution standard. This proposal follows through on California's commitment to align state and federal vehicle programs while preserving California's stronger vehicle emission standards and the faster phase-in requirements needed to address our unique and severe air quality challenges.

The proposed modifications update test procedures for certain vehicle types and brings California's LEV III regulations into broad but not complete concordance with the more recently adopted federal Tier 3 requirements which were largely informed by the original LEV III requirements. Our organizations are particularly supportive of areas where California retains and extends greater stringency in order to ensure that clean air benefits can be maximized in our state and those other states that have adopted California standards. Specifically:

- ***California's Retention and Extension of LEV III benefits.*** We strongly support staff's work to ensure that alignment with Tier 3 does not diminish the air quality benefits expected in states following the more stringent California LEV III standards. Furthermore, while California's standards are generally more stringent than the

comparable federal requirements we also strongly support the incorporation into the LEV III requirements of features from the Tier 3 program that are more stringent than those required by the original California standard.

- ***Maintaining the particulate matter standard of 1 mg/mile in the LEV III standards.*** This provision provides direction and certainty that vehicles will limit toxic particulate pollution while advancing technologies to reduce greenhouse gas emissions. We look forward to staff's 2015 report on particulate measurement capabilities and the potential for bringing the 1 mg/mile standard online sooner than 2025, as directed by the Board.
- ***Maintaining credit banking provision for 5 years.*** While Tier 3 standards allow for an 8 year credit life, we support the staff proposal to retain the LEV III 5 year credit life. LEV II standards allowed for a three year credit life, with declining credit values over time. Under LEV III, the current full credit, 5 year window already created a significant and sufficient expansion of flexibility and assures that over-compliance in early years does not slow progress over time.

In closing, we appreciate the efforts of staff and the Board to follow through on the commitment to align LEV III with Tier 3 standards while maintaining the stringency and effectiveness of California's standards to ensure clean air benefits and public health improvements. We look forward to continued work with the Board and staff as additional information is presented in the next year on the particulate pollution components of the standards.

Sincerely,

Bonnie Holmes-Gen
Senior Director, Policy and Advocacy
American Lung Association in California

John Shears
Research Coordinator
The Center for Energy Efficiency and Renewable Technologies