

Shepherd, Natalie

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
- B. 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 Massachusetts' 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 Massachusetts.

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 Massachusetts 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".

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