From:

sparker@paconserve.org

Sent: To: Friday, March 03, 2006 11:33 AM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

It absolutely makes sense to utilize the technology that already exists in order to make Pennsylvania a healthier place to live. Intelligent citizens do not want to live in a place that is unhealthy for us and our children. Lawmakers should take every opportunity to keep and attract valuable workers to our state. This is one such opportunity.

Lessening toxic emmissions from vehicles would reduce the amount of work days lost due to asthma related illness. It would also reduce the cost of health care in the state.

In addition, cleaner emmissions equals better gas mileage. We all know that oil is a non-renewable resource, and becoming more expensive.

Finding ways to conserve it is benefficial to us all. This method would not involve persuading drivers to change any habits, and it is therefore a wise choice.

Global warming is a real phenomenon, and it is absolutely irresponsible to ignore ways to lesson our negative impact on this earth, which ultimately supports our own lives and the lives of our children and, god willing, our children's children.

Please act with your morals and our long-term future in mind. Do not be swayed by relatively short-term rewards to yourselves or to those with nothing but profit and ease of production in mind.

Sincerely,

Sarah V. Parker Assistant Ecologist Western Pennsylvania Conservancy

Sarah Parker 508 Braddock Road Pittsburgh, PA 152213734

From:

mrmander@aol.com

Sent:

Friday, March 03, 2006 11:26 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I think cleaner air and greener vehicles go hand-in-hand. Our next vehicle will be both fuel-efficient and friendliest to the environment.

Thanks for considering my request.

Sincerely,

Mike Anderson 224 S. Aiken Ave. Pittsburgh, PA 152063408

From: Sent:

YWASFI@MAIL,MED.UPENN.EDU Tuesday, March 21, 2006 10:15 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Yasmine Wasfi 1872 Lambert Rd Jenkintown, PA 190461543

From:

mmueller@bethanywv.edu

Sent:

Monday, March 13, 2006 10:20 PM

To:

EP. ReaComments

Subject:

Clean Vehicle Program25 PA.CODE CHS.121 AND 126

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board, My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely,

Michael Mueller 266 Clinton St Greenville, PA 16125-1801

NOFENDENT REQUATION

From:

nbronstein@shipleySchool.org

Sent:

Monday, March 13, 2006 9:49 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

## Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely, Nathan Bronstein Nathan Bronstein 60 Haverford Road Ardmore, PA 190031021

From:

emwhite453@msn.com

Sent:

Monday, March 13, 2006 2:38 PM

To:

Subject:

EP, RegComments
PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Emily White 453 Valley Forge Rd wayne, PA 190872930

From:

flyingcars@hotmail.com

Sent:

Tuesday, March 21, 2006 6:42 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Eric Palmer Eric Palmer

Pittsburgh, PA 15217

Environmental Quality Board P.O. Box 8477 Harrisburg, PA 17105-8477

Re; "Clean Vehicles Program" for PA

Dear Environmental Quality Board

As the price per barrel of oil continues to climb and the number of large vehicles on our roads grows ever higher, it becomes increasing apparent that more miles per gallon standards and lower toxic emissions are critical.

I urge our legislators to pass the "Clean Vehicles Program" for PA in its entirety without delay.

Let us act proactively rather than suffer the consequenses of our current policies or rather lack thereof.

The time for action is NOW!

Sincerely,

William S. Aiken

542 Chandler Lane Villanova, PA 19085

# Dear Environmental Quality Board

I am writing to say I fully support the Pennsylvania Clean Vehicles Program and want to see it implemented as soon as possible. There is no reason that Pennsylvania should be one of the worst ranking states for air pollution. I have children and grandchildren who suffer from allergies and asthma. In addition to suffering, it is a financial burden for both the individual and our health system.

Additionally, global warming is no longer a debate although the current administration would like to keep it so. We need serious policy changes to combat global warming. We can not delay.

Again, I ask you to speedily implement the Pennsylvania Clean Vehicles Program as a first good step towards improved air quality and all the ramifications of that.

Sincerely,

Lt. Col. Theodore C. Martin

U.S.A.R. Ret.

256 Batleson Rd. Ambler, PA 19002-4118

Theodoa Martin

Barbara Silbert 7802 Ardmore Avenue Wyndmoor, Pa 19038

March 22, 2006

Environmental Quality Board P. O. Box 8477 Harrisburg, PA 17105-8477

Dear Board Members:

The Clean Vehicles Program must be implemented immediately!

Pennsylvania should be very, very concerned about our dangerous air pollution status and our legislator's cowardice to pass more stringent pollution standards for our automobiles and light trucks. Pennsylvania should *not* wait for the Federal government to pass stricter vehicle standards when we have the opportunity right now to safe guard our citizens, young and old.

The health issue of asthma alone represents a big expense to the State budget and the Federal budget thru Medicare and Medicaid and lost time at work. The environment is constantly under attack with our growing dependence on the automobile and energy and Pennsylvania should not cave but rather stand up for her citizens.

The Clean Vehicles Program has the opportunity to address many of Pennsylvania's problems if it was adopted.

Thank you for your time.

Sincerely,

Barbara S. Silbert

In support of the Clean Cars campaign-

I am in support of strong legislation in Pennsylvania to adopt air pollution standards for cars and trucks sold here. Pennsylvania can do what the federal government isn't willing to do to improve gas mileage and reduce pollution. The result of strong standards would be a reduction in respiratory problems, asthma and lung cancer. Cleaner air will make this state a more desirable place to work and live!

Sincerely,

Kathy Parker
KuThy Parku







Alliance for a Globally Sustainable Healthy Environment

ality Hoard

Environmental Quality Board P. O. Box 8477 Harrisburg, PA 17105-8477

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board,

My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely,

Dan Poresky 824 N Berks St

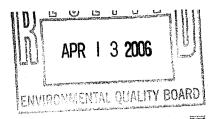
Allentown, PA 18104-3916

424 Center Street

Bethlehem, PA 18018 Email: dan@agshen.org Phone: 610 691 5253

Website: www.agshen.org





April 12, 2006

INDEPENDENT REQUISION

APR 19 PM 3: 42

Via E-Mail

Pennsylvania Environmental Quality Board Rachel Carson State Office Building 15th Floor 400 Market Street Harrisburg, PA 17101-2301

Subject:

Comments of the Alliance of Automobile Manufacturers On

Proposed Regulations to Adopt California LEV II and Greenhouse Gas

Regulations

Dear Sir or Madam:

The Alliance of Automobile Manufacturers is a trade association of nine car and light truck manufacturers including BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Porsche, Toyota and Volkswagen. The Alliance is hereby submitting electronically comments on the Board's and the Department's proposed regulations to adopt the California LEV II and motor vehicle greenhouse gas regulations. However, any appendices to our comments that are too large to be sent electronically (though we will make the attempt today) will be sent to the Board via Federal Express for delivery April 13, 2006. We have specifically confirmed with Department personnel that this method of proceeding is permissible.

If there is information the Department is planning to rely on as part of its record for this rulemaking other than the information included in the Notice of Proposed Rulemaking, the Alliance requests a copy of such information and an opportunity to comment on it. Please contact me (Ph: 202/326-5511) if you have any questions regarding the enclosed materials.

Sincerely,

Julie C. Becker

Assistant General Counsel

**Enclosures** 

# JB & Karen D. Liska 125 Gideon Drive Kennett Square PA 19348

March 28, 2006

Commonwealth of Pennsylvania Environmental Quality Board

RE: Clean Vehicles Program

To Whom It May Concern:

I would like to express my support for the Clean Vehicles Program as proposed by the Commonwealth of Pennsylvania. I believe this ruling should be put into effect without modification.

I believe we should use all available technology to reduce harmful pollutants from their source, before they enter the atmosphere. This proposed ruling would begin to address the emissions from cars and light trucks.

1BLISICIA Kelliska

Sincerely,

JB Liska

Karen D Liska

Donald R. Fonte Director, Government Relations

April 12, 2006

The Hertz Corporation 225 Brae Boulevard, Park Ridge, NJ 07656 Telephone: (201) 307-2759

To: Members of the Environmental Quality Board:

Thank you for the opportunity to offer comments on the proposed rulemaking of the Environmental Quality Board related to the Pennsylvania Clean Vehicles Program.

The Hertz Corporation ("Hertz") has many concerns about the potential adverse impact that compliance with the proposed rule would have on its business if it does not address the exemption relating to daily rental vehicles. It is our understanding that under the proposed rule a vehicle rental company may not rent new vehicles in Pennsylvania that have not received certification from the California Air Resources Board for the LEV II program, with the exception of vehicles that are registered and principally operated outside of the Commonwealth. Because of the uncertainty created in determining when a vehicle is "principally operated outside of the Commonwealth," meeting such a requirement will impose extreme burdens on the way Hertz manages its vehicle fleet and severely restrict the vehicle choices available to the renting public.

As a company that conducts interstate business Hertz rents vehicles in PA that are registered not only in the Commonwealth but also vehicles registered in other states as well. Vehicles regularly migrate to different states as a result of "one-way" rentals. Customers may pick-up a rental vehicle in say, Virginia, but may drop it off in PA. Conversely, a PA-registered vehicle could be dropped at a location outside the Commonwealth.

If Hertz only rented vehicles in the Commonwealth then compliance with CA emissions standards would be rather straightforward. CA LEV II compliant vehicles are supplied to Hertz for states that require such emissions standards. However, many other states have not adopted the CA LEV II program and only require compliance with federal emissions standards. In these federal emissions states, manufacturers supply Hertz with federal emissions vehicles, which are non-compliant with CA LEV II standards. When non-compliant rental vehicles from another state find their way to PA, under the proposed rule an exemption is provided if the vehicle was principally operated outside of the Commonwealth. No definition of "principally operated outside of this Commonwealth" is provided. Since rental vehicles are constantly moving in interstate commerce, their location of principal operation is subject to constant change.

Under the International Registration Plan formula Hertz registers a certain minimum number of vehicles in each state based on gross revenue. Hertz does not object to the requirement that vehicles registered in PA be CA LEV II compliant. As a matter of business necessity however, Hertz would strongly request a clarification regarding the exemption from CA emissions standards for rental vehicles that are registered outside PA. The clarification could confirm that any vehicle that is registered outside of the Commonwealth and engaged in interstate commerce shall be deemed to be principally operated outside of the Commonwealth. Such flexibility will allow Hertz to maintain its ability to efficiently operate in the Commonwealth

while also ensuring that vehicles registered in PA will meet the emissions requirements as set forth by the Commonwealth. The exemption could read:

Motor vehicles held for daily lease or rental to the general public which are registered outside Pennsylvania and engaged in interstate commerce shall be deemed to be principally operated outside of the Commonwealth and shall not be subject to the requirements of the Pennsylvania Clean Vehicles Program.

Thank you for your consideration of these comments. Hertz would welcome the opportunity to open a dialogue with the Environmental Quality Board on the proposed rule.

Sincerely

Donald Fonte



**Public Policy Center** 

April 11, 2006

Environmental Quality Board P.O. Box 8477 Harrisburg, PA 17105-8477

## GM Comments on Rulemaking to Adopt California Emission Standards

## Dear Board Members:

Please find attached General Motors' comments on the proposed adoption of California emissions standards for new automobiles.

If you have any questions, please contact me at 313-665-2957 or Timothy McCann of the General Motors Legal Staff at 313-665-4878.

Sincerely,

Alan R. Weverstad

**Executive Director** 

Mobile Emissions and Fuel Economy General Motors Public Policy Center

AL R Wennited

Attachment

File: SM3037

# State of Pennsylvania Environmental Quality Board

Comments of General Motors Corporation
On the Proposed Rulemaking to Adopt California
Emission Standards for Motor Vehicles

**April 11, 2006** 

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# Comments of General Motors Corporation On the Proposed Pennsylvania Rulemaking to Adopt California Emission Standards for Motor Vehicles

#### Introduction

General Motors is pleased to have the opportunity to provide input to the State of Pennsylvania on its proposed adoption of the California motor vehicle emission regulations. Many of the comments in this submission were previously provided to the California Air Resources Board (ARB) in the course of its greenhouse gas rulemaking process, as well as to other states considering adoption of the California greenhouse gas regulation. Additional comments are also included concerning NMOG and other California LEV II requirements. It is of particular importance for the Environmental Quality Board (the Board) to make an independent assessment of the issues presented by the ARB greenhouse gas rule, because there are many flaws in the California regulation as well as the technical analysis that was performed by ARB to justify that regulation. Several of these flaws are so severe that they put the regulation in violation of federal law, as well as in violation of California law, and these violations are being challenged in court. We believe it is not necessary for Pennsylvania to adopt the greenhouse gas regulation as a part of its adoption of other California motor vehicle emission regulations, and so we devote most of our comments to the greenhouse gas portion of the California program.

We strongly oppose adoption of the proposed regulations for myriad reasons discussed in our comments and in the comments of the Alliance of Automobile Manufacturers (Alliance). We support the Alliance comments and recommendations and incorporate them by reference. The greenhouse gas regulation in particular will impose substantial costs on Pennsylvania consumers that far exceed any perceived benefits, and will not improve the quality of the environment in Pennsylvania or elsewhere. Among the regulation's many additional flaws, it will create gross competitive inequities that advantage certain automobile manufacturers while penalizing General Motors and the other domestic manufacturers, and it fails to comply with the requirements of federal law. Adoption of this regulation by Pennsylvania will result in restrictions in the number and types of new vehicles that General Motors will be able to offer our dealers for sale in Pennsylvania. Product restrictions and higher vehicle prices will lead to large U.S. employment losses. Consequently, we urge the Pennsylvania Environmental Quality Board to use the discretion that it has under the Clean Air Act and not adopt the separate and severable California greenhouse gas regulation.

#### Regulatory Background

Several preliminary comments are necessary. First, it is important for the Board to recognize that the California greenhouse gas regulation would place Pennsylvania and any other State adopting the California rule in the business of regulating motor vehicle fuel economy. Fuel economy regulations at the national level have significant effects on

General Motors and its customers, which would be magnified at the state level. General Motors supports voluntary, consumer-oriented programs intended to address the issue of greenhouse gases, but not regulatory programs like that adopted by California, which conflict with federal regulation. A prime example of potentially promising voluntary programs which help define the difference between the California rule and market-oriented alternatives is the recent agreement between several vehicle manufacturers (including General Motors) and the Government of Canada. The Canadian voluntary agreement is reviewed below, following the initial discussion of how the California greenhouse gas rule and other fuel economy regulations affect consumers and the industry.

#### Fuel Economy and Carbon Dioxide

The primary greenhouse gas emission from motor vehicles is carbon dioxide, and regulating carbon dioxide at the levels of stringency required by the California rule is tantamount to regulating fuel economy. Carbon dioxide (CO<sub>2</sub>) is an inevitable product of combustion of any hydrocarbon fuel. It is formed in direct proportion to the amount of gasoline burned. Because of this direct chemical relationship, fuel economy is measured most precisely by measuring tailpipe emissions of CO<sub>2</sub> and calculating the amount of fuel burned based on a carbon balance equation. That is how fuel economy tests are performed for vehicle labeling, for advertising, and for compliance with federal fuel economy standards. Measurement of carbon dioxide emissions and fuel economy are one and the same. It is for that reason that we believe that the California greenhouse gas emissions standards are preempted under federal law.

Unlike criteria pollutant emissions regulated under the Clean Air Act, fuel economy is a function of the design and operation of the entire vehicle. There are no aftertreatment technologies such as catalytic converters to remove carbon dioxide from the exhaust stream. Therefore, fuel economy regulation has major implications for virtually all vehicle attributes, such as size, features, safety and performance. The adverse impacts of the regulation on automobile manufacturers and Pennsylvania consumers can be expected to be the largest of any motor vehicle regulation ever adopted by Pennsylvania.

#### **Federal CAFE Regulation**

The Corporate Average Fuel Economy (CAFE) program established by the Energy Policy and Conservation Act of 1975 (EPCA) requires the National Highway Traffic Safety Administration (NHTSA) to set maximum feasible fuel economy standards when setting annual truck CAFE standards and when amending the car CAFE standard set by Congress. The regulatory process to establish CAFE standards is required under EPCA to consider technical feasibility, economic practicability, the impact of other regulations and the need of the nation to conserve energy. Impacts on traffic safety and U.S. employment are also evaluated. This is all accomplished through careful consideration of detailed submissions by automobile manufacturers and an appropriate period for public comment. Given this extensive process and NHTSA's 30 years of experience with fuel economy regulations, it should give pause to the Board that ARB's evaluation of "maximum feasible" fuel economy levels is so radically different than evaluations over many years of "maximum feasible" levels by the U.S. government.

Unlike some of its foreign competitors, General Motors has always complied with federal CAFE standards and has therefore never paid a fine for CAFE noncompliance. However, as gasoline prices declined in the mid-1980's, compliance became very difficult and costly for CAFE constrained manufacturers that produced vehicles for the full range of market segments. Because General Motors was historically especially successful in segments for larger cars as well as larger trucks, CAFE became most constraining on General Motors. Even though we lead in more model-to-model fuel economy comparisons of comparable vehicles than other manufacturers, our sales mix often leaves us with fleet average fuel economy uncomfortably close to the CAFE standards.

For example, in model year 2004, General Motors had higher fuel economy in 39 of the 60 passenger car model-to-model comparisons in which GM had a similar model competing against other manufacturers, representing higher fuel economy in 65% of the direct comparisons of similar vehicles. In the light truck segments in which GM competed, GM had the best 2004 model-to-model fuel economy in 38 out of 62 comparisons, winning 61% of the matchups. Despite this, GM's domestic passenger car CAFE of 29.0 mpg and light truck CAFE of 21.2 mpg were below the industry averages, based on the most recent reports from NHTSA (NHTSA Summary of Fuel Economy Performance Report, March 2005).

While we struggled to maintain CAFE compliance, manufacturers that had previously specialized in smaller vehicle segments were given a competitive advantage that was exploited aggressively. Aided by this competitive advantage, these manufacturers expanded rapidly into larger vehicle segments. We see this dynamic being repeated in this rulemaking, to the detriment of employment in Pennsylvania and elsewhere in the U.S. The California greenhouse gas standards are grossly unfair for General Motors in particular, because we continue to have the heaviest fleet average weight due to the mix of vehicles purchased by our customers, coupled with the much more lenient standards applied by California to certain of our competitors, as described below.

For perspective, larger light duty trucks (above 4,900 lbs. curb weight but below 8,500 lbs. GVWR) represented 40% of GM truck sales in 2002 model year, and GM had a 55% market share in this category. In that year, 100% of GM's light duty trucks were assembled in North America, with an average domestic content of 90%, which was the highest in the industry. Although foreign-based competitors have exploited CAFE advantages to expand into larger vehicle segments somewhat, and although they have established some U.S. manufacturing facilities, dramatically higher fuel economy standards such as those created by the California greenhouse gas regulation would repeat the mistakes of the past by disadvantaging domestic producers and harming overall U.S. employment.

#### Canadian Memorandum of Understanding

As indicated above, the California rule stands in sharp contrast to collaborative, government-industry voluntary programs that deal more realistically with the issue of greenhouse gases. On April 5, 2005, General Motors and other companies in the

Canadian automobile industry voluntarily signed a memorandum of understanding with the Government of Canada that is intended to reduce greenhouse gas emissions in the auto sector by 5.3 million tons of CO<sub>2</sub> equivalent in 2010, compared to the "reference case" forecast of national greenhouse gas emissions in 2010 that the Canadian government estimated in 1999. The agreement includes all greenhouse gases from vehicles, including carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>) and hydrofluorocarbons (HFCs).

This agreement differs in important respects from the California regulation. It builds upon a long history of many successful, similar voluntary Canadian industry-government programs. The agreement is voluntary, nationwide and auto industry wide, and it is consistent with other voluntary auto industry efforts to reduce greenhouse gases. In contrast, the California regulation creates sharply different regulatory obligations for different manufacturers, and brings myriad regulatory burdens associated with a regulatory program.

It should also be noted that the specific elements of the Canadian MOU are suited to the Canadian market. It meets the government's target for auto sector emissions needed for compliance with the Kyoto Protocol, which Canada has ratified. Because of its unique attributes, it does not lend support to the California regulation or to more stringent U.S. CAFE standards. Indeed, Canada considered vehicle greenhouse gas regulations in Parliament in 2005 and rejected the regulatory approach.

While continuous and voluntary improvements in fuel economy are one component of the agreement, and a variety of factors already leads to a more fuel efficient sales mix in Canada, the agreement is not expected to require vehicle fuel economy increases beyond the rate of increase in the U.S. market. This rate of increase is far less than would be required by the California regulation. The 1999 Canadian "reference case" forecast that forms the baseline for the MOU was developed using assumptions that were described as "conservative" -- where "conservative" means that the reference case forecast tends toward high emissions estimates. The industry is believed to be on track to outperform those forecast assumptions in Canada, but the California standards far exceed industry technical capabilities. The MOU is not expected to require vehicles in Canada that are different from vehicles sold in the U.S., nor is it expected to require major changes in vehicle pricing or sales mix, including the cancellation or restriction of certain vehicle models in Canada. In contrast, the California regulation is expected to result in each of those adverse outcomes.

## Regulatory Compliance Issues

Although General Motors' comments to ARB opposed the adoption of the greenhouse gas rule, we also offered extensive information to ARB on specific regulatory issues and problems that were created by their regulation. Because ARB made no adjustments to correct these problems, this section is repeated for the Board so that it can understand some of the compliance problems that its adoption of the regulation will exacerbate.

## **Differential Treatment of Manufacturers**

The California regulation applies stringent requirements on the six largest automakers beginning in 2009 model year (MY), but would delay any requirements on small and mid-sized manufacturers, with annual California sales under 60,000 vehicles, until seven years later, in 2016 MY. The requirements that would be imposed on these smaller manufacturers in 2016 would remain much less stringent than the regulations that apply to larger manufacturers, with the mid-sized manufacturers given a choice of meeting the standard that had applied to comparable vehicles from their larger competitors in 2012 or, if easier, meeting a percentage improvement target applied to their 2002 baseline fleet average. There appears to be an intention, as revealed by the design of these provisions, to permanently maintain less demanding requirements for small and mid-sized manufacturers. Pennsylvania has proposed giving the same unfair advantage to manufacturers that are classified by California, according to the California volume thresholds, as small, low and intermediate volume manufacturers.

The companies that currently fall under the 60,000 vehicle threshold based on California sales include major global competitors such as Volkswagen and BMW that have no inherent weaknesses that would justify this degree of regulatory preference. In addition, new entrants are expected in the U.S. automobile market from emerging economies such as China and India. These new entrants would be handed a huge competitive advantage to help them become established in the U.S. market. The seven-year holiday from greenhouse gas standards coupled with permanently less demanding requirements provide an overwhelming competitive advantage and are grossly unfair to General Motors and the other domestic manufacturers.

#### **Equity Ownership Provision**

The California regulation requires that automobile manufacturers be grouped together for compliance purposes in cases where one company has at least a 10% equity ownership interest in the other, or in cases where a third party owns at least 10% of the equity in two or more automobile manufacturers. This provision would affect several General Motors business relationships. The 10% threshold is far below the level that would normally be considered necessary to give any significant degree of management control in a company. Yet the experience with federal CAFE regulation has shown that tight control of product design decisions, pricing, production scheduling and many other areas of business decisionmaking is required to manage fleet average fuel economy.

Indeed, comprehensive coordination with these companies in some areas such as the numbers of vehicles offered for sale and product pricing could potentially be unlawful. Yet comprehensive coordination would be necessary to manage fleet average emission levels.

In addition, publicly owned corporations have no control over investor trading in their own shares which could trigger the third party provisions of the regulation. Because of these equity ownership provisions, sudden, unexpected situations could develop that put manufacturers out of compliance with the regulation through developments that are not within the control of the manufacturers.

The 10% threshold is so low that a situation could be created where multiple automobile manufacturers would be required to include the vehicles from another manufacturer in their fleets. This situation could develop, for example, if two large manufacturers each owned over 10% of a third manufacturer. The equity ownership provisions apply a huge penalty to any smaller automaker in which GM invests. This creates a significant barrier to GM's ability to create normal business alliances and collaborations worldwide, to the detriment of GM's ability to compete in all markets worldwide and to meet the needs of our customers.

#### **Commercial Vehicles**

Despite claims to the contrary, California makes no realistic provision in its regulation for continued availability of commercial vehicles -- vehicles that are essential for Pennsylvania businesses and the health and competitiveness of the Pennsylvania economy. Initially, the ARB justified this omission with the claim that sales of commercial vehicles are "a small portion of the light duty fleet". That is untrue: commercial vehicles are a substantial part of the market and designing for work requirements has a large impact on average fleet fuel economy. Because vehicles used in commerce often have below average fuel economy, they are in the most threatened category for restricted availability should Pennsylvania adopt the California greenhouse gas regulation.

In a subsequent action, ARB clarified that vehicles in the Option I LEV II NOx category are exempted from the greenhouse gas regulation. In its commentary, ARB stated that "this post-hearing modification clarifies the original intent of the proposal, which is to exempt light-duty work trucks from greenhouse gas emissions requirements." (p. 14, October 19 ARB Proposed Modified Text, Attachment 1)

GM has never produced a vehicle in this category and, to our knowledge, the only vehicle ever produced in the Option I LEV II NOx category has been a single low volume variant of the Ford F-Series pickup. This near absence of vehicles in that category is inherent in the design of the criteria for the category -- vehicles must be LDT2 trucks having a base payload of 2,500 lbs. or more, yet not exceed 8,500 lbs. Gross Vehicle Weight Rating. This implies that the unloaded, curb weight of those trucks cannot exceed 6,000 lbs. (8,500-2,500). Yet trucks built sturdy enough to carry a load of at least 2,500 lbs. usually weigh more than 6,000 lbs. curb weight. It should be noted that 2,500 lbs. payload is a

heavy payload, so that only a small proportion of the current sales of pickup trucks provide such high capability, and these trucks are all classified as medium duty vehicles that are typically exempted from the greenhouse gas regulation without the use of the Option I LEV II NOx exemption. But the vast majority of light duty trucks, as well as passenger cars, that are currently used in commerce receive no exemption or special consideration whatsoever in the California regulation.

Because the Option I LEV II NOx exemption applies to virtually no current work trucks, the ARB's claim that it exempts work trucks from the greenhouse gas regulation is false. In order to fit into this category, the curb weight of current medium duty trucks would need to be reduced below the 6,000 lbs. curb weight threshold (if possible without sacrificing payload), which would violate the mandate of the California law that the regulations not require "a reduction in vehicle weight" (as well as ARB's claim that they do not require weight reductions).

٠<u>١</u>٠.

In addition, the Option I LEV II NOx provisions limit the vehicles in this category to 4% of a manufacturer's LDT2 truck fleet sales. Even if the aforementioned problems with this exemption did not exist, this 4% restriction on sales volume is sufficient to nullify the claim that work trucks are exempted from greenhouse gas regulations by the Option I LEV II provision. Customer usage and customary industry practice would indicate that far in excess of 4% of current LDT2 sales warrant the term "work truck".

It is highly misleading for ARB to claim that work trucks are exempted from the greenhouse gas regulations when virtually no current or past vehicles would qualify as work trucks under their definition, and no more than 4% of full-size, light-duty truck sales would ever be allowed to be classified under the ARB work truck exemption. ARB makes no provision in its regulations for identification and exemption of commercial vehicles, even though commercial vehicles are a substantial fraction of total vehicle sales.

## **Alternative Compliance Mechanisms**

California's motor vehicle greenhouse gas law (AB1493) expressly requires regulations that "provide flexibility, to the maximum extent feasible". It is sensible to pursue perceived environmental benefits at the minimum cost possible. In interpreting this provision, however, ARB created flexibility mechanisms that are sharply limited in order that they would play a "minimal role". The same philosophy of sharply limited potential availability was applied to early action credits. From a realistic standpoint, this provides essentially no compliance flexibility to protect the automobile market from costly and disruptive market distortions.

# **Greenhouse Gas Emission Test Vehicle Selection**

The ARB created an approach for selecting test vehicles for determining the CO<sub>2</sub> equivalent emissions (CO2E) fleet average that is based on testing worst-case vehicle configurations. As a result, a manufacturer's CO2E fleet average will be over-estimated by a wide margin. To achieve a CO2E fleet average representative of the true average, a manufacturer would need to test all vehicle configurations. The result is that hundreds more vehicle tests would be required at General Motors annually beyond current testing

requirements. Furthermore, ARB based its standards on a "maximum feasible" analysis of data based on representative vehicles (using the NHTSA CAFE database, which has the high volume configurations), so that requiring manufacturers to comply using worst-case vehicles creates a condition whereby the standards automatically are beyond ARB's estimation of maximum feasibility unless all vehicle configurations are tested.

#### Comments on ARB's Analyses

#### Overview

General Motors is pursuing an aggressive near, mid and long-term plan to bring to market technologies to improve fuel efficiency, reduce emissions and provide additional value and benefits to our customers. This program already includes implementation of most of the fuel economy improvement technologies for conventional gasoline-powered vehicles that could be considered feasible and practical for the relevant time period. This program also includes research and development related to the advanced technologies that ARB used in its technical analysis, so that we are knowledgeable about the state of development, potential market introduction timing, cost levels, side effects and other impacts of the technologies ARB used to justify its regulation.

We have evaluated strategies for compliance with the California regulation in view of the short lead time until the first requirements in 2009-2011 model year and the rapid rate of increase in the stringency of the standards through 2016. Technical and financial resource cadence constraints mean that a manufacturer can only update 16 to 20% of its product lines in a single year, and engineering lead times require that work on 2009 model products already be underway. These evaluations show that, even with an immediate crash program to implement the most expensive and cost-ineffective technologies, compliance with the California regulation requires severe restrictions in the product lines provided to dealers in the states subject to this regulation, both in the initial years of the rule and in later years.

The vast disagreement between General Motors compliance planning and ARB's determinations comes about through a variety of flaws in ARB's engineering and financial evaluations. The next few sections comment on ARB's engineering and financial analysis in their Initial Statement of Reasons (ISOR), which provided the technical justification for the regulation. This is followed by a critique of a subsequent technical analysis released by ARB in which two General Motors vehicles, a Buick LaCrosse and Chevrolet Silverado, are specifically evaluated for their fuel economy improvement potential.

To the extent the Board's proposed adoption of the California greenhouse gas rule is predicated on these fatally flawed ARB findings, as discussed in the next section, the the Board proposal for Pennsylvania is similarly flawed. Accordingly, the Board proposal should be withdrawn, and Pennsylvania should align itself with the federal regulatory programs related to emissions and fuel economy.

#### Retail Price Equivalent

The ARB initially relied on an interim report by the Northeast States Center for a Clean Air Future (NESCCAF) issued in March 2004 as the basis for its financial and technical analysis, although ARB made significant adjustments to the NESCCAF estimates. (Note that the final NESCCAF report released in September 2004 did not materially change from the interim report, and the following discussion based on the interim draft therefore still applies.) ARB inappropriately used the NESCCAF report with the result that significant degradations in vehicle performance in the NESCCAF computer simulations were overlooked, significant categories of costs were omitted, and the costs to consumers of the California regulation were significantly underestimated.

The NESCCAF report explains its cost estimates, compiled by the Martec consulting group, as follows (NESCCAF, p. II-17):

"As noted at the outset of this section, Martec's cost estimates do not attempt to capture all costs to the manufacturer of incorporating new technologies, nor do they include estimates of cost impacts at the consumer level as reflected in the purchase price of a new vehicle. Additional manufacturer-level costs that were not captured in this analysis but that could be associated with the use of new technologies include:

- Engineering costs, including advanced R&D, vehicle design and development engineering for integrating new technologies and software development;
- Warranty and possible recall costs;
- Factory capital costs associated with vehicle-level technology changes;
- Manufacturing costs for powertrain or vehicle assembly.

The costs described by Martec represent an estimate of the cost to the manufacturer for the hardware needed to incorporate a given GHG-reducing technology on a high-volume production vehicle. Associated system-level material content such as wires, control module drivers, etc. are included in these estimates - if purchased from a supplier, these all represent a variable cost to the automaker. However, the estimates do not necessarily capture the complete set of variable costs that might be associated with the introduction of new technologies - for example, applying some technologies might require body and chassis redesigns that would in turn incur additional costs."

This cost methodology is also described in discussing mobile air conditioners:

"In accordance with the costing methods for other portions of this study, alternative A/C system costs include only the high volume variable costs of components and do not consider the fixed costs of system introduction (e.g., engineering, and any incremental production, manufacturing, or assembly plant costs)." (NESCCAF Appendix D-20)

These descriptions make clear that important whole categories of cost have been excluded from the estimates supplied to NESCCAF by the Martec consulting group. More precisely, the Martec assessments comprehend the price that an automobile manufacturer such as GM would pay to a component supplier to purchase the component hardware to implement these technologies. However, the costs to an automobile manufacturer to implement a technology only begin with the purchase of component hardware. There is usually additional assembly labor and related costs in our powertrain factories and our vehicle assembly factories -- costs which are specifically mentioned in the NESCCAF report as not comprehended (NESCCAF p. II-17). In addition, there are often significant vehicle integration costs specific to each technology/vehicle combination which involve engineering the technology onto the vehicle, and possibly modifying other hardware on the vehicle. In essence, the analysis on which ARB and the Board rely to justify the adoption of the greenhouse gas rule is inherently flawed, and it grossly underestimates the cost of that rule to Pennsylvania citizens.

Furthermore, the technologies analyzed in these studies cover a wide range of dissimilar items, and one cannot generalize with precision about their specific implementation cost structures. A program to evaluate implementation by an automobile manufacturer would always involve much more specific attention to the details of implementation of each technology onto a specific engine or transmission, in a specific set of powertrain factories, applied to specific vehicles with their own unique implementation/integration issues, etc. Warranty costs would be estimated based on experience and expectations for each technology on a case-by-case basis. In short, there would be specific engineering and financial attention to the cost categories that were ignored in the NESCCAF and ARB analyses.

Without offering an analysis, NESCCAF and ARB apply a "retail price equivalent" (RPE) mark-up of 40 percent" (NESCCAF p. II-24, ISOR p. 80) to convert the Martec-supplied costs into the price paid by consumers. This 40% RPE factor is of tremendous importance to this analysis since it must account for all the engineering, investment, labor, material, overhead and other manufacturing costs not comprehended by Martec, as well as service and warranty costs, automobile manufacturer profit to achieve an adequate return on investment, costs and profits in the distribution network, especially the dealership markup, and any other items.

As justification for its 1.4 RPE factor, ARB cited two studies: 1) USEPA "Progress Report on Clean and Efficient Automotive Technologies Under Development at EPA: Interim Technical Report", January 2004; and 2) "Comparison of Indirect Cost Multipliers for Vehicle Manufacturing", Vyas, A., Dan Santini, Roy Cuenca, Argonne National Lab, April 2000. ARB stated that 1.4 is between the RPE factors of 1.26 in the EPA paper and the factors of 1.5 and above in the Argonne (ANL) paper (ISOR, p. 80).

Examination of these sources reveals that the EPA paper offers no justification for the 1.26 RPE factor, simply asserting that it is used "when implementing new emissions regulations" (ISOR, p. 65) and "in regulatory development, EPA uses a retail price equivalent mark-up factor of 1.26 to adjust a manufacturing price increase to a retail price

increase. This factor accounts for manufacturer overhead and profit" (p. 63). An examination of GM's cost structure reveals that 1.26 is far too low to fill that role.

The ANL paper offers an analysis of RPE factors from three sources, ANL, Energy and Environment Analysis (EEA), as quoted in a 1995 report from the U.S. Office of Technology Assessment, and a 1996 presentation by an automobile company executive, Chris Borroni-Bird, at a technology conference. The ANL RPE's derived from these sources are as follows (p. 7):

Multiplier for	ANL	Borroni-Bird EEA
In-House Components	2.00	2.05 2.14
Outsourced Components	1.50	1.56 1.56

The difference between the "in-house component" RPE and "outsourced component" RPE is that, for the case of outsourced components, ANL removed from the RPE costs for freight, warranty, amortization and depreciation, and engineering. ANL assumed that, for outsourced components, the supplier would incur these costs. However, the Martec cost estimates that form the basis of the NESCCAF and ARB analyses do not include these costs in the underlying technology cost estimates -- costs such as warranty and engineering are specifically mentioned as excluded, as are large pieces of the required capital investment that forms the basis for depreciation and amortization. Therefore, the RPE's of approximately 1.5 calculated for outsourced components are not applicable to the cost estimates provided by Martec, even if the components were ultimately outsourced. The higher RPE's of 2.0 or above would apply, in this ANL analysis, to a cost basis that did not include warranty, etc., with the difference between 1.5 and 2.0 covering these categories of cost.

Based on an analysis of General Motors cost structure and supported by the Argonne Lab study, ARB should have used a retail price equivalent factor of not less than 2.0 for this analysis. This would increase ARB's cost assessment by approximately 50% and would change their estimates of the economically feasible emissions standards significantly. ARB's use of a 1.4 RPE results in the omission of significant categories of manufacturer costs, and substantial underestimation of consumer costs related to the proposed regulation.

NESCCAF released to ARB its final report on September 23, 2004 at the ARB hearing to approve the greenhouse gas regulations. NESCCAF's final report uses the same 1.4 retail price equivalent (RPE) factor, but cites the 2002 National Research Council's report on "Effectiveness and Impact of Corporate Average Fuel Economy Standards" (NRC p. 41). The NRC report, in turn, cites a 2001 report by Energy and Environment Analysis, Inc. as the basis for the 1.4 RPE number. (The report is "Technology and Cost of Future Fuel Economy Improvements for Light Duty Vehicles".) However, the 1.4 number cannot be found in the EEA document cited. Indeed the EEA report supports use of higher RPE factors than 1.4. (EEA p. 2-5)

Further, the EEA report lays out in detail its cost methodology, which makes clear that the RPE factors it presents are intended to be applied to a cost basis that already includes detailed assessments of major categories of cost such as engineering expense, tooling, and facilities expenses. The EEA report also describes the tiers of costs going from suppliers to automobile manufacturers through the auto dealers (p. 2-5). NESCCAF and ARB's analyses omit major categories of costs by taking an RPE that was developed to be applied on top of a broad cost basis, and then applying it to a narrow cost basis that omits many of the major cost categories. Also, NESCCAF and ARB apply the RPE to supplier costs (Tier 1 of EEA p. 2-5), and ignore the automobile manufacturer's costs laid out in EEA Tier 2. The cost numbers supplied by Martec to the NESCCAF study clearly are not prepared on an accounting basis that would justify use of an RPE so low as 1.4.

In order to ensure that it is making correct policy decisions and to discharge its obligations under Pennsylvania law, the Board needs to make an independent assessment of the ARB and NESCCAF analyses, and cannot simply "rubber stamp" those analyses. To the extent that the Board concludes that those analyses have any merit, the Board must fully explain why it is choosing to rely on the ARB and NESCCAF analyses, and any reasons it may have for not accepting the points outlined above demonstrating why those analyses are not entitled to support or use by the Board.

## **Cost Omissions**

The cost estimates used in the NESCCAF report were given with numerous caveats, as noted in Attachment B of the NESCCAF interim report. For example, an upgrade to a 42-volt electrical system is noted as needed for electric power steering for large trucks and electromagnetic camless valve actuation. Upgraded batteries are needed for the motor assist and start-stop hybrid systems. Increases in transmission torque capacity are noted as potentially needed but not specifically modeled for diesels and turbocharged engines. Modifications to base engine components are excluded for direct injection systems and noise vibration and handling (NVH) modifications are excluded for cylinder deactivation.

Automated manual transmissions are noted to have no North American capacity. This is an important caveat in view of the major investment and other costs associated with changing over capital-intensive transmission factories. The ARB report states a belief that "transmission suppliers would absorb the bulk of investment costs, not the vehicle manufacturers" (ISOR, p. 85), but this overlooks the reality that all expenditures are ultimately borne by consumers. It is noted that continuously variable transmission (CVT) costs are based on a competitive component sourcing environment without major licensing cost additions and high volumes -- none of which are realistic assumptions given the status of this technology. In addition, there are numerous instances of additional costs for vehicle integration that would be expected for these new technologies that are not specifically noted by NESCCAF.

The presentation of this list of cost omissions and simplistic assumptions in Attachment B of the NESCCAF report reveals that the authors were aware that important cost issues were being excluded from the analysis. Yet not only did ARB not compensate for these

omissions, ARB added the unrealistic assumption that the NESCCAF costs for several "emerging technologies" would be reduced another 30%. The NESCCAF report states that "Martec assumed that at least three high-volume automakers would use each technology at volumes of at least 500,000 units per year and at least three competing suppliers were available to supply each automaker for each technology. This would create a highly competitive purchasing environment that would drive prices and costs to competitive levels" (NESCCAF p. II-18). The Martec estimates reflect "fully learned, high volume production of current technology designs" (NESCCAF p. II-18). Thus, learning curve effects are already incorporated in the NESCCAF costs. The NESCCAF report only allows that "to the extent that basic scientific advances in design or manufacturing do occur, future costs may be lower than estimated" (NESCCAF p. II-18). Yet costs in the relevant time frame would not be "fully learned", they would be at much higher levels reflecting introductory conditions for new technologies. Costs would reflect transitional investment and cost issues that have been omitted from the ARB analysis.

It is likewise unrealistic to factor in a 30% reduction beyond the fully learned, high volume levels based on a possibility of "basic scientific advances in design or manufacturing" (NESCCAF, II-18). Basic scientific advances are by nature not predictable and usually develop and progress toward implementation over long time frames. Reliance on basic scientific advances is in conflict with the technologies being available in the near or mid terms. Furthermore, given the pace of new technology introductions and replacement laid out by ARB in its technical justification, it is questionable whether maturation of technologies to "fully learned" levels might ever occur. The expected rate of change is simply too fast and disruptive, and expected product lifetimes too short, with new technology packages forced across the fleet in four year waves moving from the near term technologies in 2009-2012, to mid term technologies in 2013-2016 to, presumably, long term technologies described in the ARB technical analysis in 2017. Indeed, the shortened product lifecycles implied by this progression are not consistent with normal cost levels or rates of return, where powertrain technologies such as new engines or transmissions need useful economic lives of 10-20 years to be economically justifiable. Such premature obsolescence is a major cost of government regulations for a capital intensive industry such as automobile production; it is often overlooked in the financial analyses of proposed government regulations, to the detriment of the industry, its consumers, suppliers and employees.

#### **Incorrect 2009 Baseline Forecast**

NESCCAF shows a 2009 forecast that continues with OHV engines as the "dominant" technology for large trucks and minivans, among the five segments analyzed (Table II-4, p. II-7). While this representation is a simplification, it accurately reflects that OHV engines will continue to exist in large penetrations in 2009, especially among trucks. However, ARB's technology packages require conversion of all engines to overhead camshafts. ARB's cost adjustment for this change is far too low.

Further, ARB incorrectly applies anticipated fuel economy improvement factors to vehicles that either already have the technologies in the 2002 baseline, or which are not

applicable for the technology. An example is to apply a fuel economy improvement factor for improved automatic transmissions to all vehicles, even though significant numbers of vehicles have manual transmissions that cannot be improved in this fashion or to this degree.

#### Mobile Air Conditioning

ARB inappropriately incorporated possible mobile air conditioning (MAC) improvements to increase the stringency of the GHG standard based on a mistaken view of the applicability of the flammable alternative refrigerant R-152a. General Motors has been a leader in exploring alternative refrigerants through the Society of Automotive Engineers Alternative Refrigerant Cooperative Research Program as well as independent research with our suppliers. This experience differs from ARB's characterization of R-152a. It is not yet clear if R-152a will be judged acceptable, and it certainly is not a simple drop-in replacement for R-134a (contradicting the NESCCAF analysis Appendix D-20). R-152a faces significant development issues, especially regarding its safety. If implemented, it would add costs for the required safety modifications.

ARB's assumption that manufacturers "will be converting to HFC 152a systems in the mid term" (ISOR, p. 107) is unwarranted and unduly speculative for a technology that is still at R-152a's stage of development. ARB should not have relied on a technology that has not even been demonstrated to any significant degree in test fleets as the basis for setting regulatory standards.

## Fuel Economy Technology

ARB substantially overestimated the fuel economy improvements that would be expected to result from many of the technologies included in its technical justification. In order to better understand the results, we conferred with the analysts from the AVL engineering consulting group that performed the technology simulations for NESCCAF that ARB, in turn, used as the basis of much of its analysis. Following are some perspectives resulting from those discussions.

#### Vehicle Integration

Integrating fuel economy technologies into a vehicle involves a balance of all the performance attributes (tailpipe emissions, acceleration drive quality, noise and vibration, steering feel and response, ride and handling). In many cases, simultaneously meeting all vehicle performance requirements results in deteriorated fuel economy benefits and higher costs for a fuel economy technology. Benefits of a technology described in the public literature, by component suppliers, or produced by sub-systems simulations typically do not consider the integration and balancing issues required to completely integrate a technology into the vehicle. A major reason for ARB's overestimation of vehicle fuel economy potential is a disregard for this critical issue. Some examples include: the acceptable range of operation for cylinder deactivation to meet noise and vibration requirements, the additional exhaust and other noise canceling treatments needed to offset higher engine noise of a deactivated engine operating under high load or a downsized turbocharged GDI engine running at higher engine speeds.

## **Automated Manual Transmissions**

The use of automated manual transmissions with dual wet clutches (AMTs) is nearly universal in the configurations that were used by ARB to set the standards. So the standards are highly dependent on the results projected for these types of transmissions. There are some significant issues with both the benefits analysis and the applicability of these types of transmissions:

All of the AMT benefits are miscalculated due to the omission of important transmission losses. The June 2004 draft of the ARB report briefly described AMT technology, but did not go into any detail regarding clutch design. The analysis done by AVL assumed manual transmission efficiency values and only an added 15 Watt electrical load meant to represent gear-shifting-actuator loads. Neither transmission spin losses nor clutch actuator losses were accounted for in the AVL analysis. AVL has indicated that their analysis was specifically for dryclutch AMTs. However, in the August 2004 ISOR, the AMT description (but not the analysis) was revised to include dual wet clutch designs in the AMT technology. Such a clutch design includes a hydraulic actuator pump that consumes significant energy, and according to LuK (AVL's source for AMT information) would result in a 4-6% lower drive cycle efficiency (ref. LuK presentation at SAE's Emerging Transmission Technologies TOPTEC in August 2003) than the dry clutch configuration analyzed by AVL. This loss is not included anywhere in the analysis, and its omission contributes significantly to the benefit claimed for transmission technology used to determine the standards.

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- Some vehicle segments have seamless transmission operation as an important
  marketable requirement. These types of transmissions are simply not smooth
  enough for those market segments. Yet they are assumed to be applied in every
  vehicle segment.
- Single-clutch AMT's are not an acceptable alternative in the U.S. market. With
  an additional dry clutch to increase acceptability, dry dual clutch transmissions
  can only handle maximum torque of approximately 400 N-m. This torque level is
  approximately that of a V6 midsize car. At higher torque levels, a hydraulic
  system is required, accompanied by additional pump losses, mass, and increased
  electrical loads. Even hydraulic systems might not work on heavier trucks given
  extreme loads and durability concerns.
- The actual implementation of AMT transmissions into nearly all of the vehicle fleet (which is what the standard assumes) would require retirement of almost every North American investment in light-duty transmission manufacturing capacity and the addition of an equal amount of new AMT capacity somewhere in the world.

**Turbocharged Engines** 

The use of aggressively downsized (41-52% smaller), highly turbocharged, intercooled, direct-injected engines with dual cam phasing is used to set the standard in all but one of the vehicle segments. So the standards are very dependent on the results projected for these types of engines. There are some significant issues with both the benefits analysis and the applicability of these types of engines:

- The projected benefit for the turbocharged, downsized, direct-injected, camphasing engines is based on very aggressive assumptions about the specific output that is possible for these types of engines. The most unlikely of these assumptions is that the engines will use premium fuel instead of regular fuel (as discussed in more detail below). All of the AVL analysis for these engines appears to be based on premium fuel. Without premium fuel, the specific output possible from these engines will be significantly reduced and the engine sizes will be overly optimistic due to selection of very low engine displacements driven by unrealistic BMEP (Brake Mean Effective Pressure) curve assumptions that depended on high boost levels and premium fuel usage.
- Typical turbocharger installations require an intercooler, which increases vehicle drag.
- There are significant discrepancies between the benefits projected by AVL for downsized turbocharged MPFI engines and downsized turbocharged GDI-S engines. AVL has indicated through a direct comparison of turbocharged MPFI versus turbocharged GDI-S DCP engine maps that engine fuel consumption differences between these two technologies are as much as 12% at typical Federal Test Procedure engine operation conditions. Such large differences in fuel consumption are unexplained by the relatively minor physical differences between the engine technologies. This discrepancy affects a technology package used to justify the emission standard in four of the five vehicle classes.
- AVL has confirmed that the application of aggressively downsized turbocharged engines did not include consideration of vehicle launch, drive quality, and transient engine/transmission/ turbo response. The simulation results provided by AVL indicate that the vehicles configured with these engines will have serious drive quality problems. General Motors believes such deteriorations in performance are not acceptable, and they demonstrate that not enough verification of "equal performance" was done. Demonstration of sufficient vehicle launch, drive quality, and transient performance should be required prior to consideration of this and other "torque-modifying" new powertrain technologies.

#### Premium Fuel

Portions of the analysis done by AVL appear to have included the assumption of premium fuel usage. AVL states that regular fuel was assumed for all of the engine configurations that used some form of variable valve actuation, but engine specific output levels taken directly from AVL output results match exactly with other premium fuel AVL work on variable valve actuation. Further investigation of this issue by AVL indicated that in most, but not all, cases their assumptions fell within very aggressive regular fuel specific output levels. Whether through an assumption of premium fuel usage or an overestimate of what is possible with regular fuel, the result is an overestimate of the specific output possible with each of these technologies, which enables unrealistically aggressive engine downsizing – and fuel consumption reductions – to be simulated while maintaining equal performance. This discrepancy contributes to an overassumption of the specific output capability (and thus the chosen engine size) of every DCP, DVVL, and CVVL engine in the AVL analysis.

#### Simulation Issues

The AVL study used a computer simulation tool and consistent methodology. However, AVL has described their study as a generic study whose results can be used to compare relative differences between groupings of technologies, not for projecting specific consumption targets for specific vehicles. As a generic study, the AVL work did not cover some important details and constraints that are a reality for vehicle manufacturers:

- All of the engine maps used in the simulation study were based on AVL's most optimistic, upper-limit projections of the full capability of the engine technologies, assuming full application of technology without sufficient constraints which reflect real-world combustion system dilution tolerance, airflow capacity, piston-to-valve clearances, oil system capacity at low speeds, idle speed control techniques, and Noise, Vibration and Harshness (NVH) concerns. The AVL engine maps assumed a best case for all of these aspects of engine design, and in several cases their "best-in-class" results were a smoothed composite of results from multiple engines no individual engines represented the engine maps used for setting the standards. A study like this does not provide a quantitative target value that is suitable for setting fuel consumption regulations. The maps used by AVL to represent DCP, CCP, DVVL, and CVVL all had significant fuel consumption improvements at light loads where, in the real world, the improvements would be limited by combustion system dilution tolerance versus airflow capacity tradeoffs and by piston-to-valve clearance constraints.
- AVL has indicated that all of the vehicle/powertrain configurations chosen for the standard were chosen to maintain equal performance. However, seven of the ten configurations used for setting the near-term standard have worse 50-70 performance than their baseline cases; four of those cases (large truck 04, large truck 05, small truck 04, and minivan 04) are significantly worse and would be considered unacceptable when compared to the baselines.
- AVL did not consider any gradeability or drive quality metrics when choosing engine sizes. In nine of the ten configurations used for setting the near-term standard, the gradeability calculated by AVL was worse than the baseline gradeability; five of those cases (large truck 04, large truck 05, small truck 04, minivan 04, and minivan 05) showed significant degradation in gradeability to the point where they would likely be considered unacceptable. AVL made no explicit calculations concerning drive quality (the typical response to accelerator pedal inputs required by the driver) so it is impossible to quantify the impacts. Drive quality issues are frequently prevalent when the calculated gradeability is poor and when aggressive engine downsizing is attempted, so it is expected that there would be drive quality problems with several of the chosen configurations. Since the standards set by ARB were almost entirely based on configurations where drive quality problems are likely to occur, the standards should not be considered feasible unless more analysis validating acceptable drive quality is performed.
- The method used by AVL to input transmission shift patterns and torque converter lock patterns was explicit and well defined. However, the actual shift patterns and lock/unlock patterns were not chosen in a reproducible, consistent manner. There was no explicit test of the shift points to ensure that they were not too early (which would hurt drive quality, cause shift busyness problems, and

- exaggerate fuel economy benefits) or not too late (which would help drive quality at the expense of fuel economy), and there was no consideration for the number of shifts per test cycle and the acceleration disturbance level during shifts (or any other indication of acceptable drive quality).
- The method used by AVL to adjust their baseline simulations to actual test vehicle performance and fuel economy results was to first "tweak" drivetrain efficiencies to dial-in vehicle 0-60 performance, and then "tweak" transmission shift and lock patterns to dial-in vehicle fuel economy. While a method such as this might produce a simulated fuel economy number that equals the test data, it does not result in a reliable baseline simulation. If, for example, the quoted engine power for the baseline engine was higher than actual (resulting in a "fast" 0-60 simulation result), the AVL method would artificially reduce the baseline drivetrain efficiency to match performance. Then, in order to match fuel economy numbers (assuming everything else about the simulation is in order), the AVL method would have to artificially make the shift/lock points too early. The result would be a baseline simulation result with unrealistic drivetrain efficiencies and shift/lock points.
- Given the observed degradations in gradeability and the well-defined but unvalidated transmission shift/lock methods used, it is inappropriate and overly optimistic for ARB to assume in Table 5.2-4 that all vehicles would benefit from additional aggressive shift logic and early torque converter lockup. The ARB report states that "driveability and acceleration concerns must be accounted for carefully in these alterations of shifting schedules." This is true, but it was not done by AVL or ARB. The ARB report states that "... care must be exercised to ensure smooth, responsive driveability and low noise, vibration, and harshness. AVL was conservative in its modeling of these features to ensure good driveability and minimum vibration." As described above, no systematic aggressiveness test was performed. The Table 5.2-4 adjustments are not justified. ARB had access to a full-featured simulation at AVL, but chose not to use simulation results, instead multiplying an unsimulated, unrealistic adjustment by the AVL results.

#### **OHV Engines**

Some of the vehicle configurations used to set the near-term standard were combinations of OHV engine technologies that are unlikely to be applied in the real world, applying DeAct plus DVVL plus CCP. The application of either CVVL or DVVL to OHV engines is not realistic as the mechanisms which might provide such function (especially in combination with DeAct and CCP) do not exist and are not being considered for development. Two major roadblocks preventing the combination of these technologies are (1) the fact that DeAct technology already uses a dedicated valve lifter and lifter housing that would preclude adding a new mechanism in the lifter valley and (2) the strict packaging requirements currently met by OHV engine designs would be violated if a large new CVVL or DVVL mechanism were added to the top of the cylinder head. Because these technology combinations have not been demonstrated in any realistic form, they violate the statement by ARB that "the technologies being explored are currently

available on vehicles in various forms or have been demonstrated by auto companies and/or vehicle component suppliers in at least prototype form."

#### Hybrids

The AVL results for hybrid vehicles differed significantly from the estimates that ARB made. AVL's results for hybrids (which were based on analysis of simulation results) had significantly lower fuel consumption improvement than the ARB results (which were based on scaling of one production hybrid vehicle with performance significantly worse than that of any of the baseline vehicles).

#### Summary

Without actually examining system effects, it is very easy to double-count estimated fuel economy effects and to neglect important constraints. These sorts of problems are evident in many studies that use the "shopping-cart" approach. As a result, these studies tend to overestimate the possible benefits while underestimating the needed technology content and cost. AVL has identified some of the system interactions. But they have applied enormous technology content and cost.

For example, they have applied aggressively downsized, turbocharged, intercooled, premium-fuelled, direct-injected, variable valvetrain engines – a technology combination that has previously not been considered realistic, especially not for widespread application on the majority of the vehicle fleet. Another example is the application of AMT's on virtually the entire fleet. This is an all-new transmission of a type considered inappropriate for North American driving habits, where transmission smoothness is considered vital. (Subsequent assertions by ARB that conventional six-speed automatic transmissions could achieve results comparable to their calculations for AMTs are unsubstantiated and inaccurate.) Technologies such as camless valvetrains and HCCI combustion are emerging technologies that are at an early stage of development. It is premature to use them as the justification for setting regulatory standards.

In summary, ARB's analysis substantially overestimates benefits and underestimates costs by applying multiple new technologies that can have unexpected effects in combination, usually resulting in identification of additional constraints. This problem is compounded by the use of technologies that are still early in the development stage, which might not develop to fruition and which cannot be modeled with precision.

#### **Degraded Vehicle Performance**

As we examined the ARB analysis, it became very evident that the vehicle fuel economy computer simulations used to develop the standards did not maintain current or adequate levels of vehicle performance. Instead, they relied on technologies that would severely degrade vehicle performance, contradicting the claim by ARB that vehicle performance was maintained at current levels.

One prominent result of the analysis was that a large fuel consumption reduction was shown for downsized turbocharged engines. In fact, the downsized turbocharged

powertrains served as a standard-setting configuration for all of the vehicle segments except one in the near-term calculations, as shown in Figure 1.

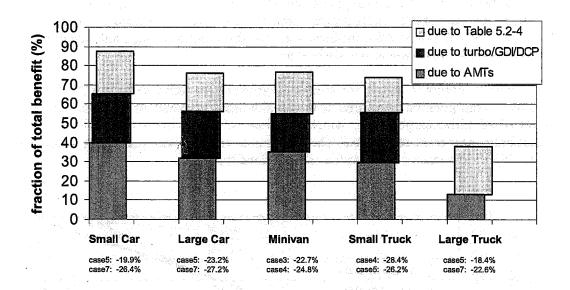


Figure 1: Breakdown of CARB AB1493 fuel consumption improvements: indicates the contribution of AMTs, downsized turbocharged engines, and Table 5.2-4 vehicle assumptions to the total fuel consumption benefits projected by CARB for the near-term standard-setting.

There are serious concerns with the methodology used to arrive at the chosen set of downsized turbocharged powertrains. These concerns are related to the real-world driveability performance of the proposed downsized turbocharged powertrains. Of specific concern is vehicle "launch" performance, which captures the initial acceleration characteristics of the vehicle from a stopped position. Also of concern are the transient response and driveability capabilities of the downsized turbocharged powertrains.

These concerns were not addressed in any way in the AVL analysis. If these concerns were sufficiently addressed, the result would be a reduction in the aggressiveness with which engines were downsized. The resulting fuel consumption benefits from downsizing/turbocharging would be reduced significantly because the vast majority of the claimed benefit comes from engine downsizing, ranging from a 41% to 52% displacement reduction. Since the California standards depend on very high production volumes of these downsized turbocharged powertrains, the feasibility has not been demonstrated.

In order to accurately address the launch and driveability concerns associated with downsizing/turbocharging, an analysis which includes other customer-driven vehicle attributes (launch, driveability, and transient response) would be needed. Nevertheless,

the only performance criterion used to comprehend customer acceptance in the AVL simulation analysis was 0-60 mph acceleration time.

GM requested that AVL answer questions regarding their analysis and perform additional analyses on the vehicle configurations used for ARB standard-setting. The same AVL personnel and the same AVL methods were sought to perform these additional analyses. A portion of those results is summarized here.

The plot in Figure 2 shows the simulated acceleration response of the 2002 baseline minivan configuration compared with the simulated response of minivan case 4 (the downsized turbocharged case, which was one of the configurations used to set the California near-term standard). The simulation analysis was performed using AVL-CRUISE, and it exactly matches the analysis done for ARB.

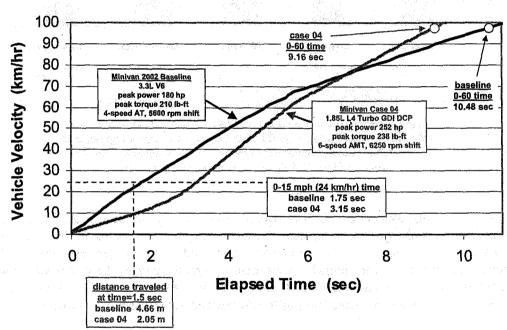


Figure 2: AVL simulated acceleration results for minivan vehicle segment, showing baseline and case 4 (the downsized turbocharged case)

It is evident from Figure 2 that the launch and early acceleration response of the downsized turbocharged powertrain for minivan case 4 is much worse than the baseline powertrain in terms of capability. Even though the 0-60 acceleration of case 4 is faster than that of the baseline, the performance lags when the vehicle is below 47 mph (75 km/hr). In case 4 it takes an engine with 252 horsepower to match the 0-60 time of the baseline 180 horsepower minivan engine! The unrealistically high horsepower value required for a baseline minivan engine is an indication that the balance of low-end torque and peak power for the powertrain is not realistic. Since the baseline case was chosen to be representative of the minivan class of vehicles, it is fair to state that the performance

expectation for minivan customers for launch and early acceleration is not being met by minivan case 4.

Also highlighted in Figure 2 are some typical metrics regarding launch performance: 0-15 mph time and distance traveled at 1.5 seconds. Various manufacturers and powertrain developers use their own metrics, which may be slightly different, but those shown in Figure 2 are representative of launch. Clearly, minimal case 4 suffers from poor launch.

Launch is an important vehicle performance criterion because it is a positive indicator to the driver that the vehicle has sufficient capability to move from zero speed in a predictable manner. Turning on to a 2-lane highway, making a left turn in traffic, accelerating across an intersection, and starting up a hill are all very common examples of vehicle maneuvers where a certain level of "launch feel" is expected by customers. North American customers have become accustomed to a comfortable level of launch capability, enabled by engines with good low-end torque, properly ratioed transmissions, and torque converter-equipped automatic transmissions (this fact was observed in the AB1493 report). Some vehicle manufacturers have experienced significant negative customer reaction and lost sales as a result of inadequate vehicle launch capability. Sufficient launch capability is a requirement that must be met in the competitive marketplace.

Figure 3 shows launch and acceleration characteristics of the other downsized turbocharged powertrains used to set the California standards. These powertrains were applied to all vehicle segments except large trucks, so they make up a substantial volume (and represent huge production volumes) in the vehicle fleet envisioned in the ARB analysis. As can be seen in Figure 3, each vehicle with a downsized turbocharged powertrain travels significantly less distance during launch when compared to the baseline. In practical terms, when the baseline vehicle has made it through the intersection, the downsized turbocharged vehicle has only traveled halfway through the intersection. It is important to note that the baseline vehicles used here are exactly those chosen by AVL and ARB: vehicles representative of what is saleable in the competitive marketplace. Any degradation from these baselines – let alone the huge degradations shown here – is a degradation in performance and contradicts the ARB assertion that vehicle performance was maintained.

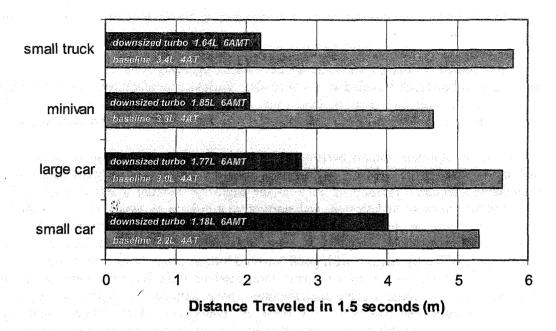


Figure 3: AVL simulated launch results for baseline and downsized turbocharged vehicles; distance traveled in 1.5 seconds is used as basis for comparison.

Another observation resulting from Figure 3 is that the heavier vehicles (trucks, minivans, large cars) suffer significantly more degradation in launch when the downsized turbocharged powertrains are applied. The simulation study performed by AVL, while sufficient for a generic comparison of various technology combinations, is not sufficient for standard-setting for vehicles which must meet customer requirements in order to be competitive. ARB states that the study projected baseline vehicle performance, and that their subsequent modeling "maintained those outcomes." This is simply not true.

#### LaCrosse and Silverado Analysis

The ARB staff subsequently disclosed an analysis in support of the California regulation that applied their maximum feasible fuel economy technology packages to two General Motors vehicles, the Buick LaCrosse passenger car and the Chevrolet Silverado pickup truck. This analysis repeated the mistakes that were made in the ISOR analysis.

In the case of the LaCrosse, a member of the ARB staff states that that GM could meet the large car near-term standard in a Buick LaCrosse by using a modified version of GM's 3.6L engine. The ARB staff member apparently included the benefits of dual cam phasers in his suggested near-term Buick LaCrosse, although the 3.6L engine already has dual cam phasers in production today. This results in the double-counting of the fuel consumption benefit of dual cam phasers, the very concern we have identified above.

It is possible to extract from the detailed simulations done by AVL in support of the ARB ISOR the approximate benefit of adding direct injection, cylinder deactivation, a 6-speed

automatic transmission, electric power steering, and an improved alternator to the large car. That benefit, according to AVL, would be a 10.8% reduction in fuel consumption.

If the 2002 baseline large car (344.6 g/mi CO<sub>2</sub>) were reduced by 10.8% (for the above changes) and also reduced by 15 g/mi CO<sub>2</sub> (for the unrealistic ARB R-152a MAC changes), the resulting CO<sub>2</sub> emissions would be 292 g/mi. This figure is significantly higher than the near-term standard for cars of 233 g/mi. In short, the analysis done for ARB does not support meeting the 2012 standard with this technology package.

GM simulated the same near term technologies with our own procedures to confirm that the California standards are not technically feasible. GM's simulation tool is our Unified Model. This is a dynamic simulation model that takes into account measured data of actual test vehicles and powertrains.

The 2005 Buick LaCrosse has the 3.6L LY7 DOHC V6 with dual cam phasing. This vehicle has an unadjusted combined fuel economy of 25.6 mpg, or 346 g/mi CO<sub>2</sub>. We then added a Gasoline Direct Injection engine, and our 6-speed automatic transmission. We modified this transmission to simulate an automated manual transmission with a wet clutch system to handle this engine's torque capacity. We removed all power steering losses to simulate a rack power steering system and applied our RVC Gen IV advanced alternator control. Combining all these technologies together gives a vehicle fuel consumption and tailpipe CO<sub>2</sub> level that is far above the ARB greenhouse gas standard, even giving the vehicle credit for ARB's unrealistic R-152a MAC factor. In addition, the simulation predicts unacceptable transmission shift quality.

We also simulated the Silverado pickup with the 5.3L V8 and 4-speed automatic transmission. The 4WD version in 2005 has unadjusted combined fuel economy of 19.2 mpg, or 462 g/mi CO<sub>2</sub>. We added displacement on demand, variable valve timing, improved power steering, the advanced alternator, and a six-speed automatic transmission. These yield a total fuel consumption that is far above of the ARB greenhouse gas standard, after accounting for the ARB R-152a MAC credit. None of these simulations adjusts for upcoming safety standards such as for braking, which will require higher rolling resistance tires.

Regarding the mid term standard, the ARB staff member states that: "there are numerous approaches that could be pursued in the leadtime remaining to 2016. General Motors could modify the engine to incorporate electrohydraulic camless valve actuation as the only other change needed to achieve the mid-term standard. Or General Motors could develop a homogeneous charge compression ignition combustion system for this engine coupled with an added integrated starter generator with launch assist." Both of the technologies cited by the ARB staff member are very far from ready for mass production, and may never be ready for mass production. Both technologies are research topics whose hardware concepts are not even well-defined -- hardware concepts have been proposed by many developers, but these have been research-grade types of systems. Both technologies have significant unresolved risk associated with their implementation (for example, in the case of EHVA camless, operation at low temperatures and control of

valve closing velocity are major roadblocks; in the case of HCCI, the ability to extract a meaningful benefit while still controlling transient response capability over a speed-load range is a roadblock). Both technologies have significant noise and vibration characteristics which will require further measures to address. For a member of the ARB staff to assert that production of these technologies will significantly affect fleet fuel consumption in 2016 is unrealistic, and indicates an undue reliance on incomplete research systems.

## Comments on the LEV II Portion of Pennsylvania's Proposed Regulations

The LEV II regulations do not provide any meaningful benefits in ozone precursor emissions relative to the Federal Tier 2 regulations. Both LEV II and Tier 2 vehicles are far cleaner than the average vehicles on Pennsylvania's roads today, and emissions of the on-road fleet will come down dramatically as the fleet turns over as shown by the modeling previously submitted by the Alliance of Automobile Manufacturers. Note that this modeling does not account for the increases in ozone precursor emissions associated with the California greenhouse gas regulations. The following are comments on some specific parts of the proposed LEV II regulations.

#### Fleet NMOG Average

GM believes Pennsylvania should not require compliance with the fleet NMOG average but instead require reporting. Fleet average NMOG is determined by sales mix. The sales mix in Pennsylvania is different than the sales mix in California because of differences in consumer demand. To comply with the fleet NMOG average, manufacturers may need to restrict sales of certain models in Pennsylvania that are not restricted in California. This would be detrimental to air quality because consumers would keep their older, higher emitting vehicles longer since they would be unable to purchase the new vehicles they wanted. By requiring reporting, the Environmental Quality Board could evaluate the differences between the California and Pennsylvania sales mix for each manufacturer and assess the problems that would be caused by requiring fleet NMOG compliance. The Department could also assess the fleet average emission levels at an industry-wide level since that is what matters from an air quality standpoint. If the industry-wide levels are below the fleet average standard, there would not be any need to require compliance. Requiring reporting instead of compliance will also alleviate the transitional issue identified in the Alliance comments.

#### Conclusion

Based on a flawed analysis, California has created *de facto* fuel economy standards that far exceed technically feasible and economically practicable levels. In its recently released final rule regarding truck CAFE standards for 2008-2011, the National Highway Traffic Safety Administration of the U.S. Department of Transportation stated that the California greenhouse gas standards are both "expressly preempted" (p. 288) and "impliedly preempted" (p. 326) under federal law (NHTSA Docket No. 2006-24306). The California greenhouse gas rule as proposed for adoption by the Board will severely

limit the product line that General Motors will be able to provide to its independent dealers in Pennsylvania, both in the initial years of the rule and in later years. Pennsylvania consumers will be met with reduced product choice and higher new vehicle prices that far surpass the value of fuel saved. In return, there will be no measurable environmental benefits, and the impacts on human health and the environment can even be expected to be negative. Likewise, adoption of the LEV II program will not provide any measurable air quality benefits compared to the federal Tier 2 program. In view of these considerations, Pennsylvania should not adopt the California motor vehicle emission standards, especially the greenhouse gas regulation.

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From: Michelle Dimeglio [mdimeglio@fxbrowne.com]

**Sent:** Tuesday, April 11, 2006 12:32 PM

To: EP, RegComments

Subject: Proposed Rulemaking - Pennsylvania Clean Vehicles Program

Dear Environmental Quality Board,

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvania ranks among the worst states in the country when it comes to air pollution. Our air pollution is plaguing our state and leading to a host of public health problems, including asthma attacks in children and aggravation of respiratory ailments in adults.

One of the worst sources of this pollution is cars and trucks. Technology exists today that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem and this technology should be used to benefit taxpayers.

By moving as quickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smog-forming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered. And an added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians money when they fill up at the gas pump.

Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program.

We should not settle for the weaker federal requirements. We deserve better.

Sincerely,

Olga Dvornikova

723 Iris Lane Media PA, 19063 CHARLES T. MCILHINNEY, JR., MEMBER

House Box 202020 Harrisburg, PA 17120-2020 Phone: (717) 772-1413 Fax: (717) 783-8332

199 North Broad Street, Suite 200 Doylestown, PA 18901 Phone: (215) 489-5000 Fax: (215) 489-5200

E-mail: cmcilhin@pahousegop.com



House of Representatives

COMMONWEALTH OF PENNSYLVANIA

HARRISBURG

April 4, 2006

COMMITTEES

Environmental Resources

And Energy

Intergovernmental Affairs

Chairman

Subcommittee on Information Technology

Liquor Control

Chairman,

Sub-Committee On Land Use Management

Urban Affairs

Caucuses

Delaware Canal State Park Delaware River Basin

Land Use Reform

Environmental Quality Board P. O. Box 8477 Harrisburg, PA 17105-8477

Dear Environmental Quality Board,

On behalf of my constituents, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvania ranks among the worst states in the country when it comes to air pollution. This air pollution is plaguing the Commonwealth and leading to a host of public health problems including asthma attacks in children and aggravation of respiratory ailments in adults.

One of the worst sources of this pollution is cars and trucks. Technology exists today that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem. In turn, this will help the Commonwealth to come into compliance with the health-based standards of the federal Clean Air Act.

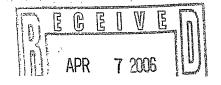
By moving as quickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smog-forming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered. And an added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians money when they fill up at the gas pump.

Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program. Pennsylvania should not settle for the weaker federal requirements—my constituents and the state's residents deserve better.

Sincerely,

Charles T. McIlhinney, Jr. State Representative

143<sup>rd</sup> Legislative District



#### BABETTE JOSEPHS, MEMBER

REPLY TO:

HOUSE BOX 202020 HARRISBURG, PENNSYLVANIA 17120-2020 PHONE: (717) 787-8529 FAX: (717) 787-5066 E-MAIL: biosephs@pahouse.net

WEB SITE: babette.org

1628 WALNUT STREET, SUITE 1901 PHILADELPHIA, PA 19102 PHONE: 215.893,1515 FAX: 215.560.5816

SATELLITE OFFICE:
GRAYS FERRY NEIGHBORHOOD SERVICE CENTER 1634 WHARTON ST. PHILADELPHIA, PA 19146 PHONE: 215.683.1880 HOURS: WEDS.: 1 P.M. TO 5 P.M.



# House of Representatives

COMMONWEALTH OF PENNSYLVANIA HARRISBURG

#### COMMITTEES

STATE GOVERNMENT, DEMOCRATIC CHAIR AGRICULTURE AND RURAL AFFAIRS CONVENER, THE WOMEN OF THE PAGENERAL DEMOCRATIC POLICY COMMITTEE

PHILADELPHIA DELEGATION

CAUCUSES

AUTISM CAUCUS BIKE CAUCUS CAMPAIGN FINANCE REFORM CAUCUS COMMON SENSE FIREARMS SAFETY CAUCUS COMMUNITY COLLEGE CAUCUS FIREFIGHTER AND EMERGENCY SERVICES CAUCUS ITALIAN CAUCUS SUBSTANCE ABUSE CAUCUS

Ms. Marjorie Hughes, Regulatory Coordinator **Environmental Quality Board** Rachel Carson State Office Building 15th Floor P. O. Box 8477 Harrisburg, PA 17105-8477

11 April 2006

Dear Ms. Hughes,

On behalf of my constituents, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvania ranks among the worst states in the country when it comes to air pollution. This air pollution is plaquing the Commonwealth and leading to a host of public health problems including asthma attacks in children and aggravation of respiratory ailments in adults.

One of the worst sources of this pollution is cars and trucks. Technology exists today that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem. In turn, this will help the Commonwealth to come into compliance with the health-based standards of the federal Clean Air Act.

By moving as guickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smog-forming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered. And an added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians money when they fill up at the gas pump.

Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program.

Pennsylvania should not settle for the weaker federal requirements—the state's residents deserve better.

Yours.

Babette Josephs

cc: fc

Original: 2523

rec'd 4/18/06

# Shepherd, Natalie

From: Leach, Daylin [DLeach@pahouse.net]

**Sent:** Monday, April 10, 2006 2:51 PM

To: regcomments@state.pa.us.

Cc: Burdick, Jennifer

Subject: Clean Vehicles Program

Dear Environmental Quality Board,

On behalf of my constituents, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvania ranks among the worst states in the country when it comes to air pollution. This air pollution is plaguing the Commonwealth and leading to a host of public health problems including asthma attacks in children and aggravation of respiratory ailments in adults.

One of the worst sources of this pollution is cars and trucks. Technology exists today that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem. In turn, this will help the Commonwealth to come into compliance with the health-based standards of the federal Clean Air Act.

By moving as quickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smog-forming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered. And an added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians money when they fill up at the gas pump.

Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program.

Pennsylvania should not settle for the weaker federal requirements—the state's residents deserve better.

Sincerely,

Representative Daylin Leach

149<sup>th</sup> District

From: BRYANANDNANCY@comcast.net

**Sent:** Monday, March 27, 2006 7:48 AM

To: EP, RegComments

Cc: PHIL & MARTHA HUTCHINSON; PAUL HUTCHINSON; Evelyn Hutchinson; ALAN HUTCHINSON

Subject: Public comment on PA Clean Vehicle Program

Environmental Quality Board Email: www.regcomments@state.pa.us

PO Box 8477

Harrisburg, PA 17105-8477

To Whom It May Concern:

My purpose in writing today is my support for implementing the PA Clean Vehicle Program.

I would like to thank the Environmental Quality Board, the Department of Environmental Protection, Secretary McGinty and the various members of the State Legislature, who are in favor of allowing the Public to make comments regarding this program. Unlike some public officials and policy members at the state and federal levels, who prefer to enact environmental laws and regulations without public comment, I strongly believe in the right for the citizens of Pennsylvanian's and America to comment on actions that will impact their lives. Public comments can provide additional time and information, on both sides of these issues, to be argued for the betterment of an educated public.

I am an advocate for the environment and renewable energy, and I am a registered republican. I purchase 100% renewable electricity and have driven a Honda Hybrid since 2003. I worked for the largest business trade association in the Greater Philadelphia region, for 17 years, as an accountant. The burdens that businesses bear from increased regulations are not new to me. I have personally heard stories from business owners who have made employment cutbacks due to higher costs of implementing these regulations. I have spent considerable time reviewing the issues behind the PA Clean Vehicle Program, from both pro and con perspectives. After consideration of both arguments, I have come to the conclusion that it would be a disadvantage to all Pennsylvanian's, and businesses in general, to not implement the PA Clean Vehicle Program. I believe this for the following reasons:

Consumer Value. The PA Department of Environmental Protection has indicated that consumer choice and consumer value would be increased through this program. Kathleen A. McCinty, Secretary of the Department testified in Harrisburg on the PA Clean Vehicles Program before the House Environmental Resources & Energy Committee on February 8. During that testimony she presented information which showed that the MSRP of cars in several other States that have passed a higher emission standard than the federal Tier II program, were the same as those cars sold in the State of Pennsylvania. She also indicated that if PA House Bill 2141 and Senate bill 1025 are passed, fewer emission reductions would result, forcing the State to comply with the Clean Air Act requirements by enforcing the reduction of emissions from stationary sources such as factories, power plants and manufacturers. My experience with business trade leads me to believe that since there is no known additional cost to consumers from this program, it would be better to implement the PA Clean Vehicle Program rather than take the time and costs associated with the alternative.

Ms. McGinty also indicated in her testimony that, as a result of implementing the Clean Vehicle program, more vehicles will increase their MPG's resulting in a greater benefit to consumers in the long run. My personal experience confirms with this. Originally, when I purchased my 2003 Honda Civic Hybrid, it did cost more than a regular Honda Civic. I calculated that I would save several thousand dollars through reduced gas consumption over my current car, a 1991 Nissan Maxima. The average gas price I had calculated in 2003, going forward into the future, was \$1.50/gallon. Gas prices were running around \$1.10 in 2003. Needless to say, my gas savings over the past 2-½ years have exceeded \$2,500. Adding to this benefit is the reduction of emissions that would have been produced by a regular gasoline engine Honda Civic. Therefore, my personal experience as a consumer, regardless of the additional cost of the Hybrid, has resulted in recouped costs of 300-400% by the time my car turns 8-10 years of useful life.

Health Value. It is estimated that by 2025, the PA Clean Vehicle Program will have reduced over 2,850 tons per yr. of volatile organic compounds (VOC); 3,540 tons of nitrogen oxides (Nox) and 5-11% reduction of six toxic pollutants, including a 7-15% reduction of benzene, a known carcinogen. The state of Pennsylvania continues to have 37 counties designated by EPA as having "non-attainment" of the federal 8-hour ozone health based standard, including Chester County, (the county in which I live). It is reported that "smog" pollution triggers an estimated 370,000 asthma attacks annually. Considering that two-thirds of all Pennsylvanian's live within the 37 counties listed above, it makes sense from a health perspective to implement the PA Clean Vehicle Program as soon as possible.

Environmental Value. Despite the position that the White House has taken on Global Warming, it appears as though the U.S. is alone on this position. Many other industrialized countries have taken a stand to reduce their global warming greenhouse gases. The PA Clean Vehicle program, along with the other States that have enacted similar programs, will reduce global warming emissions in 2020 by 64 million tons per year; an amount greater than the national emissions of more than 140 nations. These types of programs will help annually reduce the equivalent amount of carbon dioxide pollution that is produced by 63 power plants generating enough power for nearly a quarter of U.S. homes.

I trust that many other Pennsylvanian's have delivered comments to the Environmental Quality Board which are consistent with my comments.

Thank you for allowing me to opportunity to make this public comment for such an important issue.

Sincerely,

Bryan Hutchinson

1429 Cooper Circle

West Chester, PA 19380

Cc: House Legislature Rep

Senate Legislature Rep

Secretary Kathleen A. McGinty, Dept. of Environmental Protection

Honda Manufacturing Corporation, N.A.

Automobile Association of America

Sierra Club, Southeastern PA Chapter

From:

kharrison@loyola.edu

Sent:

Monday, March 27, 2006 11:29 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

In addition, despite legislative resistance, I just want to stress how important your efforts are to bring stricter emissions standards to Philadelphia. It's a wonderful city, and any effort to promise future generations that it will be livable in twenty years is paramount.

Sincerely, Kat Harrison Philadelphia Worker Kathryn Harrison 6 Princess Ave Marlton, NJ 08053

From: Sent:

Ryan Dodson [rcdodson@ogmfs.com] Monday, March 27, 2006 1:02 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Ryan Dodson 175 Hess Blvd LANCASTER, PA 17601-4045

March 27, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Please support the full implementation of the PA Clean Vehicles Program. Even though it requires an annual investment of \$25, which for some may be budget breaking, I really can not believe that there are not ways to make it affordable for all. For example, we could have a grant program for low income individuals who can not afford repairs to outdated automobiles. This plan must be enforced. Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the Clean Air Act. Becuase of this, there are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties. Action is required to combat global warming – and reducing greenhouse gas emissions is a critical part of that. Please support this bill.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Ryan Dodson (717)475-0195

From:

Melissa Merdinger [melissamerdinger@gmail.com]

Sent:

Monday, March 27, 2006 2:10 PM

To:

EP, RegComments

Subject:

Pennsylvania Clean Vehicles Program

#### Dear EQB:

I am writing to voice my full support for the Pennsylvania Clean Vehicles Program, and to urge that it be implemented as quickly as possible.

Cars and trucks are a significant source of air pollution, contributing approximately one third of the region's smog-forming emissions. The Pennsylvania Clean Vehicles Program would reduce pollution from vehicles more quickly and thoroughly than weaker federal standards. These pollution reductions are crucial for improving air quality and protecting public health in the state.

Thirty-seven counties across Pennsylvania still do not meet the federal government's basic air quality standards. The Scranton metro area has recently been ranked the nation's worst for people living with asthma, and other major cities in the state have also been rated very poorly by asthma experts. To put the matter simply: Pennsylvanians have already waited too long for clean, healthful air.

The state should have implemented the Clean Vehicles Program already. I urge the Department of Environmental Protection to move forward getting the program up-and-running as soon as it can.

Sincerely,

Melissa Merdinger 806 Round Top Circle Allentown, PA 18104

From:

Dave Lange [davidlange@hotmail.com]

Sent:

Monday, March 27, 2006 2:43 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Dave Lange 4820 windsor ave phila, PA 19143-3416

March 27, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I ride my bicycle to work every day in Philadelphia, and I want to breathe cleaner air! The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Dave Lange

From: PeteDadStevens@aol.com

Sent: Monday, March 27, 2006 6:54 PM

To: EP, RegComments

Cc: nwillcox@PennEnvironment.org

Subject: Clean Venicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks, standards that go beyond weaker federal requirements.

In November 2001 I purchased a Toyota Prius, which over 4 1/2 years has averaged 40 mpg. Its small gasoline engine is less polluting that the standard American-made engines, and subsequent Priuses have even higher average gas mileage. I am also using wind power as part of my energy purchase.

Thank you for your help in implementing the Pa.Clean Vehicles Program.

Sincerely,

John P. Stevens III

If there is literature describing the Clean Vehicles Program, please mail it to me at 204 W. Marshall Ave., Langhorne, PA 19047 or email it to me at the email address in this letter.

Thank you.

From: Sent:

Marian Freed [mtf115@psu.edu] Sunday, March 26, 2006 6:03 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Marian Freed 133 East Marylyn Avenue State College, PA 16801-6239

March 26, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

You are aware that PA is required to cut pollution from cars and trucks. To achieve this, the proposed amendments to the PA Clean Vehicles Program are necessary.

However, the federal standards will not alone improve sufficiently PA's ability to comply with the Clean Air Act.

There are no justifiable reasons for not requiring cleaner vehicles! Most importantly, more than 1,000,000 Pennsylvanians who are now suffering from breathing problems made worse by air pollution, would lead better lives!

If you have ever seen a loved one dying from lung cancer or from emphysemia, as I have, you would understand the benefits of cleaner vehicles!

Many of us are working hard to promote PA. Already ten other states have adopted California low emission vehicle standards. PA needs to accept, in the long term, the same standards.

Let me add that we need to think beyond our dear state. Thinking globally is easy to say, but it is challenging to put into effect. Those who come after us will benefit from, and appreciate, our initiatives to combat global warming by ruducing greenhous gas emissions.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Marian Freed

From: Sent:

elinor@musicvideodistributors.com Saturday, March 25, 2006 8:41 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely, Elinor & Tom

We are driving a hybrid and it is great on gas mileage. There should be more information in the media on what is happening to the planet and how humans can conserve.

Elinor Seaman 3317 Arcola Road

Collegeville, PA 194263465

From:

Briget7654@yahoo.com

Sent:

Saturday, March 25, 2006 10:30 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I drive a car that gets over 50 miles to the gallon, and would like to drive one that gets over 100 mpr. The students of a Phildelphia VoTec made a car that gets more than 50 mpg and runs on corn oil. Why doesn't out state support this effort and increase the research to produce an even more efficient car? We need the developed technology, the implementation of the technology and the jobs created by this product. How about it, let's support a better world!

Sincerely, Bridget Salantri Bridget Salantri 101 Pebble Woods Drive Doylestown, PA 189012907

From:

PATRICIA.STAIRIKER@VILLANOVA.EDU

Sent:

Saturday, March 25, 2006 4:51 PM EP, RegComments

To:

Subject:

PA Clean Vehicles Program

#### Dear EOB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Additionally, an effort to make the purchase of not only cars but other forms of mass transportation that use alternative fuels an AFFORDABLE option would be greatly appreciated not only by current populations but all those who will follow us.

Sincerely, Tricia Stairiker

Patricia sTAIRIKER 191 Iron Hill Road Doylestown, PA 189012033

From:

averyp@mcihispeed.net

Sent:

Saturday, March 25, 2006 9:09 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

As a native Iowan, I am not beyond returning to my home state to breath more easily (I have COPD). My husband, a native Pittsburgher, and I have raised our three daughters in Pittsburgh. They have thrived in the city given all that is available to them and the opportunites that exist for excellence. If it comes to having to choose, know that I will choose breath over choking. Revitilization...

attracting people to the area and keeping them...air and water pollution are major stumbling blocks . I often hear how the air quality is so much better now than it had been back in the steel days, but that is not good enough.

Please represent the good people of Pennsylvania, look into your heart and do what you know to be true and good.

Sincerely,

Avery E. Pollack

Avery Pollack 1301 Richmond St Pittsburgh, PA 15218

From:

cklayland@earthlink.net

Sent:

Friday, March 24, 2006 8:15 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EOB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Although I subscribe to AAA, it is solely for emergency road service. Had I realized their political lobbying activities, I would take my chances with flat tires, and will not renew my membership.

I back my convictions with life choices of my own - using a bicycle for transportation at least 75% of the time and owning a car with a mileage rate I'm not ashamed of - 37 mpg. I look to my state government to set an example for the federal government - which clearly ignores the wishes of the people in favor of lobbyists and to the demise of the future of our planet.

Sincerely,

Cathy Layland

Cathy Layland 1015 South 10th Philadelphia, PA 19147

From: Sharon Roth [sroth@pachamber.org]

Sent: Wednesday, April 12, 2006 10:18 AM

To: EP, RegComments
Cc: 'Jewett, John H.'

Subject: Pennsylvania Clean Vehicles Program Comments

Attached, please find the Pennsylvania Chamber of Business and Industry's comments on DEP's proposed Pennsylvania Clean Vehicles Program (Regulation #7-398). Please feel free to contact me with any questions.

#### Sharon Roth

Director, Government Affairs and Customer Advocate

PA Chamber of Business and Industry

Phone: 717-720-5455 Fax: 717-255-3298

Stay Current with The Chamber's Blog

April 12, 2006

Environmental Quality Board P.O. Box 8477 Harrisburg, PA 17105-8477

RE: Pennsylvania Clean Vehicles Program

Dear Members of the EQB:

The Pennsylvania Chamber of Business and Industry is providing comments on the proposed regulation "Pennsylvania Clean Vehicles Program." The PA Chamber is the largest broad-based business association in the state. Our thousands of statewide members employ more than 50 percent of the private workforce.

The PA Chamber recommends that this proposed rulemaking not proceed at this time. Both the House and Senate have introduced legislation which would prohibit the adoption of a California Low Emission Vehicle Program (CA LEV) until a stakeholder process can be established to analyze our state's options.

A number of interests have weighed in on this issue and predicted dire consequences for Pennsylvania, including more controls on stationary sources, if the CA LEV program is not implemented in the Commonwealth. As Pennsylvania's largest broad-based business advocacy organization, representing businesses concerned about both mobile and stationary sources, we thought a clarification of the issues, including a brief background on the CA LEV issue in Pennsylvania would be appropriate.

First, it is important to note that the CA LEV program is **not** the vehicle inspection program. These are two separate and distinct programs to control pollutants that lead to the formation of smog.

In 1990, Congress enacted the Clean Air Act Amendments, which strengthened existing programs to improve air quality. Part of that legislation gives states the ability to adopt California vehicle standards in lieu of federal standards, but expressly forbids creation of a vehicle program that is some compromise of the two (known as the third car rule.) It also means that only two entities can set vehicle standards: the federal government and the state of California through its Air Resources Board (CARB.)

In 1992, the Pennsylvania General Assembly enacted legislation to implement their requirements under the federal Clean Air Act legislation. Among other things, the PA General Assembly took two important actions in that 1992 legislation. First, they banned the prescription of California severely reformulated gasoline. Second, they authorized the creation of a commission to study whether it made sense for the Commonwealth to

adopt CA LEV. That commission, composed of legislative, business, consumer, and environmental interests met and rejected adoption of CA LEV for Pennsylvania.

During the latter part of the 1990's, four different "ozone stakeholder" groups (Southeastern PA, Lehigh Valley/Reading, Southcentral, and Southwestern) met to recommend control strategies to assist PA in meeting their attainment requirements under the Clean Air Act. These groups were again composed of diverse interests including the PA Department of Environmental Protection and the U.S. Environmental Protection Agency, as well as business and industry, consumer, and environmental groups. Of the three groups that discussed vehicle options (the Pittsburgh area group did not address the vehicle option) all clearly opted for federal auto standards instead of CA LEV. The Southeast group met in 1996 and endorsed the National Low Emission (NLEV) (minus the Zero Emission Vehicle (ZEV) component, that is an electric car.) The Lehigh Valley/Reading and Southcentral groups met in 1999 and endorsed the Tier 2 auto. This Tier 2 program is the successor to NLEV.

From the Southeastern group: "The stakeholders recommend the Commonwealth implement the National Low Emission Vehicle (NLEV) because of its national focus and cost-effectiveness. In the absence of NLEV, the stakeholders recommend the Commonwealth implement the Ozone Transport Commission Low Emission Vehicle (OTC LEV.)" (The OTC-LEV is the version of CA LEV adopted by the states of the Ozone Transport Region which includes Virginia through Maine.)

From both the Lehigh Valley/Reading and Southcentral groups: "We support the level of emission reduction that would be achieved in the Pennsylvania regional area by the implementation of the EPA's proposed national Tier 2 rulemaking. .....In the event that either the national Tier 2 program is diluted in contrast to its current proposed emission requirements or the federal government fails to implement the national program, we recommend that DEP collaboratively engage with Pennsylvania regional (multistate) commissions/compacts/stakeholder processes and with upwind states to achieve emissions reductions substantially equivalent to those expected under the Tier 2 proposed rule."

It is clear from the recommendations of these groups that the CA LEV program (minus the Zero Emission Vehicle i.e. electric car component) was intended solely as backup to NLEV/Tier 2 in the event that automakers did not comply with a cleaner, national standard for tailpipe emissions or if the national standards were somehow derailed in another way.

DEP documents support this view as well. A review of the minutes from the September 15, 1998 EQB meeting, when the rules were proposed for the "New Motor Vehicle Emissions Control Program," includes an explanation from DEP that the rulemaking opts Pennsylvania "into the NLEV program" and provides a "back up state Clean Vehicle Program." In response to questions from board members, DEP representatives responded that the language "is part of verbatim language that EPA is asking us to adopt. This is

trying to make continuity about clean vehicles from the NLEV vehicle to what is called the Tier-2 vehicle."

Further, the Philadelphia Department of Public Health, Air Management Services in its August 2004 plan submittal to EPA detailing how they will maintain air quality standards for carbon monoxide stated, "The NLEV program became effective in 1999. The Tier 2/Low Sulfur Fuel Program takes effect in 2004 and provides benefit for subsequent years."

DEP and others have claimed that implementation of the CA LEV program is necessary for Pennsylvania to meet its obligations under the Clean Air Act. US EPA has indicated that all areas, other than southeast PA, will be in attainment for ozone by the required date of 2010. However, since DEP has called for implementation of CA LEV in 2008 and according to testimony given by the PA Department of Transportation at a recent Senate committee hearing that fleet turnover is about 7% per year, it's clear that CA LEV can do very little to bring southeast PA into attainment. Further, DEP Secretary McGinty stated in the same Senate hearing that "... we won't make our attainment requirements with the Air Resources Board standard. We will need measures in addition to the tailpipe standards in order to meet those requirements."

If we need "measures in addition to the tailpipe standards" to fulfill our federal obligations, we need to have a clear idea what those measures are.

There continues to be debate about what the cost of the CA LEV program will be and what benefits we can expect to derive from the program. It is interesting to note that US EPA, the agency that is the final arbiter over whether Pennsylvania is in compliance with its federal air quality requirements, has cautioned states from taking too much credit for the CA LEV program. In fact, according to a March 2004 EPA document, Pennsylvania could receive a benefit of less than 1% in VOC (volatile organic compounds) reduction and less than 2% for air toxics. These minimal benefits would be in exchange for what could be a much more expensive vehicle. The California Air Resources Board has estimated the additional cost at over \$1,000 per vehicle while the auto industry believes the cost will average about \$3,000 more per vehicle.

Clouding the debate on CA LEV are the factually incorrect and misleading statements made by a number of environmental groups. These groups, some of whom served on the previously mentioned ozone stakeholder groups, have said that the Tier 2 auto will lead to "dirty air." In fact, the standards for this car, which became effective with model year 2004, were hailed by then President Bill Clinton in late 1999 as "the boldest steps in a generation, to clean the air we breathe by improving the cars we drive." These groups have also stated that if we don't adopt CA LEV, our air quality will deteriorate. This statement is demonstrably wrong. According to both EPA and DEP, Pennsylvania's air quality has improved significantly and will continue to do so. In fact, the federal Tier 2 automobile will reduce emissions 72% between now and 2020 when compared with the previous federal standard.

The Chamber remains unconvinced that Pennsylvania's best option for meeting our attainment standards lies in ceding control over our vehicle standards to another state as CA LEV would require, particularly when that program appears to deliver very little benefit while presenting consumers with the chance of significantly higher costs for new vehicles. We therefore recommend that the EQB not proceed with this rulemaking.

Sincerely,

Gene Barr Vice President Political and Regulatory Affairs

From:

Bertha Dougherty [Adougher@osfphila.org]

Sent:

Wednesday, April 12, 2006 9:42 AM

To:

EP. ReaComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Bertha Dougherty 2130 Franklin Avenue Morton, PA 19070-1217

April 12, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Bertha E. Dougherty

From:

Cynthia Paetow [cpaetow@hotmail.com]

Sent:

Monday, April 10, 2006 1:04 PM

To:

EP, RegComments

Subject:

support proposed amendments to PA Clean Vehicles Program

Cynthia Paetow 1239 W. Mill Street Quakertown, PA 18951-1152

April 10, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the Clean Air Act.

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution.

Ten other states have already adopted California low emission vehicle standards, the same standards the Pennsylvania program has.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Cynthia Paetow (215) 536-7311

From: CAROLE DEAL [caroledeal@msn.com]

Sent: Wednesday, April 12, 2006 2:11 PM

To: EP, RegComments

Subject: Fw: Concerning the Pennsylvania Clean Vehicles Proposed Rulemaking and California LEV II

Standards

---- Original Message ---From: CAROLE DEAL
Cc: ferlo@pasen.gov

Sent: Wednesday, April 12, 2006 2:08 PM

Subject: Fw: Concerning the Pennsylvania Clean Vehicles Proposed Rulemaking and California LEV II

Standards

---- Original Message ----From: CAROLE DEAL
To: jorie@pasen.gov

Sent: Wednesday, April 12, 2006 2:07 PM

Subject: Cc: Concerning the Pennsylvania Clean Vehicles Proposed Rulemaking and California LEV II

Standards

Dear Environmental Quality Board (EQB), State Senators and State Representatives:

Cc: Concerning the Pennsylvania Clean Vehicles Proposed Rulemaking and <u>California</u> LEV II Standards

I am very concerned about the attempt to regulated the vehicle emissions in Pennsylvania. I know the Department is committed to encouraging public participation in the development of any new regulations. This Regulation is a catastrophe waiting to happen. You must look past the pretty picture of how this will look good, and sincerely realize the long range harm it will cause.

Pennsylvania is the <u>5th highest taxed state</u> in the United States. We currently have our young adults leaving the state in record numbers. I think this additional \$3000, fee on new automobiles, along with the additional cost of monthly inspections, plus another quarter a gallon on gasoline will not only be more cause for them to leave, but it will financially break the back of seniors and our poor.

**It is unbelievable that Pennsylvania would even consider the criteria that has ruined California!** Because of the Sierra Nevada Club's pressure, Californians are suffering with all of the cost controls that the Sierra Nevada Club has insisted on in California. I worked for years at the San Diego Gas and Electric and as a Customer Service Operator, I took daily huge numbers of complaints from these customers of how they can't eat because the utilities are to high and etc.. It eventually caused the San Diego Gas and Electric to sell to the citizens of San Diego their company, which now is in an even greater catastrophe, since under California Regulations, San Diego can only use imported oils to produce electricity and at catastrophe fee of almost \$70. a barrel and increasing daily.

**What is a fact,** from their record in California is that the Sierra Nevada Club will not be satisfied with this regulation, but they will continue until they have control over Pennsylvania like they do in California.

Please do not approve this Legislation!!! We are financially crippled enough by the oil industry and we can not afford to pay any additional fees.

Thank you, Carole Deal

From: Sent:

Dennis Miller [dnm36b@aol.com] Wednesday, April 12, 2006 2:24 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Dennis Miller 897 Hale Street Pottstown, PA 19464-4327

April 12, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Ten other states have already adopted California low emission vehicle standards, the same standards the Pennsylvania program has.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Dennis Miller

From: Sent: Susan Parker [shpgardens@verizon.net] Wednesday, March 22, 2006 11:32 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Susan Parker 118 Rosewood Drive Glenshaw, PA 15116-2612

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

As an asthmatic, I am very concerned about the air we breathe. Our children need to have clean air. In addition to being a health issue, this is a quality of life issue for all of us know and our children in the future.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Susan Parker 4124927021

From:

d.drecksage@verizon.net

Sent:

Wednesday, March 22, 2006 10:49 PM

To: Subject: EP, RegComments
PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Given the recent news re: dramatic evidence of global warming, as well as the increasing incidence of asthma among the state population, we should move to reduce emissions of smog-forming pollution from cars and trucks, toxic benzene pollution and global warming emissions as aggressively as possible.

Sincerely,

Dan Drecksage 424 south 26th street Philadelphiua, PA 191461007 From: Sent:

Victoria Ross [victoryross@epix.net] Wednesday, March 22, 2006 9:16 PM

To:

EP, RegComments

Subject:

Amend rules governing the Pennsylvania Clean Vehicles Program

Victoria Ross RR 1, Box 1110 Hop Bottom, PA 18824-9717

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Pennsylvania is a Commonwealth. Please protect our common wealth, which includes our air quality. Let's use our ingenuity to come up with better less polluting engine systems. Let us require industry to do it for us. Let us have cleaner car emissions and cleaner air.

Please protect our common wealth through supporting the amendments.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Victoria Ross

From:

Suzanne Adams [myantsuz@comcast.net]

Sent:

Wednesday, March 22, 2006 9:04 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Suzanne Adams 124 East Union Street West Chester, PA 19382-3446

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Please stay the course in implementing the clean vehicles program. Mobile sources of emissions are responsible for over half of the air pollution we have today. Clean vehicles will also reduce energy consumption and green house gases, both critical to the future of our state and nation.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Suzanne Adams 61-431-0367

From:

oavp2@yahoo.com

Sent:

Friday, March 03, 2006 12:24 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

This is very important to me!! I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Teri Dignazio 560 Bethel Road Oxford, PA 193631138 From:

rschaef@edinboro.edu

Sent:

Friday, March 03, 2006 12:19 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvanians need better protections again our health and global warming and this is a time to become a leader. Are you the leader for betterment?

Sincerely,

Robin Schaef 12158 Highway 198 Guys Mills, PA 163272548

From: Sent: dcranger@mac.com

To:

Friday, March 03, 2006 11:44 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

REOEWED

2006 MAR 10 AM 9: 29

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This type of progressive action to improve our environment will be one of the major

factors that will attract young people to stay in Pennsylvania.

Sincerely,

Dennis E. Coffman Dennis Coffman 153 Hiddenwood Drive Harrisburg, PA 171103928

From:

phz517@aol.com

Sent:

Friday, March 03, 2006 10:59 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

The Federal Government's pandering to the auto and oil industries is no excuse for Pennsylvania to do the same. Please help encourage responsible consumption of our limited natural resources.

Sincerely,

Pamela Zimmerman 517 South 27th Street Philadelphia, PA 191461012

From:

margaritarose@kings.edu

Sent:

Friday, March 03, 2006 12:58 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

### Dear EQB:

As the owner of a hybrid-engine Toyota Prius, I've put my money where my priorities are when it comes to improving the quality of air in Pennsylvania.

I urge you to use your position to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Margarita Rose 183 E. Dorrance St. Kingston, PA 18704

From:

ckatarsky@earthlink.net

Sent:

Friday, March 03, 2006 1:01 PM

To:

EP, RegComments

Subject:

Clean Vehicle Program25 PA.CODE CHS.121 AND 126

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board, My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely,

Carol Katarsky 2137 Spruce St Apt. 3 Philadelphia, PA 19103-4851

From:

egrosskurth@hotmail.com

Sent:

Wednesday, March 22, 2006 12:52 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

## Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. I bought a Prius last year and am happily contributing to less pollution.

Sincerely, Ellen Grosskurth Ellen Grosskurth 357 S. 8th St. North Wales, PA 194543009

From: Sent:

Dieter Rollfinke [rollfink@dickinson.edu] Wednesday, March 22, 2006 1:17 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Dieter Rollfinke 12 Thornhill Court Carlisle, PA 17013-7626

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I live in Cumberland County where the pollution from all the trucking warehouses and truck traffic is a threat to the health of the public. It is high time that additional steps are taken to clean the air in this state.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Dieter Rollfinke

From:

boujouk@nauticom.net

Sent:

Friday, March 03, 2006 5:22 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks. I firmly believe that it is a worthwhile goal to cut emissions by 10%. Surely, we should that for future generations if we have the ability. Please continue to support and implement the PA Clean Vehicle Act.

Sincerely, Karen Boujoukos Wexford, PA

Karen Boujoukos 2616 Glenchester Rd

Wexford, PA 15090

From: Sent: Fo:

gallaghr@pobox.upenn.edu Friday, March 03, 2006 5:17 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. It is imperative that our representatives work to enact laws that will protect the health of all its citizens. Please be responsible and do the right thing.

Sincerely,

Marie Gallagher 1150 Church Road Wyncote, PA 19095

From:

don.stone@verizon.net

Sent:

Thursday, March 02, 2006 11:35 AM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

## Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I think that having clean air to breathe is a very high priority.

Sincerely,

Don Stone 2401 Pennsylvania Ave # 9B-28 Philadelphia, PA 19130-3034

From:

jhecker@rrc.edu

Sent:

Thursday, March 02, 2006 11:35 AM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Cars Bill and its clean air standards for cars and trucks that go beyond weaker federal requirements.

As a deeply religious person I am concerned that we are not fulfilling God's in junction to be responsible stewards of this earth. We are getting ourselves into deeper geopolitical trouble as ways of avoiding appropriate managing of this situation.

Sincerely,

Joel Hecker 372 Bala Ave Bala Cynwyd, PA 190042833

om: ent: John Nacchio [nacchio@msn.com] Tuesday, April 18, 2006 9:58 AM

o:

EP, RegComments

ubject:

Pennsylvania Clean Vehicles Program

Dear EQB:

I am writing to voice my full support for the Pennsylvania Clean Vehicles Program, and to urge that it be implemented as quickly as possible.

Cars and trucks are a significant source of air pollution, contributing approximately one third of the region's smog-forming emissions. The Pennsylvania Clean Vehicles Program would reduce pollution from vehicles more quickly and thoroughly than weaker federal standards. These pollution reductions are crucial for improving air quality and protecting public health in the state.

Thirty-seven counties across Pennsylvania still do not meet the federal government's basic air quality standards. The Scranton metro area has recently been ranked the nation's worst for people living with asthma, and other major cities in the state have also been rated very poorly by asthma experts. To put the matter simply: Pennsylvanians have already waited too long for clean, healthful air.

The state should have implemented the Clean Vehicles Program already. I urge the Department of Environmental Protection to move forward getting the program up-and-running as soon as it can.

Sincerely,

John Nacchio Brinton Estates 3238 S. Sydenham Street Philadelphia, PA 19145

From:

caromutz@msn.com

Sent:

Friday, April 14, 2006 6:52 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

### Dear EQB:

I am writing to advise the state of my strong support for the Pennsylvania Clean Vehicles Program. We must mandate clean air standards that go beyond weaker federal requirements. I was born in and still live in PA, and would be proud to see PA take a pro-active stance on this issue.

Sincerely, Carolyn Andrews Carolyn Andrews 1343 E. Montgomery Ave. Philadelphia, PA 191252701

From:

Kingsley Macomber [KMacomber@sierraresearch.com]

Sent:

Wednesday, April 12, 2006 5:01 PM

To:

EP, RegComments

Subject:

Sierra Research Comments on Pennsylvania Proposed Rulemaking re Clean Vehicles

Program



PA transmittal letter.pdf

TO: Chairperson Kathleen A. McGinty and Members

Pennsylvania Environmental Quality Board

P.O Box 8477

Harrisburg, PA 17101-2310

Dear Chairperson McGinty and Members:

I am attaching the following electronic files as the comments of Sierra Research, Inc. on the EQB's proposed rulemaking re: Pennsylvania Clean Vehicles Program (25 PA Code Chs. 121 and 126), as noticed in 36 Pa.B. 715 (Doc. No. 06-221). Per instructions from DEP staff, we are placing several data and reference material files that are too large for e-mail transmission on an electronic disk and transmitting it via overnight courier for delivery tomorrow, April 13, 2006. We have been informed that submitting this information in this manner will meet the applicable filing deadline. Please include the information on the disk as part of our comments.

1. Cover/Transmittal Letter, dated April 12, 2006 from S. Kingsley Macomber:

<<PA transmittal letter.pdf>>

- 2. Sierra Research Report No. SR2006-04-01, dated April 12, 2006, titled "Evaluation of Pennsylvania's Adoption of California's Greenhouse Gas Regulations on Criteria Pollutants and Precursor Emissions", and the following appendices thereto:
- A. Analysis of Impact of CARB's AB 1493 Regulations on Criteria Pollutant Emissions as a Result of Rebound, Fleet Turnover and Reduced Fuel Consumption, consisting of the Declaration of James M.

  Lyons and a report having the same title.
  - B. Declaration of Thomas C. Austin.
- C. NERA April 7, 2006 Report entitled "Modeling the Fleet Population Effects of the Pennsylvania Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles", with its three appendices:
  - A. New Vehicle Market Model
  - 3. Scrappage Model
  - C. Baseline Populations
- D. RW Crawford Energy Systems April 2006 report entitled "Assessment of VMT Rebound Effect in Pennsylvania", with two appendices:
  - A. Summary of Trendline Model for U.S. Cost-Adjusted Disposable Income
- B. RW Crawford Energy Systems Analysis of the Rebound Effect (Assessment of VMT Rebound Effect in New York State, June 2005), with additional appendices.
- E. Sierra Research October 25, 2005 Report No. SR2005-10-02, "Evaluation of Massachussets' Adoption of California's Greenhouse Gas Regulations on Criteria Pollutants and Precursor Emissions", with additional Appendices A through G:
- A. Analysis of the Impacts of CARB's AB 1493 Regulations on Criteria Pollutant Emissions as a Result of Rebound, Fleet Turnover, and Reduced Fuel Consumption.
  - B. Austin Declaration.
- C. Modeling the Fleet Population Effects of the Massachusetts Proposal to Reduce Greenhouse Gas Emissions from Motor Vehicles.
  - D. Assessment of VMT Rebound Effect in Massachussets.
- E. Presentation by Thomas C. Austin to the National Research Council, April 14, 2005, "Incremental Costs and Cost-Effectiveness of California Emissions Standards".
- F. Memorandum from NERA to Massachussets Dept. of Environmental Protection, October 14, 2005, "Response to Comments by Meszler Engineering Services Provided to the State of Vermont as Part of the Proposed Amendments to Control

Greenhouse Gas Emissions from Motor Vehicles".

G. Memorandum from Robert W. Crawford to James M. Lyons, October 24, 2005, "Response to Comments by Meszler Engineering Services in the Vermont Greenhouse Gas Proceeding".

 ${\tt NOTE:}\$  The six file attachments here will be sent separately due to file size limits imposed by the State.

Sincerely,

S. Kingsley Macomber General Counsel

From:

Donald Fonte [DFonte@hertz.com] Wednesday, April 12, 2006 3:20 PM

Sent: To:

EP, RegComments

Subject:

Proposed Regulations of Environmental Quality Board - Pennsylvania Clean Vehicles

Program



PA\_Clean.pdf

Attached below are comments of The Hertz Corporation related to the proposed rulemaking of the Environmental Quality Board amending Chapter 126, Subchapter D. Please contact me if there are any difficulties in opening the attachment.

Donald Fonte Director, Government Relations The Hertz Corporation 225 Brae Boulevard Park Ridge, NJ 07656 201-307-2759 (Fax) 201-307-2856

---- Forwarded by Donald Fonte/COR/PRK/Hertz on 04/12/2006 03:11 PM ----

То

<dfonte@hertz.com>

CC

dfonte@hertz.com

Subject

04/12/2006 05:13 AM

PA Clean Vehicles Program

Please open the attached document.
This document was sent to you using an HP Digital Sender.

Sent by:

<dfonte@hertz.com>

Number of pages:

2

Document type:

Color Document

Attachment File Format:

Adobe PDF

To view this document you need to use the Adobe Acrobat Reader. For free copy of the Acrobat reader please visit:

http://www.adobe.com

For more information on the HP Digital Sender please visit:

http://www.digitalsender.hp.com(See attached file: PA\_Clean.pdf)

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From: Sent:

dianeselvaggio@hotmail.com

Tuesday, March 07, 2006 1:36 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

There is little room for doubt these days about the respiratory and climate effects of vehicle emissions. This is not to say they are the only source of the problems. Emissions are, however, something we can take positive actions with.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Diane Selvaggio 5096 Hardt Road Gibsonia, PA 150448126

From:

bjmurphy@sunocoinc.com

Sent:

Tuesday, March 07, 2006 1:36 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead in implementing the Pennsylvania Clean Vehicles Program. It is in Pennsylvania's best interest to address the issue now, and with vehicle standards rather than problematic strictures on manufacturing.

Sincerely,

Bryan Murphy 569 Colonial Ave Souderton, PA 189642025

From:

nsabetto@hotmail.com

Sent:

Wednesday, March 08, 2006 7:20 PM

To:

EP, RegComments

Subject:

Clean Vehicle Program25 PA.CODE CHS.121 AND 126

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board,
My family, community, and I deserve to live in a state where we can breathe clean air.
Please help make Pennsylvania a safe and healthy place to live by supporting the
Department of Environmental Protection's proposed changes to the Pennsylvania Clean
Vehicle Program.

I am a conservative Republican, a sportsman and a Vietnam Veteran--not your stereotype tree hugger.this is NOT a political issue--we all want clean air, water, etc.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely,

Nick Sabetto 221 Bear Valley Rd Fort Loudon, PA 17224-9780

From:

Claire Saalbach [claire.saalbach@fvsh.net]

Sent:

Wednesday, March 08, 2006 7:50 PM

To:

EP, RegComments

Subject: PA Clean Vehicle Program

I support the proposed changes to the DEP's Pennsylvania Clean Vehicle Program to create an overall standard for tailpipe emissions for new vehicles sold in our state starting in 2008 that will reduce smog pollution by 10% and reduce global warming pollution by 25% by 2025.

The time has come for all Americans to make the tough choices that will improve the health of our citizens, provide affordable cars that run more efficiently, and create cleaner air for the future of our children and grandchildren.

Yours truly,

Claire B. Saalbach

1290 Boyce Road A340

Pittsburgh, PA 15241

From:

ccretella@hotmail.com

Sent:

Thursday, March 02, 2006 1:36 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I support the Pennsylvania Clean Vehicles Program and urge you to implement it as quickly as possible. The standards for cars and trucks are stronger than those required by the Federal government. They will greatly reduce pollution and risks of global warming, while increasing gas mileage thus reducing our reliance on fossil fuels.

Sincerely,

Christopher Cretella 440 East Third Street Bloomsburg, PA 17815

From:

km.daley@verizon.net

Sent:

Thursday, March 02, 2006 1:35 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I am disappointed that Pennsylvania has the second worst air quality in the country, second only to Ohio. I was shocked when I moved here to discover how many of my children's friends had asthma or other respiratory illness.

Clearly, some of the problem comes from power plants in Pennsylvania and surrounding states, but much of it comes from automobile exhaust.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Katherine Daley 1430 Linn St State College, PA 168033027

From:

wildwingdgg@hotmail.com

Sent:

Thursday, March 02, 2006 2:13 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

## Dear EQB:

I am the proud owner of a 2003 Honda Hybrid. Purchasing this excellent auto in Sept 2002, I was waiting for the auto industry to finally get smart and bring this clean technology to the public. Continually impressed with the technology and performance of this vehicle, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Diane Grant 426 West Farmersville Rd Leola, PA 17540

From:

wmjmdono@epix.net

Sent:

Thursday, March 02, 2006 2:25 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I have two grandchildren who

I would like to see live in a state that protects all its citizens. My youngest grandchild suffers from Asthma which she will deal with her entire life, help her and the other children who need clean air, implement this program

please Sincerely, Joyce Donohue

Jpyce Donohue RR 1 Box 1933 Hallstead, PA 188229661 From: Sent:

John S. Sloyer [jss1998@verizon.net] Wednesday, April 05, 2006 5:34 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

John S. Sloyer 151 Moore St Julian, PA 16844-9521

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I moved out of Lancaster County to get away from smog and ozone days. Now I find out that Centre County is high in smog. People drive further to work in this region than Lancaster.

We don't have to be a follower, but a leader in enacting this legislation.

Also, legislation should be enacted to reduce mercury emissions at coal fired plants. Old technology for processing mercury should be outlawed. The highest emitters of mercury occur at only 6 plants in the US.

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the Clean Air Act.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Ten other states have already adopted California low emission vehicle standards, the same standards the Pennsylvania program has.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

John S. Sloyer

From: Sent: To: Jessica Krow [jesskrow@aol.com] Wednesday, April 05, 2006 5:17 PM

EP, RegComments

Subject: Pennsylvania Clean Vehicles Program

Dear EQB:

I am writing to voice my full support for the Pennsylvania Clean Vehicles Program, and to urge that it be implemented as quickly as possible.

I want to have the choice to buy the cleanest, highest mileage car I can find, not to have to wait for 6 months.

Cars and trucks are a significant source of air pollution, contributing approximately one third of the region's smog-forming emissions. The Pennsylvania Clean Vehicles Program would reduce pollution from vehicles more quickly and thoroughly than weaker federal standards. These pollution reductions are crucial for improving air quality and protecting public health in the state.

Thirty-seven counties across Pennsylvania still do not meet the federal government's basic air quality standards. The Scranton metro area has recently been ranked the nation's worst for people living with asthma, and other major cities in the state have also been rated very poorly by asthma experts. To put the matter simply: Pennsylvanians have already waited too long for clean, healthful air.

The state should have implemented the Clean Vehicles Program already. I urge the Department of Environmental Protection to move forward getting the program up-and-running as soon as it can.

Sincerely,

Jessica Krow 3118 W Penn St Philadelphia, PA 19129

From:

Don Brown [djbrown1@comcast.net]

Sent:

Wednesday, April 05, 2006 4:25 PM

To:

EP, RegComments

Subject: Stricter Pollution Controls

We vehemently oppose the proposed stricter pollution controls that would increase the cost of new automobiles. Adopting California standards would not only be unnecessary but would unfairly "tax" all Pennsylvania residents purchasing automobiles. Reject this horrific idea and proposal. Voting & taxpaying citizens of Pennsylvania,

Donald & Barbara Brown 902 Truepenny Road Media, PA 19063

djbrown1@comcast.net

From: Sent: Roy LaPlante [royjet@earthlink.net] Wednesday, April 05, 2006 4:20 PM

To:

EP. RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Roy LaPlante 1436 Remington Rd. Wynnewood, PA 19096-3205

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Do you know more and more people who do NOT smoke cigarettes are dying of lung cancer?!

Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Roy LaPlante 610 658-2317

SENATE POST OFFICE THE STATE CAPITOL HARRISBURG, PA 17120-0030 AC 717-787-5662

NORTHERN DISTRICT OFFICE 2637 EAST CLEARFIELD STREET PHILADELPHIA, PA 19134 AC 215-560-3993



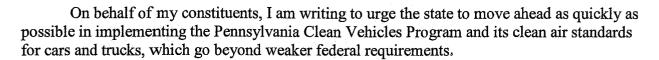
LICENSURE
URBAN AFFAIRS & HOUSING
GAME AND FISHERIES
ETHICS & OFFICIAL CONDUCT POLICY
RULES AND EXECUTIVE NOMINATIONS

http://www.fumo.com Senator\_Fumo@fumo.com

April 7, 2006

Environmental Quality Board PO Box 8477 Harrisburg, PA 17105-8477

Dear Members of the Environmental Quality Board:



The damage done to the air that we breathe from tailpipe exhaust is significant. Last summer ozone was higher than federal air quality standards for 23 days and many of those ozone alert days impacted the district I represent. When citizens have to be warned not to go outdoors because the air isn't safe for them, something must be done. I believe that adopting a stronger clean vehicles program than the federal Environmental Protection Agency is advocating is an important step in cleaning the air and protecting the health of citizens throughout the Commonwealth.

Technology exists today that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem. In turn, this will help the Commonwealth to come into compliance with the health-based standards of the federal Clean Air Act.

By moving as quickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smogforming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered.

The savings in gasoline as cleaner cars burn fuel more efficiently will also help make our country more energy independent. The greater fuel efficiency will also more than make up for any additional cost of these cleaner, more efficient cars as consumers spend less each year to buy gasoline.



Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program. It just makes sense to utilize more stringent clean vehicle standards that will provide significantly cleaner air at a reasonable cost.

Sincerely yours,

VINCENT J. FUMO

State Senator

**Environmental Quality Board** P. O. Box 8477 Harrisburg, PA 17105-8477

Dear Environmental Quality Board.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars, SUV's, mini vans, buses, and trucks that go beyond weaker federal requirements.

Pennsylvania ranks among the worst states in the country when it comes to air pollution. Our air pollution is plaguing our state and leading to a host of public health problems, including asthma attacks in children and aggravation of respiratory ailments in adults. This costs us more in health insurance as well!

One of the worst sources of this pollution is motorized vehicles. Technology exists today that would allow vehicles to run cleaner and significantly reduce our air pollution problem.

By moving as quickly as possible to implement the Pennsylvania Clean Vehicles Program we would be able to significantly reduce our air pollution problem --emissions of smog-forming pollution from cars and trucks would be cut by 10 percent, toxic benzene pollution up to 15 percent and global warming emissions would drop by nearly 25 percent by 2025, as compared to reductions under the weaker federal program being considered. And an added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians. money when they fill up at the gas pump.

Again, I urge the state to move forward and implement the Pennsylvania Clean Vehicles Program.

We will not settle for the weaker federal requirements. We deserve better.

Kein P. Meehan

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Sincerely,

Kevin P. Meehan 241 Aronimink Drive

Newtown Square, PA 19073-3415

ugu finisha ka kensula bertuat bagai tili sa

THE STATE CAPITOL HARRISBURG, PA 17120-3017 TELEPHONE: (717) 787-5544 FAX: (717) 705-7741

700 SOUTH HENDERSON ROAD SUITE 100-A KING OF PRUSSIA, PA 19406 TELEPHONE: (610) 992-9790 FAX: (610) 768-3104

MANOA SHOPPING CENTER 1305 WEST CHESTER PIKE SUITE 39 HAVERTOWN, PA 19083 TELEPHONE (610) 853-5433 FAX: (610) 853-5436



Senate of Pennsylvania

EDUCATION FINANCE

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E-MAIL: chwilliams@pasenate.com
WEBSITE: www.pasenate.com/cwilliams

ENVIRONMENTAL QUALITY BOARD

April 5, 2006

Environmental Quality Board P. O. Box 8477 Harrisburg, PA 17105-8477

Dear Environmental Quality Board,

On behalf of the constituents of the 17<sup>th</sup> Senatorial District, I write in favor of implementing the Clean Car Program in Pennsylvania and its clean air standards for new vehicles that exceed weaker federal requirements.

Pennsylvania ranks among the worst states in the nation when it comes to air pollution. In addition to environmental damage, air pollution harms public health by aggravating respiratory ailments. One of the worst sources of this pollution is cars and trucks.

Technology that allows cars and trucks to run cleaner and reduce pollution should be mandated for new vehicles sold in Pennsylvania. The new regulations will ultimately reduce nitrogen oxide emissions by 9%, volatile compounds by as much as 12%, and have the long-term additional benefit of reducing emissions of toxics such as benzene. Over time the Clean Vehicles Program standards will have significantly greater environmental impact than the federal standards.

Again, on behalf of my constituents I urge you to move forward with the implementation of the Clean Vehicles Program. Thank you for your time and consideration.

Sincerely,

Constance Williams

Constance H. Williams State Senator 17<sup>th</sup> District

CHW/apf

March 28, 2006

Commonwealth Of Pennsylvania Environment Quality Board

Re: Clean Vehicle Program

To Whom It May Concern:

I would like to express my support for the Clean Vehicle Program that the Commonwealth of Pennsylvania is proposing to implement.

I have seen the effects of pollution caused by car emissions while living in California for ten years. A sort of "brown haze" resides over congested areas of the state. I would hate Pennsylvania to mirror that image.

I would be very "proud" to live in a state that takes the environment so seriously. Please join the other 9 states in these new standards that would be tougher than the Federal Standards now in effect.

Sincerely,

Susan Racobaldo 126 Gideon Drive

Kennett Square, PA 19348

MAR

400 N. Walnut Street West Chester, PA 19380 March 20, 2006

Environmental Quality Board P.O. Box 8477 Harrisburg, PA 17105-8477

Dear members of the Environmental Quality Board,

We are pleased to support your move toward implementing the Pennsylvania Clean Vehicles Program. It is fitting that its clean air standards are higher than are the federal ones since Pennsylvania's air pollution is so severe.

We have been interested in the pollution problem for some years and in 1991 purchased an all electric car, made in Florida. Then we had a converted Dodge Colt for several years, and now a Toyota Prius. Since cars and trucks create a lot of the pollution that is causing increased numbers of asthma attacks for children and worsened respiratory illnesses in adults it makes sense to do something to have them create less pollution. Indeed the technology exists to do so.

Therefore we encourage you to move as quickly as possible to implement the Pennsylvania Clean Vehicles Program to improve our citizens' health and get more miles per gallon of gasoline.

Sincerely,

Thomas W. Moore

Anne H. T. Moore

From: Sent:

To:

Andrea Likovich [alikovic@osfphila.org] Wednesday, April 05, 2006 10:55 AM

EP. RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Andrea Likovich 609 S. Convent Road Aston, PA 19014-1207

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Please consider the health of the people, the conservation of energy, and the lessening of impact on global warming in your decisions.

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the Clean Air Act.

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Andrea Likovich

From: Sent: Diane Hollinger [dhollin256@aol.com] Wednesday, April 05, 2006 10:41 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Diane Hollinger 1207 Gross Drive Mechanicsburg, PA 17050-3113

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Please support the changes needed to make a healthier enivironment for us all.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Diane Hollinger Unlisted

From:

Stephen Bennett [stephenbennett73@yahoo.com]

Sent:

Tuesday, April 04, 2006 10:15 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicl

Program

Stephen Bennett 164 Chaps Lane West Chester, PA 19382-6158

April 4, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution. This is very important for older people and children, who are particularly vulnerable to respiratory illnesses like asthma and bronchitis. The American Lung Association of Pennsylvania has reported that children who live in communities with high concentrations of ozone, acid vapor, nitrogen dioxide and particulate pollution are at greater risk of developing chronic breathing problems due to poor lung development than children who live in less-polluted areas. This matters to parents considering moving to or staying in Pennsylvania.

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Stephen Bennett

From: Sent: James Armour [jimarmour@verizon.net]

Sent:

Tuesday, April 04, 2006 10:16 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

James Armour 1800 Montgomery Ave. Villanova, PA 19085-1713

April 4, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Although the idea behind the Clean Air Act is to reduce the polution from motor vehicles, it's important to note that a clean car will burn less gasoline than a dirty one. Gasoline is becoming more expensive becasue the porce of oil is going up, due to increased driving in the US and in other countries. Unless we improve the miles-per-gallon of our cars, gasoline will become terribly expensive and have an adverse impact on our economy. A clean car helps in two ways - it reduces pollution, and it helps to contain the price of gas.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

James Armour

From: Sent:

H. Campbell [hlc108@juno.com] Wednesday, April 05, 2006 11:38 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

H. Campbell 140 16th St New Cumberland, PA 17070-1109

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

As you may not know, recently the National Academy of Sciences validated the scientific basis for California's vehicle emissions standards and encouraged other states to adopt these regulations.

Pennsylvania has one of the largest road networks in the nation and our citizens drive more and more miles each year. The result of that excessive automobile use has contributed to the polluted and disease-causing air many of the us have to breathe.

In fact, there are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Cleaner vehicles will benefit the more than 1,000,000 Pennsylvanians who suffer from breathing problems that are made worse by air pollution.

Recent analysis of air quality data indicates that in south-central Pennsylvania--paricularly Cumerland and York Counties--air quality is upwards of 80% more polluted than the national average. In fact, in 2004 the American Lung Association ranked the Harrisburg area as having the 23rd worst air quality in the nation.

The main source of this polllution? Automobiles.

We must do more to assure the health of our citizens, especially our children.

Finally, the federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that. Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards.

Clearly, there are clear scientific and public health reasons for moving forward with the Clean Vehicles Program. To not do so would simply be immoral.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

H. Campbell 717-555-5555

From:

carolinecahill@verizon.net

Sent:

Thursday, March 02, 2006 12:45 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I live in Philadelphia and walk everywhere with my children everyday. The air quality is terrible here, especially during the rush hours. I am concerned that the high level of air pollution may cause serious problems with my family's in the future. Please take action and help the people like us who are already doing our part to reduce pollution by walking or biking instead of driving everywhere.

Sincerely,

Caroline Cahill 2315 Wallace Street Philadelphia, PA 19130

From:

Mfiorini@ptd.net

Sent:

Thursday, March 02, 2006 12:45 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

As a Pennsylvanian and a specialist in watershed management, I realize how important clean air and water is for survival. I also realize how much pollution cars add to our environment.

Therefore, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Mark Fiorini 79 Lee Spring Road Blandon, PA 19510

From:

avocatus0@hotmail.com

Sent:

Thursday, March 02, 2006 1:03 PM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EOB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Please seriously consider these changes. It's important for our future. I know it will cost money, and it will require juggling of budgets, but please try to make these changes. These changes could be some of the most important you make in office.

Sincerely, David S. Clawson David Clawson 1425 McFarland Rd Pittsburgh, PA 15216

From:

mmk@epix.net

Sent:

Thursday, March 02, 2006 1:03 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I think the bills passed by the Senate and introduced in the House to kill the more stringent standards are short-sighted, and hazardous to the health of PA's citizens.

Sincerely,

Marion M. Kyde 15 Tankhannen Road Ottsville, PA 18942

From:

aljw22@hotmail.com

Sent:

Sunday, March 05, 2006 5:21 PM

То:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. The new standards in the program will improve health conditions in Pennsylvania.

Sincerely,

Anna Weisberg 1028 W Upsal St Philadelphia, PA 191193715

From:

mgillesp@microserve.net

Sent:

Sunday, March 05, 2006 5:07 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Help us keep our children healthy and their futures bright!

Sincerely, Mark Gillespie Mark Gillespie 1941 5th Street Hollow Rd Bloomsburg, PA 178158995

From: Sent: www.Barrycuda2000@Yahoo.com Sunday, March 05, 2006 9:36 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Dismaying that european union forges ahead with "Smart" cars & biodeasel while US seems to move backwards. No wonder our car makers are loosing market share. Sincerely,

Barry Grossman 629 Bainbridge St Philadelphia, PA 191472138

From:

czmimosa@cs.com

Sent: To: Sunday, March 05, 2006 10:58 AM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

We need to improve the air we all breathe for both ourselves and for our descendents. Sincerely,

Clare Szilagyi 30 Pinetree Dr

Audubon, PA 194032025

From:

spkunz@aol.com

Sent:

Thursday, March 02, 2006 12:32 PM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the State to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. As a professional ecologist, I believe that it is programs like this one that need to be given top priority and funding if Pennsylvania is to be a leader in environmental protection.

Sincerely,

Stephen Kunz 1015 Brookwood Dr Phoenixville, PA 19460

From:

kathy\_everett@hotmail.com

Sent:

Monday, March 06, 2006 1:53 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Because of unusual amounts of diesel particulates in the air in southcentral PA (due to large numbers of truck terminals in this vicinity), our air quality is increasingly a real concern for babies, the elderly, and all those who suffer with respiratory illnesses. PLEASE pay attention to our air quality. It is of utmost importance.

Sincerely, Kathy I. Everett

Kathy Everett 1 Todd Rd. 'Carlisle, PA 170134401

From:

afscmelocal1637@cs.com

Sent:

Monday, March 06, 2006 2:08 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

For many years I have been involved with the students at West Philadelphia High School who have built and raced cars in the Tour de Sol. Their ability to build and operate efficient, clean cars should serve as inspiration to the state to do the right thing. Thank you.

Sincerely,

Ann Cohen 7501 Fowler Philadelphia, PA 191284149

From:

Sent:

jbwerb@hotmail.com Thursday, March 02, 2006 12:32 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

Let's make Pennsylvania a leader in clean air standards. Please vote for the Pennsylvania Clean Vehicles Program. Sincerely,

Joan Werblin 1061 Hedgerow Circle Wayne, PA 19087

From:

lynncjaeger@earthlink.net

Sent:

Thursday, March 02, 2006 12:32 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

The decades-long experience of California shows that this move is NOT going to cause an

adverse economic impact on the state; in fact the reverse is true.

We would not even be asking the car companies to do anything new - they would just build OUR cars on the same assembly lines they use for CA's cleaner cars.

We have terrible air pollution problems here in PA - why shouldn't we be able to buy cars that don't make it any worse than they have to?? Please move ahead with the program!

Sincerely, Lynn C. Jaeger Lynn Jaeger 1125 Colonial Ave Roslyn, PA 19001

From:

cgisselquist@msn.com

Sent:

Thursday, March 02, 2006 12:32 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

### Dear EQB:

I appreciate the chance to voice my opinion on the important issue of steps to keep the environment clean and reducing emissions by comment on the Pennsylvania Clean Vehicles Program. I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Carol Gisselquist 29 West Governor Road Hershey, PA 17033

From: Commale@aol.com

Sent: Monday, March 20, 2006 12:40 PM

To: EP, RegComments

Subject: (no subject)

## Evironmental Quality Board:

Please support the DEP's propsed changes to the PA CLEAN VEHICLE PROGRAM. Pennsylvania must clean up our air and protect our health

Original: 2523

Hughes, Marjorie

RECEIVED

From: William Ewing [william.ewing@verizon.net]

Sent: Sunday, February 19, 2006 10:30 AM

To: regcomments@state.pa.us

Subject: Comment on PA Clean Vehicles Program

2016 FEB 22 PM 2: 59

INDEPENDENT REGULATORY REVIEW COMVISSION

Dear EQB:

I am one of the millions of Pennsylvanians who suffer from asthma. Our Commonwealth, and particularly Philadelphia, have extraordinarily high rates of asthma due to air pollution.

Stricter automobile pollution standards would alleviate this problem. We need to cut down on tailpipe emissions.

My family and I support the Clean Vehicles Program which has been adopted by our neighbors New Jersey and New York.

William H. Ewing 510 E. Mt. Pleasant Ave. Philadelphia, PA 19119

From:

cdole@ursinus.edu

Sent:

Thursday, March 02, 2006 11:55 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. In this era of global warming, it is important that we move quickly to reduce the amount of pollution our cars spill into the air. Also, I for one am willing to pay a little more, if needed, to assure cleaner air for my kids to breathe.

Sincerely,

Carol Dole 663 Sunnyside Ave Trooper, PA 19403

From:

chart@nasw.org

Sent:

Thursday, March 02, 2006 12:01 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I very much support clean air legislation, and I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program. The federal requirements are to weak and PA needs to set higher standards for cars and trucks. Increasingly, all of us, environmentals and not, are realizing that we have a serious problem with emissions and global warming and we need to take serious steps to confront it.

Sincerely,

Carol Hart 102 Dudley Ave. Narberth, PA 19072

From:

kwoody@sjprep.org

Sent: To: Wednesday, March 22, 2006 12:35 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

As a person with pulmonary difficulties clean air is crucial to my health. I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Kathleen Woody 600 West Avenue Jenkintown, PA 190462729

From:

cherylhp@earthlink.net

Sent:

Thursday, March 23, 2006 12:16 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. As a school teacher in the state, I can tell you that the number of students effected by asthma and other respiratory ailments has grown exponentially in the 29 years that I have taught. The number of school days lost to respiratory ailments certainly impacts our students' education and the all important standardized test scores. Please seriously consider the far reaching benefits of this proposed legislation that do in fact have a large economic impact on our society. Fewer medical and pharmaceutical expenses and more successful students are important factors to consider. Thank you for showing integrity in this decision.

Sincerely,

Cheryl Parsons 351 Belvedere St. Carlisle, PA 170133504

From:

modhner@verizon.net

Sent: To: Wednesday, March 22, 2006 9:36 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

### Dear EQB:

Reducing polution should be a top priority for our state. The Pennsylvania Clean Vehicles Program is one way we can further that goal. I urge you to move ahead with this program and enforce more stringent standards then the federal requirements. The payback in improved health of the residents of PA (and surrounding states) will be well worth it.

Sincerely, Matthew Odhner Matthew Odhner PO Box 285 Bryn Athyn, PA 190090285

rom:

jtreat@ccat.sas.upenn.edu

ent:

Thursday, March 02, 2006 11:57 AM

o: ubject: regcomments@state.pa.us PA Clean Vehicles Program

ear Environmental Quality Board:

am writing to urge the state to move ahead as quickly as possible in implementing the ennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that o beyond weak federal requirements.

hen the federal government fails to protect our citizens' health, we depend on the ommonwealth of Pennsylvania to set conscientious standards for health.

incerely,

ay C. Treat 17 Ryans Run oothwyn, PA 190612451

From: Sent: politic@davidhunter.net

Sent:

Thursday, March 02, 2006 11:54 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to strongly urge the state to move ahead quickly in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

We need cleaner, more efficient cars to help reduce pollution, and to reduce PA's dependence on foreign oil.

As a father of two of our state's young asthmatics, I feel strongly that clean cars are an important priority in ensuring that we can all breathe effectively in PA.

Sincerely,

David Hunter 967 Pinehurst Dt Chester Springs, PA 19425

From: Sent:

DLEONARD@4RSYSTEMS.COM.

To:

Thursday, March 02, 2006 11:49 AM regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Reducing greenhouse gases, air pollution, and our dependence on oil are all long-term efforts that require diligent stewardship and a long-term view. We cannot afford to succumb to short-sighted pressure from special interests who would forfeit our children's futures for their own gain.

Sincerely,

David Leonard 1530 Sleepy Hollow Lane West Chester, PA 19380

From:

lab17@psu.edu

Sent:

Thursday, March 02, 2006 11:50 AM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Let's put an end to sooty diesel emissions from idling trucks. Drivers don't like to turn their engines off so lets clean up the emissions from these trucks.

Sincerely,

Lucy Boyce

Lucy Boyce

2031 Halfmoon Valley Road

Port Matilda, PA 16870

From:

kmpetersonmpt@verizon.net

Sent: Го: Wednesday, March 22, 2006 10:32 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

As a state we need to be at the top of the list promoting environmental protection programs instead of being mediocre with our environmental policies. Pennsylvania residents including myself have a beautiful state to protect. Who wants to see it polluted with car and truck exhaust/emissions that could have been prevented with stricter laws?

Sincerely,

Kirsten Ditzler 360 Baumgardner Road Villow Street, PA 175849356

From: Helen Jacobson [hjacobsn@osfphila.org]

Sent: Tuesday, April 11, 2006 10:53 AM EP, RegComments

Subject: I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Helen Jacobson 609 S. Convent Rd. Aston, PA 19014-1207

April 11, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that. The program is part of Pennsylvania's State Implementation Plan (SIP), required by the Clean Air Act. Cleaner vehicles mean not having to make up the difference with reductions elsewhere. Some power plants and industries have reduced their emissions over the past several years thanks to tighter pollution restrictions, but vehicle emissions have only increased, mostly because people drive more miles in bigger cars with declining fuel efficiency. Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the Clean Air Act. DEP estimates that the Pennsylvania program will reduce vehicle emissions 6 to 11 percent over and above the federal standards, even more for some things like cancer-causing benzene. This is a significant difference ž all at no cost to the consumer. There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties. Because air pollution in Adams, Allegheny, Armstrong, Beaver, Berks, Blair, Bucks, Butler, Cambria, Carbon, Centre, Chester, Clearfield, Cumberland, Dauphin, Delaware, Erie, Fayette, Franklin, Greene, Indiana, Lackawanna, Lancaster, Lebanon, Lehigh, Luzerne, Mercer, Monroe, Montgomery, Northampton, Perry, Philadelphia, Tioga, Washington, Westmoreland, Wyoming and York counties are already over federal standards, new industries or manufacturing growth in those counties is almost impossible. Cleaner air in those counties will mean new chances for economic growth. Other states that meet federal standards are out-competing Pennsylvania for jobs and growth. Vehicles that would be certified as acceptable under the Pennsylvania Clean Vehicles Program are not now more expensive than vehicles that meet the federal low emission vehicle standards. The American Automobile Association and other lobbying groups have been spreading misinformation about the cost to consumers about stricter emissions standards, implying that sticker prices for new cars will shoot up as much as \$3,000 once the Pennsylvania Clean Vehicles Program standards are fully implemented. Low emission vehicles today are not more expensive than their dirtier counterparts, and the DEP has sticker price comparisons to prove it. Over time, when the program is

From:

tbakerlaw@msn.com

Sent:

Thursday, March 02, 2006 11:51 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

Our state needs stronger emissions regulations. We can both protect the health of our citizens and our economy. This area has some of the worst particle pollution in the nation. To remain a sustainable place to live and work, this situation should change in PA.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Tim Baker 3110 E Market St York, PA 174022512

From:

balogh@epix.net

Sent:

Thursday, March 02, 2006 12:16 PM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This is the very least you can do to protect us ! I hope you know there is NO SILVER BULLET to solve this problem. They, the science and technology experts you rely on to solve the problems, know this. Do what you can and add further restrictions. It may all ready be too late ! Sincerely,

Alana Balogh P.O. Box 121 Revere, PA 18953

From:

dcs@gatewayrehab.org

Sent:

Thursday, March 02, 2006 12:05 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear Environmental Quality Board:

As concerned Pennsylvanians who wish to protect our environment, Annie and I are writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. We love our environment. Feel PA, its citizens and visitors, will benefit significantly from going beyond the weaker federal requirements for cars and trucks. We own a Hybrid car, love it, and do all that we can for our environment. We hope you will do the same with the knowledge you have the support of many concerned Pennsylvanians.

Sincerely,

Dave and Maryann Sanner 425 W Front St Erie, PA 165071228

From:

mcculloughs@afgifg.com

}ent: ∫o: Thursday, March 02, 2006 11:36 AM

⊺o: 3ubject: regcomments@state.pa.us PA Clean Vehicles Program

ear EQB:

[ am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that 30 beyond weaker federal requirements.

This is so important for the future health of our communities. PLEASE help make Pennsylvania a safer place to grow up for our children.

dincerely,

Stephanie McCullough L01 Whitemarsh Rd Ardmore, PA 190031615

From:

reesetee@yahoo.com

Sent:

Thursday, March 02, 2006 11:41 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Air pollution from automobiles poses a serious threat to Pennsylvania's public health and our environment. Cars and trucks emit pollutants that create much of the smog pollution that triggers 370,000 asthma attacks each year in Pennsylvania. These vehicles are also responsible for much of the global warming pollution that the Commonwealth produces.

Thankfully, this technology currently exists to dramatically reduce air pollution from automobiles. The Pennsylvania Clean Vehicles Program would utilize technology to cut smogforming pollution from cars by 10 percent and global warming pollution from cars by nearly 25 percent by 2025.

I urge you to move quickly to implement the Pennsylvania Clean Vehicles Program.

Sincerely,

T DeAngelis 332 Tall Meadow Lane Yardley, PA 19067

## <u>lughes, Marjorie</u>

rom:

john.duda@med.va.gov

ent:

Thursday, March 02, 2006 11:38 AM

'o: iubject: regcomments@state.pa.us PA Clean Vehicles Program

ear EQB:

am writing to urge the state to move ahead as quickly as possible in implementing the ennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that beyond weaker federal requirements.

think it is ludicrous that we as a society do not do more to protect our environment and essen our reliance on foreign oil. As a proud owner of a hybrid vehicle and public ransit rider, I think that more incentive in both of these areas is urgently needed. incerely,

ohn Duda 121 Wisteria Dr Walvern, PA 193559735

From:

kjude@sas.upenn.edu

Sent:

Thursday, March 02, 2006 11:46 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EOB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Despite the enormous potential of new technologies to provide cleaner, more efficient transportation, my 9 year old Toyota remains one of the cleanest cars on the road. To me, this represents a failure in public policy and underlines the importance of policies that will encourage bringing important new technology to the market. Pennsylvania has the opportunity to become a leader in this field and that opportunity must not be squandered.

Sincerely,

Kevin Jude 4608 Spruce St Apt 2 Philadelphia, PA 191394540

From:

skweinberg@yahoo.com

Sent:

Thursday, March 02, 2006 11:51 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

You can't run from the environment. Ignore it and it will go away. As I see it, we pay some now, or we pay more later. There is no excuse not to take serious action now.

#### Sincerely,

Kelly A. Weinberg Kelly Weinberg 7 Manor View Circle MALVERN, PA 19355

From:

patricia johnson [olivjohn@people.com]

Sent:

Friday, March 31, 2006 9:21 AM

To:

Comments - Environmental Quality Board (EQB)

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

patricia johnson 1601 walton road blue bell, PA 19422-2144

March 31, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Hi Iam Patricia Johnson,

And" Yes" to PA taking the iniative to join the other ten States in this effort to clean the air in our environment.

My other interest would be to know the different automobile companies who will be offering these vehicles makes and models

Please email me this information.

Thank you,

Patricia Johnson

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

patricia johnson one-nophone

March 7, 2006

PA Environmental Quality Board Environmental Quality Board P. O. Box 8477 Harrisburg, PA 17105-8477

Dear Members of the Environmental Quality Board,

As a young person and college student, I am very concerned about global warming, urban smog, and acid rain, and I'm concerned about how air pollution is worsened by inefficient or poorly maintained automobiles. A healthy environment is vital to a healthy future for Pennsylvania, and it isn't fair that future generations – or even asthmatic children today – should have to pay with their health for our convenience in driving dirty vehicles. Therefore, please support the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

Sincerely,

John Dziak

315 W Beaver Ave Apt 2

State College, PA 16801-4007

DEGEOVED)
MAR I O 2006

From:

FaJoy@aol.com

Sent:

Sunday, March 19, 2006 10:49 AM

To:

EP, RegComments

Cc:

bhutchinson@zh-inc.com

Subject: Clean Air

Since PA is ranking high in smog-type pollution I recommend that we do something about it. It is a win-win-win-win-win-win-win-win situation. Win for PA: we look and "smell" better; Win for the general public: more efficient & more economic for the consumer; Win for the individual: stay healthy, less pollutants; Win for health Care: fewer sequelae from pollutants, fewer people taxing the health system; Win for manufacturers of cars: more people are going to want to buy the "cleaner" car; Win for wildlife: fewer toxins emptying into the air and streams. It's a no brainer!

By adopting the PA Clean Vehicle Program, Pennsylvania will join 10 other states, including New York and New Jersey, in moving the United States towards cleaner cars and cleaner air for our future.

Let Pennsylvania lead the way and be the leader! We have the potential, we have the desire, we have the way! Help us, help ourselves. Adopt the PA Clean Vehicle Program. NOW.

NDEPENDENT REGULATORY
REVIEW COMMISSION

THE MAR 23 MM 8: 59

From:

mark merdinger [markmerdinger@hotmail.com]

Sent:

Sunday, March 19, 2006 5:56 PM

To:

EP, RegComments

Subject:

Pennsylvania Clean Vehicles Program

#### Dear EQB:

I am writing to voice my full support for the Pennsylvania Clean Vehicles Program, and to urge that it be implemented as quickly as possible.

Protecting the quality of our air is more important than protecting the automotive industry. Cars may have become a necessity in today's world, but they are unfortunately destroying the air we breath.

Our government should be doing more than looking out for business interests - it should protect its citizens from those interests when necessary. This is one such situation.

Sincerely,

mark merdinger 806 roundtop circle allentown, PA 18104

REVIEW COMMISSION

AR 23 M 8: 59

From: Sent: John Barnes [jhbarnes@mac.com] Friday, March 17, 2006 6:02 AM

To: Subject: EP, RegComments Clean Vehicle Program

I am writing in support of the proposed changes to the Pennsylvania Clean Vehicle Program. We must do everything possible to improve the air quality in our state. This change in the program, as proposed by DEP, will help reduce pollution from one of the greatest sources, vehicles. Thank you.

John H. Barnes 1161 Wintertide Drive Harrisburg, PA 17111

From: Elise Annunziata [khadyelise@yahoo.com]

Sent: Thursday, March 16, 2006 3:50 PM

To: EP, RegComments

Subject: Clean Vehicle Program: PA 25 CODE CHS.121 AND 126

Subject: Clean Vehicle Program: 25 PA CODE CHS.121 AND 126

Dear Members of the Environmental Quality Board,

My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

I work in Philadelphia and have noticed that the air pollution from cars and trucks is becoming worse and worse. In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely, Elise Annunziata 4100 Main St., #405 Philadelphia, PA 19127

2006 MAR 23 AM 8: 58

NDEPENDENT REGULATORY

From:

kopphm@yahoo.com

Sent:

Thursday, March 02, 2006 11:33 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Even though I am from Ohio, I speak for my friends who live in Pennsylvania and who I visit nearly every year. I want clean air for everyone no matter where I might be

Sincerely,

Helen Kopp 12521 Indian Hollow Rd Grafton, OH 440449190

From:

jgferreira@comcast.com

Sent:

Thursday, March 02, 2006 11:46 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Several members of my family here in the Pittsburgh area suffer from asthma and allergies to airborne pollutants; anything we can do to reduce emissions from cars and trucks, among the most ubiqutous producers of such pollutants, would help greatly reduce the discomfort and health risks my family endures and enhance our quality of life as Pennsylvania residents. Please proceed forward as quickly as possible to implement these new standards. Thanks.

#### Sincerely,

John Ferreira 114 Buckingham Road Pittsburgh, PA 15215

From:

maryangert@ilearinc.com

Sent:

Thursday, March 02, 2006 11:46 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

We all breathe the same air, no matter our political party. PLEASE do the right thing for our grandchildren and their grandchildren: Put the Pennsylvania Clean Vehicles Program into action ASAP. Pennsylvania MUST do better than the weak federal requirements. If your motivation is purely financial, do it because it will save money on medical care, cut down absenteeism, and help employers hold down medical costs.

Sincerely,

Mary Angert 615 Portsmouth Road State College, PA 16803

From: Sent: marykinney@hotmail.com Monday, April 03, 2006 9:27 AM regcomments@state.pa.us

To: Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Given the fact that the measures taken will give us more milage per gallon of gas, I can't imagine a reason for passing over this legislation

Sincerely, Mary Kinney

Mary Kinney 45 High St Mt. Pocono, PA 183441301

From:

martindm@acm.org

Sent: To: Monday, April 03, 2006 11:19 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I have to BREATHE this stuff. If it costs money, so be it. I'd rather be hurt in my wallet than hurt in my lungs.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

David Martin 1550 Vernon Road Blue Bell, PA 194223524

From:

ccbooz@aol.com

Sent:

Sunday, April 02, 2006 10:10 PM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

i worry about the quality of the air that we are leaving for future generations. Sincerely,

Carolyn Booz 909 High Pointe Circle Langhorne, PA 190475166

From: Sent: theprincipledpen@comcast.net Sunday, April 02, 2006 8:50 PM regcomments@state.pa.us

To: Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Please follow the lead of other states around the country who are doing their part to protect public health and the environment by implementing clean cars programs. Pennsylvania has a great chance to be a leader with this exciting new program.

Sincerely,

Rebecca Farabaugh Rebecca Farabaugh 820 N. Corinthian Ave. Philadelphia, PA 191301416

From:

wiupjim@yahoo.com

Sent:

Tuesday, March 07, 2006 9:36 PM

To: Subject: EP, RegComments
PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. It is essential to our quality of life that we set the highest standards for maintaining clean air and water.

Sincerely, James M. Rogers James Rogers 944 East Pike Indiana, PA 15701

From:

sharpieoforanje@hotmail.com

Sent: To: Tuesday, March 07, 2006 9:59 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

WE strongly support the implementation of the Pennsylvania Clean Vehicles Program, and purchased a Hybrid car in late 2005. We are getting 53 mpg in city driving, and about 50 mpg on the highway. We have been very pleased with the technology, and with both the savings at the gas pump and the improvement made in the emmissions affecting the environment. Please urge the state representatives to push this program through. If everyone could drive a "clean car", the air would be much more healthy, especially for those who suffer from emphysema, asthma, COPD, CHF, lung diseases, and those with various breathing problems.

Sincerely,

Patience Sharp 5600 Gibson Hill Rd Edinboro, PA 164121817

From:

hoffhort@aol.com

Sent:

Tuesday, March 07, 2006 1:33 PM

To:

EP, RegComments

Subject: PA C

PA Clean Vehicles Program

#### Dear EQB:

I was very distressed to learn that the Pennsylvania Legislature is considering bills to overturn the Clean Vehicles Program. Nothing is more important than the health of our citizens, our environment and our planet. Please don't be swayed by short-term thinking. Support the Clean Vehicles Program. Sincerely,

Lucy Horton 4206 Winchester Rd Allentown, PA 181041952

From:

ifa5@psu.edu

Sent:

Tuesday, March 07, 2006 2:04 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge Pennsylvania to move as quickly as possible to implement the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am strongly in support of any proposals that would sensibly reduce emissions by bringing cleaner vehicles to the state.

One has to question why anyone would not support sound proposals such as this.

Sincerely,

Jay Angert 615 Portsmouth Road State College, PA 168031260

From:

mmazick@verizon.net

Sent:

Tuesday, March 07, 2006 1:53 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. I very much want to live in a state with cleaner air for its citizens to breathe.

Sincerely, Meghan Mazick Meghan Mazick 234 Maple Avenue Hershey, PA 170331548

From:

JMF3@PSU.EDU

Sent:

Tuesday, March 07, 2006 1:53 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. We have no time to waste in taking steps to repair damage we have done to the atmosphere we all share.

Sincerely,

Joanne Feldman 1140 Smithfield St State College, PA 168016427

From:

Barbara R. Litt [brlitt@gmail.com]

Sent:

Tuesday, March 07, 2006 8:12 PM

To:

EP, RegComments

Subject: comment on proposed changes to PA Clean Vehicles Program

I am writing to ask you to support the Pennsylvania DEP's proposed changes to the Pennsylvania Clean Vehicles program. This would require auto makers to sell within Pennsylvania the mostfuel efficient, cleanest cars that meet the California tailpipe standards. Human health is at risk due to bad air quality in many counties in western Pennsylvania. This program is necessary to comply with federal laws that protect human health from impacts of air pollution like smog.

--Barbara Litt 6567 Bartlett St. Pittsburgh, PA 15217

From:

starbb22@aol.com

Sent:

Tuesday, March 07, 2006 8:06 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Pennsylvania needs to take action to improve the lives of its residents and future children!

Sincerely,

Renee Adam

Kutztown, PA 19530

From:

CAROLFHERSHEY@EARTHLINK.NET

Sent:

Tuesday, March 07, 2006 9:01 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Green cars today, blue skies tomorrow!! Go for clean air as soon as possible.

Sincerely, Carol F. Hershey Carol Hershey 5423 Northumberland St Pittsburgh, PA 152171128

From:

mtsrlynkssck@yahoo.com

Sent:

Tuesday, March 07, 2006 9:02 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. The future of our area and the entire world is imperative on this program. Our children and other future generations are counting on us to preserve this area so they can enjoy its benefits in the future. We should not deprive them of that.

Sincerely,

Brian R.

Brian Reed 715 Lincoln Avenue Manville, NJ 08835

rom:

pblack@libcom.com

Tuesday, March 07, 2006 8:37 AM

EP, RegComments

iubject:

PA Clean Vehicles Program

#### ear EQB:

ent:

o:

am writing to urge the state to move ahead as quickly as possible in implementing the ennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that o beyond weaker federal requirements.

s you are well aware, in this country state governments are taking the leadership as our ederal government appears content to roll back advances made by previous administrations. ennsylvania should be no exception.

incerely,

eter Black 27 Division Avenue ellevue, PA 152023652

From: Sent: rdy17@comcast.net

Tuesday, March 07, 2006 10:45 AM

EP, RegComments

Го: Bubject:

PA Clean Vehicles Program

Dear EQB:

am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that so beyond weaker federal requirements.

Realizing that much of our polluted air is also inherited through the air from our western reighbors, we must keep our standards high and control what we can.

Sincerely,

Richard Yowell .7 Cobblestone Drive Worsham, PA 190441847

From:

msmaurin@hotmail.com

Sent:

Tuesday, March 07, 2006 1:07 PM

Го:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### ear EQB:

[ am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that so beyond weaker federal requirements.

have been driving a gas-sipping and non-polluting Prius for over 2 years, and we need to put many more vehicles of this type on PA's roads asap.

Sincerely,

fargaret S. Maurin
.4 Westview Rd
3ryn Mawr, PA 190103717

From:

pstocker@lutron.com

Sent:

Wednesday, March 08, 2006 8:45 AM

To:

EP, RegComments

Subject:

Clean Vehicle Program25 PA.CODE CHS.121 AND 126

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board, My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

Further, there exists a tremendous inequity in that I have (gladly) participated in the time and expense of emissions testing on all of my vehicles while commuters from outlying areas drive every day in my community with cars that violate these standards. Let's make thism requirement uniform across the state! It only makes good sense.... why would we NOT mandate these beneficial standards???

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Sincerely,

Paul Stocker 36 W Laurel St Bethlehem, PA 18018-2739

From:

lab17@psu.edu

Sent:

Wednesday, March 08, 2006 9:25 AM

To:

EP, ReqComments

Subject:

Clean Vehicle Program25 PA.CODE CHS.121 AND 126

Dear PA Env. Quality Board,

Dear Members of the Environmental Quality Board, My family, community, and I deserve to live in a state where we can breathe clean air. Please help make Pennsylvania a safe and healthy place to live by supporting the Department of Environmental Protection's proposed changes to the Pennsylvania Clean Vehicle Program.

In 2003, Pennsylvania was ranked 11th in the nation for the worst smog pollution from cars and trucks while 37 PA counties, including all of southeastern Pennsylvania, failed to meet federal air quality standards. 'Smog' pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually. This puts our families at risk.

I urge the Environmental Quality Board to support the DEP's proposed changes to the PA Clean Vehicle Program.

Please consider additional restrictions on idling vehicles. Everywhere I see trucks, diesel and non-diesel, with the engines left running while the driver is otherwise occupied inside a place of commerce. I would like to see a time limit on this sort of thing OR a provision for reporting and penalizing violators. Conservation and cleaning up the air starts in our neighborhoods and small towns.

Sincerely,

lucy boyce 2031 Halfmoon Valley Rd Port Matilda, PA 16870-9333

From: Sent:

Jesseca Davis [wonderjess@gmail.com] Wednesday, March 15, 2006 12:37 PM

To:

EP, RegComments

Subject:

Pennsylvania Clean Vehicles Program

Dear EQB:

I am writing to ask you to please support the Pennsylvania Clean Vehicles Program. There are a lot of reasons why I support this bill but the one I think would resonate most w/v our government is the fact that this policy will likely improve gas mileage.

Imagine an America that doesn't need to depend on foreign countries for gas?

This is a small step but my God, we have start taking these steps.

Sincerely,

Jesseca Davis 4751 Fowler Street Philadelphia, PA 19127

HEVERY COMMISSION

1

701/ MAR 22 MM 9: 08

From:

a-bruiexir@lycos.com

Sent:

Wednesday, March 15, 2006 1:16 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I not only believe in cleaner cars, I own one Honda Insight. My next car will be all Electric, that is if PennDot allows it.

Sincerely,

Bruce Arkwright, Jr. 620 W. 4th St. Apt.1 Erie, PA 16507-1119

NOTPENDENT REQUIATORY

2006 MAR 22 AM 9: 09

March 9, 2006

Pennsylvania Environmental Quality Board P.O.Bx 8477 Harrisburg PA 17105-8477

Dear Board Members:

My family, community, and I deserve to live in a state where we can breathe clean air. I urge the Environmental Quality Board to support the DEP's proposed changes to the Pennsylvania Clean Vehicle Program.

Sincerely,

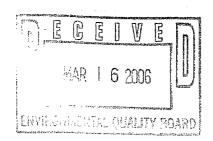
Richard Wodzinski

3421 Timberwood Drive

Munhall, PA 15120-3551

412-461-2431

Sardines1@ hotmail.com



From: Sent: Lisa Corrado [lisacorrado@comcast.net] Thursday, March 16, 2006 9:35 AM

To:

EP, RegComments

Subject:

Pennsylvania Clean Vehicles Program

#### Dear EQB:

I live about 2 miles from the Pa state line and my husband works at Methodist Hospital in Philadelphia. If there is anything that can be done to make him safer, I support it. I also support anything that can be done to preserve our environment. Every little bit helps add years to our lives, and I don't feel like I will ever have enough with him. Please help make the air quality better for him.

I am writing to voice my full support for the Pennsylvania Clean Vehicles Program, and to urge that it be implemented as quickly as possible.

Cars and trucks are a significant source of air pollution, contributing approximately one third of the region's smog-forming emissions. The Pennsylvania Clean Vehicles Program would reduce pollution from vehicles more quickly and thoroughly than weaker federal standards. These pollution reductions are crucial for improving air quality and protecting public health in the state.

Thirty-seven counties across Pennsylvania still do not meet the federal government's basic air quality standards. The Scranton metro area has recently been ranked the nation's worst for people living with asthma, and other major cities in the state have also been rated very poorly by asthma experts. To put the matter simply: Pennsylvanians have already waited too long for clean, healthful air.

The state should have implemented the Clean Vehicles Program already. I urge the Department of Environmental Protection to move forward getting the program up-and-running as soon as it can.

Sincerely,

Lisa Corrado 912 Causez Avenue Claymont, DE 19703

From: Sent: Phyl Morello [fastphyl1@hotmail.com] Tuesday, April 11, 2006 8:37 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Phyl Morello P O Box 1964

Albrightsville, PA 18210-1964

April 11, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building 2.0. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Please please demand clean air for us.

Please demand all vehicles cut pollution & get better mileage.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

hyl Morello

From:

longstrt@adelphia.net

Sent:

Friday, March 03, 2006 4:30 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am tired of Pennsylvania being behind other states in what we do to protect our future and our environment. We need to stand up now and not be intimated by a wealthy lobby that is trying to protect itself.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Carol Brown 4820 Old Harrisburg Rd Gettysburg, PA 17325

From:

billwoodnc@yahoo.com

Sent:

Friday, March 03, 2006 2:43 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

As a physician who treats patients with breathing disorders, and the parent of small children, I write to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Bill Wood 1136 Winterton St. Pittsburgh, PA 15206

From:

fastphyl1@hotmail.com

Sent:

Friday, March 03, 2006 6:02 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

My family & I WANT CLEAN VEHICLES FOR OUR STATE OF PA!

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Phyl Morello P O Box 1964 Abrightsville, PA 18210

From:

gaseman@adelphia.net

Sent: To: Friday, March 03, 2006 1:20 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

It's insane to act as if we have plenty of time to clean up our environmental act, we don't! Let's act now!!!

Sincerely,

George Seman 5 Watres Dr Scranton, PA 185052267

From:

rollfink@dickinson.edu

Sent:

Friday, March 03, 2006 1:41 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

In central Pennsylvania we live in an area with very high levels of air pollution that comes from cars and trucks. This situation is especially bad for young children and the elderly.

Sincerely,

Dieter Rollfinke 12 Thornhill Court Carlisle, PA 17013

From:

Sent:

alex.gamburg@gmail.com Tuesday, March 14, 2006 6:26 AM EP, RegComments PA Clean Vehicles Program

To:

Subject:

Dear EQB,

I would like the state to put the Pennsylvania Clean Vehicles Program in action, and its clean air standards for cars and trucks.

Sincerely, Alex Gamburg Alex Gamburg 1263 Farm Rd Berwyn, PA 193122064

From:

m89soccer@aol.com

Sent:

Tuesday, March 14, 2006 10:01 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am part of the generation which will experience the effects of  $\$ our polution, I hope that through our efforts, we can live in a cleaner world.

Sincerely,

Matthew Piltch 841 Montgomery Avenue Bryn Mawr, PA 190103501

TOTAL MARK 22 MM 9: 07

From:

lindaestiles@msn.com

Sent:

Thursday, March 02, 2006 3:01 PM

То:

EP, RegComments

Subject: PA Clean V

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. I can't imagine weakening the laws on the books now. I have grandchildren and want the air to be clean for them and their children.

Sincerely, Linda Stiles Linda Stiles 4320 New Texas Road Pittsburgh, PA 15239

From:

deb.wood@westtown.edu

Sent:

Thursday, March 02, 2006 9:35 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Let's be a leader for the nation, a leader of environmentally responsible policies.

Sincerely,

Deb Wood Westtown School Westtown, PA 19395

From:

jesiambr@ptd.net

Sent:

Thursday, March 02, 2006 9:26 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Common sense dictates that we have to do everything possible to make our vehicles cleaner, for they are a major source of air pollution today given the distances people travel for work, family, etc. Let's see Pennsylvania take the lead in doing everything possible to make our vehicles run cleaner and to "keep Pennsylvania beautiful", to quote a famous slogan.

Sincerely,

Jennifer Hunsinger 505 Fisher Ave. Catawissa, PA 178201023

From: Sent: mattz@gfsnet.org

Sent: To: Thursday, March 02, 2006 2:49 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Don't wait on this! The federal government is obviously not going to lead anywhere on this issue.

Sincerely,

matthew Zipin 3120 Midvale Ave Philadelphia, PA 191291011

From:

virginia.alpaugh@verizon.net

Sent:

Thursday, March 02, 2006 2:48 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program. Its clean air standards for cars and trucks make sense, and go beyond weaker federal requirements.

Please listen to the pleas of parents like me, whose children suffer from environment-related asthma. Remember what it was like breath clean air? Don't just tell your children and grandchildren about it -- bring it back!

My family and I urge you to pass this responsible legislation.

Sincerely,

Virginia Alpaugh 312 Roslyn Avenue Glenside, PA 19038

From:

smongold@hotmail.com

EP, RegComments

Sent:

Thursday, March 02, 2006 2:49 PM

To: Subject:

PA Clean Vehicles Program

#### Dear EOB:

I love living in Pennsylvania. Compared to my hometown in VA, PA has many desirable attributes for young citizens. While PA's commuter congestion presents less of an environmental hazard then many states, continued urban sprawl and lacking public transportation system seem problamatic. I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. PA needs to start planning for our future and consider the immediate as well as long term effects of our clean air standards.

Sincerely,

Sylvia Monogld 37 E. Jonathan Ct. Kennett Sq., PA 19348

From:

js232594@muhlenberg.edu

Sent: To: Wednesday, March 22, 2006 1:04 AM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. As the majority of the counties in PA didn't meet the clean air standards, it is important that we work hard to lower the amount of emissions we put out into the air each day. The PA Clean Vehicles Program is a great way to start this reduction process.

Sincerely,

Janet Saunders 2400 W. Chew Street, Box 2186 Allentown, PA 181045564

From:

bill.dautremontsmith@gmail.com

Sent:

Wednesday, March 22, 2006 12:25 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Please do not be swayed by cost/benefit analyses that are quantified in today's dollars only. Please also note the recent NRC report that concluded that the stricter restrictions pioneered in CA have been of benefit to the nation overall.

Sincerely,

William Dautremont-Smith 1432 Valley View Circle Orefield, PA 180699075

From:

Harry and Esther Buck [emhbuck@innernet.net]

Sent:

Tuesday, April 04, 2006 7:49 PM

То:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Harry and Esther Buck 1053 Wilson Chambersburg, PA 17201-1247

April 4, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Harry and Esther Buck 717-263-8303

From:

dms352@yahoo.com

Sent:

Thursday, March 02, 2006 6:14 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I know laws are state wide, and you probably can't influence other states to make certain laws, but I feel that every state should do more to decrease pollutants produced from cars. Why is it that some states don't even have mandatory state inspections for vehicles? AKA FLORIDA. I don't feel that is is right that they don't even have regulated car inspections when other states do. I live in an area where we have car inspections as well as emissions test for our vehicles. This year I visited Florida and I found out that they don't even have car inspections. It is rediculous!

I am proud of Pennsylvania for doing what we already do to elliminate pollution from vehicles.

WE NEED OTHER STATES TO DO THE SAME! It doesn't really help much if some states care and others don't!

Sincerely,

Dawn Scheets 251 Cambridge Lane Newtown, PA 189403322

From:

jordan.offutt@verizon.net

Sent:

Thursday, March 02, 2006 6:26 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Word. up. And Ginko trees. We should plant some.

Sincerely, Jordan Offutt Jordan Offutt

Pittsburgh, PA

From:

jab56@psu.edu

Sent:

Thursday, March 02, 2006 5:49 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Our state is extremely precious in the natural resources that we have and we should do all that we can to protect them.

Sincerely,

Jennifer Brackbill PO Box 652 Pine Grove Mills, PA 168680652

From: Sent: thorncharle@mindspring.com

Thursday, March 02, 2006 5:40 PM EP, RegComments

To: Subject:

PA Clean Vehicles Program

To Whom It May Concern:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

It is imperative that we get off the crackpipe of foreign oil. We need to conserve fuel and reduce the emmissions resulting from vehicles. This will force automakers to create cleaner vehicles and further push them to develop alternate fuel technologies.

Furthermore, these standards must apply equally to all passenger vehicles. SUV's and pick-up trucks can no longer be allowed to have unequal and less stringent standards especially since they are the most prolific smog producers.

Also, the environmental impact would greatly reduce toxic emmissions and prevent health risks such as asthma.

I urge you to pass this bill!!

Sincerely,

Tom Maduzia 2529 S Jessup St Philadelphia, PA 191484411

From:

dalex@macconnect.com

Sent:

Thursday, March 02, 2006 5:42 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

More, and better funded, mass transit couldn't hurt either!

Sincerely,

David A. Walker Jr.
David A. Walker Jr.
3428 Osmond Street
Philadelphia, PA 19129-1431

From:

crogers15701@yahoo.com

Sent:

Thursday, March 02, 2006 5:25 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. We want the strongest possible pollution standards for cars and trucks please don't support legislative efforts to block these standards.

Sincerely, Lucinda Rogers

Lucinda Rogers 944 East Pike Indiana, PA 157018991

From: Sent: twodogsfarm@erols.com

Thursday, March 02, 2006 5:19 PM

To: Subject: EP, RegComments
PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am not some tree hugger but I would like to have a planet with ice caps and breathable air to leave to my grandchildren. Not to mention reducing our reliance on foreign oil. Higher standards for auto manufacturers are long overdue and would have happened much sooner if common sense had prevailed over lobbying and political interests.

I will be very proud if Pennsylvania leads the way on this initiative.

Sincerely,

Kris Becker 569 Headquarters Road Erwinna, PA 189209245

From:

trish134@surferie.net

Sent:

Thursday, March 02, 2006 5:04 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

We citizens of Pennsylvania have a right to decide how best to make our environment cleaner and safer. We don't need a weak, politicized federal EPA to take over for us.

Sincerely,

Beth Rockwell 322 Washington Pl Erie, PA 165052548

From:

ert@sas.upenn.edu

Sent:

Thursday, March 02, 2006 4:57 PM

То:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am looking forward to the day when all vehicles are environmentally clean -- and I firmly believe that government participation now will be a significant driving force toward the creation of cleaner, less expensive, and better clean vehicles for the future. So taking action at this time would not only be the responsible thing to now, it would also have a major and very significant future impact.

Sincerely,

Edward Thornton 7 Swarthmore Pl Swarthmore, PA 190811023

From:

frohman@dickinson.edu

Sent:

Thursday, March 02, 2006 4:52 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to express my support for the PA Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. It is critical that we protect the environment by all reasonable means. If that means increased personal expenditures, then that's the way it'll have to be. Auto manufacturers are likely to find ways to keep costs within reason while maintaining the highest fuel efficiency and reducing pollutants.

I hope the state will move ahead as quickly as possible in implementing the PA Clean Vehicles Program.

Sincerely,

Dave Frohman 456 C St Carlisle, PA 170131833

From:

crd@andrew.cmu.edu

Sent:

Thursday, March 02, 2006 10:04 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. I live in Allegheny county and can say from firsthand experience that the air quality this past summer was abysmal due to particulate pollution.

Sincerely,

Chad Dougherty 477 Olive Street Pittsburgh, PA 152374886

From:

jpmartin59@yahoo.com

Sent:

Thursday, March 02, 2006 3:10 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. This buness of saying that the CA Legislature will be setting our agenda is bogus. Do not be mislead. Thank you.

Sincerely,

jere martin
4 pilgrim drive
LANCASTER, PA 176036421

From:

annec.ewing@verizon.net

Sent:

Thursday, March 02, 2006 3:11 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I want my grachildren to be able to breathe PA air when they visit.

Sincerely,

Anne Ewing 510 E. mt. Pleasant Ave Philadelphia, PA 191191232

From:

rism@iup.edu

Sent:

Thursday, March 02, 2006 3:11 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I represent Indiana University of Pennsylvania's Environmental organization.

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am concerned about the health of Pennsylvania residents as a result of something that you have the power to change. There is no reason why 370,000 Pennsylvania residents should suffer from asthma attacks as a result of smog created by carbon dioxide emissions. Sincerely, Marisa Foltz

Maria Foltz 1941 Stoney Creek Road Dauphin, PA 170189605

From:

dorsey10@verizon.net

Sent:

Thursday, March 02, 2006 3:13 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. The resulting health benefits for Pennsylvanians are enough of a reason to move ahead with this legislation. In addition, the Pennsylvania Clean Vehicles Program will help secure a cleaner environment for our children and grandchildren.

Sincerely,

Lucia Dorsey 1020 Hershey Mill Road West Chester, PA 193805811

From:

nikitasweeta@msn.com

Sent:

Thursday, March 02, 2006 2:54 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

As a lifetime Pennysvlanian, I can think of no cause that is more pressing than the immediate implementation of a strong and enforceable Pennsylvania Clean Vehicles Program, with strong clean air standards for cars and trucks that go beyond weakened federal requirements.

I speak for myself my husband and many friends in my community.

Sincerely,

Grace Soltis 821 Valley Rd Blue Bell, PA 194222054

From:

winey@seas.upenn.edu

Sent:

Thursday, March 02, 2006 8:24 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

As a city dweller with asthma I am particularly keen to improve air quality.

Sincerely,

Karen Winey

Philadelphia, PA 19103

From:

babloom@verizon.net

Sent:

Thursday, March 02, 2006 4:27 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

Clean Air is important for the economic health of our state as well as the health of the individuals within it. Since cars are major sources of pollution, I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program and its clean air standards for cars and trucks that go beyond weaker federal requirements. Please defeat attempts to weaken the standards.

Sincerely,

Barbara Bloom 49 E. Mermaid Lane Philadelphia, PA 191183548

From:

tinades@verizon.net

Sent:

Thursday, March 02, 2006 4:28 PM

To: Subject: EP, RegComments
PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This is one step that we can do that is really a win-win solution. Lead the way, and we will improve our air quality for so many who suffer.

With gratitude

Tina Shelton 1307 Edgewood Rd Havertown, PA 190834132

From:

HUFFDCLG@AOL.COM

Sent:

Thursday, March 02, 2006 4:26 PM

То:

EP, RegComments

Subject:

PA Clean Vehicles Program

## Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I also believe we should be studying countries like Brazil who are self-sufficient for automobile fuel.

Sincerely, Carol S. Huff CAROL HUFF 112 WOODSHIRE DRIVE PITTSBURGH, PA 152151714

From:

panastas@sju.edu

Sent:

Thursday, March 02, 2006 4:24 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

There appears to be consensus among many scientists that this will be a very efficient way for us to reduce pollution, greenhouse gases, and our "addiction to oil."

Sincerely,

Phyllis Anastasio Stackhouse 833 Twining Rd Dresher, PA 190251814

From:

levanal@yahoo.com

Sent:

Thursday, March 02, 2006 4:25 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Cars are the biggest contributor to air pollution and our dependency on foreign oil. It is time for PA to make cleaner vehicles a priority. Sincerely,

Levana Layendecker 226 S. 46th St. Philadelphia, PA 191394508

From:

blumsr@hotmail.com

Sent:

Thursday, March 02, 2006 4:23 PM

To:

EP, RegComments

Subject: PA Clean Vehicles Program

Dear EQB:

I understand that the EQB is holding a 60 day public comment period to gauge residents' opinions on the Clean Vehicles Program.

I strongly urge you to implement this program, with its clean air standards for cars and trucks that go beyond weaker federal requirements.

The air we breathe is too dirty, and too many residents are having their life shortened by lung diseases as a result.

Sincerely,

Steve Blum 7717 McCallum St. Philadelphia, PA 191184307

From:

EGKALS@YAHOO.COM

Sent:

Thursday, March 02, 2006 4:18 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

We've got big pollution problems in this state. Let's encourage people to move into Pennsylvania and not drive them out of the state!

Sincerely,

Elaine and Grant Kalson

Elaine Kalson 976 Lehigh Dr Yardley, PA 190672906

From:

henrynco@paonline.com

Sent:

Thursday, March 02, 2006 4:12 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

Dear EQB:

I favor the Pennsylvania Clean Vehicles Program and clean air standards for cars and trucks that go beyond weaker federal requirements.

As a long-time member of AAA, I oppose them fighting this Program.

Sincerely, Henry Frank 2763 Island Ave Philadelphia, PA 191532225

From:

smcoppin@uvm.edu

Sent:

Thursday, March 02, 2006 4:12 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Air quality is an important issue in cities, the current levels of pollution are enough to cause health problems. Many children, including my brother, have asthma which is caused and/or aggravated by poor air quality. Please protect his health and the health of all of the city's citizens by promoting strong clean air standards.

Sincerely,

Sarah Coppinger 9183 Ryerson Rd Philadelphia, PA 191143403

From:

barbmisti@aol.com

Sent:

Thursday, March 02, 2006 8:37 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This is necessary to improve air quality, reduce consumers' energy costs, and improve the health of residents of Pennsylvania.

Sincerely,

Barbara Mistichelli 138 Rutledge Avenue Rutledge, PA 190702117

From: Sent:

MCHORINE@DEJAZZD.COM Thursday, March 02, 2006 8:35 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Cleaner air means savings in medical costs, hospitalization and many respiratory infections. It can mean a cleaner and healthier environment for our children.

Please move for passage of this Program as quickly as possible.

Sincerely, Merrill C. Horine Merrill C. Horine 115 Bentley Ln Lancaster, PA 17603-6224

RECEIVED

From:

trcresswell@aol.com

Sent: To: Thursday, March 02, 2006 8:50 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

2007 MAR 10 AM 9: 30

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear EQB:

I think it is very important to the health of Pennsylvanians, therefore am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This program will ultimately result in economic improvements (less sick time, fewer hospital visits) for our state.

Sincerely,

Suzanne Cresswell 830 Plumtry Dr West Chester, PA 193822208

From:

maben730@aol.com

Sent:

Thursday, March 02, 2006 8:49 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

Please move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

For the sake of our health and our environment, we must act immediately in this matter.

Sincerely,

Mary Ann Bentz 733 N. Penna. Ave. Morrisville, PA 19067

From:

rsaylor@nursing.upenn.edu

Sent:

Thursday, March 02, 2006 6:12 PM

To: Subject:

EP, RegComments
PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

It is a measure that is absolutely necessary to take in order to have a world worth living in for us and future generations. So, I ask you again to please implement the Pennsylvania Clean Vehicles Program to ensure a better place to call home.

Sincerely,

Rhonda Saylor 2031 Chestnut St. Apt. #4F Philadelphia, PA 191033326

From:

nutripeg@aol.com

Sent:

Thursday, March 02, 2006 7:42 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

This is clearly the right thing to do at a ytime when so many other environmental laws have been weakened.

Thank you. Sincerely,

Margaret Schiavo

Margaret Schiavo 235 w 7th ave collegeville, PA 194262111

From:

DRDAD@COMCAST.NET

Sent:

Thursday, March 02, 2006 4:33 PM

To: Subject: EP, RegComments

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible to implement the Pennsylvania Clean Vehicles Program. As you know, its clean air standards for cars and trucks go beyond weaker federal requirements; I feel this is a very important step to take to improve air quality and the health of Pennsylvanians and our friends to the east in New Jersey.

Sincerely,

Jonathan Kleinman 464 Leedom St Jenkintown, OH 190463840

From:

mjbst57@pitt.edu

Sent:

Thursday, March 02, 2006 4:29 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

The PA Constitution formalizes the right of all Pennsylvanians to clean air and water. That guarantee exists to prevent the weakening of environmental protections, which is exactly what the PA House and Senate bills will do.

I urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Mickey Bannon 18 Mildred St Pittsburgh, PA 152052810

# Robyn Liska 125 Gideon Drive Kennett Square PA 19348

March 25, 2006

Commonwealth of Pennsylvania Environmental Quality Board

RE: Clean Vehicles Program

To Whom It May Concern:

I would like to express my support for the Clean Vehicles Program as proposed by the Commonwealth of Pennsylvania. I believe we should use all available technology to reduce harmful pollutants from their source, before they enter the atmosphere. This proposed ruling would begin to address the emissions from cars and light trucks.

I believe this ruling should be put into effect without modification and without further delay. We are already remiss in improving our state's environmental standards and this piece of legislation is key if we aspire to be responsible environmental stewards. The issues of global warming, human-induced respiratory illness, and air pollution will not go away without committed, visionary political leadership. It is your responsibility as our elected state representatives to pass this legislation which will protect us and our children. Please support this bill and help ensure a safer future for all.

Sincerely,

Roben Liska Robyn E Liska

MAR

# Terry Kramzar 702 Haldane Drive Kennett Square PA 19348

March 23, 2006

Commonwealth of Pennsylvania Environmental Quality Board

RE: Clean Vehicles Program

To Whom It May Concern:

I would like to express my support for the Clean Vehicles Program as proposed by the Commonwealth of Pennsylvania. I believe this ruling should be put into effect without modification.

I believe we should use all available technology to reduce harmful pollutants from their source, before they enter the atmosphere. This proposed ruling would begin to address the emissions from cars and light trucks.

Sincerely,

Terry Kramzar

MAD - 1

Gary and Veronique Liska

4 Honeysuckle Lane

Kennett Square PA 19348

March 23, 2006

Commonwealth of Pennsylvania

**Environmental Quality Board** 

RE: Clean Vehicles Program

## To Whom It May Concern:

We would like to express our support for the Clean Vehicles Program as proposed by the Commonwealth of Pennsylvania. We believe this ruling should be put into effect without modification.

We believe we should use all available technology to reduce harmful pollutants from their source, before they enter the atmosphere. This proposed ruling would begin to address the emissions from cars and light trucks.

As parents of a child with asthma with a worsened condition ever since living in Pennsylvania over the last 8 years, we are in full support of legislation that will promote stricter standards for cutting emissions of smog-forming pollution from cars and trucks.

Sincerely,

Gary and Veronique Liska

## Sandy Mayer 10 Walnut Valley Road Chadds Ford, PA 19317

March 23, 2006

Commonwealth of Pennsylvania Environmental Quality Board RE: Clean Vehicles Program

To Whom It May Concern:

I would like to express my support for the Clean Vehicles Program as proposed by the Commonwealth of Pennsylvania. I believe this ruling should be put into effect without modification.

I believe we should use all available technology to reduce harmful pollutants from their source, before they enter the atmosphere. This proposed ruling would begin to address the emissions from cars and light trucks.

Sincerely,

Sandy Mayer

MAD

From:

rgrainer@adelphia.net

Sent:

Thursday, March 02, 2006 7:36 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Rich Grainer

While you are at it, save some money for horrible bridge conditions. Richard Grainer 497 Bassett Drive Bethel Park, PA 151023205

From:

tbwitholt@gmail.com

Sent:

Thursday, March 02, 2006 7:38 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I am all for cleaning up pollution and Pennsylvania needs to stay at the forefront of environmental issues.

Sincerely,

Thomas Witholt 101 N Dithridge St, Apt 1102 Pittsburgh, PA 152132653

From: Thomas Au [thomxau@gmail.com]

**Sent:** Friday, April 07, 2006 11:13 AM

To: EP, RegComments

Subject: Comments on Proposed Rulemaking on the Pennsylvania Clean Vehicles Program

# Comments on the Proposed Rulemaking on the Pennsylvania Clean Vehicles Program (25 Pa. Code Chapters 121 and 126)

Dear Members of the Environmental Quality Board:

The Clean Vehicles Program is a win-win for Pennsylvanians: it will improve air quality and our health, give car buyers more options, reduce our contribution to global warming and regional ozone problems, and result in cost savings from engine-efficiency. The program will also help reduce demand for gasoline.

Implementing this program is critical for Pennsylvania. Pennsylvania is required to meet healthy air standards one way or another. If automobiles do not contribute their share of pollution reductions, the burden of pollution reductions will fall on businesses and industries. In many urban areas, the growing numbers of vehicles constitute an increasingly larger portion of the total air pollution problem. Pennsylvania has already factored in necessary pollution reductions that will be achieved by the Clean Vehicles Program into its federally approved State Implementation Plan (SIP). Seven years ago, under the Ridge administration, the Environmental Quality Board recognized that this plan was a necessary part of a comprehensive strategy to reduce smog-forming pollution throughout the Commonwealth.

On March 16, 2006, the National Academy of Sciences' National Research Council (NRC) issued a new report reaffirming the importance of states having the ability to adopt California's more stringent air pollution standards for automobiles and trucks. The NRC considered alternatives that would weaken state authority, but did not support recommendations that would change current law or prohibit states from adopting California's cleaner vehicle emission standards.

The NRC report, entitled State and Federal Standards for Mobile Source Emissions, found that California's approach to setting vehicle pollution standards continues to provide emissions control, air quality benefits and technological innovation beyond the federal standards. California's more protective standards allow states to achieve greater pollution reductions to protect public health and the environment. Eight other states, including New York and New Jersey, have already followed California's lead. Indeed, many of the cars sold in Pennsylvania today meet current California standards.

The practical result is that the NRC report rejected arguments advanced by vehicle manufacturers which would curtail state authority to adopt the California standards and to further reduce air pollution from motor vehicles.

Please protect our health, our air quality, and our economy by supporting implementation of the Pennsylvania Clean Vehicles Program.

Thomas and Justina Au 1528 Dogwood Drive

From:

cba5300cba@gmail.com

Sent:

Thursday, March 02, 2006 12:47 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the State to just follow the Federal Requirements. The residents of our State do not need to be penalized by more rigorous standards--since a great amount of pollution is generated in other states and is carried many miles through the atmosphere.

Residents in the Philadelphia area already bear the "undue burden" of emmissions testing and special fuels that we are forced to buy to operate our vehicles.

Even though I have 3 family members with asthma, I do not agree with Penn Environment that we need "california" standards.

Please consider the "ADDITIONAL costs and the undue burden" on Pennsylvanians--fuel costs are already breaking some residents budgets---what will this do to them???

What is the cost-benefit-ratio to this proposal? I urge you to defeat this proposal. Sincerely,

Clair Arocho 414 Welsford Rd Fairless Hills, PA 190304016

From:

crkcity@pitt.edu

Sent:

Thursday, March 02, 2006 12:34 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

As a public health professional and assistant professor, I am quite aware that Nitrogen oxide and volatile organic compound creates triggers asthma attacks and contributes to global warming. If PA implements the Clean Vehicles Program, smog-forming pollution from vehicles would be cut 10%, toxic benzene pollution up to 15%, global warming emissions down nearly 25% percent by 2025, relative to the weaker federal program now being considered. So move head with the Clean Vehicles Program please.

Thank you,

Christopher Keane 1551 Old Beulah Road PIttsburgh, PA 15235

From:

sydheese@verizon.net

Sent:

Thursday, March 02, 2006 1:00 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

It is clear that Global Warming and air quality are a huge issue. Do it for our children, PLEASE!

Sincerely,

Sydney and Margaret Heese 14 Dunkin Drive Washington Crossing, PA 18977 Sydney and Maggie Heese 14 Dunkin Drive Washington Crossing, PA 18977

rom: ent:

tunickfamily@hotmail.com

Thursday, March 02, 2006 12:55 PM

o: ubject: regcomments@state.pa.us PA Clean Vehicles Program

#### ear EQB:

am writing to urge the state to move ahead as quickly as possible in implementing the ennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that beyond weaker federal requirements. Please this is an important issue for the future of ur children and the air that they breathe.

incerely, ail Tunick ail Tunick

296 mulberry lane

afayette hill, PA 19444

From:

rbcohen@wustl.edu

Sent:

Thursday, March 02, 2006 12:52 PM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Higher fuel economy is a policy that everyone can support and that government can enforce with today's technology. Environmental issues are of critical importance for my generation of young voters, as we will either reap the benefits or pay the immense costs of today's environmental policy. Thus, I strongly support this policy and ask for my representatives to do the same.

Sincerely, Rachel Cohen Rachel Cohen 1445 Huntingdon Rd. Abington, PA 19001

From:

blucabau@aol.com

Sent:

Thursday, March 02, 2006 12:41 PM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Help us make Pennsylvania a cleaner, healthier place for our children. Sincerely,

Beth Lucabaugh 15168 Bonnair Road Glen Rock, PA 17327

From:

janelhutton@hotmail.com

Sent:

Sunday, March 05, 2006 7:37 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

### Sincerely,

Jane L. Hutton
Our ability to breathe depends on it...our ability to survive!!!!
jane hutton
111 Vernon Drive
pittsburgh, PA 152281112

From:

bds202@hotmail.com

Sent:

Sunday, March 05, 2006 7:23 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. We need to lead in this. Sincerely,

Beryl Sternagle RR 2, Box 400 Hollidaysburg, PA 166489230

From:

R1Cuttgood@hotmail.com

Sent:

Sunday, March 05, 2006 6:23 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

My Dad and Grandma are elderly and Dad has respiratory problems. It would mean a great deal if the Clean Vehicles Program went into effect ASAP. We here in southern Chester county appreciate good breathing air..the cleaner the better! Thank you very much for your time.

Sincerely,

James Orcutt

James Orcutt 46 N. 3rd Street

Oxford, PA 193631424

From:

prosier1@verizon.net

Sent: To: Saturday, March 04, 2006 2:09 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I urge you to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks. Pensylvanians need to establish their own strict standards regardless of what the federal government decides to do. Let us act proactively to protect the unborn and newborns so that their environment will be cleaner than ours. That is, as Teddy Roosevelt put it a century ago, "a patriotic duty."

best wishes, Dr. Paul C. Rosier

Paul Rosier 409 Bickmore Drive Wallingford, PA 190866806

From: Alan & Hazel Cope [copes@verizon.net]
Sent: Saturday, March 04, 2006 1:11 PM

To: EP, RegComments

Subject: COMMENTS FOR PUBLIC HEARING OF EQB, MARCH 14.

As a Registered Nurse I know only too well how Pittsburgh's poor air quality adversely effects the human body, especially the young and old. As a fan and resident of Pittsburgh I also know, and regret, that people are deterred from moving here because of the poor air quality. As an extremely enthusiastic owner of a Toyota Prius I know that better gas mileage and greatly reduced emissions are possible without any sacrifice of convenience or quality. (Quite the opposite).

I therefore urge the EQB to make every endeavor to ensure that vehicles sold in Pennsylvania have low emissions and are more fuel efficient.

Other states also have proved the benefits of reducing vehicle idling. I hope the EQB will also consider measures to encourage this. Just getting people aware of the fuel costs of prolonged idling would be a start.

It is sad that although the technology exists to temporarily shut down engines when the vehicle is stopped, as in the Prius, it has not been widely utilised.

Hazel Cope.

From:

eroosa@enter.net

Sent:

Monday, March 06, 2006 8:35 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. This is a health issue and cannot wait.

Sincerely,

Linda Roosa 6689 Vera Cruz Rd. Center Valley, PA 180348652

From:

ejensen1@swarthmore.edu

Sent:

Tuesday, April 04, 2006 9:06 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I drive a hybrid car, and in talking to other people about it, I've been impressed with how much people want us to have cleaner air and more fuel-efficient cars, but just need a little extra incentive to do it. This is an area where the state can do a huge amount of good; I urge you to support the Clean Vehicles Program.

Sincerely,

Eric Jensen Swarthmore, PA Eric Jensen 410 N. Swarthmore Ave. Swarthmore, PA 190811417

From: Sent: treeleaf@rcn.com

Sent: To: Tuesday, April 04, 2006 9:58 PM

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I can remember being drowsy spending a calm sunny summer day in Philadelphia and being fine again once I drove a distance out of the city. I think I was suffering from high levels of Carbon monoxide in the City. So please implement the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Otherwise our cities will be unlivable.

Sincerely, Virginia Fitzpatrick Virginia Fitzpatrick 6 Embassy

East Norriton, PA 19403-4012

From:

Matthew Cleveland [matt@occasionsdjs.com]

Sent:

Tuesday, April 04, 2006 10:25 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules of the PA Clean Vehicles Program

Matthew Cleveland 64 Beech Ln Elizabethtown, PA 17022-2517

April 4, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

My wife and son both suffer from asthma.

There are 37 counties in Pennsylvania with smog pollution that is higher than allowed by health-based federal standards. Unless we reduce vehicle emissions, there will be no room for industry to expand in those counties.

Clean cars are more fuel-efficient than heavy polluters, and gasoline is expensive.

Action is required to combat global warming - and reducing greenhouse gas emissions is a critical part of that.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Matthew

From:

Lauren Ivy Chiong [Lchiong@earthlink.net]

Sent:

Tuesday, April 04, 2006 10:47 PM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Lauren Ivy Chiong 8 Crum Ledge Lane Swarthmore, PA 19081-1301

April 4, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I was shocked to learn that Delaware County has smog emission levels higher than health-based federal standards. Please encourage automakers to improve emissions standards. We have the technology--why not do it now to make the air more breathable when our kids go outside and play? Thank you.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Lauren Ivy Chiong

From: RL

RL [rlange@suscom.net]

Sent:

Tuesday, April 04, 2006 11:01 PM

To:

EP, RegComments

Subject: Strongly Oppose Attempt to Copy California Environmental Regulations on Vehicles

My understanding is that the State of Pennsylvania is considering implementing measures which will increase the cost of automobiles by as much as \$ 3000.

I have lived in both California and Pennsylvania and am currently a legal resident of Pennsylvania. I can assure you that the quality of life is far better here in the Keystone State.

Let's keep it that way. California is not a model for anything, let alone environmentalism which has been run to extremes there.

R Lange Blanchard, PA 16826

From:

Michael Helfrich [lowsusriver@hotmail.com]

Sent:

Wednesday, April 05, 2006 1:10 PM

To:

EP. RegComments

Subject:

Writing in support of proposed amendments to the rules governing the Pennsylvania Clean

Vehicles Program

Michael Helfrich 821 E Market St York, PA 17403-1101

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Citizens of Pennsylvania deserve cleaner air for our children and grandchildren. Our children have increasing rates of life-threatening lung problems such as asthma. Currently over half the counties in the state have unacceptable levels of pollutants, many coming from cars and trucks.

Its been proven that the costs for improvements to vehicles are less than 1% of the cost of a vehicle.

One more thing that I haven't heard mentioned is the contribution of vehicle pollutants to the problems in the Chesapeake Bay. Chemicals from exhaust contribute to nitrogen pollution. I believe that within a few years of enacting the proposed regulations, there will be a measurable reduction in the amount of pollutants entering the Susquehanna and Chesapeake Bay. This could benefit at least half the state by reducing the burdens on wastewater treatment plants and farmers to reduce their nitrogen loads. Remember, the Chesapeake Agreement is a legally binding contract, and we should voluntarily seek all means to reduce the pollutants leaving Pennsylvania and harming the waters of the Chesapeake Bay, before the federal government tells us what we will do.

Thank you for considering this information. I am in full support of the amendments proposed by the Environmental Quality Board.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Michael R Helfrich 717-779-7915

From:

John Carricato [jcarricato@hersheypa.com]

Sent:

Wednesday, April 05, 2006 8:07 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

John Carricato 699 Knight Road Harrisburg, PA 17111-4921

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that. It is time for the elected officials to start representing the best interest of the people and their long-term health instead of corporate interests. It is unconscionable behavior in this day and age to purposly allow more pollution when the technology exists to easily clean it up and prevent the known bad haelth effect on the most vulnerable of our population, the very young , the very sick, and the very old. Vote for pollution control now!!!!!!!!

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

John Carricato

From: Sent: Katherine Baker [k\_aeder@yahoo.com] Wednesday, April 05, 2006 9:22 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Katherine Baker 18 S. Ryanford Road Schwenksville, PA 19473-1660

April 5, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I find it difficult to comprehend how our government is capable of not taking environmental concerns seriously.

As a voter, I alsways take a serious look at how my candidates have voted in regards to environmental issues.

Please do everything in your power to ensure that our environment is protected.

Thank you very much for your time and consideration. I sincerely hope that you take action appropriately.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Katherine M. Baker

#### Hughes, Marjorie

From:

music@latrobepc.org

Sent:

Thursday, March 02, 2006 11:48 AM

To: Subject: regcomments@state.pa.us PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

The tougher requirements will also benefit us all by encouraging people to use more fuel efficient and ULEV vehicles. We are in the midst of an oil crisis but not many people realize it because they can still buy gas.

Passing tougher air standards will help bring about the use of newer, more fuel efficient cars and trucks with safe emission levels.

Sincerely, Michael Long Mike Long 861 Weldon St. Latrobe, PA 15650

#### Hughes, Marjorie

From:

jeanbrooks1@verizon.net

Sent:

Thursday, March 02, 2006 11:59 AM

To:

regcomments@state.pa.us

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. The health of our citizens is too important to just toss aside for the sake of the auto industry. A few dollars spent now on cleaning up emissions will save millions in health care costs down the road.

Sincerely,

Jean Brooks 106 W Montgomery Avenue - #6 Ardmore, PA 19003

From: Sent:

Ann Fuchs [annfuchs@comcast.net] Wednesday, March 22, 2006 11:58 AM

EP, RegComments

Fo: Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Ann Fuchs 3 Fairhill Drive Chadds Ford, PA 19317-9375

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

This is very important. Please adopt these important standards. '

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Ann Fuchs

From:

WEShibi@aol.com

Sent:

Thursday, March 02, 2006 11:59 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that

go beyond weaker federal requirements.

There is no excuse for obstructing this program when we know how important clean air is for each person's health and for keeping the environment free from impurities that affect other life. The only objection could be a greed-motivated one in which legislators kowtow to special interests who wish to avoid any added expenses which accompany keeping air clean. Now this is not the time legislators should want to be perceived as greedy! But it is time for them to start thinking about doing a good thing for the people they represent.

Sincerely,

Shirley Ellsworth 3970 Coplay Creek Rd. Schnecksville, PA 180783005

From:

carternorman@hotmail.com

Sent:

Thursday, March 02, 2006 3:47 PM

Го:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

[ am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

By joining other states that are setting higher standards, we leverage our efforts with theirs: we contribute towards creating a larger market for green technologies, increasing the incentive for businesses to work green, and decreasing the cost of those technologies.

Sincerely,

Norman Carter 538 S 48th St Philadelphia, PA 191432021

From:

rfinley2@verizon.net

Sent:

Thursday, March 02, 2006 11:48 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

I don't understand how anyone with a conscientious interest in the health of his feloow man and his own family also could not move ahead to implement this program as quickly as possible. Sincerely,

Ruth Finley 41 Landmark Drive Malvern, PA 193552472

From:

frenspaner@aol.com

Sent:

Friday, March 03, 2006 9:00 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

As a Pennsylvanian who grew up in an area where coke ovens and coal-fired locomotives nearly did me in as a childhood suffer of allergies and asthma, I thought that when those days became history, my future was rosier. Not so because of other pollutants, especially deisel engines and the continued emissions of coal-fired plants! Not so because of lack of action on the part of Federal and State governmental inaction or outright lack of action! The past few years, under the Bush Administration has set this country back by decades in the area of protection for the general population!

So, any opportunity to oppose pollution is high on my list of priorities, and I am writing to plead that our Commonwealth move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, as well as its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Charles Jacobs 696 Fruithurst Dr Pittsburgh, PA 15228-2534

From:

dáisy6617@yahoo.com

Sent:

Friday, March 03, 2006 9:09 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

We need to reduce our nation's fuel use!!! This fact has been made more and more clear over the years, as we have been troubled by war in Iraq and spiking gas prices, neither which would be an issue if we needed only a little oil. Deforesting our country is not a good option, as it will remove all the natural buffers we have remaining against natural deisasters, like hurricanes and floods. So rather than cutting down trees and drilling in the animal preserves, please move now towards a Pennsylvania and America which are clean users of energy. I would be proud to be a part of such a country; as it stands now, I wish I lived somewhere else, in a place which was taking care of its country and its people. We will not be able to develop into a more productive society without becoming healthier and more efficient. Clean energy and clean cars are the way to go. I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

Sincerely,

Elizabeth Farwell 915 s 49th st Philadelphia, PA 191433403

From: Sent: To: Hope Punnett [hpunnett@voicenet.com] Wednesday, March 22, 2006 12:15 PM

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Hope Punnett 5635 Wissahickon Ave Philadelphia, PA 19119-3725

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Farrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I have recognized this need by purchasing a car that meets the federal low emission vehicle standards for myself and my family. Such vehicles are only slightly more expensive than conventional but they are far more suel-efficient than heavy polluters, and gasoline is expensive.

Thank you for the opportunity to provide comment on this program that is pritical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Iope Punnett 15-848-5577

From:

pbv@juno.com

Sent:

Tuesday, March 21, 2006 4:32 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

We have already done a great deal of damage to the environment with poor quality standards; it's time we stood up for what's right! I don't want my children or grandchildren dying of cancer because we've failed to clean up the environment.

Sincerely,

Patti Vargo 2621 Patrice Ct Murrysville, PA 156681756

From:

rl.andersn@gmail.com

Sent:

Tuesday, March 21, 2006 4:36 PM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements. Both my husband and I have hybrids, one Prius and one Civic. Not only do they make a difference in our gasoline budget, but we know that they are helping preserve the environment. I would love for Pennsylvania to become the California of the east coast in regards to pollution control on vehicles.

Sincerely,

Robin Anderson 841 Hedgerow Dr State College, PA 168014264

From:

gadfly10@rcn.com

Sent:

Wednesday, March 22, 2006 9:54 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EQB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

All legislators cars bought or rented with state tax dollars should be Hybrid's

Sincerely,

Dennie Baker

dennie baker 863 euclid ave warrington, PA 189762165

From:

Michael Babitch [michael@camphillkimberton.org]

Sent:

Wednesday, March 22, 2006 10:03 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Michael Babitch PO Box 1045 Kimberton, PA 19442-1045

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

I have carefully read the arguments for not supporting the amendments. On the surface, they seem credible, but when one thinks about them carefully, they are specious. I do not have time to go into the details, but, after careful review, I even more strongly urge you to support the amendments and full implementation of the Clean Vehicles Program.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Michael Babitch

From: Sent: Cathy Fant [ctfant@yahoo.com]

Wednesday, March 22, 2006 7:38 AM

To:

EP, RegComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Cathy Fant 7790 Timber Ridge Rd Big cove Tannery, PA 17212-9446

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

Pennsylvania has not been tough on environmental issues, and its time for it to move ahead. Air pollution from cars, plus the fuel they consume must be dealt with.

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Cathy Fant

From:

belh@verizon.net

Sent:

Wednesday, March 22, 2006 7:49 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

#### Dear EOB:

I am writing to urge the state to move ahead as quickly as possible in implementing the Pennsylvania Clean Vehicles Program, and its clean air standards for cars and trucks that go beyond weaker federal requirements.

My husband is asthmatic and compromised air quality compromises his health. Also, Cleaner vehicles contribute less to global warming which is rapidly transforming our world in sometimes threateneing ways. Pennsylvania should join other states which have taken the lead on this issue!

Help to improve air quality and quality of life by promulgating stiffer standards for cars and trucks.

Sincerely,

Bonita Hay 9 Deaver PL Wyncote, PA 190951726

From: Sent: Dorene Pasekoff [alliums@yahoo.com] Wednesday, March 22, 2006 7:53 AM

To:

EP. ReaComments

Subject:

I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles

Program

Dorene Pasekoff 224 Morgan Street Phoenixville, PA 19460-3528

March 22, 2006

Comments - Environmental Quality Board (EQB) 16th Floor, Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Dear Comments Environmental Quality Board (EQB):

As a concerned citizen of Pennsylvania, I support the proposed amendments to the rules governing the Pennsylvania Clean Vehicles Program. I also support full implementation of the Clean Vehicles Program, as recommended by the Pennsylvania Department of Environmental Protection (DEP).

The federal Clean Air Act requires Pennsylvania to cut pollution from cars and trucks, and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

I recently purchased a pickup truck for my business -- I would have been happy to buy a hybrid, but there are no hybrid trucks! I'd have bought a hybrid car if I could use it for my business -- I needed a truck and I'd rather buy one that cuts air pollution.

Ten other states have already adopted California low emission vehicle standards, the same standards the Pennsylvania program has. What the heck is PA waiting for?

Thank you for the opportunity to provide comment on this program that is critical to cleaning our air, safeguarding our health, keeping our economy strong, and providing consumers with better vehicle options.

Sincerely,

Dorene Pasekoff

From: Sent:

fritzi@unconventional-wisdom.com Friday, March 03, 2006 10:14 AM

To:

EP, RegComments

Subject:

PA Clean Vehicles Program

Dear EQB

The Pennsylvania Clean Vehicles Program sounds like a big improvement over the current standards the federal requirement impose.

Please implement it as soon as possible! Our health and environment are greatly at risk!

Thank you.

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