

MYTHS AND FACTS ABOUT THE PENNSYLVANIA CLEAN VEHICLES PROGRAM

ASSERTION: *The Pennsylvania Clean Vehicles program incorporating California standards was not adopted in 1998 because it was only a backstop to the National Low Emission Vehicle program.*

FACT: DEP did indeed adopt the California standard in 1998. The regulation says, “The provisions of the California Low Emission Vehicle Program ... are adopted and incorporated herein by reference ...” and “The Commonwealth’s participation in the NLEV [National Low Emission Vehicle] Program extends until model year 2006 ...” In a December 2, 2005 letter to Rep. Geist, the U.S. Environmental Protection Agency underscored this: “because Pennsylvania’s acceptance of NLEV continued only up to the 2006 model year, it is our opinion that the CA LEV [California Low Emission Vehicle] program is no longer a “backstop,” but is the legally effective program for Pennsylvania. It is also our opinion that the Pennsylvania Clean Vehicle Program is a “federally enforceable part of the SIP ...”

ASSERTION: *Pennsylvania does not need the Pennsylvania Clean Vehicles program because it can attain and maintain air quality standards without it.*

FACT: Pennsylvania faces a challenge in meeting and maintaining the standards throughout the Commonwealth. EPA implemented a tighter eight-hour ozone standard in April 2004 when it designated 37 counties out of attainment. DEP is in the process of developing State Implementation Plans for this standard. The Commonwealth’s current state implementation plan takes credit for emission reductions achieved through the Pennsylvania Clean Vehicles Program. Looking forward, to meet this next round of ozone requirements our plans will, again, take credit for the Pennsylvania Clean Vehicles Program. As EPA is required to revise their standards every five years to reflect the need to protect public health, DEP must revise its SIPs to reflect the changing standards. EPA is in the process of reviewing the ozone standard for health impacts right now.

ASSERTION: *DEP has overestimated the benefits attributable to the Pennsylvania Clean Vehicles Program. EPA has stated there may only be a 1 percent difference between federal vehicle programs and the California program.*

FACT: It is wrong to cite this number as it has no relevance to the issues at hand today. EPA was comparing CA LEV II to the NLEV program, which has now expired and is no longer an option for automakers. We compare it to the only legal option, Tier 2. DEP has not overstated the benefits, which are that in 2025, the CA LEV II standards will result in a 6 percent to 12 percent greater reduction in VOCs and a 9 percent greater reduction in NOx from light duty vehicles, compared to the existing federal vehicles.

ASSERTION: *The Pennsylvania Clean Vehicles program would restrict vehicle choice, particularly for diesel vehicles.*

FACT: The selection of overall models is not affected. The CA LEV II program is not new – New York and several New England states have had it in place for several years. Vehicle choice has not been adversely affected in these states, and there has been no increase in vehicle price. Diesel pick-ups, such as those typically used by farmers, are not regulated by the Pennsylvania Clean Vehicles program because of their size—the program applies only to vehicles 8,500 lbs. or less.

January 31, 2006

ASSERTION: *Cars designed to meet the California standards cost more, as much as \$3000 more.*

FACT: There is no price difference now for the consumer. For the ozone-reducing standards, the difference between cost estimates for the federal Tier 2 program by EPA and the CA LEV II program by CARB was \$30 per vehicle, and even that minimal cost is not being passed on to consumers. For greenhouse gas compliant vehicles, California is estimating a cost savings to the consumer. Even assuming gasoline costs as low as \$1.74 per gallon, consumers will save some \$3.50 to \$7.00 per month.

ASSERTION: *The Pennsylvania Clean Vehicles program is unnecessary because the air is cleaner now, and new cars are getting cleaner.*

FACT: Even if ozone air quality has improved, we need to achieve even lower levels to protect human health and meet the new standards. Meeting its federal Clean Air Act obligation to protect public health, EPA is considering tightening air quality standards even further. We have come a long way and air quality has dramatically improved, but this state still has air that does not meet the current health based standards and will likely not meet future potential revisions to the standards. The auto industry has done a great job meeting the challenge posed by more stringent new vehicle standards. But, because the number of miles being driven in Pennsylvania increase by about 1-2 percent per year, technology must continue to improve to ensure decreasing emissions from the light-duty vehicle sector. Cars continue to be major contributors to air pollution, at least one-third of ozone-causing emissions in most areas - even a decade from now.