

### **Comment 1 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 2 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: David

Last Name: Chase

Email Address: dchase@smallbusinessmajority.org

Affiliation: Small Business Majority

Subject: Fuel Efficiency Testimony

Comment:

See attached testimony.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/4-david\_chase.\_fuel\_efficiency\_testimony\_jan\_2012.pdf'

Original File Name: David Chase. Fuel Efficiency Testimony\_Jan 2012.pdf

Date and Time Comment Was Submitted: 2012-01-17 12:27:30

No Duplicates.

### **Comment 3 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Lance

Last Name: Tunick

Email Address: tunick@vsci.net

Affiliation: Vehicle Services Consulting

Subject: Comment of Aston Martin, Lotus & McLaren

Comment:

Attached is the comment on the LEV VIII-GHG rulemaking on behalf of Aston Martin, Lotus and McLaren. the comment addresses the rulemaking from the small volume manufacturer viewpoint.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/5-carb\_comment.docx'

Original File Name: carb comment.docx

Date and Time Comment Was Submitted: 2012-01-18 11:20:11

No Duplicates.

**Comment 4 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Jessica

Last Name: Tovar

Email Address: Non-web submitted comment

Affiliation:

Subject: Long Beach Alliance for Children with Asthma

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/7-jessica\_tovar.pdf'

Original File Name: Jessica Tovar.pdf

Date and Time Comment Was Submitted: 2012-01-20 09:38:47

No Duplicates.

**Comment 5 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: John

Last Name: Cabaniss

Email Address: [jcabaniss@globalautomakers.org](mailto:jcabaniss@globalautomakers.org)

Affiliation: Association of Global Automakers

Subject: Advanced Clean Cars - LEV III and GHG

Comment:

Attached is a letter providing comments on the Advanced Clean Cars regulatory package.

Attachment: 'www.arb.ca.gov/lists/leviiiighg2012/9-arb\_advanced\_clean\_cars\_comments\_1.20.2012.pdf'

Original File Name: ARB Advanced Clean Cars Comments 1.20.2012.pdf

Date and Time Comment Was Submitted: 2012-01-20 10:48:52

No Duplicates.

**Comment 6 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Barbara B.

Last Name: Hines

Email Address: Non-web submitted comment

Affiliation:

Subject: Queens Care Family Clinic

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/zev2012/29-barbara.pdf'

Original File Name: Barbara.pdf

Date and Time Comment Was Submitted: 2012-01-20 13:31:15

No Duplicates.

## **Comment 7 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Michael

Last Name: Jordan

Email Address: Michael.Jordan@Cartential.com

Affiliation:

Subject: "The CARTENTIAL Effect" for California

Comment:

We used a USA 3rd party to test "The CARTENTIAL Effect"; attached please find the final report from the CAFEE Lab [www.cafee.wvu.edu](http://www.cafee.wvu.edu). The testing was conducted on "as new" equipment; meaning flushed, with none of the normal sediment, rust and other normal wear conditions. Cartential shows even better results when introduced into Vehicles manufactured on or before 2004. The purpose of Cartential is to make exhaust emissions a non-factor worldwide in Automotive, Commercial Trucking and other Industries where combustion motors are used. The up to 80% reduction in exhaust emissions will help California and other States reach the daily goal of removing an extra 100 tons of smog-forming emissions from the air; which will help the air quality worldwide.

--

Michael Jordan

NAFTA Region

Market Consultant

ICT/Cartential

Direct: 916.458.1447

Attachment: '[www.arb.ca.gov/lists/leviiighg2012/13-cartential\\_effect\\_final\\_report\\_18.01.2012\\_hhddt\\_carb.pdf](http://www.arb.ca.gov/lists/leviiighg2012/13-cartential_effect_final_report_18.01.2012_hhddt_carb.pdf)'

Original File Name: Cartential Effect\_Final\_Report 18.01.2012 HHDDT CARB.pdf

Date and Time Comment Was Submitted: 2012-01-22 14:04:07

No Duplicates.

**Comment 8 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: John  
Last Name: Ruud  
Email Address: jruud@bmbuilders.com  
Affiliation: Small Business Majority

Subject: Testimony  
Comment:

A copy of testimony is attached.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/15-john\_ruud\_la\_fuel\_efficiency\_testimony\_1.24.12-1.pdf'

Original File Name: John Ruud\_LA\_Fuel Efficiency Testimony\_1.24.12-1.pdf

Date and Time Comment Was Submitted: 2012-01-23 10:39:44

No Duplicates.



## Comment 9 for Low Emission Vehicles III (leviiighg2012) - 45 Day.

First Name: Loren

Last Name: Marz

Email Address: lmarz@charter.net

Affiliation:

Subject: Comments on LEV III Proposed Regulation

Comment:

While fully supporting the spirit of the proposed LEV III Regulation, it doesn't appear that the impacts of a significant shift to "ZEV" technology such as electric vehicles (EV) have been fully considered.

According to a National Academies report (National Academies, "Hidden Costs of Energy: Unpriced Consequences of Energy Production and Use.")...

"...Electric vehicles and grid-dependent (plug-in) hybrid vehicles showed somewhat higher nonclimate damages than many other technologies for both 2005 and 2030. Operating these vehicles produces few or no emissions, but producing the electricity to power them currently relies heavily on fossil fuels; also, energy used in creating the battery and electric motor adds up to 20 percent to the manufacturing part of life-cycle damages...."

This is supported by the latest version of Argonne National Laboratory's GREET model (GREET1\_2011 - <http://greet.es.anl.gov/>) which shows that WTW emissions of particulate matter (PM) in California are higher for EV technology than current "clean diesel" technology. Based on the default "mid-sized" vehicle assumed in GREET for the year 2020...

WTW PM10 (diesel) = 0.004 (Feedstock) + 0.009 (Fuel) + 0.030 (Vehicle Operation) = 0.043 g/mi

WTW PM10 (EV) = 0.060 (Feedstock) + 0.006 (Fuel) + 0.021 (Vehicle Operations) = 0.087 g/mi

WTW PM2.5 (diesel) = 0.003 (Feedstock) + 0.005 (Fuel) + 0.016 (Vehicle Operations) = 0.024 g/mi

WTW PM2.5 (EV) = 0.015 (Feedstock) + 0.004 (Fuel) + 0.007 (Vehicle Operations) = 0.026 g/mi

All of these values are based on the California electric generation mix assumed in GREET in 2020.

Exhaust PM from the diesel vehicle assumed in GREET = 0.009 g/mi (PM10); 0.0084 g/mi (PM2.5).

Furthermore, based on certified emissions of the 2003 VW Jetta TDI (example of an "old tech" diesel vehicle), exhaust PM emissions = 0.05 g/mi

([http://www.arb.ca.gov/msprog/onroad/cert/pcltdmdv/2003/volkswagen\\_pc\\_a0070228\\_ld9\\_1\\_diesel.pdf](http://www.arb.ca.gov/msprog/onroad/cert/pcltdmdv/2003/volkswagen_pc_a0070228_ld9_1_diesel.pdf)).

$0.05 - 0.009 = 0.041$  g/mi more exhaust PM for the "old tech" diesel than that assumed for "clean diesel" in GREET.

$0.043$  g/mi +  $0.041$  g/mi =  $0.084$  g/mi WTW PM10 for the "old tech" diesel car, actually less than the  $0.087$  g/mi WTW PM10 calculated by GREET for EV in California for 2020.

"Old tech" diesel vehicles have been effectively banned for many years under LEV II regulations, to the Air Resources Board's credit, yet mandates are being proposed for vehicle technology (e.g., EV) which may actually increase PM emissions from a WTW perspective above "old tech" diesel engine technology. EPA acknowledges in the Draft RIA for the Proposed Rule to Extend the National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks - Docket ID No. EPA-HQ-OAR-2010-0799, that all PM2.5 is treated as equally potent in causing premature mortality regardless of source (page 6-35 of the Draft RIA), even specifically mentioning PM2.5 from diesel engine sources. So there appears to be no valid reason from a public health perspective to displace the reduction in PM2.5 emissions from diesel engines with increased PM2.5 emissions from power plants to support EV/PHEV technology. The regulatory push for these "advanced technologies" defies logic from an emissions perspective.

A massive shift to EV/PHEV technology would potentially offset gains made from diesel PM emission reduction mandates. It appears superfluous to propose significant reductions in PM emissions from gasoline/diesel vehicles under LEV III to trivial levels (which I support) yet essentially mandate technology which not only doesn't decrease WTW PM emissions from current technology, it increases WTW PM emissions with respect to pre-2004 (Tier 1) diesel vehicles.

I would like to state unequivocally that I support EV/PHEV technology for certain niches (e.g., urban commuter travel), but upstream emissions of this technology really need to be taken into account.

As a disclaimer, I am in no way associated with the auto industry or any support industries to the auto industry, including diesel engine manufacturers.

Thank you for your consideration of these comments.

Respectfully submitted,

Loren Carl Marz, Certified Consulting Meteorologist (#591)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-01-23 11:01:37

No Duplicates.

## **Comment 10 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: klaus

Last Name: Land

Email Address: william.craven@daimler.com

Affiliation:

Subject: LEV III, CFO and ZEV testimony

Comment:

Klaus Land would like to testify on LEV III, CFT and ZEV at the board hearing. Attached is hid testimony.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/17-klaus\_land\_testimony\_1-26-2012.doc'

Original File Name: Klaus land testimony 1-26-2012.doc

Date and Time Comment Was Submitted: 2012-01-23 13:34:31

No Duplicates.

## **Comment 11 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Emily

Last Name: Schneider

Email Address: eschneider@pecg.org

Affiliation: Professional Engineers in CA Government

Subject: Adoption of the Clean Car Standards

Comment:

Please see the attachment.

Attachment: 'www.arb.ca.gov/lists/zev2012/32-12\_0120\_clean\_car\_standards\_testimony\_-\_final\_hearing.pdf'

Original File Name: 12 0120 Clean Car Standards Testimony - Final Hearing.pdf

Date and Time Comment Was Submitted: 2012-01-20 16:52:29

No Duplicates.

## **Comment 12 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Ken

Last Name: McEldowney

Email Address: ken.mceldowney@consumer-action.org

Affiliation:

Subject: Consumer groups offer support for CA Clean Cars Program

Comment:

Please accept the attached comments in support of the California Clean Cars Program.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/19-lowincome-minority\_letter\_to\_carb\_1-17-12final\_.pdf'

Original File Name: LowIncome-Minority Letter to CARB 1-17-12FINAL\*.pdf

Date and Time Comment Was Submitted: 2012-01-23 16:58:03

No Duplicates.

## **Comment 13 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Jack

Last Name: Gillis

Email Address: jack@jagillis.com

Affiliation:

Subject: Consumer experts offer support for a strong Clean Cars Program

Comment:

Attached is a letter of support signed by Consumer Federation of America, Consumers Union and Consumers for Auto Reliability and Safety.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/20-cu\_cfa\_cars\_letter\_to\_carb\_1-17-12-final.pdf'

Original File Name: CU:CFA:CARS Letter to CARB 1-17-12-FINAL.pdf

Date and Time Comment Was Submitted: 2012-01-23 18:47:34

No Duplicates.

## **Comment 14 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Carol Lee

Last Name: Rawn

Email Address: rawn@ceres.org

Affiliation:

Subject: Letter in support of proposed Clean Cars rules

Comment:

This is sent on behalf of Martin Lagod of Firelake Capital

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/21-martin\_lagod\_carb\_letter.pdf'

Original File Name: Martin Lagod CARB letter.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:11:31

No Duplicates.



## **Comment 15 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Felisa

Last Name: Amedeo

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari S.p.A.

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/zev2012/41-ferrari.pdf'

Original File Name: Ferrari.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:06:51

No Duplicates.

## **Comment 16 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Giacomo

Last Name: Mattioli

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari of Beverly Hills

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/zev2012/42-beverly\_hills.pdf'

Original File Name: Beverly Hills.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:12:55

No Duplicates.

**Comment 17 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Greg

Last Name: Minor

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari of San Francisco

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/zev2012/43-san\_francisco.pdf'

Original File Name: San Francisco.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:12:55

No Duplicates.

## **Comment 18 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast AQMD

Subject: SCAQMD Staff Comments to the Proposed "LEV III" Amendments to California Greenhouse Gas

Comment:

Please see attachment re SCAQMD Staff Comments to the Proposed "LEV III" Amendments to the California Greenhouse Gas and Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements for Heavy-Duty Vehicles and Proposed 2012 Amendments to the California Zero Emission Vehicle Regulation

Attachment: '[www.arb.ca.gov/lists/leviiiighg2012/25-lev\\_iii.pdf](http://www.arb.ca.gov/lists/leviiiighg2012/25-lev_iii.pdf)'

Original File Name: LEV III.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:25:29

No Duplicates.

## **Comment 19 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Samantha

Last Name: Harmon

Email Address: saharmon@pa.gov

Affiliation: PA Dept of Environmental Protection

Subject: Submission of comments on CARB Proposed Rulemaking LEV III and GHG  
Comment:

Attached are comments from the Pennsylvania Department of  
Environmental Protection on CARB's proposed 'LEV III' amendments.

Attachment: 'www.arb.ca.gov/lists/leviiiighg2012/27-  
pa\_dep\_comments\_on\_lev\_iii\_and\_ghg\_2012\_proposed\_revisions.pdf'

Original File Name: PA DEP Comments on LEV III and GHG 2012 Proposed Revisions.pdf

Date and Time Comment Was Submitted: 2012-01-24 13:16:41

No Duplicates.

## **Comment 20 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Carol Lee

Last Name: Rawn

Email Address: rawn@ceres.org

Affiliation:

Subject: BICEP letter in Support of Proposed Clean Car Standards

Comment:

Submitted on behalf of Business for Innovative Climate and Energy Policy. Thank you.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/28-bicep\_carb\_1\_12\_final.docx'

Original File Name: BICEP CARB 1\_12 final.docx

Date and Time Comment Was Submitted: 2012-01-24 13:20:46

No Duplicates.

## **Comment 21 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Andre

Last Name: Welch

Email Address: awelch4@ford.com

Affiliation: Ford Motor Company

Subject: Advanced Clean Car - LEV III and GHG

Comment:

See the attached for comments on the subject portions of the Advanced Clean Car regulatory package submitted on behalf of the Ford Motor Company.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/29-isor\_advanced\_clean\_car\_2012-01-25\_ford.pdf'

Original File Name: ISOR\_Advanced Clean Car\_2012-01-25\_Ford.pdf

Date and Time Comment Was Submitted: 2012-01-24 13:53:45

No Duplicates.

## **Comment 22 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Frank

Last Name: Krich

Email Address: fak6@chrysler.com

Affiliation: Chrysler

Subject: Chrysler LEV III and ZEV Comments

Comment:

Attached you will find Chrysler's comments on California's proposed LEV III and ZEV regulations.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/30-chrysler\_lev\_iii\_and\_zev\_comments\_01.24.12.docx'

Original File Name: Chrysler LEV III and ZEV Comments 01.24.12.docx

Date and Time Comment Was Submitted: 2012-01-24 16:54:11

No Duplicates.



## **Comment 23 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Joseph  
Last Name: Kubsh  
Email Address: jkubsh@meca.org  
Affiliation: MECA

Subject: MECA comments on LEV III, post-2016 GHG standards  
Comment:

Please find attached MECA's comments on ARB's LEV III and post-2016 greenhouse gas emission standards.

Attachment: 'www.arb.ca.gov/lists/leviiiighg2012/31-meca\_comments\_on\_arb\_lev\_iii\_\_post-2016\_ghg\_012512.pdf'

Original File Name: MECA comments on ARB LEV III, post-2016 GHG 012512.pdf

Date and Time Comment Was Submitted: 2012-01-25 07:35:12

No Duplicates.

## **Comment 24 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Thomas

Last Name: Jordan

Email Address: tom.jordan@valleyair.org

Affiliation: San Joaquin Valley APCD

Subject: Resolution of Support

Comment:

See attached resolution.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/32-sjvapcd\_clean\_cars\_resolution.pdf'

Original File Name: SJVAPCD Clean Cars Resolution.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:26:01

No Duplicates.

## **Comment 25 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Don

Last Name: Anair

Email Address: danair@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Support For The LEV III Amendments To The California Greenhouse Gas And Criteria Pollutant

Comment:

Please find the attached comments from the Union of Concerned Scientists. The complete title of comments Re: Support For The LEV III Amendments To The California Greenhouse Gas And Criteria Pollutant Exhaust And Evaporative Emission Standards.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/33-comments\_to\_arb\_on\_leviii\_\_-\_final.pdf'

Original File Name: Comments to ARB on LEVIII - FINAL.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:31:44

No Duplicates.

## **Comment 26 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Stuart

Last Name: Johnson

Email Address: stuart.johnson@vw.com

Affiliation:

Subject: VW Group LEV-III Comments (Incl ZEV)

Comment:

Comments submitted via file upload in PDF format.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/34-vw\_lev-iii\_comments\_jan-2012.pdf'

Original File Name: VW\_LEV-III\_Comments\_Jan-2012.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:49:13

No Duplicates.

## **Comment 27 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Shankar

Last Name: Prasad

Email Address: shankar@coalitionforcleanair.org

Affiliation: Coalition for Clean Air

Subject: Accelerating PM emissions reduction

Comment:

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.

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

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 09:06:49

No Duplicates.

**Comment 28 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Lisa A.

Last Name: Stegink

Email Address: avujovic@emamail.org

Affiliation:

Subject: EMA's Comments - LEV III

Comment:

Please see the attached EMA comments.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/36-ema\_comments\_-\_lev\_iii.pdf'

Original File Name: EMA Comments - LEV III.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:11:20

No Duplicates.

**Comment 29 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Chris

Last Name: Bliley

Email Address: cbliley@growthenergy.org

Affiliation: Growth Energy

Subject: Comments from Growth Energy

Comment:

Attached please find comments from Growth Energy.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/37-carb\_comments\_01252012.pdf'

Original File Name: CARB\_comments\_01252012.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:40:41

No Duplicates.



## **Comment 30 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Miriam

Last Name: Swaffer

Email Address: mswaffer@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Comments on Amendments to the CA LEV III Regulation by CA Members of UCS  
1/25/2012

Comment:

The statement below represents the comments of 4,220 Californians who are members and supporters of the Union of Concerned Scientists. Please see the attached document (pdf) to view the full list of signers.

California has led the nation and the world in protecting public health with clean car standards for more than 50 years. Thank you for continuing to make California a leader in innovation with proposed vehicle and fuel policies that will cut vehicle pollution, guarantee consumer access to clean fuels, and foster the development of electric-car technology.

We support the proposed changes to the Zero Emissions Vehicles program while urging California Air Resources Board officials to strengthen the proposal by raising the requirement for battery, fuel cell, and plug-in hybrid electric vehicles to account for 1.8 million new vehicle sales in the state between 2018 and 2025 and by eliminating or significantly modifying provisions that allow automakers to avoid meeting the full requirements.

We support the state's proposals to reduce global warming emissions for vehicles built between 2017 and 2025 to 166 grams per mile.

We support the proposal to reduce smog-forming emissions from new cars and light truck tailpipes by 75 percent by 2025 and a reduction in toxic particulate matter by 2028, while urging California Air Resources Board officials to move up the date on toxic particulates to 2022.

We support the proposals for the Clean Fuels Outlet rules to ensure California consumers have access to hydrogen fuel and electricity for advanced vehicles.

Thank you for providing a vision for a cleaner transportation future for California with this inspiring package of clean car standards.

Signed,  
SEE ATTACHMENT FOR LIST OF SIGNERS

Attachment: '[www.arb.ca.gov/lists/leviiiighg2012/38-comments\\_from\\_ucs\\_supporters\\_on\\_ca\\_clean\\_cars\\_standards\\_1-25-2012.pdf](http://www.arb.ca.gov/lists/leviiiighg2012/38-comments_from_ucs_supporters_on_ca_clean_cars_standards_1-25-2012.pdf)'

Original File Name: Comments from UCS Supporters on CA Clean Cars Standards 1-25-2012.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:28:37

No Duplicates.

## **Comment 31 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Advanced Clean Car Regulation

Comment:

Attached are the comments of the Alliance of Automobile Manufacturers, a trade association representing 12 car and light-truck manufacturers.

Attachment: 'www.arb.ca.gov/lists/leviiiighg2012/39-alliance\_comments\_lev\_iii\_with\_attachments.pdf'

Original File Name: Alliance Comments LEV III with Attachments.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:32:39

No Duplicates.

## **Comment 32 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Miriam

Last Name: Swaffer

Email Address: mswaffer@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Statement by Economists from UCS Science Network

Comment:

The statement below represents the comments of 114 Ph.D. economists from around the nation. Please see the attached document (pdf) to view the full list of signers.

The statement below represents the comments of 114 Ph.D. economists from around the nation. Please see the attached document (pdf) to view the full list of signers.

Gina McCarthy  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20004

David Strickland  
Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE, West Building  
Washington, DC 20590

Mary D. Nichols  
Chairman, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento CA 95812

June 7, 2011

Dear Assistant Administrator McCarthy, Administrator Strickland, and Chairman Nichols:

Last year, the Environmental Protection Agency (EPA), the National Highway Traffic Safety Administration (NHTSA), and the California Air Resources Board (CARB) worked together to set standards through 2016 that would raise the average fuel efficiency of new vehicles to about 34.1 miles per gallon and cut the average global warming pollution from new vehicles to about 250 grams per mile. Now, your agencies are working together to develop the second phase of standards covering new vehicles sold in model years 2017-2025 that could cut new vehicle global warming emissions up to an additional 45 percent and raise fuel efficiency standards to as much as 60 miles per gallon.

Strong, cost-effective standards will provide consumers with a wider choice of cleaner and more fuel efficient vehicles that save

drivers money. In the absence of standards, market barriers prevent drivers from realizing these savings, leaving drivers without the options they need to respond to volatile and rising gasoline prices. Standards are the right policy approach given the realities of this marketplace.

Our continued dependence on oil puts our economy at risk from the effects of oil price volatility and energy insecurity. Oil price spikes were associated with most of the U.S. recessions in the past 40 years.<sup>1</sup> The United States currently sends \$1 billion each day to foreign countries to pay for oil and other petroleum products—that is equivalent to more than half of the average daily U.S. trade deficit over the last decade.<sup>2</sup>

Strong standards that save drivers money can also support robust employment. Increasing standards will promote new vehicle technologies and increase investment in the auto industry, generating new jobs throughout that sector. The savings consumers realize at the pump will also shift consumer purchases away from the petroleum and wholesale industries to other parts of the economy that generate more jobs for every dollar spent.<sup>3</sup>

Finally, strong standards will help reduce the heat-trapping emissions that cause global warming. Current and projected climate change impacts pose significant risks to public health, the economy, and the environment. Delaying action now and waiting for the future before initiating accelerated action to reduce global warming emissions would be more costly than initiating action now.

We support these efforts to reduce global warming emissions, improve the fuel efficiency of our vehicles, reduce our dependence on oil, and protect public health by ensuring drivers have more choices for clean cars and light trucks through the use of strong, cost-effective standards.

Signed,  
SEE ATTACHMENT FOR LIST OF SIGNERS

1 Causes and Consequences of the Oil Shock of 2007-08,  
[http://www.brookings.edu/~media/Files/Programs/ES/BPEA/2009\\_spring\\_bpea\\_papers/2009a\\_bpea\\_hamilton.pdf](http://www.brookings.edu/~media/Files/Programs/ES/BPEA/2009_spring_bpea_papers/2009a_bpea_hamilton.pdf)  
What is An Oil Shock, Hamilton (2003)  
<http://dss.ucsd.edu/~jhamilto/oil.pdf>

2. Cost of petroleum imports based on U.S. Energy Information Agency data, net petroleum product imports between March 19th 2010 and March 18th 2011 averaged 9.6 million barrels per day. At \$100 per barrel, this equates to \$960 million dollars per day. EIA data available at:  
[http://www.eia.doe.gov/dnav/pet/pet\\_move\\_wkly\\_dc\\_NUS-Z00\\_mbbldpd\\_w.htm](http://www.eia.doe.gov/dnav/pet/pet_move_wkly_dc_NUS-Z00_mbbldpd_w.htm)  
Historical U.S. trade data from the U.S. BEA available at:  
[http://www.bea.gov/newsreleases/international/trade/trad\\_time\\_series.xls](http://www.bea.gov/newsreleases/international/trade/trad_time_series.xls)

3. Based on data from the Bureau of Labor Statistics,  
[http://www.bls.gov/emp/ep\\_data\\_industry\\_out\\_and\\_emp.htm](http://www.bls.gov/emp/ep_data_industry_out_and_emp.htm)

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/42-clean-cars-economists-letter-2011.pdf'

Original File Name: clean-cars-economists-letter-2011.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:46:06

No Duplicates.

### **Comment 33 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Jack

Last Name: Gillis

Email Address: christina@catercommunications.com

Affiliation: Consumer Federation of America

Subject: Consumer's Want Cleaner Cars, Standards Are Good for Consumer Choice

Comment:

Jack Gillis would like to speak as early as possible at the hearing on January 26th. I will also be notifying the clerk of his interest in testifying. Jack's comments are attached. Thank you

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/43-carb\_statement\_of\_jack\_gillis\_v3.doc'

Original File Name: CARB Statement of Jack Gillis V3.doc

Date and Time Comment Was Submitted: 2012-01-25 10:47:29

No Duplicates.

## **Comment 34 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Azita

Last Name: Khalili

Email Address: azita.khalili@bmwna.com

Affiliation: BMW of North America, LLC

Subject: BMW Comments on the Proposed LEV III and GHG Emission Standards  
Comment:

BMW Comments on the Proposed LEV III and GHG Emission Standards

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/44-  
20120125\_bmw\_comments\_ghg\_leviii\_final.pdf'

Original File Name: 20120125\_BMW\_comments\_GHG\_LEVIII\_final.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:48:29

No Duplicates.



## **Comment 35 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Chris

Last Name: Carney

Email Address: ccarney@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: CA Scientists & Engineers on Advanced Clean Cars & Reducing Heat-Trapping Emissions

Comment:

The statement below represents the comments of 159 scientists and engineers who live or work in California. Scientists have published and have a Ph.D. or are in a Ph.D. program. Engineers have a Ph.D., or a master's degree with at least five years of career experience, or a bachelor's degree with at least ten years of career experience. All signers have expertise relevant to our understanding of climate change, its impacts, or solutions. Please see the attached document (pdf) to view the full list of signers.

\*\*\*\*\*

An Open Letter from California Scientists and Engineers on Advanced Clean Cars and Reducing Heat-Trapping Emissions

We write to urge California leaders to seize the opportunity, once again, to demonstrate that the nation can begin to meet the climate challenge by adopting strong policies that will further reduce heat-trapping emissions from cars and trucks.

The causes and risks of climate change are clear and well documented. In May 2010, a report by the U.S. National Academy of Sciences concluded "Climate change is occurring, is caused largely by human activities, and poses significant risks for—and in many cases is already affecting—a broad range of human and natural systems."

Global average surface temperatures have increased at a rate of 0.7°C (1.3°F) per century since 1900, with the rate accelerating to approximately 0.16°C (0.29°F) per decade since 1970(1), and impacts are now being observed worldwide.(2) These temperature changes, driven by human-caused emissions, have locked in further changes, such as sea-level rise that intensifies coastal flooding and dramatic changes in snowpack that risk disrupting water supplies in the western United States.(3) If emissions continue unabated, California will face continued warming with more temperature extremes, faster sea-level rise, increasing risks and cost for agriculture, and severe public health challenges for at-risk populations.(4)

The longer we wait to bring down emissions, the harder and more costly it will be to limit climate change impacts and to adapt to those that cannot be avoided. We already have the solutions and technology to start significantly reducing emissions.

Informed by the threats to California from climate change, the

state has set a long-term goal to reduce its heat-trapping emissions 80 percent below 1990 levels by 2050. Cars, trucks, and other mobile sources account for nearly 40 percent of these emissions in California. (5)

We urge you to adopt policies that will reduce heat-trapping emissions from cars and trucks over the next decade and beyond, while promoting advancements in vehicle and fuel technologies that will create jobs and will be needed to meet the state's long-term emissions reductions goals.

Signed,  
SEE ATTACHMENT FOR LIST OF SIGNERS

\*\*\*\*\*

This letter may also be downloaded at  
[http://www.ucsusa.org/assets/documents/clean\\_vehicles/ca-scientist-letter.pdf](http://www.ucsusa.org/assets/documents/clean_vehicles/ca-scientist-letter.pdf)

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/45-ca-scientist-letter.pdf'

Original File Name: ca-scientist-letter.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:34:24

No Duplicates.

## **Comment 36 for Low Emission Vehicles III (leviiiighg2012) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF Written Comments on LEV III Standards

Comment:

Included are Environmental Defense Fund's written comments. I have previously signed up to speak at the hearing so have not checked that box in this submission. I will also bring hard copies to the hearing.

Attachment: 'www.arb.ca.gov/lists/leviiiighg2012/47-edf\_comments\_on\_leviii\_standards\_final.docx'

Original File Name: EDF Comments on LEVIII Standards FINAL.docx

Date and Time Comment Was Submitted: 2012-01-25 11:18:53

No Duplicates.

## **Comment 37 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Lili

Last Name: Kokkinakos

Email Address: lili.kokkinakos@tema.toyota.com

Affiliation:

Subject: TTC Comment to the Criteria Section of the LEV III Proposal

Comment:

TTC Comment letter to the Criteria Section of the LEV III Proposal.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/48-ttc\_lev\_iii\_criteria\_comment\_letter.pdf'

Original File Name: TTC LEV III Criteria comment letter.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:54:53

No Duplicates.

## **Comment 38 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Katherine

Last Name: Yehl

Email Address: kyehl@volvocars.com

Affiliation: Volvo Car Corporation

Subject: Volvo Car Corporation Comments on California's Clean Cars Package

Comment:

Volvo Car Corporation (VCC) appreciates the opportunity to submit comments in response to California's proposed California's Clean Cars Package.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/49-carb\_clean\_cars\_package\_vcc\_comments\_final.pdf'

Original File Name: CARB Clean Cars Package VCC Comments FINAL.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:58:49

No Duplicates.

## **Comment 39 for Low Emission Vehicles III (leviighg2012) - 45 Day.**

First Name: William E.

Last Name: Avery

Email Address: Non-web submitted comment

Affiliation:

Subject: California State University Sacramento

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/leviighg2012/50-avery\_\_zev\_\_lev\_.pdf'

Original File Name: Avery (ZEV & LEV).pdf

Date and Time Comment Was Submitted: 2012-01-31 10:12:17

No Duplicates.

**Comment 40 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: kriss@caletc.com

Affiliation:

Subject: California Electric Transportation Coalition

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/51-eileen\_tutt.pdf'

Original File Name: Eileen Tutt.pdf

Date and Time Comment Was Submitted: 2012-01-31 10:39:47

No Duplicates.

**Comment 41 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Kellen  
Last Name: Schefter  
Email Address: kschefter@fiskerautomotive.com  
Affiliation:

Subject: Fisker Automotive, Inc.  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/leviiighg2012/52-fisker\_lev.pdf'

Original File Name: Fisker LEV.pdf

Date and Time Comment Was Submitted: 2012-01-31 10:58:53

No Duplicates.



**Comment 42 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: David

Last Name: Patterson

Email Address: david.patterson@na.mitsubishi-motors.com

Affiliation:

Subject: Mitsubishi Motors

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/zev2012/99-mitsubishi.pdf'

Original File Name: Mitsubishi.pdf

Date and Time Comment Was Submitted: 2012-01-31 11:46:04

No Duplicates.

**Comment 43 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: Shannon

Last Name: Baker-Branstetter

Email Address: bakesh@consumer.org

Affiliation: Consumers Union

Subject: Consumers Union's comments on Advanced Clean Cars rules

Comment:

Please see attached for Consumers Union's comments and survey report.

Attachment: 'www.arb.ca.gov/lists/zev2012/68-cu\_comments\_to\_carb.zip'

Original File Name: CU Comments to CARB.zip

Date and Time Comment Was Submitted: 2012-01-25 08:07:28

No Duplicates.

**Comment 44 for Low Emission Vehicles III (leviiighg2012) - 45 Day.**

First Name: MARICELA

Last Name: CUEVA

Email Address: MARICELACUEVA04@GMAIL.COM

Affiliation:

Subject: We need more clean cars

Comment:

We need more fuel efficient cars! Having more clean cars on the road will have the added benefits of helping families save money, cleaner air and supporting new jobs and investment in California's clean energy economy.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 09:45:45

No Duplicates.

## **Comment 1 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Steve

Last Name: Douglas

Email Address: Non-web submitted comment

Affiliation:

Subject: Auto Alliance

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/101-steve\\_douglas.pdf](http://www.arb.ca.gov/lists/zev2012/101-steve_douglas.pdf)

Original File Name: Steve Douglas.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

## **Comment 2 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Michael

Last Name: Ong

Email Address: Non-web submitted comment

Affiliation:

Subject: American Lung Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/102-michael\\_ong.pdf](http://www.arb.ca.gov/lists/zev2012/102-michael_ong.pdf)

Original File Name: Michael Ong.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

### **Comment 3 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Klaus

Last Name: Land

Email Address: Non-web submitted comment

Affiliation:

Subject: Mercedes-Benz

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/103-klaus\\_land.pdf](http://www.arb.ca.gov/lists/zev2012/103-klaus_land.pdf)

Original File Name: Klaus Land.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

## **Comment 4 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Jack

Last Name: Gillis

Email Address: jack@jagillis.com

Affiliation:

Subject: Carson Black Chamber of Commerce

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/107-jack\\_gillis.pdf](http://www.arb.ca.gov/lists/zev2012/107-jack_gillis.pdf)

Original File Name: Jack Gillis.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

**Comment 5 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Cathy

Last Name: Jackson-Ervin

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/108-cathy\\_jackson\\_ervin.pdf](http://www.arb.ca.gov/lists/zev2012/108-cathy_jackson_ervin.pdf)

Original File Name: Cathy Jackson Ervin.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.



## **Comment 6 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Tim

Last Name: Carmichael

Email Address: tim@cngvc.org

Affiliation:

Subject: California Natural Gas Vehicle Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/110-tim\\_carmichael\\_\\_written\\_submission\\_.docx](http://www.arb.ca.gov/lists/zev2012/110-tim_carmichael__written_submission_.docx)

Original File Name: Tim Carmichael (Written Submission).docx

Date and Time Comment Was Submitted: 2012-02-01 09:22:50

No Duplicates.

## **Comment 7 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Tracy

Last Name: Woodward

Email Address: tracy.woodward@nissan-usa.com

Affiliation:

Subject: Nissan North America, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/116-tracy\\_woodward.pdf](http://www.arb.ca.gov/lists/zev2012/116-tracy_woodward.pdf)

Original File Name: Tracy Woodward.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

## **Comment 8 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: Natural Resources Defense Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/117-simon\\_mui.pdf](http://www.arb.ca.gov/lists/zev2012/117-simon_mui.pdf)

Original File Name: Simon Mui.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

## **Comment 9 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Uduak

Last Name: Ntuck

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free -TNSP

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/120-uduak\\_ntuk.pdf](http://www.arb.ca.gov/lists/zev2012/120-uduak_ntuk.pdf)

Original File Name: Uduak Ntuk.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

## **Comment 10 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Henry

Last Name: Hogo

Email Address: Non-web submitted comment

Affiliation:

Subject: South Coast Air Quality Management District

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/121-henry\\_hogo.pdf](http://www.arb.ca.gov/lists/zev2012/121-henry_hogo.pdf)

Original File Name: Henry Hogo.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

## **Comment 11 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Shankar

Last Name: Prasad

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition for Clean Air

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/122-shankar\\_prasad.pdf](http://www.arb.ca.gov/lists/zev2012/122-shankar_prasad.pdf)

Original File Name: Shankar Prasad.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

## **Comment 12 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Robert  
Last Name: Vinetz, MD  
Email Address: [rvinetz@queenscare.org](mailto:rvinetz@queenscare.org)  
Affiliation:

Subject: Asthma Coalition of Los Angeles County  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/126-robert\\_vinetz.pdf](http://www.arb.ca.gov/lists/zev2012/126-robert_vinetz.pdf)

Original File Name: Robert Vinetz.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

### **Comment 13 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.



## **Comment 14 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Ernesto

Last Name: Pantoja

Email Address: Non-web submitted comment

Affiliation:

Subject: Laborers Local 300

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/128-ernesto\\_pantoja.pdf](http://www.arb.ca.gov/lists/zev2012/128-ernesto_pantoja.pdf)

Original File Name: Ernesto Pantoja.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

## **Comment 15 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Kevin

Last Name: Norton

Email Address: Non-web submitted comment

Affiliation:

Subject: IBEW Local 11

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/129-kevi\\_norton.pdf](http://www.arb.ca.gov/lists/zev2012/129-kevi_norton.pdf)

Original File Name: Kevi Norton.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

## **Comment 16 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Reginald

Last Name: Modlin

Email Address: r.modlin@chrysler.com

Affiliation:

Subject: Chrysler

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/130-reginald\\_modlin.pdf](http://www.arb.ca.gov/lists/zev2012/130-reginald_modlin.pdf)

Original File Name: Reginald Modlin.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

### **Comment 17 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 18 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Robert

Last Name: Babik

Email Address: Non-web submitted comment

Affiliation:

Subject: General Motors

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/133-robert\\_babik.pdf](http://www.arb.ca.gov/lists/zev2012/133-robert_babik.pdf)

Original File Name: Robert Babik.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

## **Comment 19 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Mario

Last Name: Rivas

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/134-mario\\_rivas.pdf](http://www.arb.ca.gov/lists/zev2012/134-mario_rivas.pdf)

Original File Name: Mario Rivas.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

## **Comment 20 for Low Emission Vehicles III (leviiiighg2012). (At Hearing)**

First Name: Sean

Last Name: Carroll

Email Address: scarroll@environmentcalifornia.org

Affiliation:

Subject: Environment California

Comment:

The attachment includes 10 of 10,400 signatures. Due to the volume of the attachment only the first page of the document is attached. The hard copy is available with the Clerk of the Board in the January 26 & 27, 2012 Board Book.

Attachment: [www.arb.ca.gov/lists/zev2012/135-sean\\_carroll.pdf](http://www.arb.ca.gov/lists/zev2012/135-sean_carroll.pdf)

Original File Name: Sean Carroll.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

## **Comment 21 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Judy

Last Name: Mitchell

Email Address: Non-web submitted comment

Affiliation:

Subject: California Clean Cars

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/137-judy\\_mitchell.pdf](http://www.arb.ca.gov/lists/zev2012/137-judy_mitchell.pdf)

Original File Name: Judy Mitchell.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.



## **Comment 22 for Low Emission Vehicles III (leviiighg2012). (At Hearing)**

First Name: Wendy

Last Name: James

Email Address: wendy@betterworldgroup.com

Affiliation:

Subject: California Clean Cars Campaign

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/138-wendy\\_james.pdf](http://www.arb.ca.gov/lists/zev2012/138-wendy_james.pdf)

Original File Name: Wendy James.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

## **Comment 1 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Lance

Last Name: Tunick

Email Address: tunick@vsci.net

Affiliation:

Subject: Small volume manufacturer comment - LEVIII 15 day notice

Comment:

This comment is submitted on behalf of Aston Martin Lagonda Limited, Lotus Cars Limited and McLaren Automotive Limited. Each of these companies is classified as a "small volume manufacturer" (SVM) under CARB regulations. We support the proposed changes in CARB's 15 day notice dated February 22, 2012. The proposed modified text adds clarity to the timing of the LEV III FTP and SFTP requirements for SVMs.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/77-carb\\_15\\_day\\_comment.docx](http://www.arb.ca.gov/lists/leviiighg2012/77-carb_15_day_comment.docx)

Original File Name: carb 15 day comment.docx

Date and Time Comment Was Submitted: 2012-03-03 01:38:45

No Duplicates.

## **Comment 2 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Greg

Last Name: Minor

Email Address: gminor@ferrarisf.com

Affiliation: Ferrari of San Francisco

Subject: 15-Day Notice to the ZEV and LEVIII Amendments

Comment:

Attached is my signed letter

Attachment: [www.arb.ca.gov/lists/leviiighg2012/79-15\\_day\\_notice\\_zev\\_and\\_leviii354.pdf](http://www.arb.ca.gov/lists/leviiighg2012/79-15_day_notice_zev_and_leviii354.pdf)

Original File Name: 15 Day Notice Zev and LEVIII354.pdf

Date and Time Comment Was Submitted: 2012-03-06 12:30:43

No Duplicates.

### **Comment 3 for Low Emission Vehicles III (leviiiighg2012) - 15-1.**

First Name: David  
Last Name: Wertheim  
Email Address: dwertheim@ferrariusa.com  
Affiliation: VP & Gen. Counsel, Ferrari North America

Subject: LEV III California Greenhouse Gas Regulation  
Comment:

Dear Sir or Madam:

Attached please find the comments of Ferrari SpA and Ferrari North America, Inc. on the 15-Day Notice of Amendments to the California Zero Emission Vehicle Program Regulations and the proposed "LEVIII" amendments to the California Greenhouse Gas, Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures, and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements For Heavy-Duty Vehicles.

Thank you for the opportunity to comment. Please contact me if you have any questions.

Sincerely,

David M. Wertheim  
Vice President & General Counsel  
Ferrari North America, Inc.

Attachment: [www.arb.ca.gov/lists/leviiiighg2012/80-ferrari\\_comments\\_to\\_carb\\_15\\_day\\_notice\\_-\\_03\\_07\\_12.pdf](http://www.arb.ca.gov/lists/leviiiighg2012/80-ferrari_comments_to_carb_15_day_notice_-_03_07_12.pdf)

Original File Name: Ferrari Comments to CARB 15 Day Notice - 03 07 12.pdf

Date and Time Comment Was Submitted: 2012-03-07 07:31:57

No Duplicates.

## **Comment 4 for Low Emission Vehicles III (leviighg2012) - 15-1.**

First Name: Giacomo

Last Name: Mattioli

Email Address: letizia@ferraribeverlyhills.com

Affiliation:

Subject: 2012 Amendments to the "LEV III" California Greenhouse Gas Regulation  
Comment:

Dear Sir / Madam

Please find attached the letter for Ferrari Maserati Beverly Hills  
/ Silicon Valley.

Kindest regards,

Giacomo Mattioli

Attachment: [www.arb.ca.gov/lists/leviighg2012/81-3.7.12\\_carb\\_new\\_emission\\_regulations\\_letter\\_of\\_support.pdf](http://www.arb.ca.gov/lists/leviighg2012/81-3.7.12_carb_new_emission_regulations_letter_of_support.pdf)

Original File Name: 3.7.12 CARB new emission regulations letter of support.pdf

Date and Time Comment Was Submitted: 2012-03-07 10:06:17

No Duplicates.

## **Comment 5 for Low Emission Vehicles III (leviiiighg2012) - 15-1.**

First Name: Azita

Last Name: Khalili

Email Address: azita.khalili@bmwna.com

Affiliation:

Subject: BMW Comments on the Proposed 15 Day Modifications to thLEV III and GHG Regulation

Comment:

attached please find BMW comments on proposed 15 day Modifications.

Kind Regards,  
Azita Khalili

Attachment: [www.arb.ca.gov/lists/leviiiighg2012/82-20120307\\_bmw\\_comments\\_ghg\\_leviii\\_15\\_day\\_changes\\_notice\\_final.pdf](http://www.arb.ca.gov/lists/leviiiighg2012/82-20120307_bmw_comments_ghg_leviii_15_day_changes_notice_final.pdf)

Original File Name: 20120307\_BMW\_comments\_GHG\_LEVIII 15 day Changes Notice Final.pdf

Date and Time Comment Was Submitted: 2012-03-07 14:10:39

No Duplicates.

## **Comment 6 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Ken

Last Name: Bush

Email Address: kbush@suz.com

Affiliation: American Suzuki Motor Corp.

Subject: Suzuki Comments - LEV III 15-Day Notice

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/83-suzuki\\_comments\\_-\\_lev\\_iii\\_15-day\\_notice.pdf](http://www.arb.ca.gov/lists/leviiighg2012/83-suzuki_comments_-_lev_iii_15-day_notice.pdf)

Original File Name: Suzuki Comments - LEV III 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2012-03-07 16:54:36

No Duplicates.

**Comment 7 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Andre

Last Name: Welch

Email Address: awelch4@ford.com

Affiliation: Ford Motor Company

Subject: Ford Motor Company Comments on Proposed 15-Day Modified Text to the "LEV III" amendments

Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/84-15-day\\_comments\\_advanced\\_clean\\_car\\_2012-03-08\\_ford\\_final.pdf](http://www.arb.ca.gov/lists/leviiighg2012/84-15-day_comments_advanced_clean_car_2012-03-08_ford_final.pdf)

Original File Name: 15-Day Comments\_Advanced Clean Car\_2012-03-08\_Ford\_final.pdf

Date and Time Comment Was Submitted: 2012-03-08 09:29:06

No Duplicates.



## **Comment 8 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Advanced Clean Car Regulation

Comment:

Attached are the comments of the Alliance of Automobile Manufacturers, a trade association representing 12 car and light-truck manufacturers.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/85-2012-03-07\\_alliance\\_comments\\_15-day\\_notice.pdf](http://www.arb.ca.gov/lists/leviiighg2012/85-2012-03-07_alliance_comments_15-day_notice.pdf)

Original File Name: 2012-03-07\_alliance\_comments\_15-day\_notice.pdf

Date and Time Comment Was Submitted: 2012-03-08 10:51:53

No Duplicates.

## **Comment 9 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Group Comments re: LEV III standard

Comment:

Please find the attached comments of public health and environmental organizations re: LEV III particulate standard.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/86-health\\_and\\_environmental\\_ngo\\_letter\\_re\\_lev\\_iii\\_15\\_day\\_changes\\_3.8.12.pdf](http://www.arb.ca.gov/lists/leviiighg2012/86-health_and_environmental_ngo_letter_re_lev_iii_15_day_changes_3.8.12.pdf)

Original File Name: Health and Environmental NGO letter re LEV III 15 day changes\_3.8.12.pdf

Date and Time Comment Was Submitted: 2012-03-08 15:00:02

No Duplicates.

## **Comment 10 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Robert

Last Name: Bienenfeld

Email Address: Robert\_Bienenfeld@ahm.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Honda Comments on LEV & GHG 15-Day Notice

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/leviiighg2012/87-honda\\_15-day\\_lev\\_notice\\_comments.pdf](http://www.arb.ca.gov/lists/leviiighg2012/87-honda_15-day_lev_notice_comments.pdf)

Original File Name: Honda 15-Day LEV Notice Comments.pdf

Date and Time Comment Was Submitted: 2012-03-08 16:00:57

No Duplicates.

## **Comment 11 for Low Emission Vehicles III (leviiiighg2012) - 15-1.**

First Name: Ray

Last Name: Minjares

Email Address: ray@theicct.org

Affiliation: International Council on Clean Transport

Subject: Comment on Alternative Compliance Mechanism for Meeting Particulate Standards  
Comment:

Please see the attached comment letter and excel file with additional information.

Attachment: [www.arb.ca.gov/lists/leviiiighg2012/88-icct\\_comments\\_15day\\_notice\\_lev\\_iii.zip](http://www.arb.ca.gov/lists/leviiiighg2012/88-icct_comments_15day_notice_lev_iii.zip)

Original File Name: ICCT Comments 15day notice LEV III.zip

Date and Time Comment Was Submitted: 2012-03-08 16:21:11

No Duplicates.

## **Comment 12 for Low Emission Vehicles III (leviiighg2012) - 15-1.**

First Name: Sara

Last Name: Rudy

Email Address: srudy@ford.com

Affiliation: Ford Motor Company

Subject: Ford Comments on CFO 15-Day Notice

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/cfo2012/73-ford\\_cfo\\_comments\\_15-day\\_2012\\_03\\_07.pdf](http://www.arb.ca.gov/lists/cfo2012/73-ford_cfo_comments_15-day_2012_03_07.pdf)

Original File Name: Ford CFO comments 15-Day 2012\_03\_07.pdf

Date and Time Comment Was Submitted: 2012-03-07 12:28:23

No Duplicates.