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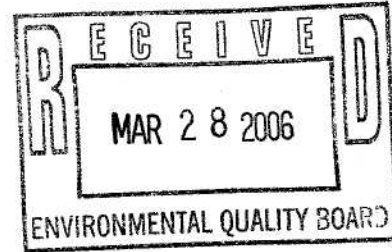
INDEPENDENT REGULATORY
REVIEW COMMISSION



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Testimony of the SE PA Group of the Sierra Club In Support of a PA Clean Vehicles Rule March 28, 2006

My name is Dennis R. Winters, and I am the Vice-Chair and Conservation Chair of the Southeastern Pennsylvania Group of the Sierra Club. On behalf of the approximately 10,000 members of the Sierra Club in Chester, Delaware, Montgomery, and Philadelphia counties, I want to thank the Environmental Quality Board, the Department of Environmental Protection, and the House Transportation Committee and its Chairman for this opportunity to comment on this critical issue for the Commonwealth's environment and the health of every Pennsylvanian.

The Southeastern PA Group of the Sierra Club would like to add its voice to others who are calling for implementation of the National Low Emission Vehicle (NLEV) program in 2008. NLEV or the "Clean Vehicles Program" has already received unanimous votes of the EQB regulations under two Governors.

The Clean Vehicle requirements will reduce transportation-related emissions including the smog-precursors, Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NO_x), as well as other toxics and carbon dioxide (CO₂), a major contributor to global warming and climate change. When fully implemented, NLEV will reduce VOCs by 12 percent, NO_x by 9 percent, toxic benzene by 15 percent, and CO₂ by 25 – 30 percent.

The Clean Vehicles program will reduce transportation costs for vehicle owners by providing improved fuel economy. With rapid and persistent rise in gasoline prices, doing anything to improve the efficiency of the Commonwealth's vehicle fleet is performing a huge public service. There is every reason to believe that the annual savings to consumers will exceed any increase in clean vehicle production costs. This is particularly true if Pennsylvania joins New Jersey, New York, California, and a host of other northeastern states that have already adopted these vehicle changes. As the vehicle manufacturers respond to this market, it is more than likely that production volumes will absorb any increase in production costs. The American automakers are already suffering for the lack of LEVs capable of competing with those of foreign manufacturers. How many otherwise worthwhile regulations actually save consumers money and a major American industry?

More importantly, a PA Clean Vehicles requirement will aid cities and municipalities of the Commonwealth who attempt to reduce their overall greenhouse gas emissions. In Philadelphia's case, vehicles offering greater fuel efficiency will add significantly to an already aggressive program designed to meet the requirements of the U.S. Mayor's Climate Protection Agreement. As of March 24, 2006, 219 mayors representing 43.7 million Americans had signed onto

the agreement. Mayor Street was one of the first U.S. mayors to sign the agreement and because the vehicles that make up our transportation system produce approximately forty percent of all greenhouse gases, improving vehicle mileage results in less carbon dioxide as well as fewer emissions that are hazardous to the public's health.

In Summary, implementation of the Pennsylvania's Clean Car Program in 2008 represents a single action that can improve air quality, reduce greenhouse gas emissions, and save consumers money. We encourage you to adopt this program on schedule and without any weakening.

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