

February 17, 2012

Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1400 Pennsylvania Avenue, NW
Mail code: 1101A
Washington, DC 20460

Dear Administrator Jackson:

On January 27, 2012, the California Air Resources Board adopted an update to the CA Low Emissions Vehicle (LEV) regulations. These regulations, known as LEV III, reduce vehicle criteria emissions by 75 percent over the next 15 years. We understand that EPA is planning to propose updates for its parallel vehicle criteria emissions program (Tier 3) with the intent to harmonize these standards with California's LEV III program and to propose needed gasoline quality improvements.

As EPA moves ahead with Tier 3 emissions requirements, we want to stress the critical need to harmonize EPA's program with California's already adopted program. In addition to the criteria emissions standards and fleet averages, EPA must focus on harmonizing the certification fuels, test procedures, and certification requirements. Just as EPA, California, and industry have recognized the need to harmonize the greenhouse gas (GHG) vehicle emissions control program, we need to harmonize the vehicle criteria emissions programs. Neither automakers nor the agencies have the resources to duplicate efforts. A manufacturer should be required to develop and produce only one version of a vehicle for the U.S. market, and that vehicle should be subject to one set of certification procedures. Anything more wastes resources.

Additionally, gasoline quality improvements, such as reducing sulfur in gasoline to 10 parts per million or lower, will not only assist auto manufacturers in achieving more stringent Tier 3 standards for future vehicles, they will also result in significant emissions reductions from the existing fleet. Moreover, gasoline quality improvements nationwide will enable automakers to develop and refine advanced engine technologies needed to meet the stringent GHG emissions standards which EPA has proposed for 2017-2025 model years. To achieve the greatest benefits, vehicles and fuels must be regulated through a systems approach.

We look forward to working with you on this important rulemaking. Please feel free to have your staff contact me or John Cabaniss of my staff at (202) 650-5562.

Sincerely,



Michael J. Stanton
President & CEO

cc: Gary Guzy, CEQ