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March 10, 2008

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Environmental Quality Board
 Rachel Carson State Office Building, 16th Floor
 400 Market Street
 P.O. Box 8477
 Harrisburg, PA 17105-8477

ENVIRONMENTAL QUALITY BOARD
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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

To Whom It May Concern:

Following are comments from the League of Women Voters of Pennsylvania regarding the proposed rulemaking related to the Diesel Vehicle Idling and Auxiliary Power Systems.

In 1971, the League of Women Voters reached a position in support of federal air pollution controls on industrial production, on government installations, on fuels and on vehicles, notwithstanding the higher prices and taxes that might result. The position opened the way for League action at the federal, state, regional and local levels.

The League of Women Voters of Pennsylvania strongly supports the proposed Idling Reduction Regulation proposed by the Environmental Quality Board for four major reasons.

Health Issues

Diesel engines emit nitrogen oxide, volatile organic compounds and fine particulate matter, pollutants that cause and/or exacerbate breathing problems such as asthma, bronchitis and emphysema¹. Over a lifetime, health risks include increased cancer, reduced heart health and arteriosclerosis². Furthermore, children's health is more at risk, because they have more lung surface area compared to body weight and have higher respiratory rates. Health risks for children include: a) slowed lung function and growth, b) increased asthma attacks, c) respiratory infections and coughing, and d) increased allergic reactions. Pennsylvania has many diesel emission hot spots in both Eastern and Western Pennsylvania, placing residents at more risk for breathing and other health disorders.³

Environmental Issues

The League of Women Voters believes that "global climate change is one of the most serious threats to the environment." In February, the United Nations-sponsored International Panel on Climate Change reported that there is 90% likelihood that human activity is influencing the warming of the planet. Pennsylvania contributes one percent of the world's greenhouse gases. Reduction in diesel emissions along with other pollution decreasing policies will contribute to improved air and water quality and an improved state economy. The League believes negative impacts of global warming on PA include:

- Loss of State's ski industry and other winter recreation,
- Loss of breeding areas of many species of songbirds,
- Severe heat waves,
- Crop yield change by as much as 39%,

Decline in forested areas,
Lower stream and river flows and lake levels,
Increased storm related property damage.

In addition, sportsmen are reporting disease typically found in warmer climates appearing in the Southern Pennsylvania deer herd, which suggests that Pennsylvania is indeed experiencing warmer weather.

Economy

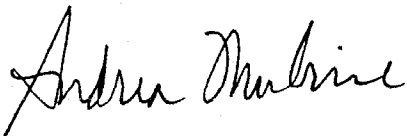
Pennsylvania's large and heavily used interstate highway system includes some 260 truck stops and 47 public rest areas, which provide convenient areas for heavy-duty diesel vehicles to idle. The Commonwealth's highway emissions consultant, Michael Baker, Jr., estimates that total statewide idling related to truck travel rest is more than 21 million annual hours. Use of an alternate method to heat/cool their cabs during idling would reduce fuel use by 20 million gallons a year. Baker estimates this would save about \$67 million per year at current fuel prices. In addition, any reduction of air pollutants could positively influence health costs and the environmental issues that impact water supply, hunting, recreation and agriculture. These economic issues are significant and provide a strong basis for implementing the proposed rule.

Neighboring States Regulations

In addition, Pennsylvania is the only state in the mid-Atlantic region with no restrictions on idling which makes us a haven for interstate truckers taking their required 10-hour breaks. New Jersey limits idling to three minutes per hour, while New York restricts the practice to five minutes per hour. The effect—our neighboring states have moved the air pollution from idling diesel vehicles to us.

The Department of Environmental Protection has made practical exemptions and timetables for implementing the regulations. The League of Women Voters of Pennsylvania applauds the Environmental Quality Board of the Department of Environmental Protection for this proposed regulation and urges its immediate adoption.

Sincerely,



League of Women Voters of Pennsylvania

1. www.epa.gov/otaq/schoolbus/basicinfo.htm/
2. Schneider, C.G. & Hill, L.B., (Feb., 2005),
Diesel and Health in America: The Lingering Threat,
www.catf.us/publications/reports/Diesel_Health_in_America.pdf
3. Ibid