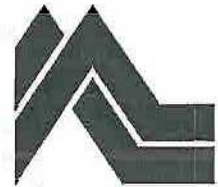


Original: 2523

VIA E-MAIL

April 12, 2006

Chairperson Kathleen A. McGinty and Members  
Pennsylvania Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477



**sierra  
research**

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**Re: Sierra Research, Inc. Comments on Proposed Rulemaking  
(25 PA Code Chs. 121 and 126) Re Pennsylvania Clean  
Vehicles Program**

Dear Chairperson McGinty and Members:

Sierra Research, Inc., is an environmental consulting firm located in Sacramento, California. We have followed the development of the California low emission vehicle, zero emission vehicle, and greenhouse gas regulations since their inception, and we have also examined the materials prepared by the Department of Environmental Protection (DEP) in support of adoption of the proposed rulemaking. Attached please find our comments on the proposed rulemaking.

Following instructions from EQB staff, we are today transmitting our written comments electronically to the designated e-mail address. Supporting data and reference materials will be placed on a disk and transmitted via overnight courier for delivery tomorrow, April 13, 2006. We were specifically informed that this process is available to allow for submission of files too large to send by e-mail, and that it complies with the applicable comment deadline.

As you will see from our enclosed comments, our analysis demonstrates that adoption of the proposed rulemaking would have the effect of substantially increasing smog-forming emissions in Pennsylvania. Based on what we believe are the most realistic assumptions about the costs and methods of compliance with the California regulations in Pennsylvania, our analysis shows an increase in smog-forming emissions of almost 8 tons per summer day in Pennsylvania statewide in 2020 under a "National" car scenario where manufacturers respond to the CARB greenhouse gas regulation by redesigning all vehicles sold nationwide, and an emissions increase of about 49 tons per summer day in Pennsylvania statewide in 2020 under a "Two-Car Scenario" where only those vehicles sold in California and in other states that have adopted the California program are redesigned.

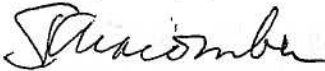
We are unaware of any analysis performed by DEP regarding the impact of adoption of the California regulations on emissions of smog-forming pollutants in Pennsylvania and would like to stress that reliance on the work performed by the California Air Resources Board regarding how the regulations would affect California has little, if any, relevance as to how the regulations would affect Pennsylvania. In contrast, our analysis examines

in a complete and direct manner how the California regulations will affect Pennsylvania and is, to our knowledge, the only one that examines the impact of the rule specifically in Pennsylvania.

Based on our analysis, we believe that the EQB should not proceed with adoption of the proposed rulemaking because it will substantially increase smog-forming emissions. If the EQB receives any other comments on the environmental aspects of the California regulations in Pennsylvania from other parties, we would like to be advised of that fact and to be given an opportunity to provide comments on any such submissions.

Although our comments and the electronic files that explain our analysis are complete, we would be glad to confer with the EQB or DEP regarding our comments and the analysis that we have performed. Please contact my partners Tom Austin or Jim Lyons, or me if you would like to have such a discussion.

Sincerely,



S. Kingsley Macomber  
General Counsel