

# California Clean Cars Campaign

Global Warming Solutions for a Healthy California

[www.calcleancars.org](http://www.calcleancars.org)

American Lung Association  
of California

Bluewater Network

California League of  
Conservation Voters

CLCV Education Fund

California Public Interest  
Research Group

Center for Energy Efficiency  
and Renewable  
Technologies

Coalition for Clean Air

Environment California

Environmental Defense

Natural Resources  
Defense Council

Physicians for Social  
Responsibility

Planning and Conservation  
League

Sierra Club

Steven and Michele Kirsch  
Foundation

Union of Concerned  
Scientists

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July 7, 2004

Chuck Shulock  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Mr. Shulock:

The California Clean Cars Campaign, a coalition of health, environmental and public interest groups, commends the California Air Resources Board staff for a thorough job in crafting a draft regulation to implement California's vehicle global warming pollution reduction law pursuant to AB 1493.

The draft staff proposal issued June 14 responds effectively to the directions set forth in the original legislation, and represents a promising step toward reducing harmful global warming pollution from cars in California. Our coalition believes the ARB's analysis over the past two years has resulted in a draft rule that fairly complies with the law and that will deliver affordable clean car choices for California consumers. It's a good start.

The proposed regulation expands consumer choice by providing drivers the opportunity to buy cleaner versions of every type of vehicle currently offered in the marketplace. Consumers clearly want cleaner cars; there's a 6-month waiting list for one of today's hybrid models.

ARB staff has conducted a thorough examination of the many cost-effective technologies that are available "off the shelf" to reduce global warming pollution from cars and light trucks of all sizes, including full-sized pickups and SUVs. These technologies can reduce global warming pollution without affecting vehicle safety, size, weight or performance. The proposed regulation gives automakers the flexibility to apply these technologies in varying combinations to achieve significant emissions reductions.

The staff analysis shows that these technologies are available at low up-front costs and can be paid back through reduced operating costs. In this area, however, the Clean Cars Campaign believes ARB's assumptions for gasoline at \$1.74 per gallon do not reflect future price trends. We urge staff to calculate payback on a range of more realistic prices such as \$2 or \$2.25 per gallon in the final staff report.

Because global warming threatens California's environment, economy and the health of its people, the state must continue to take decisive action now to slow the warming trend. By acting now, California can make a difference. California has one of the world's largest economies and a long history as the national leader in environmental cleanup. Passenger vehicles and light-duty trucks are responsible for 40 percent of California's total greenhouse gas emissions. Because the clean car technologies developed for California have a history of spreading far beyond our borders, our actions can have a measurable impact on global warming.

We applaud the ARB's effort to determine reasonable emission reduction opportunities over the next 10 years. We also see a clear need to look at requirements down the road that respond both to increases in emissions from a growing vehicle population and to rapidly improving vehicle technologies.

In addition to this joint letter, some members of the California Clean Cars Campaign will be calling for a stronger standard now, and many will offer specific comments and technical input on the draft staff proposal.

Sincerely,

Bonnie Holmes-Gen  
American Lung Association of California

Kate Larsen  
Environmental Defense

Elisa Lynch  
Bluewater Network

Roland Hwang  
Natural Resources Defense Council

Luis Cabrales  
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