

**Comments Regarding Proposed Rulemaking  
on the Pennsylvania Clean Vehicles Program**

March 14, 2006

To Members of the Environmental Quality Board:

Good afternoon. My name is Heather Sage, and I live at 454 44<sup>th</sup> Street, Pittsburgh, Pennsylvania, 15201. I am here to day to testify in support of the changes proposed by the Department of Environmental Protection to the Pennsylvania Clean Vehicles Program. I also speak in support of full implementation of this program as suggested by the DEP.

The Pennsylvania Clean Vehicles Program regulations need to be updated to reflect changes in California requirements, upon which our program is based, and to give automobile manufacturers flexibility in meeting the standards while the program is being implemented. Pushing back the compliance date from model year 2006 to 2008 won't result in significant delays in the sorts of air quality improvements that we as citizens will realize as a result of this important program.

Federal standards pertaining to low emission vehicles do not go far enough to improve Pennsylvania's ability to comply with federal air law. The Pennsylvania Clean Vehicles Program, and the changes proposed to it by DEP, will do far more to protect our health, the economic competitiveness of many parts of the state, like the Pittsburgh region, and our choice as consumers to have a variety of options in vehicles sold.

Pennsylvania DEP has done in-depth, state-specific analyses to determine the benefits of our Clean Vehicles Program as compared to the federal program. These analyses included data from the Pennsylvania Department of Transportation regarding vehicles traveling on our state's roads, Pennsylvania fuels, etc. The air quality—and more importantly the public health—benefits of the Pennsylvania program exceed the federal program. For example, this program when fully implemented will result in up to 12 percent *more* reduction in volatile organic compounds, and nine percent *more* reduction in NOx than would the federal program.

Those percentages matter immeasurably to the one million Pennsylvanians who suffer from breathing problems that result from and are made worse by air pollution. The Pittsburgh area alone saw 11 days last year where our air was literally unsafe to breathe, as we exceeded ozone standards. There are new studies that demonstrate ground-level ozone, even at levels far below the federal standards, is extremely unhealthy, and in fact deadly to those with problems like asthma.

We also need to make significant progress on reducing our contribution to global warming, now more than ever with the complete lack of federal leadership on this critical problem. With the program, we could see as much as 30 percent reduction in greenhouse gas emissions from new cars and trucks sold in Pennsylvania. Since we as a state

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contribute more to global warming gases than 105 other nations combined, we have a serious obligation to reduce our contributions as soon as possible. This is one easy way to do that.

The bottom line is that we need the Pennsylvania Clean Vehicles Program. Without it, we will not get far enough fast enough in most corners of the state, and in other areas, we won't be able to meet air quality standards at all. In southwestern Pennsylvania, a region where we are simply hampered in our ability to grow our economy while our air quality remains as poor as it is, we can't afford not to take every opportunity to get the problem under control. Industry has done and continues to do its part in improving air quality. We need to do our part to reduce our contribution to the problem.

The Pennsylvania Clean Vehicles Program is a simple, easy, cost-effective way to do that. It's already working in neighboring states, and the costs of cars there are not more expensive than vehicles here—yet they pollute far less. It is a win for Pennsylvania. Thank you.

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