

**PENNSYLVANIA  
CLEAN VEHICLES PROGRAM**

**Comment/Response Document**

## **List of Commentators**

This is a list of corporations, organizations and interested individuals from whom the Environmental Quality Board has received comments regarding the above referenced regulation.

## Comments and Responses\*

### COMMENTS ON ANNEX A

#### Enforcement

1. **COMMENT:** The proposed amendment to Section 126.413(a) exempting new vehicles purchased out of state by residents of Pennsylvania creates an uneven marketplace. While there is little or no price differential today, in the future after implementation of the GHG standards, price could become an issue. Permitting residents to bring noncompliant new vehicles into Pennsylvania could affect Pennsylvania dealer sales and sales tax revenues to state and local government. There should be the same level of emissions standards for new vehicles brought into Pennsylvania by residents as for new vehicles sold by Pennsylvania dealers. The exemption will make it difficult to enforce the Pennsylvania Clean Vehicles Program. The emissions benefit could be reduced if this exemption is adopted; in Maine, the U.S. Environmental Protection Agency (EPA) reduced the emissions credit allowable because Maine did not have an effective registration enforcement system. Pennsylvania borders more states than Maine, which could lose the Commonwealth even more credit. (2270, 1265/4241, 3192/4526, 4348/4349 )

**RESPONSE:** The Department of Environmental Protection (DEP or Department) agrees that the proposed exemption should be deleted and is therefore deleting proposed Section 126.413(a)(14). The proposed amendment, added to the proposed rulemaking by the Environmental Quality Board (EQB) on October 18, 2005, was offered to ensure equitable vehicle registration requirements in Pennsylvania, under the assumption that this would reflect the anticipated PENNDOT approach to registration. The Department agrees that purchasers need to be treated similarly. Additionally, the exemption would have complicated enforcement and increased the possibility of reduced emissions credit.

Using the titling process offers the most equitable and effective way to enforce the vehicle registration requirement, since a vehicle must be titled in Pennsylvania in order to be registered in Pennsylvania. Prohibiting titling of vehicles not certified by the California Air Resources Board (CARB) will protect individuals from purchasing a vehicle out-of-state that cannot be registered in the Commonwealth. In addition, individuals who purchase vehicles from out-of-state dealers work with a Pennsylvania issuing agent to title a new vehicle in Pennsylvania. In order to title a vehicle, the issuing agent must have access to a Manufacturer's Certificate of Origin (MCO), a document that includes a statement about the emission standards (for example, that the vehicle is certified by CARB or by EPA, or is a "50-state" vehicle that can be sold in both Tier 2

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\* A slash (ex. 1265/4241) indicates the same commentator was assigned two separate numbers. The EQB received 4,673 letters, postcards and emails. Several commentators submitted multiple emails and letters with additional comments and observations throughout the public comment period. There were approximately 4,260 unique commentators.

and California Low Emission Vehicle (CA LEV) jurisdictions. Registration does not require access to an MCO. Pennsylvania will require issuing agents to certify that the vehicle complies based on the MCO.

2. **COMMENT:** The exemption in Section 126.413(a) for new vehicles purchased out of state by residents of Pennsylvania should be removed and Pennsylvania's implementation of the program should be consistent with EPA's "Policy on Cross-Border Sales of California Certified Vehicles for 2004 and Later Model Years". The guidance allows a Pennsylvania dealer to sell a California vehicle to any customer and a dealer from a contiguous state to sell a California vehicle to any customer. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** DEP agrees and is therefore deleting the proposed exemption. The Commonwealth will make a specific outreach effort to advise dealers in the contiguous states that are not already required to sell CA LEV vehicles about the Pennsylvania requirements. As long as out-of-state dealers offer CA LEV vehicles, Pennsylvania residents will be able to purchase vehicles from neighboring states.

3. **COMMENT:** In order to get full State Implementation Plan (SIP) credit, Pennsylvania should establish a registration enforcement process. Manufacturers print a statement on the Certificate of Origin that a vehicle is certified for sale to California standards. This certificate is delivered with each new vehicle. This is the document shown during registration to prove that the vehicle is certified to California emissions standards. This registration enforcement process has been successfully implemented in New York, Massachusetts and Vermont. Maine has not implemented a registration enforcement process and did not receive full SIP credit. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** DEP agrees with the commentators. The existing regulatory language requires new subject vehicles registered in Pennsylvania to be those certified by CARB. Pennsylvania has consulted with PENNDOT on the registration enforcement process. PENNDOT has recommended that the Department add titling to the final-form regulation because to title a vehicle, the issuing agent must have access to the Certificate of Origin. A vehicle must be titled in Pennsylvania to be registered in Pennsylvania.

4. **COMMENT:** Because of the uncertainty created in determining when a vehicle is "principally operated outside the Commonwealth" in Section 126.413(a)(6) of the existing regulation, meeting such a requirement will impose extreme burdens on the way Hertz manages its vehicle fleet and severely restrict the vehicle choices available to the renting public. Vehicles regularly migrate to different states. Many other states have not adopted the CA LEV II program and only require compliance with federal emissions standards. A clarification is requested on vehicles that are registered outside the Commonwealth. These vehicles engaged in interstate commerce should be deemed to be principally operated outside of the Commonwealth, and thus not subject to the Pennsylvania Clean Vehicles Program. Under the International Registration Plan

formula, rental car companies register a certain minimum number of vehicles in each state based on gross revenue in the preceding year. (4350)

**RESPONSE:** The Department agrees with Hertz' suggested interpretation of the existing regulation. The final rulemaking includes an amendment to this paragraph to clarify the intent of the Commonwealth with respect to enforcement of the rules relating to daily lease and rental companies under the Pennsylvania Clean Vehicles Program. The International Registration Plan referred to by the commentator ensures that rental car companies cannot avoid registering a certain number of vehicles in Pennsylvania in order to avoid compliance with the Pennsylvania Clean Vehicles Program. Those model year 2008 and later rental vehicles that are registered in Pennsylvania must be certified by CARB. The final-form regulation includes an explanation in section 126.413(a)(6) that for purposes of section 126.413(a)(6) a light-duty vehicle is deemed to be principally operated outside of the Commonwealth if it is registered outside of the Commonwealth in accordance with the International Registration Plan or a successor plan for apportioning vehicle registration fees internationally.

5. **COMMENT:** The Hertz Corporation is concerned about how the CARB standards will affect the rental car industry. Does the EQB intend to require rental car companies to ensure that any car that could possibly be used in Pennsylvania comply with CARB standards or would rental car companies merely be required to have all vehicles registered in the Commonwealth comply with those standards? The EQB should clearly delineate the requirements in the final-form regulation. (4350, 4673)

**RESPONSE:** The Department does not intend to require rental car companies to ensure that any new car that could possibly be used in Pennsylvania comply with CARB standards. The Department does not intend to interfere with the normal business practices of national rental car companies. The Department examined regulations adopted by other states that have adopted the California standards and found that provisions in state regulations that differed from Pennsylvania's were not practical for Pennsylvania. For the reasons described in response to comment no. 4, the Department has revised the final-form regulation to include an explanation in section 126.413(a)(6) that for purposes of section 126.413(a)(6) a light-duty vehicle is deemed to be principally operated outside of the Commonwealth if it is registered outside of the Commonwealth in accordance with the International Registration Plan or a successor plan for apportioning vehicle registration fees internationally.

6. **COMMENT:** The commentator questions the legality of the delegation to CARB that Section 126.431(d) represents (pertaining to enforcement actions taken by CARB applying to Pennsylvania) and notes that it unlawfully strips manufacturers of their ability in a Pennsylvania court to contest the validity at law of any CARB enforcement action as to Pennsylvania vehicles. See 2 Pa. Cons. Stat. Ann. §703(a). One way that the Department could reduce the practical concerns associated with this issue would be to adopt language similar to Rhode Island's approach by adding the following clause to proposed Sections 126.431(c) and (d): "except where the manufacturer demonstrates to

the Department's satisfaction that said action is not applicable to said vehicle.”  
(1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** DEP does not agree that there is a legal issue as described by the commentator. The purpose of Section 126.431 (c) and (d) is to ensure full protection to Pennsylvania consumers pertaining to recall efforts taken by CARB or initiated by manufacturers for vehicles that are sold, leased, offered for sale or lease, registered or titled in Pennsylvania. For the sake of clarity, the final rulemaking adds language, which is similar to that suggested by the commentator, to allow a manufacturer the opportunity to demonstrate that an order issued or enforcement action taken by CARB or a voluntary or influenced recall campaign to correct noncompliance with any provision of Title 13 CCR is not applicable to vehicles sold, leased, offered for sale or lease or registered in Pennsylvania. An example might be if a manufacturer demonstrated that the noncompliance was corrected for or did not occur in the first place in the vehicles sold, leased, offered for sale or lease or registered in Pennsylvania.

#### Non-Methane Organic Gas (NMOG) Fleet Average and Credits

7. **COMMENT:** The EQB indicates that Section 126.412(d) is intended to allow manufacturers to carry forward NMOG credits fully for a three-year period without any loss of those credits each year. However, this is not clearly stated in this section. This provision should be amended to clarify the EQB's intentions. (4673)

**RESPONSE:** DEP agrees that Section 126.412(d) allows manufacturers to carry forward NMOG credits fully for a three-year period without any loss of those credits each year. The final-form regulation clarifies in Section 126.412(d) that these credits may be carried forward without diminution during the three-year period (model years 2008, 2009 and 2010).

8. **COMMENT:** Pennsylvania tried to address an NMOG fleet average transitional issue in their proposal but this transition mechanism is not adequate. Other states, for example Massachusetts, Vermont and New York, included a transition mechanism that allowed credits/debits to be earned during the transition period, which is the period required for any credits that were earned in California to completely expire (3 years). If an NMOG fleet average requirement is maintained, Commonwealth should adopt such provisions.  
(1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department agrees that the appropriate credit-earning period is three years. The commentator's reference to the approach adopted by Massachusetts, Vermont and New York, however, is inapposite since those states transitioned directly from CA LEV I to CA LEV II, without having adopted NLEV as a compliance alternative. In Pennsylvania, credits could not be fairly determined for any model year before MY 2006 because most vehicles sold in Pennsylvania would have been Tier 2 vehicles, whereas credits (and debits) are calculated by comparing the actual fleet average of CARB-certified vehicles with the required fleet average. Consequently, credits could be earned for only a small number of vehicles.

The Department is proposing that the EQB adopt a mechanism that allows credits to be earned during the transition period model years 2008-2010. While California discounts these credits after the first year, Pennsylvania will allow full credit over model years 2008-2010. Language clarifying this full credit has been added to the final-form regulation.

**9. COMMENT:** By adopting and attempting to enforce the California Fleet NMOG average, Pennsylvania will violate the federal Clean Air Act (CAA). California's fleet average scheme includes the opportunity for manufacturers to earn credits in one year by having a lower fleet NMOG average than required and spend credits in a later year by having a fleet NMOG average higher than otherwise required. A manufacturer could have earned a substantial amount of credits in California during 2005-2007 and then use those credits in 2008-2010 to offset a higher than otherwise required fleet NMOG. Because Pennsylvania's regulation did not take effect until 2008, the manufacturer would not have earned any credits in Pennsylvania in 2005-2007 and therefore accumulated significant debits in Pennsylvania in 2008-2010 by selling the very same mix of vehicles as it sold in California those years. This would lead to a lack of identicality in 2011 as there would be two different standards as a result of the differences in credit counting, violating Section 177 on its own and by requiring manufacturers to limit the sales of California certified vehicles or to create a third vehicle. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department is recommending that the EQB adopt a mechanism that allows credits to be earned during the transition period model years 2008-2010. The Department disagrees that the adoption or enforcement of the NMOG fleet average in Pennsylvania will lead to a lack of identicality or otherwise violate the CAA. See also response to comment 8.

**10. COMMENT:** Pennsylvania should not require compliance with the fleet NMOG average but instead require reporting. Fleet average NMOG is determined by sales mix. The sales mix in Pennsylvania is different than the sales mix in California because of differences in consumer demand. To comply with the fleet NMOG average, manufacturers may need to restrict sales of certain models in Pennsylvania that are not restricted in California. Consumers would then keep their older, higher emitting vehicles longer since they would be unable to purchase the new vehicles they wanted. (3192/4526)

**RESPONSE:** It is unlikely that the sales mix in California differs significantly overall from the sales mix in Pennsylvania (see response to comment #97). The commentator has provided no evidence that certain models have been restricted in other states adopting the California low emission program on any parameter of concern to purchasers. In many cases, manufacturers make both a California and a federal version of a specific engine family. Many factors will influence purchase of new vehicles. The commentator has not presented any evidence that consumers would keep older vehicles longer based on differences due to NMOG fleet averages. Therefore, the requested change has not made in the final-form regulation.

11. **COMMENT:** Section 177 problems (of identicality) do not arise if a state only requires manufactures to report fleet NMOG average. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees that the Pennsylvania Clean Vehicles Program or the final rulemaking raises identicality problems. See response to comment 8.

12. **COMMENT:** By requiring reporting, the EQB could evaluate the differences between the California and Pennsylvania sales mix for each manufacturer and assess the problems that would be caused by requiring fleet NMOG compliance. If the industry-wide levels are below the fleet average standard, there would not be any need to require compliance. (3192/4526)

**RESPONSE:** The Department disagrees that the existing or final amendments to the Pennsylvania Clean Vehicles Program will present a compliance difficulty for automakers to a degree that the Department must “assess” the existing Pennsylvania-specific NMOG fleet average requirement before implementation. The Department believes, given automakers’ current collective ability to comply with the NMOG fleet average in other states, that automakers collectively can meet the requirement in Pennsylvania. Furthermore, based on CARB’s analysis of its GHG provisions, the Department is confident the automakers will be able to comply with the Pennsylvania-specific NMOG fleet average requirement in the future. The commentator provided no specific information on why it believes it cannot comply with the NMOG fleet average in Pennsylvania. Additionally, requiring only reporting without enforcement would likely present problems for earning emission reduction SIP credits from EPA.

### Reporting

13. **COMMENT:** Subsection (b) in Sections 126.421 – 126.425 requires a manufacturer to provide certain types of information to DEP “upon request.” Under what circumstances would the Department make the request? The EQB should clearly identify the type of request it will make to the manufacturers and that the request should be in writing. (4673)

**RESPONSE:** These sections, 126.421 – 126.425, assure that documents relating to the compliance of vehicles throughout the entire production process (including documents ensuring that vehicles are manufactured to meet the applicable certification standards throughout their useful life) are available to the Commonwealth. The Department anticipates that these requests will be infrequent. They could be triggered by reports from dealers, vehicle owners or other states implementing the California program regarding specific makes or models. Some of these documents are not directly obtainable from CARB because of confidentiality agreements. The Department has the authority to enter into similar confidentiality agreements with manufacturers, if necessary, in order to receive reports. The requests would be to provide to the Commonwealth those specific kinds of documents already in existence relative to a specific test group in California: for



example, “new vehicle certification testing determinations and findings made by CARB” under Section 126.421(b). The Department has added language to each of these sections stating that these requests to the manufacturer will be made in writing. The Department also added parallel “upon request” language to Section 126.431(b) because of comment during the proposed rulemaking.

14. **COMMENT:** Pennsylvania would not find reports of failures of emission-related components required in Section 126.431(b) of much value because the Department has already proposed to extend emission-related actions such as recalls applicable in California to Pennsylvania. In order to save resources, these reports should be available only upon request. This language has been included in other states. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department agrees to reduce the reporting requirements by adding language that reports required under Section 126.431(b) can be made available upon a written request from the Department rather than provided routinely.

#### **GENERAL COMMENT REGARDING PROPOSED RULEMAKING**

15. **COMMENT:** Senators Madigan and White submitted a letter on March 27, 2006 expressing support for Tier II as an alternative to the California program. In addition, the Senate passed SB 1025 by a vote of 27 to 20, which would revive the regulatory framework initiated in 1998 and give the automobile industry the option of complying with either the CARB regulations or Tier II.

Commentators for the automobile industry also recommended that EQB adopt the Tier II program. They claim it is a comparable, or an even better, program for reducing air pollution. Additionally, the economic impacts on the automobile industry and consumers will not be as great as those imposed by CARB regulations.

In its response to these concerns, the EQB needs to explain why and how the CARB regulations address the issues of environmental protection and cost-effectiveness. DEP should demonstrate how its regulation will generate greater benefits for public health and the Commonwealth’s natural resources at a cost that is affordable, reasonable and competitive with alternative regulatory approaches. (4673)

**RESPONSE:** The Department disagrees with the characterization that SB 1025 revives the regulatory low emission vehicle framework initiated in 1998. The voluntary NLEV program was adopted as an opt-in program, i.e., if a sufficient number of states and automakers opted in, compliance with that program would be required in the Ozone Transport Region beginning in model year 1999. The voluntary NLEV program provided a complex system of adverse consequences for failing to fulfill commitments. SB 1025, on the other hand, offers the auto industry the option of complying with California standards or the less stringent federal Tier II standards, with no consequence to industry for choosing the less stringent standards. SB 1025 would also abrogate the

existing Pennsylvania Clean Vehicles Program and prohibit the EQB from adopting vehicle emission standards established by CARB.

Note that this final rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. In the preamble to the 1998 rulemaking that incorporated the California standards by reference, the EQB stated its intention to reassess the air quality needs and emission reduction potential of both programs.

Achieving and maintaining the health-based NAAQS for ground-level ozone remain challenges for Pennsylvania, particularly in the Southeast. EPA has concluded that there is an association between ambient ozone concentrations and increased hospital admissions for respiratory ailments, such as asthma. Children, the elderly and those with respiratory problems are most at risk, but healthy individuals may experience increased respiratory ailments and other symptoms when they are exposed to ambient ozone while engaged in activities that involve physical exertion.

Ozone is not directly emitted, but is created in the atmosphere as a result of the chemical reaction of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs), in the presence of light and heat. The formation of ozone is greater in the summer months because of the higher temperatures. Ground-level ozone and its precursors, VOC and NO<sub>x</sub>, adversely affect not only public health but also the environment, such as agricultural crops and forest vegetation. Passenger cars and light-duty trucks are significant sources of VOCs and NO<sub>x</sub>. About one third of the Commonwealth's ozone-forming pollution comes from motor vehicles. Later this year, EPA is expected to finalize the fine particulate (PM<sub>2.5</sub>) implementation rule, which will also identify NO<sub>x</sub> emissions as a precursor to the formation of PM<sub>2.5</sub>. Further reducing ozone precursors and other air pollutants from motor vehicles will thus help protect public health and the environment.

During the development of the instant rulemaking to revise the 1998 regulation, the Department engaged the services of a national transportation consultant, Michael Baker Corporation (Baker), to estimate the emission-reducing benefits of retaining the California standards in Pennsylvania compared to participating in the federal Tier II program. This study (*Pennsylvania LEVII Air Quality Impacts*, November 2004) showed that by 2025, when full fleet turnover is expected, the California LEV II program will provide an additional 2850 to 6170 tons per year of VOC, 3540 tons per year of NO<sub>x</sub> and 5% to 11% more reduction of six toxic air pollutants, including a 7% to 15% additional benefit for benzene, a known carcinogen, when compared to the federal Tier II program. (A range is shown because Pennsylvania prepared analyses using assumptions from EPA as well as assumptions from the Northeast States Coordinated Air Use Management (NESCAUM) study. The lower number uses the more conservative EPA assumptions.) The Baker analysis used Pennsylvania-specific vehicle, travel, fuel and other information.

CA LEV II and EPA's Tier II use similar approaches in regulating emissions affecting ozone and other criteria pollutants from new passenger cars and light-duty trucks, which include vehicle-specific standards and manufacturer fleet averages. In both programs, manufacturers may choose the technologies they use to meet the vehicle-specific emission limits and may choose the mix of vehicles they offer for sale to meet the fleet averages.

A manufacturer may certify any particular type of vehicle to a category that limits emissions of a number of pollutants. For CA LEV, the major categories include Low Emission Vehicle (LEV), Ultra Low Emission Vehicle (ULEV) and Super Ultra Low Emission Vehicle (SULEV). For the federal program, there are eight "bins". Bin 5 is considered equivalent to the least stringent California standard. These vehicle-specific emission limitations affect both tailpipe and evaporative emissions. Overall, the California program is more stringent. In addition, each manufacturer must meet a fleet average for emissions of non-methane organic compounds (NMOG) (equivalent of VOCs) for California and a fleet average for emissions of NO<sub>x</sub> for the federal program. Overall, these fleet averages make the California program more stringent.

California has recently promulgated amendments to its regulations establishing its California LEV II standards in Chapter 1 of Division 3, Title 13 of the California Code of Regulations (CCR) to include Greenhouse Gas (GHG) requirements. These GHG regulations are already incorporated by reference by the Department's regulations and are part of the Pennsylvania Clean Vehicles Program. Under these regulations, California has added a GHG fleet average requirement to its LEV II program for vehicles offered for sale in California. The final regulations do not include a Pennsylvania GHG fleet average requirement. A vehicle offered for sale in Pennsylvania must simply be CARB-certified. For a vehicle to be CARB certified, the vehicle manufacturer must meet California's GHG fleet average requirements based on sales of vehicles in California. The Department does not believe that it needs to establish a GHG fleet average requirement for vehicles offered for sale in Pennsylvania to realize the GHG emission reductions in Pennsylvania anticipated under the California LEV II program. Overall, the vehicle fleet mix in Pennsylvania is similar to California's, and Pennsylvania anticipates it will realize similar GHG emissions reductions in Pennsylvania because the fleet vehicle mix in Pennsylvania is similar to California's.

To assess costs and cost differentials, the Department evaluated the CARB initial and final Statements of Reasons for the adoption of CA LEV II and the GHG provisions and the costs contained in EPA's impact analysis for promulgation of Tier II. Before adoption, CARB predicted that implementing LEV II could increase retail vehicle prices from \$68 to \$276 depending on the weight of the vehicle. Similarly, EPA predicted that implementing Tier II could increase vehicle retail prices from \$78 to \$245 depending on the weight of the vehicle. Today, with both programs having been in place since model year 2004, there appears to be little to no difference in vehicle retail price between CARB-certified and federal-certified vehicles.

In September 2004, CARB estimated that by MY 2016 the operational efficiency savings of vehicles meeting GHG requirements would provide vehicle owners an overall cost savings of \$3.50 to \$7.00 per month, assuming \$1.74 per gallon of gasoline. These savings are probably understated, since the price of gasoline is likely to remain higher than that used in CARB's analysis. CARB estimated the GHG-related initial investment costs, possibly reflected in sticker prices, would start under \$50 per vehicle for the first year of the requirement, MY 2009, and be approximately \$350 in 2012 and \$1000 per vehicle in MY 2016. Vehicle manufacturers disagree with CARB's GHG estimate, citing initial costs of about \$3000 per vehicle. Vehicle manufacturers also believe that the cost savings will not be as great as CARB predicts.

In summary, there is a continuing need for additional reductions in ozone precursors because of the challenge in achieving and maintaining the ground-level ozone standard; there are additional benefits to health and the environment from obtaining reductions of VOC, NOx and GHG emissions that federal new motor vehicle programs do not provide; and the CARB standards cost consumers little or nothing in the short term and overall save consumers money in the long term.

## **COMMENTS SUPPORTING IMPLEMENTATION OF PROGRAM**

### General support

**16. COMMENT:** I am writing to voice my full support for implementing the Pennsylvania Clean Vehicles Program.

(1, 2, 3, 4, 5, 7, 10, 14, 16, 19, 208, 220, 232, 304, 360, 569, 597, 644, 691, 761, 993, 1013, 1138, 1173, 1193, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1222, 1223, 1224, 1225, 1226, 1228, 1229, 1232, 1233, 1234, 1235, 1236, 1237, 1241, 1244, 1245, 1246, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1259, 1260, 1261, 1262, 1263, 1264, 1266, 1267, 1269, 1271, 1272, 1277, 1323, 1351, 1391, 1428, 1520, 1585, 1588, 1590, 1591, 1592, 1594, 1597, 1601, 1603, 1604, 1605, 1607, 1608, 1610, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1624, 1640, 1641, 1643, 1645, 1646, 1647, 1650, 1654, 1655, 1658, 1659, 1660, 1662, 1663, 1664, 1667, 1668, 1669, 1670, 1673, 1674, 1675, 1678, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1689, 1691, 1693, 1695, 1697, 1698, 1699, 1700, 1705, 1713, 1761, 1762, 1770, 1772, 1773, 1779, 1780, 1785, 1786, 1789, 1791, 1793, 1794, 1795, 1796, 1797, 1800, 1801, 1802, 1803, 1805, 1806, 1807, 1809, 1812, 1813, 1814, 1815, 1816, 1818, 1819, 1820, 1822, 1824, 1825, 1826, 1828, 1830, 1831, 1833, 1834, 1835, 1837, 1839, 1840, 1842, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1857, 1859, 1861, 1862, 1863, 1864, 1865, 1867, 1869, 1872, 1873, 1876, 1877, 1878, 1880, 1887, 1888, 1891, 1895, 1896, 1898, 1905, 1906, 1907, 1908, 1912, 1914, 1917, 1926, 1928, 1929, 1930, 1931, 1933, 1934, 1937, 1938, 1943, 1944, 1946, 1947, 1948, 1952, 1954, 1958, 1960, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1972, 1973, 1974, 1975, 1977, 1978, 1979, 1981, 1984, 1986, 1987, 1990, 1996, 1997, 2000, 2009, 2011, 2013, 2015, 2030, 2033, 2034, 2035, 2037, 2063, 2070, 2072, 2073, 2074, 2075, 2076, 2078, 2082, 2083, 2084, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2102, 2103, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2131, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2165, 2167, 2168, 2173, 2178, 2181, 2182, 2184, 2196, 2199, 2200, 2201, 2212, 2214, 2218, 2222, 2223, 2227, 2228, 2230, 2231, 2233, 2235, 2237, 2239, 2249, 2251, 2252, 2254, 2255, 2256, 2257, 2258, 2259, 2261, 2262, 2263, 2267, 2273, 2276, 2280, 2282, 2285, 2286, 2289, 2291, 2292, 2293, 2294, 2295, 2296, 2307, 2309, 2311, 2312, 2313, 2314, 2316, 2317, 2322, 2325, 2327, 2329, 2331, 2332, 2333, 2334,



3720, 3721, 3722, 3723, 3724, 3725, 3726, 3727, 3728, 3729, 3730, 3731, 3732, 3733, 3734, 3735, 3736, 3737, 3738, 3739, 3740, 3741, 3742, 3743, 3744, 3745, 3746, 3747, 3748, 3749, 3750, 3751, 3752, 3753, 3754, 3755, 3756, 3757, 3758, 3759, 3760, 3761, 3762, 3763, 3764, 3765, 3766, 3767, 3768, 3769, 3770, 3771, 3772, 3773, 3774, 3775, 3776, 3777, 3778, 3779, 3780, 3781, 3782, 3783, 3784, 3785, 3786, 3787, 3788, 3789, 3792, 3793, 3794, 3795, 3796, 3797, 3798, 3799, 3800, 3801, 3802, 3803, 3804, 3805, 3806, 3807, 3808, 3809, 3810, 3811, 3812, 3813, 3814, 3815, 3816, 3817, 3818, 3819, 3820, 3821, 3822, 3823, 3824, 3825, 3826, 3827, 3828, 3829, 3830, 3831, 3832, 3833, 3834, 3835, 3836, 3837, 3838, 3839, 3840, 3841, 3842, 3843, 3844, 3845, 3846, 3847, 3848, 3849, 3850, 3851, 3852, 3853, 3854, 3855, 3856, 3857, 3858, 3859, 3860, 3861, 3862, 3863, 3864, 3865, 3866, 3867, 3868, 3869, 3870, 3871, 3872, 3873, 3874, 3875, 3876, 3877, 3878, 3879, 3880, 3881, 3882, 3883, 3884, 3885, 3886, 3887, 3888, 3889, 3890, 3891, 3892, 3893, 3894, 3895, 3896, 3897, 3898, 3899, 3900, 3901, 3902, 3903, 3904, 3905, 3906, 3907, 3908, 3909, 3910, 3911, 3912, 3913, 3914, 3915, 3916, 3917, 3918, 3919, 3920, 3921, 3922, 3923, 3924, 3925, 3926, 3927, 3928, 3929, 3930, 3931, 3932, 3933, 3934, 3935, 3936, 3937, 3938, 3939, 3940, 3941, 3942, 3943, 3944, 3945, 3946, 3947, 3948, 3949, 3950, 3951, 3952, 3953, 3954, 3955, 3956, 3957, 3958, 3959, 3960, 3961, 3962, 3963, 3964, 3965, 3966, 3967, 3968, 3969, 3970, 3971, 3972, 3973, 3974, 3975, 3976, 3977, 3978, 3979, 3980, 3981, 3982, 3983, 3984, 3985, 3986, 3987, 3988, 3989, 3990, 3991, 3992, 3993, 3994, 3995, 3996, 3997, 3998, 3999, 4000, 4001, 4002, 4003, 4004, 4005, 4006, 4007, 4008, 4009, 4010, 4011, 4012, 4013, 4014, 4015, 4016, 4017, 4018, 4019, 4020, 4021, 4022, 4023, 4024, 4025, 4026, 4027, 4028, 4029, 4030, 4031, 4032, 4033, 4034, 4035, 4036, 4037, 4038, 4039, 4040, 4041, 4042, 4043, 4044, 4045, 4046, 4047, 4048, 4049, 4050, 4051, 4052, 4053, 4054, 4055, 4056, 4057, 4058, 4059, 4060, 4061, 4062, 4063, 4064, 4065, 4066, 4067, 4068, 4069, 4070, 4071, 4072, 4073, 4074, 4075, 4076, 4077, 4078, 4079, 4080, 4081, 4082, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091, 4092, 4093, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4129, 4130, 4131, 4132, 4133, 4134, 4135, 4136, 4137, 4138, 4139, 4140, 4141, 4142, 4143, 4144, 4145, 4146, 4147, 4148, 4149, 4150, 4151, 4152, 4153, 4154, 4155, 4156, 4157, 4158, 4159, 4160, 4161, 4162, 4163, 4164, 4165, 4166, 4167, 4168, 4169, 4170, 4171, 4172, 4173, 4174, 4175, 4176, 4177, 4178, 4179, 4180, 4181, 4182, 4183, 4184, 4185, 4186, 4187, 4188, 4189, 4190, 4191, 4192, 4193, 4194, 4195, 4196, 4197, 4198, 4199, 4201, 4202, 4203, 4204, 4205, 4206, 4207, 4208, 4209, 4210, 4211, 4212, 4213, 4214, 4215, 4216, 4217, 4218, 4219, 4220, 4221, 4222, 4223, 4224, 4225, 4226, 4227, 4228, 4229, 4230, 4231, 4232, 4233, 4234, 4237, 4238, 4240, 4347, 4474, 4475, 4481, 4486, 4493, 4494, 4495, 4499, 4500, 4502, 4505, 4687, 4704, 4705, 4706, 4710, 4711, 4712, 4713, 4714, 4715, 4716, 4717, 4718, 4752, 4753, 4754, 4755, 4756, 4757, 4758, 4759, 4760, 4761, 4762, 4763, 4764, 4765, 4766, 4767, 4768, 4769, 4770, 4770, 4771, 4772, 4773, 4774, 4775, 4776, 4777, 4778, 4779, 4780, 4781, 4782, 4783, 4784, 4785, 4786, 4787, 4788, 4789, 4790, 4791, 4792, 4793, 4794, 4795, 4796, 4797, 4798, 4799, 4800, 4801, 4802, 4803, 4804, 4805, 4806, 4807, 4808, 4809, 4810, 4811, 4812, 4813, 4814, 4815, 4816, 4817, 4818, 4819, 4820, 4821, 4828, 4829, 4746, 4747, 4748, 4749, 4750, 4751)

**RESPONSE:** DEP appreciates the support of the commentators.

**17. COMMENT:** I support the proposed amendments to the Pennsylvania Clean Vehicles Program.

(412, 533, 586, 644, 659, 676, 681, 697, 761, 902, 903, 906, 907, 908, 910, 914, 915, 916, 920, 922, 924, 926, 927, 928, 930, 931, 933, 934, 935, 936, 937, 938, 939, 940, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 957, 958, 959, 960, 961, 981, 1025, 1026, 1027, 1029, 1035, 1036, 1037, 1038, 1039, 1041, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1068, 1070, 1071, 1072, 1074, 1075, 1076, 1077, 1078, 1080, 1081, 1082, 1084, 1086, 1087, 1091, 1093, 1094, 1097, 1098, 1099, 1100, 1102, 1103, 1104, 1106, 1108, 1112, 1113, 1114, 1115, 1116, 1119, 1125, 1127, 1128, 1131, 1132, 1133, 1135, 1136, 1138, 1139, 1142, 1149, 1150, 1154, 1155, 1158, 1159, 1160, 1161, 1162, 1164, 1165, 1167, 1169, 1173, 1178, 1217, 1219, 1220, 1221, 1227, 1231, 1248, 1261, 1262, 1264, 1269, 1270, 1272, 1274, 1585, 1588, 1590, 1591, 1592, 1594, 1597, 1601, 1603, 1604, 1605, 1607, 1608, 1610, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1640, 1641, 1643, 1645, 1646, 1647, 1650, 1654, 1655, 1658, 1659, 1660, 1662, 1663, 1666, 1667, 1668, 1669, 1670, 1673, 1674, 1675, 1678, 1680, 1681, 1682, 1683, 1684, 1686, 1687, 1689, 1691, 1693, 1695, 1697, 1698, 1699, 1700, 1705, 1713, 1762, 1770, 1772, 1773, 1779, 1780, 1785, 1786, 1789, 1791, 1793, 1794, 1795,

1796, 1797, 1800, 1801, 1802, 1803, 1805, 1806, 1807, 1809, 1812, 1813, 1814, 1815, 1816, 1818, 1819, 1820, 1822, 1824, 1825, 1826, 1828, 1830, 1831, 1833, 1834, 1835, 1837, 1840, 1842, 1843, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1857, 1859, 1861, 1862, 1863, 1864, 1865, 1866, 1869, 1872, 1873, 1876, 1877, 1878, 1880, 1887, 1888, 1891, 1895, 1896, 1898, 1905, 1906, 1907, 1908, 1912, 1914, 1917, 1926, 1928, 1929, 1930, 1931, 1933, 1934, 1937, 1938, 1943, 1944, 1946, 1947, 1948, 1952, 1954, 1958, 1960, 1962, 1963, 1964, 1965, 1966, 1967, 1969, 1972, 1973, 1974, 1975, 1977, 1978, 1979, 1981, 1984, 1986, 1987, 1990, 1996, 1997, 2000, 2009, 2011, 2013, 2015, 2017, 2018, 2019, 2020, 2021, 2030, 2033, 2034, 2035, 2037, 2063, 2067, 2068, 2069, 2071, 2077, 2079, 2080, 2081, 2085, 2086, 2087, 2088, 2089, 2101, 2103, 2104, 2113, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2132, 2137, 2164, 2165, 2167, 2168, 2173, 2178, 2181, 2182, 2184, 2196, 2199, 2200, 2201, 2212, 2218, 2222, 2223, 2227, 2228, 2231, 2233, 2235, 2239, 2240, 2244, 2245, 2246, 2247, 2248, 2249, 2251, 2253, 2254, 2255, 2256, 2265, 2267, 2276, 2280, 2282, 2285, 2286, 2289, 2291, 2292, 2293, 2294, 2295, 2296, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2308, 2310, 2315, 2321, 2322, 2338, 2339, 2340, 2341, 2342, 2343, 2352, 2363, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2433, 2436, 2450, 2451, 2452, 2455, 2458, 2460, 2462, 2464, 2465, 2470, 2471, 2473, 2476, 2486, 2488, 2490, 2491, 2492, 2493, 2494, 2495, 2497, 2498, 2499, 2500, 2501, 2502, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2616, 2617, 2619, 2620, 2621, 2624, 2625, 2626, 2627, 2629, 2630, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2649, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2681, 2682, 2683, 2684, 2685, 2686, 2687, 2688, 2689, 2690, 2691, 2692, 2693, 2694, 2695, 2696, 2697, 2698, 2699, 2700, 2701, 2702, 2703, 2704, 2705, 2706, 2707, 2708, 2709, 2710, 2711, 2712, 2713, 2714, 2715, 2716, 2717, 2718, 2719, 2720, 2721, 2722, 2723, 2724, 2725, 2726, 2727, 2728, 2729, 2730, 2731, 2732, 2733, 2734, 2735, 2736, 2737, 2738, 2739, 2740, 2741, 2742, 2743, 2744, 2745, 2746, 2747, 2748, 2749, 2750, 2751, 2752, 2753, 2754, 2755, 2756, 2757, 2758, 2759, 2760, 2761, 2762, 2763, 2764, 2765, 2766, 2767, 2768, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 2795, 2796, 2797, 2798, 2799, 2800, 2801, 2802, 2803, 2804, 2805, 2806, 2807, 2808, 2809, 2810, 2811, 2812, 2813, 2814, 2815, 2816, 2817, 2818, 2819, 2820, 2821, 2822, 2823, 2824, 2825, 2826, 2827, 2828, 2829, 2830, 2831, 2832, 2833, 2834, 2835, 2836, 2837, 2838, 2839, 2840, 2841, 2842, 2843, 2844, 2845, 2846, 2847, 2848, 2849, 2850, 2851, 2852, 2853, 2855, 2857, 2858, 2859, 2860, 2861, 2862, 2863, 2864, 2865, 2866, 2868, 2869, 2870, 2871, 2872, 2874, 2875, 2877, 2880, 2881, 2882, 2883, 2884, 2885, 2886, 2887, 2888, 2889, 2890, 2891, 2892, 2893, 2894, 2895, 2896, 2897, 2898, 2899, 2900, 2901, 2902, 2903, 2904, 2905, 2906, 2907, 2908, 2909, 2910, 2911, 2912, 2913, 2914, 2915, 2916, 2917, 2918, 2919, 2920, 2921, 2922, 2923, 2924, 2925, 2926, 2927, 2928, 2929, 2930, 2931, 2932, 2933, 2934, 2935, 2936, 2937, 2938, 2939, 2940, 2941, 2942, 2943, 2944, 2945, 2946, 2947, 2948, 2949, 2950, 2951, 2952, 2953, 2954, 2955, 2956, 2957, 2958, 2959, 2960, 2961, 2962, 2963, 2964, 2965, 2966, 2967, 2968, 2969, 2970, 2971, 2972, 2973, 2974, 2975, 2976, 2977, 2978, 2979, 2980, 2981, 2982, 2983, 2984, 2985, 2986, 3183, 3185, 3422, 4237, 4238, 4240, 4310, 4311, 4312, 4313, 4314, 4315, 4316, 4317, 4318, 4319, 4320, 4321, 4322, 4323, 4324, 4325, 4326, 4327, 4328, 4329, 4330, 4331, 4332, 4333, 4334, 4335, 4336, 4337, 4338, 4339, 4340, 4341, 4342, 4343, 4344, 4345, 4347, 4351, 4352, 4353, 4354, 4355, 4356, 4357, 4358, 4359, 4360, 4361, 4362, 4363, 4364, 4365, 4366, 4367, 4368, 4369, 4370, 4371, 4372, 4374, 4375, 4376, 4377, 4378, 4379, 4380, 4381, 4382, 4383, 4384, 4385, 4386, 4387, 4388, 4389, 4390, 4391, 4392, 4393, 4394, 4395, 4396, 4397, 4398, 4399, 4400, 4401, 4402, 4403, 4404, 4405, 4406, 4407, 4408, 4409, 4410, 4411, 4412, 4413, 4414, 4415, 4416, 4417, 4418, 4419, 4420, 4421, 4422, 4423, 4424, 4425, 4426, 4427, 4428, 4429, 4430, 4431, 4432, 4433, 4434, 4435, 4436, 4437, 4438, 4439, 4440, 4441, 4442, 4443, 4444, 4445, 4446, 4447, 4448, 4449, 4450, 4451, 4452, 4453, 4454, 4455, 4456, 4457, 4458, 4459, 4460, 4461, 4462, 4463, 4464, 4465, 4466, 4467, 4468, 4469, 4470, 4471, 4472, 4473, 4474, 4475, 4476, 4477, 4478, 4479, 4480, 4481, 4482, 4483, 4484, 4485, 4487, 4488, 4489, 4490, 4491, 4492, 4496, 4497, 4498, 4501, 4503, 4504, 4506, 4507, 4508, 4509, 4510, 4511, 4512, 4513, 4514, 4515, 4516,

4517, 4518, 4519, 4520, 4521, 4522, 4523, 4524, 4525, 4527, 4528, 4529, 4530, 4531, 4532, 4533, 4534, 4535, 4536, 4537, 4538, 4539, 4540, 4541, 4542, 4543, 4544, 4545, 4546, 4547, 4548, 4549, 4550, 4551, 4552, 4553, 4554, 4555, 4556, 4557, 4558, 4559, 4560, 4561, 4562, 4563, 4564, 4565, 4566, 4567, 4568, 4569, 4570, 4571, 4572, 4573, 4574, 4575, 4576, 4577, 4578, 4579, 4580, 4581, 4582, 4583, 4584, 4585, 4586, 4587, 4588, 4589, 4590, 4591, 4592, 4593, 4594, 4595, 4596, 4597, 4598, 4599, 4600, 4601, 4602, 4603, 4604, 4605, 4606, 4607, 4608, 4609, 4610, 4611, 4612, 4613, 4614, 4615, 4616, 4617, 4618, 4619, 4620, 4621, 4622, 4623, 4624, 4625, 4626, 4627, 4628, 4629, 4630, 4631, 4632, 4633, 4634, 4635, 4636, 4637, 4638, 4639, 4640, 4641, 4642, 4643, 4644, 4645, 4646, 4647, 4648, 4649, 4650, 4651, 4652, 4653, 4654, 4655, 4656, 4657, 4658, 4659, 4660, 4661, 4662, 4663, 4664, 4665, 4666, 4667, 4682, 4683, 4684, 4685, 4686, 4688, 4689, 4733, 4734, 4735, 4736, 4737, 4738, 4739, 4730, 4741, 4742, 4743, 4744, 4745)

**RESPONSE:** DEP appreciates the support of the commentators.

**18. COMMENT:** The proposed rulemaking should be put into effect without modification. (2338, 2339, 2340, 2341, 2342, 2343)

**RESPONSE:** DEP appreciates the support of the commentators. DEP has made only minor changes to the proposed rulemaking.

#### Comments regarding health and environmental benefits

**19. COMMENT:** The commentators made various statements indicating that since “creation belongs to God”, people are called to act as stewards of creation on God’s behalf and indicated their belief that the Pennsylvania Clean Vehicles Program honors and protects God’s sacred and irreplaceable gift of creation. These statements were made pertaining to both public health and global climate change benefits of the program. (9, 11, 34, 1262, 1378, 1975, 2245, 2251, 2253, 2313, 2340, 2510, 2880, 2881, 2882, 2883, 2884, 2885, 2886, 2887, 2888, 2889, 2890, 2891, 2892, 2893, 2894, 2895, 2896, 2913, 2914, 2915, 2916, 2917, 2918, 2919, 2920, 2921, 2922, 2923, 2924, 2925, 2926, 2927, 2928, 2929, 2930, 2931, 2932, 2933, 2934, 2935, 2936, 2937, 2938, 2939, 2940, 2941, 2942, 2943, 2944, 2945, 2946, 2947, 2948, 2949, 2950, 2951, 2952, 2953, 2954, 2955, 2956, 2957, 2958, 2959, 2960, 2961, 2962, 2963, 2964, 2965, 2966, 2967, 2968, 2969, 2970, 2971, 2972, 2973, 2974, 2975, 2976, 2977, 2978)

**RESPONSE:** DEP appreciates the support of the commentators.

**20. COMMENT:** Commentators supported the program because pollution is dirtying the air in Pennsylvania and it is getting worse, pollution from cars and trucks in particular.

(204, 206, 353, 732, 944, 1231, 1382, 1686, 2243, 2246, 2263, 2318, 2321, 2648, 2838, 2848, 3181, 3182, 3190, 3193, 4748)

**RESPONSE:** The Department appreciates the support but disagrees that pollution is getting worse. Many areas of the Commonwealth are not meeting the health-based ambient air quality standards. Vehicle emissions continue to contribute significantly to emissions causing ozone and are predicted to do so well into the future. Therefore, greater reductions in ozone-producing emissions continue to be necessary. EPA has revised the ozone and particulate matter standards after determining that pre-existing standards were not protective of public health. EPA is anticipated to continue to do so. Therefore, even though ambient air concentrations of criteria pollutants and emissions are



decreasing, additional reductions are necessary to achieve and maintain the tighter standards imposed to protect public health.

21. **COMMENT:** A significant number (about 3000) of commentators support the rulemaking because of their concern for the adverse health effects from the pollutants that implementing the Clean Vehicles Program will help reduce. The following are examples of comments that fall within this group:

These pollution reductions (of the Pennsylvania Clean Vehicles Program) are crucial for improving air quality and protecting public health in the state. Adopting a stronger clean vehicles program than the federal EPA is advocating is an important step in cleaning the air and protecting the health of citizens throughout the Commonwealth.

Thirty-seven counties across Pennsylvania still do not meet the federal government's basic air quality standards. These counties comprise about 5/6ths of the Commonwealth's population.

In 2003, Pennsylvania was ranked 11<sup>th</sup> in the nation for the worst smog pollution from cars and trucks. Pennsylvania has some of the worst air quality in the country.

Twelve Pennsylvania metro areas ranked among the worst 50 nationwide for ground-level ozone or particle pollution or both, and seven ranked among the worst 25 for at least one pollutant. This air pollution is plaguing the Commonwealth and leading to a host of public health problems including asthma attacks in children and aggravation of respiratory ailments in adults.

When citizens have to be warned not to go outdoors because the air isn't safe for them, something must be done.

The Pennsylvania Constitution guarantees clean air to its citizens.

In 2003, approximately 47 percent of Pennsylvanians rated our air quality as fair or poor according to a National Conservation Trust study.

The nonattainment status of areas in Pennsylvania is based on standards promulgated in 1997, but since then, thousands of new studies have been published in peer-reviewed literature further establishing the link between adverse health effects and ozone, between adverse health effects and particulate matter, between high-traffic areas and asthma, between a reduction in pollution and a reduction in risks due to cardiovascular and respiratory disease. The American Lung Association submitted a copy of its 2005 Research Highlights on the health effects of particulate matter and ozone air pollution. Studies show that levels lower than the existing standard have adverse health effects and one study indicates that there is no safe level that can be identified for ground-level ozone. EPA is required to set ambient air quality standards to "protect the public health and provide an adequate margin of safety".

Taking away one of the tools that we know works (that is, preventing the Pennsylvania Clean Vehicles Program from coming into effect) is just going to make the job of achieving future more stringent standards that much harder. Without new efforts, it is unclear whether Pennsylvania will ever expect to protect human health.

Millions of Pennsylvania citizens including children, the elderly and those with chronic conditions exacerbated by pollution are at risk, about half the Commonwealth's population.

The Scranton metro area has recently been ranked the nation's worst for people living with asthma, and other major cities in the state have also been rated very poorly by asthma experts. "Smog" pollution from cars and trucks triggers an estimated 370,000 asthma attacks annually.

Clean air standards are particularly important for older cities such as Philadelphia.

An analysis of 2002 emissions in tons per year shows that in four areas (Philadelphia, Lancaster, Pittsburgh and State College) in Pennsylvania, nitrogen oxide emissions from highway vehicles range from 27% to 64% of the total emissions, with statewide emissions at approximately 40%. Volatile organic compound emissions range from 14% to 26%, with statewide emissions at 32%. This pollution is affecting even our rural areas.

Many commentators also provided their own personal experiences with adverse health effects on days with excess pollution, experiences with their own or a relative's asthma or other respiratory condition, anecdotal evidence from local physicians about patient load on smoggy days, adverse health effects from car pollution and/or how important a concern clean air is for them personally to make the point that air pollution causes pain and suffering to their loved ones and that they support this program to reduce air pollution.

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**RESPONSE:** The Department appreciates the support of these commentators and agrees that reducing health effects from ozone pollution is one of the primary purposes of the Pennsylvania Clean Vehicles Program adopted in 1998. The Department agrees with statements linking adverse health effects with ozone pollution and agrees with the possibility that EPA will find the existing ozone standard not protective of public health. Should this happen, the Commonwealth will have the responsibility of reducing ozone levels to meet a new federal standard.

The Department neither agrees nor disagrees with the specific rankings mentioned since sources of the rankings were generally not provided. The Department agrees that there are 37 eight-hour ozone nonattainment areas in Pennsylvania; the Southeast Pennsylvania area continues to have the highest eight-hour ozone concentrations in this Commonwealth. The Pennsylvania Clean Vehicles Program will be of particular benefit to this area, where local measures, in addition to statewide programs, may still be needed to achieve and maintain the standards. The Philadelphia area also benefits by the application of statewide programs because it is downwind of most areas of Pennsylvania.

Eight-hour nonattainment areas in Pennsylvania that are now meeting the ozone standard based on 2003-2005 ambient air quality data will need to maintain the quality of the air to protect their citizens and to satisfy the requirements of the CAA including federally enforceable State Implementation Plan requirements. EPA has already proposed to make the particulate standard more stringent based on required review of the scientific evidence and is the process of concluding its scientific review of the ozone standard. The next step will be to make recommendations about revising the ozone standard, potentially in the range of 0.06 to 0.08 parts per million (at or below the existing standard).

The Department concurs with statements made that indicate reducing health effects from ozone pollution is one of the primary purposes of the Pennsylvania Clean Vehicles Program adopted in 1998 and with statements linking adverse health effects with ozone pollution. It should be noted, however, that Section 126.401 (relating to purpose) of the existing regulation states that the Clean Vehicles program established under Section 177 of the CAA is “designed primarily to achieve emission reductions of precursors of ozone and other air pollutants from new motor vehicles.” See 25 Pa. Code Section 126.401. The Department also agrees with the possibility that EPA will find the existing standard not protective of public health. Should this happen, the Department will have the responsibility of developing additional strategies to reduce ozone precursor levels to meet a new standard.

Note that this rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The revisions in the final rulemaking will not significantly affect overall air quality benefits at full implementation of the program.

**22. COMMENT:** Cars and trucks are a significant source of air pollution, contributing approximately one third of the region’s smog-forming emissions. One of the worst sources of pollution is cars and trucks. While the focus has been concentrated on stationary sources, automobiles cannot and should not be ignored. The trend towards driving more miles in single occupant vehicles is still increasing, and the percentage of all commuters driving alone in Pennsylvania is greater than the US average.

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**RESPONSE:** Emissions from motor vehicles in Pennsylvania are actually decreasing because of the programs already being implemented, including federal new motor vehicle programs for cars, trucks and buses, federal and state fuel improvements and the vehicle emission inspection/maintenance program. This is despite the increase in vehicle-miles traveled, about a 1-2 percent increase per year, depending on the area. However, even with this emissions decrease, highway vehicles will continue to be significant contributors to ozone precursors in the future. According to EPA's analysis for the Clean Air Interstate Rule, emissions from motor vehicles (cars and trucks) for 2010 will still comprise 30% of the NOx emissions in Pennsylvania. See *Clean Air Interstate Rule Emissions Inventory Technical Support Document*, March 4, 2005 at



[www.epa.gov/CAIR/pdfs/finaltech01.pdf](http://www.epa.gov/CAIR/pdfs/finaltech01.pdf). If driving continues to increase, at some point these increases will overcome the technology improvements. The reductions achievable under the Pennsylvania Clean Vehicles Program will allow the Department to achieve greater emission reductions from the mobile source sector.

23. **COMMENT:** An analysis of 2002 emissions in tons per year shows that in four areas (Philadelphia, Lancaster, Pittsburgh and State College) in Pennsylvania, nitrogen oxide emissions from highway vehicles range from 27% to 64% of the total emissions, with statewide emissions at approximately 40%. Volatile organic compound emissions range from 14% to 26%, with statewide emissions at 32%. This pollution is affecting even our rural areas. (1261)

**RESPONSE:** The Department agrees that emissions from mobile sources contribute significantly to the formation of ozone precursor emissions. See response to comment 22.

24. **COMMENT:** The Pennsylvania Clean Vehicles Program goes beyond weaker federal requirements. Federal standards pertaining to low emission vehicles don't go far enough to improve Pennsylvania's ability to comply with the CAA.

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3352, 3353, 3354, 3355, 3356, 3357, 3358, 3359, 3360, 3361, 3362, 3363, 3364, 3365, 3366, 3367, 3368, 3369, 3370, 3371, 3372, 3373, 3374, 3375, 3376, 3377, 3378, 3379, 3380, 3381, 3382, 3383, 3384, 3385, 3386, 3387, 3388, 3389, 3390, 3391, 3392, 3393, 3394, 3395, 3396, 3397, 3398, 3399, 3400, 3401, 3402, 3403, 3404, 3405, 3406, 3407, 3408, 3409, 3410, 3411, 3412, 3413, 3414, 3415, 3416, 3417, 3418, 3419, 3420, 3421, 3422, 3423, 3424, 3425, 3426, 3516, 3517, 3518, 3519, 3520, 3521, 3522, 3523, 3524, 3525, 3526, 3527, 3528, 3529, 3530, 3531, 3532, 3533, 3534, 3535, 3536, 3537, 3538, 3539, 3540, 3541, 3542, 3543, 3544, 3545, 3546, 3547, 3548, 3549, 3550, 3551, 3552, 3553, 3554, 3555, 3556, 3557, 3558, 3559, 3560, 3561, 3562, 3563, 3564, 3565, 3566, 3567, 3568, 3569, 3570, 3571, 3572, 3573, 3574, 3575, 3576, 3577, 3578, 3579, 3580, 3581, 3582, 3583, 3584, 3585, 3586, 3587, 3588, 3589, 3590, 3591, 3592, 3593, 3594, 3595, 3596, 3597, 3598, 3599, 3600, 3601, 3602, 3603, 3604, 3605, 3606, 3607, 3608, 3609, 3610, 3611, 3612, 3613, 3614, 3615, 3616, 3617, 3618, 3619, 3620, 3621, 3622, 3623, 3624, 3625, 3626, 3627, 3628, 3629, 3630, 3631, 3632, 3633, 3634, 3635, 3636, 3637, 3638, 3639, 3640, 3641, 3642, 3644, 3645, 3646, 3647, 3648, 3649, 3650, 3651, 3652, 3653, 3654, 3655, 3656, 3657, 3658, 3659, 3660, 3661, 3662, 3663, 3664, 3665, 3666, 3667, 3668, 3669, 3670, 3671, 3672, 3673, 3674, 3675, 3676, 3677, 3678, 3679, 3680, 3681, 3682, 3683, 3684, 3685, 3686, 3687, 3688, 3689, 3690, 3691, 3692, 3693, 3694, 3695, 3696, 3697, 3698, 3699, 3700, 3701, 3702, 3703, 3704, 3705, 3706, 3707, 3708, 3709, 3710, 3711, 3712, 3713, 3714, 3715, 3716, 3717, 3718, 3719, 3720, 3721, 3722, 3723, 3724, 3725, 3726, 3727, 3728, 3729,

3730, 3731, 3732, 3733, 3734, 3735, 3736, 3737, 3738, 3739, 3740, 3741, 3742, 3743, 3744, 3745, 3746, 3747, 3748, 3749, 3750, 3751, 3752, 3753, 3754, 3755, 3756, 3757, 3758, 3759, 3760, 3761, 3762, 3763, 3764, 3765, 3766, 3767, 3768, 3769, 3770, 3771, 3772, 3773, 3774, 3775, 3776, 3777, 3778, 3779, 3780, 3781, 3782, 3783, 3784, 3785, 3786, 3787, 3788, 3789, 3791, 3792, 3793, 3794, 3795, 3796, 3797, 3798, 3799, 3800, 3801, 3802, 3803, 3804, 3805, 3806, 3807, 3808, 3809, 3810, 3811, 3812, 3813, 3814, 3815, 3816, 3817, 3818, 3819, 3820, 3821, 3822, 3823, 3824, 3825, 3826, 3827, 3828, 3829, 3830, 3831, 3832, 3833, 3834, 3835, 3836, 3837, 3838, 3839, 3840, 3841, 3842, 3843, 3844, 3845, 3846, 3847, 3848, 3849, 3850, 3851, 3852, 3853, 3854, 3855, 3856, 3857, 3858, 3859, 3860, 3861, 3862, 3863, 3864, 3865, 3866, 3867, 3868, 3869, 3870, 3871, 3872, 3873, 3874, 3875, 3876, 3877, 3878, 3879, 3880, 3881, 3882, 3883, 3884, 3885, 3886, 3887, 3888, 3889, 3890, 3891, 3892, 3893, 3894, 3895, 3896, 3897, 3898, 3899, 3900, 3901, 3902, 3903, 3904, 3905, 3906, 3907, 3908, 3909, 3910, 3911, 3912, 3913, 3914, 3915, 3916, 3917, 3918, 3919, 3920, 3921, 3922, 3923, 3924, 3925, 3926, 3927, 3928, 3929, 3930, 3931, 3932, 3933, 3934, 3935, 3936, 3937, 3938, 3939, 3940, 3941, 3942, 3943, 3944, 3945, 3946, 3947, 3948, 3949, 3950, 3951, 3952, 3953, 3954, 3955, 3956, 3957, 3958, 3959, 3960, 3961, 3962, 3963, 3964, 3965, 3966, 3967, 3968, 3969, 3970, 3971, 3972, 3973, 3974, 3975, 3976, 3977, 3978, 3979, 3980, 3981, 3982, 3983, 3984, 3985, 3986, 3987, 3988, 3989, 3990, 3991, 3992, 3993, 3994, 3995, 3996, 3997, 3998, 3999, 4000, 4001, 4002, 4003, 4004, 4005, 4006, 4007, 4008, 4009, 4010, 4011, 4012, 4013, 4014, 4015, 4016, 4017, 4018, 4019, 4020, 4021, 4022, 4023, 4024, 4025, 4026, 4027, 4028, 4029, 4030, 4031, 4032, 4033, 4034, 4035, 4036, 4037, 4038, 4039, 4040, 4041, 4042, 4043, 4044, 4045, 4046, 4047, 4048, 4049, 4050, 4051, 4052, 4053, 4054, 4055, 4056, 4057, 4058, 4059, 4060, 4061, 4062, 4063, 4064, 4065, 4066, 4067, 4068, 4069, 4070, 4071, 4072, 4073, 4074, 4075, 4076, 4077, 4078, 4079, 4080, 4081, 4082, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091, 4092, 4093, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4129, 4130, 4131, 4132, 4133, 4134, 4135, 4136, 4137, 4138, 4139, 4140, 4141, 4142, 4143, 4144, 4145, 4146, 4147, 4148, 4149, 4150, 4151, 4152, 4153, 4154, 4155, 4156, 4157, 4158, 4159, 4160, 4161, 4162, 4163, 4164, 4165, 4166, 4167, 4168, 4169, 4170, 4171, 4172, 4173, 4174, 4175, 4176, 4177, 4178, 4179, 4180, 4181, 4182, 4183, 4184, 4185, 4186, 4187, 4188, 4189, 4190, 4191, 4192, 4193, 4194, 4195, 4196, 4197, 4198, 4199, 4200, 4201, 4202, 4203, 4204, 4205, 4206, 4207, 4208, 4209, 4210, 4211, 4212, 4213, 4214, 4215, 4216, 4217, 4218, 4219, 4220, 4221, 4222, 4223, 4224, 4225, 4226, 4227, 4228, 4229, 4230, 4231, 4232, 4233, 4234, 4238, 4347, 4352, 4703, 4704, 4705, 4706, 4707, 4708, 4709, 4710, 4711, 4712, 4713, 4714, 4715, 4716, 4717, 4718, 4719, 4720, 4721, 4722, 4723, 4724, 4725, 2726, 4727, 4728, 4729, 4730, 4731, 4732, 4746, 4749, 4751, 4752, 4753, 4754, 4755, 4756, 4757, 4758, 4759, 4760, 4761, 4762, 4763, 4764, 4765, 4766, 4767, 4768, 4769, 4770, 4770, 4771, 4772, 4773, 4774, 4775, 4776, 4777, 4778, 4779, 4780, 4781, 4782, 4783, 4784, 4785, 4786, 4787, 4788, 4789, 4790, 4791, 4792, 4793, 4794, 4795, 4796, 4797, 4798, 4799, 4800, 4801, 4802, 4803, 4804, 4805, 4806, 4807, 4808, 4809, 4810, 4811, 4812, 4813, 4814, 4815, 4816, 4817, 4818, 4819, 4820, 4821, 4822, 4823, 4824, 4825, 4826, 4827, 4828, 4829)

**RESPONSE:** The Department agrees. While federal Tier II standards effective for model year 2004 required significant reductions in new car and light-duty truck emissions, the California standards go beyond these requirements. Pennsylvania should avail itself of the additional emission benefits from the California program. This rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

25. **COMMENT:** The federal standards are outdated and too weak, being based on older technology. (2269)

**RESPONSE:** The Department disagrees that the current federal standards are outdated or that they are based on older technology. However, the California standards, which have been adopted in Pennsylvania, were established to provide greater emission reductions.

26. **COMMENT:** The Pennsylvania Clean Vehicles Program reduces emissions. When fully implemented in 2025, the Pennsylvania Clean Vehicles Program will result in 6 to 12 percent more reduction in volatile organic compounds and 9 percent more NO<sub>x</sub> than would the federal program. Reductions also include a 5 percent to 11 percent reduction in six toxic air pollutants. In addition, the Pennsylvania Clean Vehicles Program will reduce tailpipe emissions of carbon dioxide and cancer-causing benzene by as much as 15 percent. According to the USEPA National Assessment of Air Toxics, mobile sources contribute 66 percent of all toxics.

(220, 360, 567, 603, 761, 976, 1136, 1137, 1138, 1264, 1266, 1270, 1271, 1272, 1345, 1428, 1585, 1588, 1592, 1605, 1607, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1640, 1641, 1643, 1645, 1647, 1654, 1660, 1663, 1669, 1670, 1673, 1674, 1678, 1680, 1684, 1687, 1690, 1691, 1693, 1697, 1698, 1699, 1700, 1762, 1769, 1770, 1772, 1773, 1786, 1789, 1794, 1797, 1802, 1803, 1807, 1812, 1818, 1820, 1824, 1825, 1828, 1830, 1834, 1837, 1842, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1859, 1869, 1877, 1878, 1880, 1888, 1896, 1898, 1906, 1915, 1917, 1926, 1928, 1930, 1931, 1933, 1934, 1938, 1944, 1952, 1954, 1958, 1960, 1963, 1967, 1969, 1973, 1974, 1975, 1977, 1984, 1986, 1987, 2009, 2013, 2015, 2030, 2033, 2034, 2035, 2063, 2165, 2167, 2168, 2173, 2181, 2184, 2196, 2199, 2201, 2218, 2222, 2223, 2228, 2235, 2239, 2240, 2254, 2257, 2260, 2267, 2268, 2282, 2285, 2286, 2292, 2293, 2294, 2295, 2296, 2325, 2326, 2327, 2330, 2331, 2332, 2333, 2334, 2338, 2339, 2340, 2341, 2342, 2343, 2362, 2426, 2450, 2452, 2462, 2467, 2471, 2473, 2486, 2488, 2491, 2497, 2498, 2500, 2501, 2504, 2505, 2506, 2511, 2512, 2513, 2516, 2517, 2519, 2523, 2525, 2526, 2527, 2528, 2529, 2532, 2534, 2537, 2538, 2542, 2545, 2546, 2550, 2551, 2554, 2555, 2561, 2565, 2567, 2570, 2571, 2574, 2576, 2577, 2578, 2580, 2581, 2583, 2584, 2585, 2587, 2588, 2589, 2592, 2593, 2595, 2596, 2598, 2600, 2601, 2604, 2605, 2606, 2609, 2610, 2611, 2612, 2613, 2614, 2616, 2621, 2627, 2630, 2632, 2633, 2634, 2637, 2638, 2639, 2641, 2642, 2643, 2646, 2858, 2860, 2862, 2863, 2865, 2868, 2869, 2872, 2873, 2874, 2877, 3181, 3182, 3185, 3190, 3193, 3421, 3422, 3423, 3424, 3425, 3427, 4238, 4240, 4347, 4703, 4707, 4708, 4709, 4719, 4720, 4721, 4722, 4723, 4724, 4725, 4726, 4727, 4728, 4729, 4730, 4731, 4732, 4751)

**RESPONSE:** The Department agrees with the emissions benefits stated by the commentators. The Department conducted two sets of quantitative analyses using Pennsylvania-specific motor vehicle/traffic data and Pennsylvania fuels. The first set used EPA's conservative assumptions and the second set used assumptions developed by the Northeast States Coordinated Air Use Management (NESCAUM) in "*Comparing the Emission Reductions of the LEVII Program to the Tier2 Program*," NESCAUM, October 2003. These analyses resulted in a range of emission benefits of the CA LEV II program over federal Tier II that is consistent with the comments above. The lower number in volatile organic compound and toxic emission benefits use the EPA methodology. The Department neither agrees nor disagrees with the statement about the national contribution of mobile sources to air toxics. However, it should be noted that in the latest toxics assessment completed by EPA, about 50% of the benzene emissions come from highway vehicles.

27. **COMMENT:** The federal CAA requires Pennsylvania to cut pollution from cars and trucks and the proposed amendments to the Pennsylvania Clean Vehicles Program are necessary to do that.

(1588, 1605, 1607, 1611, 1612, 1616, 1618, 1619, 1640, 1641, 1643, 1647, 1654, 1660, 1673, 1669, 1670, 1678, 1680, 1684, 1687, 1691, 1693, 1697, 1698, 1699, 1700, 1713, 1773, 1797, 1803, 1807, 1812, 1818, 1825, 1826, 1828, 1830, 1834, 1837, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1859, 1869, 1877, 1878, 1880, 1930, 1931, 1933, 1934, 1938, 1944, 1954, 1958, 1960, 1963, 1967, 1969, 1973, 1974, 1975, 1977, 1984, 1986, 1987, 1997, 2009, 2013, 2015, 2030, 2033, 2034, 2035, 2165, 2167, 2168, 2184, 2222, 2223, 2235, 2285, 2286, 2292, 2293, 2294, 2295, 2296, 2452, 2462, 2471, 2473, 2486, 2488, 2497, 2498, 2500, 2501, 2504, 2505, 2506, 2511, 2512, 2513, 2516, 2517, 2519, 2523, 2525, 2526, 2527, 2528, 2529, 2532, 2534, 2537, 2538, 2540, 2541, 2542, 2544, 2545, 2546, 2550, 2551, 2554, 2555, 2561, 2565, 2567, 2570, 2571, 2574, 2577, 2578, 2580, 2581, 2583, 2584, 2585, 2587, 2588, 2589, 2592, 2593, 2595, 2600, 2601, 2605, 2606, 2609, 2610, 2611, 2612, 2613, 2614, 2616, 2621, 2627, 2630, 2632, 2633, 2634, 2637, 2638, 2639, 2641, 2642, 2643, 2646, 2647, 2857, 2860, 2862, 2863, 2865, 2868, 2872, 2874, 2877)

**RESPONSE:** The purpose of this revision was to fulfill the Commonwealth's responsibility to reduce emissions to attain and maintain the health-based ambient standards. Implementation of the final amendments are reasonably necessary to achieve and maintain the national ambient air quality standards.

28. **COMMENT:** We drive our cars and SUVs to states already adopting California standards and we don't think about the pollution we left behind in the trip. Our pollution spreads to other states as well. (594, 905, 944, 1263, 1924, 2201)

**RESPONSE:** The Department agrees that vehicles driven by Pennsylvania residents and Pennsylvania pollution affect the air quality in other states. The Commonwealth has a responsibility when devising clean air plans to take this effect into account.

29. **COMMENT:** We in the northeast face a much greater challenge than other states when it comes to air pollution such as population density and pollution that blows over from the Mid West. Since we are affected by that pollution, we need to do all that we can to keep our air clean and safe to breathe. (556, 628, 771, 1004, 1152)

**RESPONSE:** The Department agrees that the northeast faces a greater challenge than many other states and that it is affected by pollution from upwind areas. The Commonwealth has worked hard to ensure that upwind areas address that pollution and has made substantial progress.

30. **COMMENT:** Many commentators mentioned future generations and long-term benefits as reasons for supporting the implementation of the Pennsylvania Clean Vehicles Program. Examples include the following statements:

We need to not only take care of the air for ourselves, but for our children.

This program is necessary for the future of our children.

The future health of our residents is at stake along with a cleaner environment.

The comments were made in reference to protection of health and the environment, most commonly global warming.

(50, 79, 89, 111, 197, 199, 230, 242, 247, 253, 307, 309, 316, 326, 350, 403, 405, 412, 413, 424, 508, 558, 571, 581, 646, 700, 742, 780, 787, 807, 862, 866, 887, 897, 923, 941, 993, 1040, 1134, 1148, 1184, 1251, 1263, 1316, 1320, 1332, 1364, 1382, 1388, 1412, 1440, 1453, 1482, 1682, 1744, 1790, 1795, 1800, 1806, 1814, 1858, 1895, 1897, 1914, 1931, 1939, 2019, 2038, 2072, 2169, 2184, 2189, 2234, 2245, 2246, 2247, 2253, 2262, 2264, 2273, 2281, 2301, 2319, 2322, 2325, 2340, 2352, 2370, 2373, 2455, 2842, 2847, 3877, 4663, 4665, 4703, 4707, 4708, 4709, 4719, 4720, 4721, 4722, 4723, 4724, 4725, 2726, 4727, 4728, 4729, 4730, 4731, 4732, 4826)

**RESPONSE:** The Department agrees with the long-term nature of implementing a new vehicle program, since it will take some time for model year 2008 and newer vehicles, as required under the final-form amendments to the Pennsylvania Clean Vehicles Program, to comprise a majority of the fleet. The year 2025 represents the year 95% of the Commonwealth's vehicles are expected to be those certified by California.

**31. COMMENT:** Many commentators supported the Pennsylvania Clean Vehicles Program because of its effects on GHG and thus global climate change. Examples of these statements include the following:

The Pennsylvania Clean Vehicles Program is expected to reduce global warming pollution from passenger vehicles by about 30 percent. This is a huge step forward in reducing American's global warming emissions, particularly if other states implement similar standards.

Tailpipe emissions from passenger vehicles are a major component of all the global warming pollution created in Pennsylvania.

The Pennsylvania Clean Vehicles Program would help curb smog and global climate change pollution that poses public health and environmental threats to our citizens.

Action is required to combat global warming and reducing GHG is a critical part of that.

Pennsylvania contributes more to global warming gases than 105 other nations combined, so we have an obligation to reduce our contributions as soon as possible.

We don't yet know what the costs of global warming may be.

(65, 111, 114, 147, 201, 220, 242, 304, 360, 603, 689, 700, 761, 788, 816, 963, 990, 1013, 1134, 1136, 1137, 1138, 1147, 1251, 1252, 1253, 1262, 1270, 1272, 1326, 1336, 1378, 1388, 1407, 1409, 1428, 1480, 1482, 1497, 1510, 1540, 1541, 1554, 1556, 1585, 1588, 1592, 1594, 1603, 1605, 1607, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1639, 1640, 1641, 1643, 1645, 1647, 1650, 1654, 1660, 1663, 1667, 1669, 1670, 1674, 1678, 1680, 1684, 1687, 1691, 1693, 1695, 1697, 1698, 1699, 1700, 1705, 1744, 1760, 1762, 1770, 1772, 1773, 1786, 1789, 1791, 1794, 1795, 1797, 1800, 1801, 1802, 1803, 1805, 1807, 1815, 1816, 1818, 1820, 1825, 1827, 1828, 1830, 1834, 1835, 1837, 1840, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1864, 1869, 1872, 1873, 1876, 1877, 1880, 1891, 1896, 1917, 1926, 1929, 1931, 1933, 1934, 1937, 1938, 1948, 1952, 1954, 1960, 1963, 1965, 1966, 1969, 1972, 1973, 1974, 1975, 1977, 1979, 1984, 1986, 1987, 1996, 1997, 2000, 2008, 2009, 2011, 2013, 2015, 2030, 2033, 2037, 2063, 2070, 2072, 2073, 2074,

2075, 2076, 2078, 2082, 2083, 2084, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2102, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2131, 2133, 2134, 2135, 2136, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2165, 2167, 2168, 2181, 2182, 2196, 2199, 2201, 2218, 2222, 2223, 2233, 2235, 2237, 2239, 2240, 2244, 2245, 2247, 2249, 2251, 2252, 2253, 2254, 2257, 2259, 2260, 2263, 2264, 2265, 2267, 2280, 2285, 2286, 2289, 2292, 2293, 2294, 2295, 2307, 2309, 2311, 2312, 2313, 2314, 2316, 2317, 2322, 2325, 2326, 2327, 2329, 2330, 2331, 2332, 2333, 2334, 2340, 2365, 2371, 2375, 2437, 2449, 2450, 2452, 2455, 2458, 2460, 2462, 2471, 2488, 2491, 2492, 2493, 2497, 2498, 2499, 2500, 2501, 2504, 2505, 2506, 2510, 2511, 2512, 2515, 2516, 2517, 2518, 2519, 2521, 2522, 2523, 2524, 2525, 2527, 2528, 2529, 2534, 2535, 2538, 2540, 2541, 2542, 2545, 2546, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2559, 2561, 2562, 2565, 2567, 2570, 2571, 2574, 2575, 2577, 2578, 2579, 2580, 2581, 2583, 2584, 2585, 2589, 2591, 2592, 2593, 2595, 2597, 2598, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2609, 2610, 2611, 2612, 2616, 2619, 2621, 2622, 2623, 2629, 2630, 2632, 2633, 2634, 2635, 2637, 2639, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2840, 2851, 2857, 2858, 2861, 2862, 2863, 2865, 2866, 2870, 2871, 2872, 2873, 2878, 2879, 3181, 3182, 3185, 3190, 3193, 3427, 3601, 3817, 4237, 4238, 4240, 4347, 4486, 4493, 4494, 4495, 4532, 4682, 4687, 4703, 4707, 4708, 4709, 4719, 4720, 4721, 4722, 4723, 4724, 4725, 2726, 4727, 4728, 4729, 4730, 4731, 4732)

**RESPONSE:** The Department agrees with the commentators regarding anticipated GHG reductions as a benefit of the Pennsylvania Clean Vehicles Program. Because new model year 2008 vehicles in Pennsylvania will be those certified by CARB, and because in order to receive CARB certification after model year 2009, an auto manufacturer will have to meet the GHG fleet average based on sales in California, Pennsylvania expects to realize similar GHG reductions to those anticipated in California. California estimated their regulations would ultimately provide about a 30% reduction in GHG emissions from new vehicles required to comply compared to the 2002 fleet. The Department also agrees with the commentators that transportation emissions are a significant source of GHG emissions. *A Greenhouse Gas Emissions Inventory for Pennsylvania* by Pennsylvania State University researchers (Journal of the Air and Waste Management Association, August 2005) stated that transportation emissions accounted for the largest increases in emissions between 1990 and 1999, with total GHG emissions increasing by 3 percent from 1990 to 1999. In 1999, fossil fuel combustion accounted for over 90% of GHG emissions in Pennsylvania, and transportation accounted for over 25% of GHG emissions for fossil fuel.

32. **COMMENT:** We should do all we can to protect our precious environment and natural resources in Pennsylvania. Some commentators also pointed out various other environmental effects that could be co-benefits of reducing volatile organic compounds, mobile air toxics, and/or GHG such as reduced deposition of toxics into water affecting wildlife, and reduced productivity of agriculture.

(18, 316, 346, 353, 459, 468, 502, 564, 751, 912, 918, 993, 1013, 1178, 1247, 1251, 1252, 1253, 1428, 1453, 1497, 1685, 1738, 1895, 1928, 1981, 2069, 2070, 2072, 2073, 2074, 2075, 2076, 2078, 2082, 2083, 2084, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2114, 2131, 2133, 2134, 2135, 2136, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2184, 2252, 2307, 2309, 2311, 2312, 2313, 2314, 2316, 2317, 2320, 2369, 2375, 2622, 2623, 2839, 2840, 2842, 2846, 2878, 2879, 4486, 4493, 4494, 4495, 4687)

**RESPONSE:** The Department agrees that there are environmental effects of ground-level ozone pollution. Pennsylvania's Clean Vehicles program is designed to achieve



emission reductions from ozone precursors and other air pollutants from new motor vehicles.

Comments concerning economic issues

33. **COMMENT:** Commentators indicated that the failure to decrease ozone precursors create additional health care costs. Examples of these statements include the following:

The Pennsylvania Clean Vehicles Program is a step towards protecting public health and easing the suffering and costs of asthma and allergy sufferers.

Medical expenses and insurance payments reflect our failure to control air pollution.

The consequences result in a total loss of about \$1 billion per year, half accounted for by health care costs and the remainder including lost work and productivity, and premature mortality.

Costs have the potential to grow at a time when many Pennsylvanians are uninsured or lack access to adequate health care.

Costs, if any, associated with clean car programs are recouped many times over in savings in health, work and lives.

(89, 152, 335, 501, 508, 700, 726, 1164, 1262, 1264, 1271, 1274, 1440, 1604, 1668, 1857, 2028, 2058, 2247, 2269, 2335, 2369, 2371, 2375, 2435, 2631, 2636, 2650, 2851, 3205, 3423, 3434)

**RESPONSE:** The Department agrees that there are significant costs associated with adverse health effects of air pollution and that the Pennsylvania Clean Vehicles Program can help prevent these cost expenditures.

34. **COMMENT:** Clean air is good for the economy. Environmental regulations make the US stronger. Examples of similar statements include the following:

People are deterred from moving to an area because of the poor air quality.

Pennsylvania's ranking among the worst states in the country when it comes to air pollution discourages economic growth by allowing competing states to claim Pennsylvania provides a poor quality of life.

Having smog pollution levels that already exceed federal health standards in over half of our counties will severely limit business and industry growth opportunities in these counties.

Clean air will help protect our natural beauty to encourage continued tourism which is important to Pennsylvania.

(599, 611, 620, 700, 782, 1067, 1138, 1140, 1142, 1148, 1262, 1272, 1556, 1685, 1720, 1806, 2069, 2175, 2196, 2254, 2257, 2258, 2352, 2395, 2532, 2587, 2620, 4235)

**RESPONSE:** The Department agrees with the statements about the economic benefit of clean air.

**35. COMMENT:** Many commentators stated that the Pennsylvania Clean Vehicles Program is good for the economy and for the American automobile industry itself. Examples include the following statements:

The danger in not implementing the Pennsylvania Clean Vehicles Program is that the U.S. auto industry would fall further behind in the economy and competitors, because 4/5 of Americans desire higher fuel performance vehicles.

America's car manufacturers are almost always dragging their feet to their own detriment and to the detriment of the consumer.

The American automakers are already suffering for the lack of LEVs capable of competing with those of foreign manufacturers.

Tougher standards will help Americans innovate new technologies rather than stagnate in old business models.

The regulation can spur creativity in vehicle development and create more demand for cars which are better environmental performers thus bringing the cost of technology down faster.

(116, 206, 441, 644, 761, 828, 973, 1067, 1141, 1262, 1266, 1270, 1585, 1588, 1590, 1591, 1592, 1594, 1597, 1601, 1603, 1604, 1605, 1607, 1608, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1624, 1640, 1641, 1643, 1646, 1647, 1650, 1654, 1655, 1656, 1658, 1660, 1662, 1663, 1666, 1667, 1668, 1669, 1670, 1674, 1675, 1678, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1689, 1691, 1693, 1695, 1697, 1698, 1699, 1700, 1705, 1713, 1762, 1770, 1772, 1773, 1779, 1780, 1785, 1786, 1789, 1791, 1793, 1794, 1795, 1796, 1797, 1800, 1801, 1802, 1803, 1805, 1806, 1807, 1809, 1812, 1813, 1814, 1815, 1816, 1818, 1819, 1820, 1822, 1824, 1825, 1826, 1828, 1830, 1831, 1833, 1834, 1835, 1837, 1840, 1842, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1857, 1859, 1861, 1862, 1863, 1864, 1865, 1867, 1869, 1872, 1873, 1876, 1877, 1878, 1880, 1887, 1888, 1891, 1895, 1896, 1898, 1905, 1906, 1907, 1908, 1912, 1914, 1917, 1926, 1928, 1929, 1930, 1931, 1933, 1934, 1937, 1943, 1944, 1946, 1947, 1948, 1952, 1958, 1960, 1962, 1963, 1964, 1965, 1967, 1969, 1972, 1973, 1974, 1975, 1977, 1978, 1979, 1981, 1984, 1986, 1987, 1990, 1996, 1997, 2000, 2009, 2011, 2013, 2015, 2028, 2030, 2033, 2034, 2035, 2037, 2058, 2063, 2165, 2167, 2168, 2173, 2178, 2181, 2182, 2184, 2191, 2196, 2199, 2200, 2201, 2212, 2218, 2222, 2223, 2227, 2228, 2231, 2233, 2235, 2237, 2240, 2276, 2280, 2282, 2285, 2286, 2289, 2291, 2292, 2293, 2294, 2295, 2296, 2322, 2433, 2436, 2450, 2451, 2452, 2455, 2458, 2460, 2462, 2465, 2470, 2471, 2473, 2476, 2486, 2488, 2490, 2491, 2492, 2493, 2494, 2495, 2497, 2498, 2499, 2500, 2501, 2502, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2559, 2560, 2561, 2562, 2564, 2565, 2566, 2567, 2568, 2570, 2571, 2572, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2616, 2617, 2619, 2620, 2621, 2627, 2629, 2630, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2641, 2642, 2643, 2644, 2645, 2647, 2649, 2857, 2858, 2859, 2860, 2862, 2863, 2864, 2865, 2866, 2868, 2869, 2871, 2872, 2874, 2875, 2877, 2897, 2898, 2899,

2900, 2901, 2902, 2903, 2904, 2905, 2906, 2907, 2908, 2909, 2910, 2911, 2912, 3185, 3429, 3430, 3431, 3432, 3433, 3434, 3435, 3436, 3437, 3438, 3439, 3440, 3441, 3442, 3443, 3444, 3445, 3446, 3447, 3448, 3449, 3450, 3451, 3452, 3453, 3454, 3455, 3456, 3457, 3458, 3459, 3460, 3461, 3462, 3463, 3464, 3465, 3466, 3467, 3468, 3469, 3470, 3471, 3472, 3473, 3474, 3475, 3476, 3477, 3478, 3479, 3480, 3481, 3482, 3483, 3484, 3485, 3486, 3487, 3488, 3489, 3490, 3491, 3492, 3493, 3494, 3495, 3496, 3497, 3498, 3499, 3500, 3501, 3502, 3503, 3504, 3505, 3506, 3507, 3508, 3509, 3510, 3511, 3512, 3513, 3514, 4237, 4238, 4240, 4347, 4733, 4734, 4735, 4736, 4737, 4738, 4739, 4740, 4741, 4742, 4743, 4744)

**RESPONSE:** The National Academy of Sciences indicated in its recent report entitled, *State and Federal Standards for Mobile Source Emissions*, that it is difficult to determine what parties bear what fraction of the costs of emission standards. Therefore, it would be difficult to assess the quantitative validity of these statements, which are ancillary to the rulemaking.

36. **COMMENT:** Unless we reduce vehicle emissions, there will be no room for industry to expand in the 37 counties not attaining the standard for ozone. If reductions in these air pollutants do not come from cars and light trucks, further reductions of pollution will be required from power plants and industries, making it hard to locate new businesses and expand existing businesses in areas that do not meet clean air standards. Legislative attempts to kill CA LEV II would force new pollution controls on non-vehicle sources of air pollution that could cost an area jobs.

(353, 761, 991, 1136, 1137, 1138, 1266, 1272, 1308, 1585, 1588, 1592, 1605, 1607, 1608, 1611, 1612, 1615, 1616, 1640, 1641, 1643, 1645, 1647, 1654, 1659, 1660, 1663, 1669, 1674, 1678, 1680, 1681, 1684, 1687, 1689, 1691, 1693, 1697, 1698, 1699, 1700, 1762, 1770, 1772, 1773, 1780, 1786, 1789, 1791, 1794, 1795, 1801, 1802, 1803, 1805, 1807, 1809, 1812, 1815, 1816, 1818, 1822, 1824, 1825, 1828, 1830, 1834, 1835, 1837, 1844, 1845, 1847, 1848, 1850, 1852, 1853, 1857, 1864, 1865, 1869, 1872, 1876, 1877, 1878, 1880, 1891, 1898, 1906, 1908, 1926, 1930, 1931, 1938, 1943, 1946, 1947, 1952, 1954, 1958, 1960, 1963, 1966, 1969, 1972, 1974, 1979, 1984, 1987, 2011, 2013, 2015, 2030, 2034, 2035, 2063, 2165, 2167, 2168, 2178, 2182, 2184, 2196, 2200, 2212, 2218, 2223, 2231, 2233, 2235, 2237, 2244, 2282, 2285, 2286, 2289, 2292, 2293, 2294, 2296, 2352, 2433, 2436, 2450, 2452, 2462, 2471, 2473, 2488, 2491, 2492, 2495, 2497, 2498, 2499, 2500, 2501, 2504, 2505, 2506, 2507, 2509, 2510, 2511, 2512, 2513, 2515, 2516, 2518, 2519, 2520, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2531, 2532, 2534, 2535, 2537, 2538, 2539, 2541, 2542, 2543, 2545, 2546, 2549, 2550, 2551, 2552, 2554, 2555, 2559, 2561, 2567, 2570, 2571, 2574, 2575, 2577, 2578, 2580, 2583, 2584, 2587, 2589, 2590, 2592, 2593, 2595, 2598, 2600, 2601, 2602, 2604, 2605, 2606, 2609, 2611, 2612, 2613, 2614, 2616, 2621, 2629, 2630, 2632, 2633, 2634, 2635, 2637, 2638, 2639, 2641, 2642, 2643, 2644, 2646, 2647, 2648, 2857, 2858, 2860, 2862, 2863, 2865, 2866, 2868, 2870, 2874, 2875, 3185, 3190, 3427, 4237, 4238, 4240, 4347)

**RESPONSE:** Vehicle emissions continue to contribute significantly to emissions causing ozone and are predicted to do so well into the future. To the extent that the Commonwealth can rely on emission reductions from the Pennsylvania Clean Vehicles Program to attain and maintain the health-based ambient air quality standards, the Commonwealth's need to find additional reductions from industry, power plants, commercial operations, consumer activities or other mobile sources of pollution will be reduced. Pennsylvania has limited ability under the federal CAA to require mobile source reductions, so controls on stationary and commercial business sources are the most viable when additional reductions are necessary. There is a shrinking slate of options since the Department is already stringently regulating most other sectors. It is unlikely that the Commonwealth will make progress in meeting its clean air obligations in certain geographic areas if the Department foregoes additional emission reductions

from the transportation sector. Reducing vehicle emissions provides additional room for economic growth while still maintaining air quality.

37. **COMMENT:** To do it clean in the beginning is far less expensive than to clean it up after the damage. We should use all available technology to reduce harmful pollutants from their source before they enter the atmosphere. (567, 782, 1263, 1356, 1548, 2338, 2339, 2340, 2341, 2342, 2343, 2757)

**RESPONSE:** The Department agrees.

38. **COMMENT:** Several commentators supported the Pennsylvania Clean Vehicles Program because of the need for government regulation to balance the profit-making concerns of private industry in the transportation field. Examples of such statements include the following:

Corporations will choose quick monetary profits over almost any other public or private consumer good accomplished by their respective agencies.

California and the European Union are way ahead of the curve in correcting this imbalance between markets and resources regarding the personal automobile.

American corporations don't voluntarily do anything that increases current costs, no matter what it does for society at large, which they ultimately depend on.

Lessening dependence on oil is going to spread the wealth around, rather than in the stock portfolios of oil companies.

(10, 13, 102, 152, 396, 459, 567, 571, 581, 635, 700, 1141, 1147, 1148, 1245, 1270, 1297, 1515, 1556, 1813, 2166, 2246, 2247, 2263, 2287, 2324, 2335, 2370, 2451, 4123, 4650)

**RESPONSE:** The Department agrees that government regulation is sometimes necessary for the protection of public health and the environment. Voluntary measures also reduce emissions.

39. **COMMENT:** Many commentators mentioned issues of saving money on fuel, energy independence and responsible use of petroleum resources as reasons for supporting the implementation of the Pennsylvania Clean Vehicles Program. Examples of these statements include:

The Pennsylvania Clean Vehicles Program would provide more fuel-efficient vehicles for Pennsylvania.

An added benefit of the standards is that they would likely make cars go farther on a gallon of gas, saving Pennsylvanians money when they fill up at the gas pump.

Pennsylvanians are clearly interested in more fuel-efficient vehicles, as evidenced by the success of the rebate program for hybrid vehicles.

Clean cars are more fuel-efficient than heavy polluters and gasoline is expensive.

Saving money at the pump is a top priority. There should be reduced vehicle operating costs under LEV II.

The price of fuel can only be expected to rise, so savings on fuel costs due to greater fuel efficiency will probably grow.

We would make this nation safer by reducing our dependency on natural resources that come in the largest quantities from the most volatile portion of the globe.

(7, 18, 46, 111, 116, 132, 232, 304, 326, 384, 507, 567, 571, 602, 603, 621, 700, 716, 729, 761, 788, 810, 886, 912, 938, 1137, 1139, 1140, 1141, 1142, 1143, 1145, 1147, 1183, 1204, 1217, 1227, 1262, 1263, 1266, 1269, 1270, 1271, 1272, 1345, 1400, 1428, 1510, 1597, 1607, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1641, 1643, 1645, 1647, 1654, 1660, 1662, 1663, 1669, 1670, 1678, 1680, 1683, 1684, 1687, 1691, 1693, 1697, 1698, 1699, 1700, 1713, 1736, 1762, 1770, 1772, 1773, 1780, 1789, 1794, 1797, 1805, 1807, 1809, 1822, 1825, 1828, 1831, 1833, 1834, 1845, 1850, 1852, 1853, 1854, 1861, 1869, 1876, 1877, 1878, 1880, 1887, 1891, 1908, 1917, 1926, 1929, 1930, 1931, 1933, 1934, 1937, 1938, 1954, 1963, 1964, 1965, 1967, 1969, 1974, 1975, 1986, 1987, 1997, 2013, 2015, 2017, 2018, 2019, 2020, 2021, 2030, 2034, 2035, 2067, 2071, 2075, 2077, 2079, 2080, 2081, 2085, 2086, 2087, 2088, 2089, 2101, 2103, 2104, 2113, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2132, 2137, 2164, 2165, 2167, 2168, 2200, 2214, 2218, 2223, 2235, 2237, 2239, 2240, 2244, 2247, 2248, 2254, 2262, 2263, 2267, 2285, 2289, 2293, 2294, 2295, 2296, 2298, 2299, 2300, 2301, 2302, 2303, 2306, 2308, 2315, 2322, 2326, 2327, 2329, 2330, 2331, 2333, 2334, 2336, 2369, 2372, 2374, 2375, 2395, 2433, 2450, 2452, 2458, 2460, 2462, 2471, 2473, 2488, 2491, 2493, 2497, 2501, 2505, 2506, 2507, 2510, 2511, 2512, 2514, 2516, 2517, 2518, 2519, 2520, 2524, 2526, 2527, 2529, 2531, 2541, 2549, 2551, 2552, 2556, 2557, 2559, 2561, 2567, 2568, 2570, 2574, 2577, 2578, 2579, 2581, 2583, 2585, 2589, 2593, 2594, 2595, 2598, 2600, 2602, 2604, 2605, 2606, 2609, 2610, 2611, 2612, 2614, 2616, 2624, 2625, 2626, 2627, 2629, 2630, 2632, 2633, 2634, 2651, 2860, 2862, 2863, 2865, 2868, 2871, 2873, 2990, 2999, 3181, 3182, 3185, 3190, 3193, 3421, 3423, 3424, 3425, 3426, 3427, 4235, 4237, 4238, 4240, 4333, 4334, 4335, 4336, 4337, 4338, 4342, 4344, 4345, 4347, 4682, 4688, 4689, 4703, 4707, 4708, 4709, 4719, 4720, 4721, 4722, 4723, 4724, 4725, 4726, 4727, 4728, 4729, 4730, 4731, 4732, 4746, 4747, 4751)

**RESPONSE:** The Department agrees that these are co-benefits of the Pennsylvania Clean Vehicles Program for model year 2009 and subsequent vehicles. CARB predicted that by MY 2016 the operational efficiency savings of vehicles meeting the GHG requirements, which start in MY 2009, would afford owners an overall cost savings of \$3.50 to \$7.00 per month, assuming a price of \$1.74 per gallon of gasoline. These savings are probably understated, since the price of gasoline is likely to remain higher than that used in CARB's analysis.

40. **COMMENT:** Commentators made various statements regarding current and potential costs to consumers and the industry as a result of compliance with California emission standards. Examples of these statements include:

Some arguments against the Pennsylvania Clean Vehicles Program involve cost, but the argument is questionable.

Vehicles certified under the Pennsylvania Clean Vehicles Program are not more expensive than vehicles that meet federal standards. The Department conducted a web study of prices for Ohio, New York and Pennsylvania that showed in almost all cases that the price was the same.

AAA stated that cars would cost thousands of dollars and this would hurt low-income consumers, but this isn't true.

The larger question for us is what the cost will be if we fail to design cars with lower emissions.

As vehicle manufacturers respond to the Pennsylvania market, it is more than likely that production volumes will absorb any increase in production costs.

(7, 761, 1136, 1138, 1139, 1262, 1264, 1266, 1271, 1272, 1345, 1762, 1780, 1794, 1797, 1800, 1802, 1807, 1809, 1825, 1828, 1833, 1840, 1844, 1845, 1846, 1850, 1852, 1853, 1859, 1869, 1877, 1880, 1888, 1891, 1895, 1906, 1926, 1934, 1938, 1947, 1952, 1954, 1964, 1965, 1967, 1969, 1973, 1974, 1981, 1987, 2009, 2011, 2015, 2030, 2034, 2035, 2181, 2199, 2200, 2218, 2223, 2235, 2237, 2240, 2257, 2259, 2261, 2285, 2289, 2292, 2293, 2295, 2436, 2452, 2604, 2605, 2606, 2609, 2611, 2612, 2613, 2616, 2619, 2621, 2629, 2630, 2632, 2633, 2635, 2638, 2639, 2641, 2642, 2646, 2863, 2865, 2868, 3185, 4237, 4238, 4347)

**RESPONSE:** The Department agrees that there presently appears to be little to no cost difference between the prices of CARB-certified cars and federal Tier II cars to the consumer. This is not expected to change in model year 2008. For model year 2009 and beyond, CARB is predicting increases in initial purchase prices starting at \$17 for passenger cars and small trucks and \$36 for large trucks and SUVs, ending at about \$1,000. In 2016, by which time the most stringent GHG standards would be in place in California, CARB predicts the estimated increases in initial cost to be \$1,064 for smaller vehicles and \$1,029 for larger vehicles. The auto industry estimates the maximum costs to be \$3,000. For model year 2009 and beyond vehicles, CARB predicts that the cost of sticker price increases will be overtaken during the life of the vehicle by increased efficiency.

41. **COMMENT:** Commentators made statements about the historical trends of estimating future costs. Examples of such statements include the following:

It is clear from the history of regulation of the auto industry that cost estimates invariably significantly overstate the costs that consumers experience when such air pollution control measures are actually implemented.

Pre-regulatory estimates from both the automobile industry and the regulators are typically higher than what the costs end up being. Given this track record, to base any policy decision on the automobile industry's estimate with regard to the Pennsylvania Clean Vehicles Program doesn't make sense.

Incremental initial costs of the GHG portion of the California LEV program may actually be very small in proportion to total costs of a vehicle. (1264, 2239)

**RESPONSE:** The Department shares the commentators' concerns regarding reliance solely on cost estimates provided by industry.

42. **COMMENT:** Commentators indicated that the benefits are worth any costs associated with the Pennsylvania Clean Vehicles Program. Examples of such statements include the following:

We are doing our part by buying cleaner vehicles now, even if they are more expensive.

Any costs associated with the Pennsylvania Clean Vehicles Program would be well worth the public health benefits and reduction in global warming.

Even if the costs of cars are a bit higher, the costs of not implementing the program is to turn our backs on the responsibility to leave a healthy world for our children.

It's wrong not to improve emission standards because of pressures from industry groups that the cost is too high.

According to the results of a Harris Poll in 2005, 74% of US adults agree that "protecting our environment is so important that requirements and standards cannot be too high."

(13, 46, 144, 194, 257, 451, 680, 701, 885, 926, 1216, 1264, 1357, 1440, 1467, 1479, 1742, 1792, 1840, 1861, 1863, 1901, 1990, 2064, 2091, 2092, 2094, 2214, 2237, 2244, 2245, 2248, 2253, 2259, 2265, 2267, 2336)

**RESPONSE:** Commonwealth agencies must consider the costs and benefits of regulatory measures. There is no present cost to consumers of the Pennsylvania Clean Vehicles Program, since postponing the program does not incur costs. Vehicles meeting the GHG standards, starting with model year 2009, will provide a cost savings to consumers over the life of the vehicle.

#### Comments regarding technology and vehicles

43. **COMMENT:** The standard-setting process in California leads to more innovation. Examples of such statements include the following:

California has historically revised its standards more frequently than the federal government. The result has often been more stringent standards in California for a period of some years before the federal standards catch up.

A recent report by the National Academy of Science's National Research Council (NRC) found that California's role in setting emission standards has been scientifically valid and necessary to achieve clean air goals in parts of the country

struggling to clean up the air. The report also found that the California standards have helped speed up technological air pollution control innovations.

Leading edge policies and technologies that encourage efficiency have long been a California export right along with our movies and semiconductors.

As California adopts new standards, other states follow and then they're adopted at the federal level.

(1136, 1266, 1556, 1742, 1763, 2272)

**RESPONSE:** The Department agrees with the characterization of the California program and the findings in the NRC report. The NRC found that the California program has been beneficial overall for air quality by improving mobile-source emissions control.

44. **COMMENT:** Technology exists that would allow cars and trucks to run cleaner and significantly reduce our air pollution problem. California has demonstrated this for years. The technology is being used and has been proven in nine other states. When we have the technology to improve emission standards in our cars, it's fundamentally wrong not to do so. Many commentators mentioned the availability and popularity of the hybrid vehicle.

(65, 92, 206, 232, 370, 585, 644, 656, 700, 810, 1137, 1147, 1262, 1267, 1270, 1515, 1659, 1705, 1813, 2086, 2239, 2243, 2250, 2253, 2267, 2269, 2272, 2325, 2326, 2328, 2329, 2330, 2333, 2334, 2335, 2336, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2490, 2503, 2873, 3182, 3190, 3181, 3193, 3421, 3423, 3425, 3426, 4235, 4747, 4748, 4749)

**RESPONSE:** The Department agrees that the technology exists to control ozone-related pollutants in order to meet the CA LEV II standards, as proven in California since model year 2004 and the several states that have been implementing the California standards for many years. Compliance in Pennsylvania to meet these standards will not require additional technology development by the automakers.

The Department believes that some of the technology to meet the GHG standards is on the market today. The "near-term" GHG standards – model year 2009 to 2013 -- were based on technologies that are already available on the market now on some vehicles or demonstrated in prototypes. Those that still face technological challenges were only considered in setting standards for beyond 2013. In setting standards for GHG emissions, California looked at 26 separate technologies for "near term," 8 additional technologies for "mid-term" (2013-15) and 3 additional technologies for "long-term" (2015 and beyond). California also looked at alternative fuels, but did not include all such fuels in their evaluation (for example, full function long-range battery electric vehicles; hydrogen vehicles) if they would not be viable in 2009. The available technologies include engine/drivetrain improvements, air conditioning and some exhaust aftertreatment technologies (for methane and nitrous oxide). The standards were set based on combinations of these technologies. These standards do not even rely on the most



advanced technology available; in fact, they were based on the challenges that the manufacturer now having the worst-performing fleet would face. Hybrid electric vehicle technology was not included because California believed it would not be available across all vehicle classes. Automakers are given flexibility to choose any technology appropriate for the various vehicle types they sell, whether or not the technology was considered by California. The automotive industry has been successful in meeting similar challenges since the 1960s.

45. **COMMENT:** No special fuel would be required. Cleaner vehicles are being used in New York and those drivers are able to use the same gasoline as Pennsylvanians use. (1345)

**RESPONSE:** The Department agrees. In addition, emission benefits in the Department's analysis do not assume the use of California reformulated gasoline since the regulation that will be implemented in Pennsylvania does not require the use of California fuels in CARB certified vehicles.

46. **COMMENT:** The Pennsylvania Clean Vehicles Program is critical to consumer choice in Pennsylvania. The program provides better vehicle options to consumers. Examples of statements supporting this position include the following:

I want to buy a car for my family but there is nothing on the market that meets my standards for fuel efficiency and environmental standards.

Consumers should be able to choose a vehicle that is cleaner and healthier for the community.

If more fuel-efficient vehicles are available, that's what people will drive, and in the process they will save money and provide for a healthier environment.

The Pennsylvania Clean Vehicles Program will allow Pennsylvania citizens more choices in choosing cars and trucks that give off less global warming and smog pollution and also reduce the threat these have on public health.

(223, 644, 761, 797, 1002, 1137, 1138, 1141, 1263, 1267, 1269, 1271, 1275, 1538, 1585, 1588, 1590, 1591, 1592, 1594, 1597, 1601, 1603, 1604, 1605, 1607, 1608, 1610, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1624, 1640, 1641, 1643, 1645, 1646, 1647, 1650, 1654, 1655, 1658, 1659, 1660, 1662, 1663, 1666, 1667, 1668, 1669, 1670, 1674, 1675, 1678, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1689, 1691, 1693, 1695, 1697, 1698, 1699, 1700, 1705, 1713, 1762, 1770, 1772, 1773, 1779, 1780, 1785, 1786, 1789, 1791, 1793, 1794, 1795, 1796, 1800, 1801, 1802, 1803, 1805, 1806, 1807, 1809, 1812, 1813, 1814, 1815, 1816, 1818, 1819, 1820, 1822, 1824, 1825, 1826, 1828, 1830, 1831, 1833, 1834, 1835, 1837, 1840, 1842, 1844, 1845, 1846, 1847, 1848, 1850, 1852, 1853, 1854, 1857, 1859, 1861, 1862, 1864, 1865, 1867, 1869, 1872, 1873, 1876, 1877, 1878, 1880, 1887, 1888, 1891, 1895, 1896, 1898, 1905, 1906, 1907, 1908, 1912, 1914, 1917, 1926, 1928, 1929, 1930, 1931, 1933, 1934, 1937, 1938, 1943, 1944, 1946, 1947, 1948, 1952, 1954, 1958, 1960, 1962, 1963, 1964, 1965, 1966, 1967, 1969, 1972, 1973, 1974, 1975, 1977, 1978, 1979, 1981, 1984, 1986, 1987, 1990, 1996, 1997, 2000, 2009, 2011, 2013, 2015, 2030, 2033, 2034, 2035, 2037, 2063, 2165, 2167, 2168, 2173, 2178, 2181, 2182, 2184, 2196, 2199, 2200, 2201, 2212, 2218, 2222, 2227, 2228, 2231, 2233, 2235, 2239, 2257, 2262, 2276, 2280, 2282, 2285, 2286, 2289, 2291, 2292, 2293, 2294, 2295, 2296, 2322, 2433, 2436, 2450, 2451, 2452, 2458, 2460, 2462, 2465, 2470, 2471, 2473, 2476, 2486, 2488,

2490, 2491, 2492, 2493, 2494, 2495, 2498, 2499, 2500, 2501, 2502, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2525, 2526, 2527, 2528, 2529, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2570, 2571, 2572, 2574, 2575, 2576, 2577, 2585, 2586, 2587, 2588, 2589, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2616, 2617, 2619, 2620, 2621, 2627, 2629, 2630, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2641, 2642, 2643, 2644, 2645, 2646, 2649, 2651, 2857, 2858, 2859, 2860, 2861, 2862, 2863, 2864, 2865, 2866, 2868, 2869, 2870, 2871, 2872, 2874, 2875, 2877, 2880, 2881, 2882, 2883, 2884, 2885, 2886, 2887, 2888, 2889, 2890, 2891, 2892, 2893, 2894, 2895, 2896, 2897, 2898, 2899, 2900, 2901, 2902, 2903, 2904, 2905, 2906, 2907, 2908, 2909, 2910, 2911, 2912, 2913, 2914, 2915, 2916, 2917, 2918, 2919, 2920, 2921, 2922, 2923, 2924, 2925, 2926, 2927, 2928, 2929, 2930, 2931, 2932, 2933, 2934, 2935, 2936, 2937, 2938, 2939, 2940, 2941, 2942, 2943, 2944, 2945, 2946, 2947, 2948, 2949, 2950, 2951, 2952, 2953, 2954, 2955, 2956, 2957, 2958, 2959, 2960, 2961, 2962, 2963, 2964, 2965, 2966, 2967, 2968, 2969, 2970, 2971, 2972, 2973, 2974, 2975, 2976, 2977, 2978, 2979, 2980, 2981, 2982, 2983, 2984, 2985, 2986, 3013, 3185, 4237, 4238, 4240, 4733, 4734, 4735, 4736, 4737, 4738, 4739, 4740, 4741, 4742, 4743, 4744, 4745)

**RESPONSE:** The Department agrees that the Pennsylvania Clean Vehicles Program can enhance vehicle choice for clean, efficient vehicles and provide environmental and health protections in the ways described by the commentators.

47. **COMMENT:** Warranties are better with CARB-certified vehicles. (1266)

**RESPONSE:** The Department agrees.

48. **COMMENT:** Under the Pennsylvania Clean Vehicles Program, automakers will still be allowed to sell gas-guzzling SUVs, pickups and vans, as long as they sell the cleaner models as well. (1137)

**RESPONSE:** The Department agrees to some extent. The CA LEV II program establishes separate NMOG fleet averages for passenger cars and light-duty trucks between 0 and 3750 pounds and for light-duty trucks between 3751 and 8500 pounds. Both of these NMOG fleet averages must be met, and they cannot be averaged with each other. The CA LEV II program also establishes separate fleet averages for these categories of vehicles for GHGs; however, neither Pennsylvania's existing regulations nor the final rulemaking requires automakers to meet the California GHG fleet average based on sales in Pennsylvania.

#### Other comments in support

49. **COMMENT:** Commentators remarked that Pennsylvania cannot count on the federal government to protect Pennsylvania residents when it comes to environmental issues in general and air quality in particular, and urged the Commonwealth to be a leader. Examples of such statements include the following:

At the federal level, the USEPA has repeatedly failed to implement emission standards and fuel efficiency regulations that protect our health and welfare.

We need to take localized action to protect those rights to clean air, and we can do that through the strongest Pennsylvania Clean Vehicles Program possible.

Pennsylvania must also make significant progress of reducing our contribution to global warming now more than ever with a complete lack of federal leadership on this critical problem.

The Pennsylvania Clean Vehicles Program is an opportunity for Pennsylvanians to be a leader on the environment again.

(12, 60, 208, 209, 210, 285, 291, 350, 383, 393, 404, 447, 486, 488, 493, 500, 527, 529, 571, 578, 589, 598, 621, 622, 626, 627, 635, 650, 781, 839, 1008, 1138, 1168, 1263, 1267, 1295, 1306, 1364, 1400, 1419, 1447, 1449, 1487, 1556, 1667, 1822, 1938, 1946, 1947, 1954, 1960, 1963, 1966, 1967, 1969, 1972, 1973, 1974, 1975, 1981, 1984, 1987, 1997, 2009, 2011, 2013, 2015, 2030, 2037, 2083, 2095, 2166, 2205, 2229, 2250, 2251, 2252, 2259, 2328, 2340, 2369, 2370, 2372, 2375, 2395, 2437, 2614, 2645, 2651, 2849, 2864, 2995, 3007, 3022, 3877, 4235, 4347, 4750, 4829)

**RESPONSE:** The Department also agrees that the Commonwealth needs to take action where federal programs will not result in attainment and maintenance of the federal ambient air quality standards. In the case of emission standards for vehicles, the federal Tier II program made significant progress, but is not sufficient for Pennsylvania to attain and maintain the health-based standards in all areas of this Commonwealth. The National Academy of Sciences in its recent report, *State and Federal Standards for Mobile Source Emissions*, affirmed the value to the entire nation of the ability of California to set standards and confirmed that California has usually led EPA in establishing standards for light-duty vehicles and small non-road gasoline engines.

50. **COMMENT:** Ten other states have already adopted CA LEV standards, the same standards that the Pennsylvania program has. Several commentators also pointed out other factors related to other states that have adopted the California program. Examples of these statements include the following:

We would be joining a healthy group of states who are already acting to clean up the air they breathe. These are not states on the fringes of environmental action.

When we join with other states, we establish a strong precedent to lead the nation.

Joining other states will help bring total costs down for the industry and consumers.

(14, 441, 628, 1138, 1145, 1247, 1261, 1263, 1266, 1272, 1364, 1487, 1585, 1588, 1592, 1604, 1605, 1607, 1611, 1612, 1615, 1616, 1617, 1618, 1619, 1640, 1641, 1643, 1645, 1654, 1657, 1660, 1663, 1669, 1670, 1674, 1678, 1680, 1684, 1687, 1689, 1691, 1693, 1697, 1698, 1699, 1700, 1762, 1770, 1772, 1773, 1786, 1789, 1794, 1797, 1800, 1802, 1803, 1815, 1818, 1820, 1825, 1826, 1827, 2165, 2167, 2168, 2173, 2200, 2201, 2218, 2223, 2235, 2237, 2239, 2240, 2244, 2247, 2254, 2257, 2258, 2264, 2267, 2268, 2269, 2276, 2280, 2285, 2286, 2289, 2292, 2293, 2294, 2295, 2322, 2328, 2337, 2352, 2370, 2433, 2436, 2450, 2452, 2462, 2471, 2473, 2475, 2488, 2491, 2497, 2499, 2500, 2501, 2504, 2505, 2506, 2511, 2512, 2513, 2514, 2526, 2527, 2528, 2529, 2531, 2532, 2534, 2535, 2541, 2542, 2545, 2546, 2549, 2550, 2551, 2554, 2560, 2561, 2567, 2570, 2574, 2577, 2578, 2579, 2581, 2585, 2588, 2589, 2591, 2592, 2593, 2594, 2595, 2596,

2598, 2600, 2602, 2604, 2605, 2606, 2609, 2612, 2614, 2616, 2621, 2629, 2630, 2632, 2633, 2634, 2637, 2639, 2642, 2643, 2644, 2646, 2648, 2857, 2860, 2863, 2865, 2866, 2868, 2870, 4238, 4240, 4377)

**RESPONSE:** The Department agrees with the commentators. States that have adopted CA LEV standards, pursuant to Section 177 of the CAA, are Connecticut, Maine, Massachusetts, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Vermont, and Washington. As much as 30 percent of new vehicles sales in the United States will be sales of CARB-certified vehicles by model year 2009, once all states that have thus far adopted CA LEV standards have implemented their programs. However, it should be noted that this final rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

51. **COMMENT:** Commentators made various statements indicating that adopting California standards is not abdicating responsibility to Pennsylvania's citizens. Examples of these statements include the following:

(Those who oppose the program) want us to stay subservient to the federal regulations that are developed by federal bureaucrats.

We have a right to adopt a program that we choose.

Following another state's proven standards really is not abrogating responsibility.

Ten other states have followed these standards and we know the program works.

Since only California can set its own standards, we must adopt those. This is not a case of "letting another state tell us what to do" as critics have tried to say.

We would not be beholden to the standards of other states and could opt out of any standards we decide are not suitable for us.

(226,393, 428, 1269, 1345, 2088)

**RESPONSE:** The Department agrees. The federal CAA allows states like Pennsylvania to follow the federal vehicle emissions standards or adopt the California standards. In 1998, while adopting the California standards, Pennsylvania chose not to adopt the Zero Emission Vehicle (ZEV) program requirements because of ongoing litigation and technology concerns. Subsequently, court rulings and EPA findings indicated that adoption of ZEV requirement was not required to satisfy the identicality requirements of Section 177 of the CAA. In 1998, Pennsylvania did not adopt the California fuel standards, either; the adoption of such standards is prohibited by Pennsylvania law.

52. **COMMENT:** Commentators stated that they do not believe AAA is representing the best interest of its members with AAA’s position on implementation of the Pennsylvania Clean Vehicles Program. Examples of these comments included the following:

I am offended by the amount of money AAA is using to promote its side of this issue. AAA opposes being able to purchase the cleanest, most fuel-efficient vehicles possible. By opposing the Pennsylvania Clean Vehicles Program, AAA is actually supporting maintaining high fuel prices. AAA apparently has no process at all to gauge the opinion of their members.

I do not think the membership of AAA of Pennsylvania know that AAA is saying they are representing us. I am disappointed that AAA has lobbied and testified against the Pennsylvania Clean Vehicles Program and the proposed amendments. AAA does not represent my interests on this issue.

AAA’s position is irresponsible, shortsighted and not appropriate.

(615, 1269, 1274, 2166, 2257, 2269, 2272)

**RESPONSE:** The Department acknowledges these comments; however, they do not relate to the regulatory proposal.

53. **COMMENT:** Commentators supported the Pennsylvania Clean Vehicles Program and/or the amendments but also suggested other ways to reduce air pollution, save energy and make other environmental improvements, such as by improving public transit, promoting hybrids, promoting ethanol or other alternative fuels, increasing taxes on gasoline, promoting the use of “plug-in” vehicles, making other states take the same measures Pennsylvania is taking, expanding the vehicle emission inspection program and providing repair assistance to low-income individuals, improving land use, using wind and solar power, supporting research on fuel-efficient vehicles, including diesel buses and trucks in the program, and enacting restrictions on vehicle idling.

(6, 110, 175, 210, 249, 367, 567, 601, 635, 1058, 1067, 1076, 1146, 1152, 1515, 1517, 1788, 1858, 1905, 1990, 2002, 2040, 2070, 2075, 2179, 2191, 2193, 2264, 2269, 2614, 3864, 4100, 4109, 4473, 4808)

**RESPONSE:** These suggestions are not within the scope of this rulemaking. The Department appreciates these ideas, some of which, including diesel retrofits and anti-idling measures, are already being implemented in Pennsylvania.

Comments regarding implementation schedule

54. **COMMENT:** DEP should implement the Pennsylvania Clean Vehicles Program as quickly as possible.

(1, 2, 3, 4, 5, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121,

122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 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**RESPONSE:** The Department appreciates the commentators' concern. The Department has been moving rapidly toward finalizing this rulemaking at the earliest possible opportunity. The Department proposed postponing the program's compliance date to minimize any potential vehicle availability issues and to specify a transition mechanism for compliance. The Department's use of enforcement discretion during the pendency of the rulemaking will provide the industry with time to adjust production volumes for Pennsylvania sales. Since model year 2008 can begin as early as January 2, 2007, the Department anticipates that compliance with the Pennsylvania Clean Vehicles Program will begin as early as January 2007, or as soon thereafter as the model year 2008 vehicles are first sold, leased, offered for sale or lease, imported, delivered, purchased, rented, acquired, received, titled or registered in this Commonwealth.

55. **COMMENT:** I support the postponement of the Pennsylvania Clean Vehicles Program because there is value in a regionally consistent approach across the Northeast states. (2259)

**RESPONSE:** The Department agrees.

56. **COMMENT:** Pushing back the compliance date from model year 2006 to model year 2008 won't resolve the significant delays in the sorts of air quality improvements that we as citizens will realize as a result of this important program. (1138)

**RESPONSE:** Upon publication of the final rulemaking, the Department anticipates that enforcement of the Pennsylvania Clean Vehicles Program will begin as early as January 2007, or as soon thereafter as the model year 2008 vehicles are first sold, leased, offered for sale or lease, imported, delivered, purchased, rented, acquired, received, titled or registered in this Commonwealth.

57. **COMMENT:** It is unclear how Pennsylvania will allow for an unenforceable period for the Clean Vehicles Program as stated in the preamble to the proposed regulation. Does this mean that the existing Pennsylvania Clean Vehicles Program, which is a part of the SIP, will be enforced until the amendatory rulemaking of the program is complete? It would seem there should be some enforcement during rulemaking. (1136)

**RESPONSE:** The Department appreciates the commentator's concern. The Department anticipates that enforcement of the Pennsylvania Clean Vehicles Program will begin as early as January 2007, or as soon thereafter as the model year 2008 vehicles are first sold, leased, offered for sale or lease, imported, delivered, purchased, rented, acquired, received, titled or registered in this Commonwealth.

## **COMMENTS OPPOSING THE PENNSYLVANIA CLEAN VEHICLES PROGRAM**

### General opposition to California emission standards for Pennsylvania

58. **COMMENT:** We do not support Pennsylvania's proposal to adopt California's low emission vehicle and GHG regulations for motor vehicles. We recommend the Commonwealth continue participation in the Federal Tier II program. (1265/4241, 4348/4349, 3192/4526)

**RESPONSE:** Automakers are currently subject to the Commonwealth's Clean Vehicle Program requirements in Chapter 126, Subchapter D (relating to new motor vehicle emissions control program), which incorporate certain California LEV requirements by reference in the Pennsylvania Code. This rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. Voluntary participation by the automakers in the NLEV Program through MY 2005 as a compliance alternative to the Pennsylvania Clean Vehicles program, allowed manufacturers to sell cars complying with the more stringent Tier II program rather than NLEV for model years 2004 and 2005.

59. **COMMENT:** I am urging Pennsylvania just to follow the federal requirements because residents in the Philadelphia area already bear the "undue burden" of emissions testing and special fuels that we are forced to buy to operate our vehicles. (239)

**RESPONSE:** The five-county Philadelphia area faces the greatest challenge in Pennsylvania in achieving and maintaining the eight-hour health-based ozone standards. The Pennsylvania Clean Vehicles Program will be of particular benefit to this area, where local measures, in addition to statewide programs, may still be needed to achieve and maintain the standards. The Philadelphia area also benefits by the application of statewide programs because it is downwind of most areas of Pennsylvania.

60. **COMMENT:** I oppose the proposal; the state should follow the federal standards. The residents of Pennsylvania do not need to be penalized by more rigorous standards, since a great amount of pollution is generated in other states and is carried many miles through the atmosphere. (239)

**RESPONSE:** The Department disagrees that implementing the Pennsylvania Clean Vehicles Program will be penalizing Pennsylvania residents, since there are no present costs, and over the lifetime of the vehicle there appears to be a net savings to consumers. DEP agrees that significant amounts of pollution are generated in other states, but notes that Pennsylvania has a responsibility to reduce pollution within its borders and areas downwind of the Commonwealth. Pennsylvania is also working to ensure sources in

upwind areas reduce their contribution. This rulemaking does not adopt the Pennsylvania Clean Vehicles Program, but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

61. **COMMENT:** We have little faith that DEP will revise the Pennsylvania Clean Vehicles Program to maintain continued use of the federal Tier II standard in Pennsylvania. We therefore do not support promulgation of this regulation and will continue to advocate for legislation which calls for a comprehensive strategy of assessing, improving and maintaining the Commonwealth's air quality in a manner compliant with the federal CAA. We do not support promulgation of this regulation. (2439, 2440)

**RESPONSE:** The California standards are currently incorporated by reference in the Commonwealth's regulations set forth in Chapter 126, Subchapter D of the Pennsylvania Code. The final rulemaking revises these already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. Since language adopted in the existing regulations as a condition of participation in NLEV allowed automakers to comply with the voluntary program as a compliance alternative to the Pennsylvania Clean Vehicles Program for the model years 2004 and 2005, manufacturers needed to sell cars complying with the more stringent mandated Tier 2 program rather than the voluntary NLEV for these model years. The Department believes that "a comprehensive strategy" for attaining and maintaining the health-based ambient air quality standards must reduce emissions beyond the reductions projected for the federal programs.

62. **COMMENT:** The commentator shares the goal of increasing fuel efficiency (i.e., reducing GHGs), but opposes the proposed regulatory amendment and calls on Pennsylvania and California to focus their efforts in support of existing national programs. The EQB should provide an independent review of the flawed analysis offered to support the GHG rule. The EQB should consider all the relevant issues before it decides whether to remain in the California program or to rely on the federal motor vehicle fuel economy and emission rules. (4348/4349, 3192/4526)

**RESPONSE:** The Department agrees that the EQB should consider all relevant issues. The Department disagrees that the Commonwealth should focus its efforts in support of existing national programs. Additional reductions are needed to ensure attainment and maintenance of the health-based standards. During the development of these amendments, the Department engaged the services of a national transportation consultant, Michael Baker Corporation (Baker), to estimate the emission-reducing benefits of retaining the California standards in Pennsylvania compared to participating in the federal Tier II program. This study (*Pennsylvania LE VII Air Quality Impacts*, November 2004) showed that by 2025, when full fleet turnover is expected, the California LEV II program will provide an additional reduction of 2850 to 6170 tons per

year of VOC, 3540 tons per year reduction of NOx and 5% to 11% more reduction of six toxic air pollutants, including a 7% to 15% additional benefit for benzene, a known carcinogen, when compared to the federal Tier II program. (See response to comment #15.)

The California standards are currently incorporated by reference in the Commonwealth's regulations. The final rulemaking revises these already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. (See response to comment #63.)

**63. COMMENT:** It is not necessary for Pennsylvania to adopt the GHG regulations as part of its adoption of other California motor vehicle emission regulations. We urge the EQB to use the discretion that it has under the CAA and not adopt the separate and severable California GHG regulation. (3192/4526) (GM)

**RESPONSE:** The Department adopted Chapter 1 of Division 3, Title 13 of the California Code of Regulations (CCR) in 1998, which now includes the GHG regulation, with the exceptions of the two provisions expressly excluded in Section 126.411(b), namely the zero emission vehicle program and the California smog check label. The GHG provisions are incorporated by reference and are part of the Pennsylvania program. The final rulemaking does not, however, require automakers to comply with the California GHG fleet average based on vehicles introduced for sale in the Commonwealth. In addition, CARB is expected to include compliance with the GHG provisions in its determination of whether to issue an Executive Order (i.e., certify a vehicle for sale), unlike its enforcement of the clearly separate zero emission vehicle program.

#### Comments regarding health and environmental benefits

**64. COMMENT:** The California low emission vehicle standards will produce no air quality benefit relative to the Tier II program. EPA has stated: "*We estimated that LEV II will provide about 1 percent additional reduction in mobile source VOC, and about 2 percent reduction in air toxics, over Tier II in 2020 with the program starting in the 2004 model year and lower with a later program start date.*" EPA has cautioned states against taking too much credit for the CA LEV program. (1265/4241, 1268/2857, 2439, 2440, 3192/4526, 4242, 4236, 4348/4349)

**RESPONSE:** The Department disagrees with the characterization of the benefits of implementing the Pennsylvania Clean Vehicles Program. This often cited letter from EPA to NESCAUM regarding NESCAUM's analysis of benefits was not a statement pertaining to the benefits estimated by the Department. In fact, EPA stated in a December 2005 response to State Rep. Richard Geist regarding the issue of EPA quantification of the emissions benefits from the implementation of the Pennsylvania Clean Vehicles Program that "at present, EPA has not performed such an analysis, although PADEP has done so. Section 177 of the CAA does not require a state to do such analysis prior to

adoption of CA LEV standards. However, such benefits would need to be quantified in order to rely on associated emission reductions in a SIP submitted for EPA approval.” The Department will submit its analysis to EPA as part of a revision to its SIP.

With regard to the 2004 letter from EPA to NESCAUM, EPA also stated in the same December 2005 letter to Rep. Geist, “EPA commented in a March 26, 2004 letter to NESCAUM on a White Paper NESCAUM prepared on methods quantifying differences between federal Tier II and CA LEV II standards. EPA was concerned that states use the proper methods in modeling both programs to ensure that incremental benefit from LEV II is properly quantified, although EPA also provided a typical estimate for incremental emissions benefits to be expected between the two programs. Pennsylvania should follow EPA’s guidelines when calculating incremental emissions benefits available to Pennsylvania for CA LEV II versus Tier II.” The Department used EPA guidelines in estimating the emissions benefits of implementing the amended Pennsylvania Clean Vehicles Program regulations in addition to using the NESCAUM method to establish range of potential benefits. The Department intends to use the EPA methodology as part of its SIP submittal for the revised Pennsylvania Clean Vehicles Program.

**65. COMMENT:** DEP’s January 31, 2006 letter dismisses as irrelevant arguments that EPA has stated there is only a 1%-2% emission reduction difference between federal vehicle emission standards and the California program. DEP writes that EPA was comparing CA LEV II to the NLEV program, but EPA’s March 26, 2004 letter states that the comparison was to Tier II. (2439, 2440)

**RESPONSE:** The EPA’s 2004 letter to NESCAUM stated that NESCAUM’s estimated benefits of LEV II “are expressed in terms of relative benefit over Tier II; when characterized in terms of the absolute benefits relative to a (non-Tier II) baseline, the differences between the programs are more realistically characterized.” EPA then goes on to say that the 1%-2% additional reduction benefit estimate is in addition to Tier II. EPA did not show what data they used to estimate these percentage reductions but by their statement about NESCAUM’s analysis and that a realistic characterization would be an absolute comparison to a non-Tier II baseline, the Department concluded the EPA made that comparison for estimating their reductions, that is, by using the NLEV program as a baseline.

The Department disagrees that the NLEV program should be used as a baseline comparison for the purpose of estimating the benefits of implementing the Pennsylvania Clean Vehicles Program. NLEV is no longer an option for automakers, as automakers were required to comply with the more stringent Tier II standards beginning with model year 2004. The Department’s comparisons were to the only legal alternative to CA LEV II standard; the federal Tier II program.

**66. COMMENT:** The projected emissions benefits represent a tiny fraction of Pennsylvania’s overall vehicle emissions inventory of VOCs and NOx. (4242)

**RESPONSE:** The Department agrees that benefits may seem small when compared to total vehicle emissions inventory. Measures like the Pennsylvania Clean Vehicles Program are necessary for attaining and maintaining the health-based 8-hour ozone standard and reducing exposure to other air pollutants.

67. **COMMENT:** Much of the claimed incremental benefit of the LEV II program over the Tier II is derived from two factors in the California program: California-specific gasoline and an advanced technology requirement or zero emissions vehicle (ZEV) mandate. Neither of these two factors is included in the Pennsylvania proposed regulation. (1268/2857)

**RESPONSE:** . The Department’s analysis of the benefits of implementing the Pennsylvania Clean Vehicles Program assumed fuel programs currently implemented in this Commonwealth and did not assume the ZEV mandate because those vehicles are not a component of Pennsylvania’s program.

68. **COMMENT:** MOBILE modeling is imprecise and the emission reduction benefits of CA LEV II estimated by DEP are within normal error. (4242)

**RESPONSE:** The MOBILE model is a planning tool and is the only EPA-approved model for use by Pennsylvania for the purpose of calculating emissions benefits from on-road vehicle emissions control programs. The model does not have a quantifiable degree of error associated with it as it is not intended to be a definitive predictive tool.

The Department’s analysis was performed using the EPA-approved model and estimation methodology with current and future year input data prepared by methods that have been long accepted by the federal government for estimating future emissions from highway vehicles for the purposes of transportation conformity and SIP planning purposes. The Department’s analysis of the reduction in emissions from subject highway vehicles due to the implementation of the Pennsylvania Clean Vehicles Program, though small in comparison to the entire highway vehicle inventory, is significant and is not the result of “normal error” within the model.

EPA has revised the MOBILE model many times over the years as real in-use data is obtained. States are responsible for updating a wide variety of input assumptions in accordance with guidance provided by the federal government (e.g., EPA and Federal Highways Administration). Future planning assumptions, such as VMT growth, are estimated by using EPA-approved methodologies. Results of the modeling are then used to establish credit for State Implementation Plans.

69. **COMMENT:** It is unnecessary for Pennsylvania to adopt California vehicle emission standards because they will not provide any additional environmental benefits for Pennsylvania. All vehicles sold throughout the United States are “clean” vehicles. The CA LEV II standards and federal Tier II standards essentially require the same vehicle emissions control technologies to be applied. From 60 to 70 percent of current new vehicle models are certified for sale as so-called “50-state” vehicles. There can be

no additional environmental benefits by adopting California standards for this vast majority of vehicles. (4242)

**RESPONSE:** This rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The emissions benefit analysis conducted by the Department shows that through the implementation of the existing Pennsylvania Clean Vehicles Program in this Commonwealth, additional air quality benefit in excess of what the federal Tier II program would be achieved. This analysis was performed using EPA approved guidance for the modeling of state programs that implement CA LEV II standards. While the Department agrees that most automakers do offer, in part, “50-state” vehicles (i.e. identically configured vehicles that meet both California and federal emissions standards), without implementation of the Pennsylvania Clean Vehicles Program with its Pennsylvania-specific NMOG fleet average requirement, it is unknown if the mix of vehicles offered for sale in Pennsylvania by an individual automaker will, as a whole, reduce emissions compared to a mix offered without the NMOG fleet average requirement.

70. **COMMENT:** EPA’s statements about emission benefits do not account for EPA’s very recent proposed rule to further reduce toxics emissions with more stringent federal vehicle emission standards, which will essentially eliminate any perceived difference in federal and California standards. In some cases, the federal standards may provide even more environmental benefits than California standards. (4242)

**RESPONSE:** The Department cannot consider at this time changes that may or may not occur due to EPA’s recently proposed revisions to its Mobile Source Air Toxics (MSAT) rule, as that rule is only proposed. While EPA’s proposed rule indicates that EPA is adopting evaporative emissions standards for light duty cars and trucks that are similar or identical to current CARB non-zero evaporative standards, EPA does not make any claims that the rule revision would make the overall federal standards at least as protective as the current CARB standards. The MSAT rule primarily regulates air toxics emissions as a result of mobile sources and the Commonwealth’s implementation of the Pennsylvania Clean Vehicles Program does not relieve entities regulated under the current or proposed amended MSAT rule from complying with their obligations under that program.

71. **COMMENT:** The CARB staff’s analysis of the impact of the GHG regulations on precursor and criteria pollutant emissions is fundamentally flawed in and of itself, as is extensively documented in the CARB rulemaking record and as summarized in this [the commentator’s] report. (4346, 4348/4349)

**RESPONSE:** The Department disagrees that the CARB GHG provision analysis is fundamentally flawed. The Department disagrees that the flaws alleged by the commentator to exist in CARB’s GHG analysis are extensively documented in the CARB

rulemaking record. With regard to the commentator's summary of these flaws, which forms the basis of a large part of the commentator's analysis of the effects of the Commonwealth's proposed rulemaking to extend the compliance deadline for the existing PCV program, the Department believes that CARB adequately addressed and refuted the commentator's alleged flaws in CARB's Final Statement of Reasons. See also the Department's response to comment #76.

72. **COMMENT:** The CARB analysis for California is not relevant to Pennsylvania and PADEP has done nothing to evaluate the impact of Pennsylvania specific factors on the results of a California analysis. (4346, 1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The commentators incorrectly assume that the Commonwealth is proposing adoption of a GHG fleet average requirement based on Pennsylvania sales. Neither the Commonwealth's existing regulations nor the final rulemaking adopts a GHG fleet average requirement based on Pennsylvania sales. The commentator's accompanying analysis is focused almost in its entirety on the GHG provisions assuming a GHG fleet average based on Pennsylvania sales. Therefore, the erroneous conclusions of its analysis are not relevant.

The Department did use Pennsylvania-specific "factors" for its emissions analysis evaluating the proposed amendments to the existing Pennsylvania Clean Vehicles Program. The Department used EPA approved guidance for evaluating the impacts of the implementation of state programs incorporating CA LEV II standards. This analysis expressly used Pennsylvania-specific vehicle registration distribution data, highway traffic pattern data, VMT growth assumptions, temperature and humidity variables, fuel formulations, and inspection and maintenance program configurations, among other factors. This data was provided to the commentator to prepare its analysis and to a consultant hired by the Alliance of Automobile Manufacturers. Neither the commentator nor the Alliance's consultant produced any evidence refuting the Department's analysis or methodology that was based on assumptions that accurately reflected the nature of the Department's existing or amended Pennsylvania Clean Vehicles Program regulations. See also the Department's response to comment # 76.

73. **COMMENT:** An independent review of the impact of the California regulations on criteria pollutants and precursor emissions in Pennsylvania has been performed relative to opting out of the CA LEV II regulations. This analysis addresses not only errors made by CARB staff in its analysis of the impact of the California GHG regulations on criteria and precursor pollutant emissions in California but also the significant issues specifically as they apply to Pennsylvania. Sierra [Sierra Research, Inc.] has not requested nor received endorsement of this analysis by any specific manufacturer or any organization of manufacturers. (4346, 4348/4349)

**RESPONSE:** The Department disagrees that the Sierra Research analysis addresses significant issues specifically as they apply to Pennsylvania. Sierra Research's analysis is fundamentally flawed in that it incorrectly assumes that Pennsylvania is adopting a GHG fleet average compliance requirement based on Pennsylvania sales, and in that it



incorrectly assumes that failure to adopt the final rulemaking would result in implementation of the federal Tier II standards. The California low emission vehicle standards are already adopted in Pennsylvania and will remain in place even without this rulemaking. Neither the existing Pennsylvania Clean Vehicles Program nor the final rulemaking requires automobile manufacturers to meet the California GHG fleet average based on sales in Pennsylvania. This rulemaking makes changes to the already existing Pennsylvania regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

The Department disagrees that the Sierra Research analysis can be considered an “independent review.” While Sierra Research claims it received no endorsement from any specific manufacturer or organization of manufacturers, the Alliance of Automobile Manufacturers (“Alliance”) commissioned Sierra Research to perform an equivalent analysis of the GHG provisions for the California GHG provision rulemaking (indicated both in the Alliance’s comments to the Department and in CARB’s rulemaking documents). It is evident that the analysis performed by Sierra Research for submittal to Pennsylvania was largely based on data and conclusions conjoined with Sierra Research’s commission by the Alliance for the Alliance’s comments to CARB.

As to the commentator’s assertions of errors made by CARB staff and its reference to “significant” issues as they pertain to Pennsylvania, please see the Department’s responses to comments 71, 74, 76, 79, 80 and 81.

**74. COMMENT:** DEP appears to assert, without having performed any technical analysis, that there will be no criteria pollutant or precursor impact associated with the adoption of the California GHG regulations and that the impact of the adoption of the CA LEV II regulations on emissions of criteria and precursor pollutants is unaffected by whether those regulations include the GHG provisions added by CARB in September 2004. Such an analysis would show that criteria and precursor emissions in Pennsylvania would increase compared to the federal Tier II standards. (4346, 4348/4349, 4348/4349)

**RESPONSE:** This final rulemaking does not adopt the California low emission vehicle standards: they are already adopted and incorporated by reference in the Pennsylvania Code. Automakers must comply with the current California standards with or without this rulemaking. As indicated in the preamble to the proposed rulemaking and the Order for this final rulemaking, the purpose of this rulemaking is to postpone the compliance date from MY 2006 to MY 2008 and specify a 3-year early-credit earning period within which vehicle manufacturers must come into compliance with the NMOG fleet average of the Pennsylvania Clean Vehicles Program.

The commentator’s analysis of the purported emissions increase incorrectly assumes that automakers would be required to comply with the California GHG fleet average based on vehicles introduced for sale in the Commonwealth. Because this fundamental assumption is incorrect, the commentator’s analysis has little practical value with regard to this rulemaking. In addition, the analysis provided no relevant information, analysis, or data

to specifically refute the Department's analysis of the emissions impact of postponing the compliance date of the Commonwealth's existing program. The Department's analysis is based on current EPA guidance.

Furthermore, any emission reductions that are to be achieved in California, Pennsylvania or elsewhere from CARB's GHG provisions are dependent upon EPA granting a waiver of preemption to CARB for the GHG emission standards. Pursuant to section 209(b) of the CAA, California must first find that its standards are, in the aggregate, at least as protective of public health and welfare as applicable federal standards. California has already made this determination. EPA will then review California's "protectiveness" finding and must deny a waiver if it determines that California's finding was arbitrary and capricious, among other things. The commentator will have the opportunity to present its analyses of CARB's GHG emission standards to EPA during EPA's waiver decision-making process, which includes federal publication of a proposed decision and a public comment period. If EPA (the agency that promulgated the Tier II standards) grants CARB a waiver of preemption for the GHG standards, there should be no question of whether CARB's standards are as protective as Tier II. And if EPA denies waiver coverage, then the GHG standards may not be enforced and the issue of their impact on emissions will be moot.

**75. COMMENT:** Although it cannot be conclusively determined from the available documents published by PADEP, it appears that PADEP is asserting that the impact of the adoption of the California LEV II regulations on emissions of criteria and precursor pollutants is unaffected by whether those regulations include the GHG provisions added by CARB in September 2004. (4346, 4348/4349)

**RESPONSE:** The Department agrees with CARB's analysis of its GHG provisions, that there will be a net decrease of the emissions of NOx and Reactive Organic Gases (an analog to VOC) as a result of the GHG provisions. However, the Department did not account for these additional benefits in its analysis as neither the Commonwealth's existing regulations nor the final rulemaking require the California GHG fleet average requirement to be met based on Pennsylvania sales.

**76. COMMENT:** It may be that PADEP is relying on a flawed analysis prepared by CARB staff that found that adoption of the California GHG regulations in California will reduce precursor emissions and criteria pollutant levels. (4346, 4348/4349)

**RESPONSE:** The Department is relying, in part, on EPA approved guidance for the estimation of emissions benefits for states that implement programs incorporating CA LEV II standards. The Department's analysis also used a similar methodology developed by NESCAUM. The use of two methodologies resulted in a range of emissions benefits. The Department agrees with CARB that the GHG provisions will provide an additional net decrease of the emissions of NOx and Reactive Organic Gases (an analog to VOC). The Department's analysis did not include estimates of those potential additional benefits because neither the Commonwealth's existing regulations nor its final rulemaking

requires compliance with the California GHG fleet average requirement based on Pennsylvania sales. See also the Department's response to comment #73.

**77. COMMENT:** Adoption of the California GHG regulations in Pennsylvania will lead to higher pollutant emissions. There are three mechanisms by which the GHG regulations could impact emissions of precursor pollutants and criteria pollutants:

1. Reduction of the amount of gasoline that has to be produced or brought into a state and distributed to fuel passenger cars and light-duty trucks, which is also known as the "fuel cycle emissions" effect;
2. Retention of older vehicles with higher emissions and diminished sales of new vehicles with lower emissions as the result of increased price of new vehicles known as the "fleet turnover" effect; and
3. Increased vehicle operation due to the higher fuel economy of new vehicles subject to the regulations known as the "rebound" effect.

Two of these effects (#2 and #3) will increase precursor emissions (NO<sub>x</sub> and VOC) and criteria pollutants (PM 2.5 and CO) in the future if the California regulations are implemented in Pennsylvania. ((1265/4241, 3192/4526, 4346, 4348/4349)

**RESPONSE:** The Department agrees that "fuel cycle emissions," "fleet turnover" and "rebound" effects could impact emissions, but the Department disagrees with the commentator's estimation of the magnitude of these effects. The Department believes that CARB's estimation of these effects for the purpose of evaluating emissions effects of the GHG provisions in California is more accurate for California's purposes than the commentator's estimation. As the Department believes that the aggregate fleet mix in California is similar to Pennsylvania (see response to comment #102), the Department anticipates similar GHG benefits without the need to require that the GHG fleet average be met based on sales in Pennsylvania. This is based on the assumption that Pennsylvania consumers as a whole, as they do now, will in the future demand similar vehicles as consumers in California.

The Department agrees that emissions of CO and particulate emissions (PM<sub>10</sub> in particular) may slightly increase with the implementation of the California program as indicated by CARB. For the purpose of this rulemaking, the Department did not do a specific analysis regarding CO and particulate emissions but instead relies on the assumption, supported by CARB's analysis, that any potential increases in particulate matter or CO due to the GHG regulations would be *de minimis* and would have no significant effect on the Commonwealth's current attainment status for either the CO or PM<sub>2.5</sub> NAAQS.

The existing Pennsylvania Clean Vehicles Program and proposed amendments do not add a Pennsylvania sales-based GHG fleet average requirement; this final rulemaking makes changes to the already existing Pennsylvania regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. See responses to comments #79, 80 and 81 regarding the Department's evaluation of the same commentators' analysis and the underlying effects thereof.

**78. COMMENT:** It should be noted that while we used the MOBILE6.2 model to evaluate the impact, that model is not capable of fully evaluating the implications of the California GHG regulations on PM emissions because the model does not contain any deterioration of PM emissions rates as a function of vehicle age. (4346, 4348/4349)

**RESPONSE:** The Department agrees that MOBILE6.2 may not be adequate to fully evaluate PM emissions changes as a result of the California GHG regulations. In fact, the EPA has no guidance available to model any of the impacts of the GHG provisions. The Department did not model the estimated effects of the GHG provisions, as neither the Department's existing regulations nor the final rulemaking requires compliance with the GHG fleet average requirement based on Pennsylvania sales. See also the Department's responses to comments #72, 73, 74, 75 and 76 regarding CARB, the Department's and the commentators' analyses.

**79. COMMENT:** Adoption of the CA LEV II regulations with the GHG provisions in Pennsylvania will result in increased VOC+NOx, CO and PM2.5 emissions relative to a baseline where the federal Tier II emissions standards apply. These increases over a federal Tier II alternative range from 40.97 tons per day in 2015 to 30.13 tons per day in 2030. These emissions increases are expected to increase ambient ozone and PM2.5 concentrations. The net impact of adoption of the California GHG regulations on precursor emissions and criteria pollutants will be the sum of the impacts of the fuel cycle, fleet turnover, and rebound effects. (4346, 4348/4349)

**RESPONSE:** The Department disagrees with the commentators' estimates of emissions impacts. The commentators' analysis of the purported emissions increase incorrectly assumes that automakers will be required to comply with the California GHG fleet average based on vehicles introduced for sale in the Commonwealth. Because this fundamental assumption is incorrect, the commentators' analysis has little practical value with regard to this rulemaking. In addition, the analysis provided little, if any, additional information, analysis, or data to specifically refute the Department's analysis of the emissions impact of postponing the compliance date of the Commonwealth's existing program. The Department's analysis is based on current EPA guidance.

The Department agrees that emissions, in general, may be influenced in part by three secondary effects of GHG regulation: fuel cycle emissions (described by the commentators as potential changes in emissions with regard to the changes in the amount of gasoline produced), fleet turnover (described by the commentators as potential changes in fleet composition due to possible retention of older vehicles longer) and VMT rebound (described by the commentators as potential increase in vehicle miles traveled due to increased vehicle operation efficiency), but the commentator's evaluation of the magnitude of these effects in Pennsylvania is flawed given the commentators' erroneous assumption regarding the GHG fleet average. In addition, the commentators' underlying assumptions with regard to the resultant impact of these effects in California were successfully refuted by CARB in its Final Statement of Reasons (FSOR). Furthermore,

the commentators provided little supporting data to allow the Department to replicate and quantitatively evaluate the commentators' claims.

The Department disagrees that the relative baseline for comparison of emissions, for the purpose of the commentator's analysis to evaluate the impacts of the California GHG provisions, is the federal Tier II program. The California standards are currently incorporated by reference in the Pennsylvania Code and approved as a SIP revision. The purpose of this final rulemaking is to postpone the compliance date of the Pennsylvania Clean Vehicles Program from MY 2006 to MY 2008 and specify a 3-year early-credit earning period within which vehicle manufacturers must come into compliance with the NMOG fleet average of the Pennsylvania Clean Vehicles Program. The relative baseline, therefore, should be the CA LEV II standards and not the federal Tier II standards. The commentators did not provide any such comparison of GHG provision impact to the existing regulations or proposed amendments to the Pennsylvania Clean Vehicles Program.

The Department's analysis estimates a reduction of 7.8 to 16.9 tons per day VOC and 9.7 tons per day NO<sub>x</sub> in 2025 by implementing the Pennsylvania Clean Vehicles Program. The Department continues to agree with CARB that there would be a slight decrease in NO<sub>x</sub> and VOC emissions as a result of the GHG provisions but given that the Pennsylvania Clean Vehicles Program does not require compliance with a GHG fleet average based on Pennsylvania sales and that automakers will still be required to meet the NMOG fleet average based on Pennsylvania sales (thus ensuring reductions over Tier II), these benefits would be secondary and are not included in the Department's analysis.

Any emission reductions that are to be achieved in California, Pennsylvania or elsewhere from CARB's GHG provisions are dependent upon EPA granting a waiver of preemption to CARB for the GHG emission standards. Pursuant to section 209(b) of the CAA, California must first find that its standards are, in the aggregate, at least as protective of public health and welfare as applicable federal standards. California has already made this determination. EPA will then review California's "protectiveness" finding and will waive preemption unless EPA determines that California's finding was arbitrary and capricious, California does not need the standards to meet compelling and extraordinary conditions, or California's standards and accompanying enforcement procedures are not consistent with section 202(a) of the CAA. The commentator will have the opportunity to present its analyses of CARB's GHG emission standards to EPA during EPA's waiver decision-making process, which includes federal publication of a proposed decision and a public comment period. If EPA (the agency that promulgated the Tier 2 standards) grants CARB a waiver of preemption for the GHG standards, there should be no question of whether CARB's standards are as protective as Tier 2. See also response to comments # 77, 80 and 81.

**80. COMMENT:** Implementation of the motor vehicle GHG rule will increase ozone-forming emissions. Using more realistic cost estimates, smog-forming emissions will increase by at least 7.9 tons per day in 2020. Additionally implementation of the California rule will increase PM<sub>2.5</sub> by 2.3% in the year 2020. CO emissions would

increase by at least 140 tons per day in 2020. Such emissions increases should be unacceptable when there is no scientific or other evidence that the California GHG program will have any measurable positive effect on the climate of Pennsylvania or any other predictable public-health benefit. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. The increases the commentators purport will occur as a result of implementing the PCV program are assertedly based on an analysis submitted by Sierra Research with supporting material provided by NERA economic consulting and Robert Crawford of Rincon Ranch Consulting. That analysis incorrectly assumed that the Commonwealth is proposing adoption of a GHG fleet average requirement based on Pennsylvania sales. That overarching assumption is incorrect and calls into question the results of the analysis. Furthermore, the commentators' quantification of the emissions impact differs from the conclusions of the Sierra Research analysis, which claimed only a 6.56 ton per day increase of CO in 2020 and a 49.57 ton per day increase in NOx and VOC. The Department disagrees with the conclusions of both Sierra Research and these commentators.

The Department disagrees that "there is no scientific or other evidence" regarding the effects of the GHG provisions. The Department believes that the analysis performed by CARB provided the best, most reasonable estimate of the effects of CARB's regulations and that the commentators' rebuttal of CARB's analysis, commissioned by the Alliance of Automobile Manufacturers from Sierra Research, was adequately refuted by CARB.

With reference to the Sierra Research/NERA/Crawford analysis regarding this final rulemaking, it was clear that the same underlying assumptions about "rebound" and "fleet turnover" used for Sierra Research's / NERA's California analysis were being loosely applied to Pennsylvania with no supporting data or direct explanation of how such estimates were derived. For example:

- 1) NERA's modeling of the Pennsylvania fleet population effects were largely based on a New York state study with no documentation verifying NERA's assumption that fleet scrappage rates were similar in Pennsylvania. Sierra Research also allegedly provided forecasted information to NERA on new vehicle sales counts in Pennsylvania through 2030 but with no explanation on Sierra Research's sales forecasting methodology. Ultimately this undocumented data is used by NERA to synthesize "baseline populations" of vehicles. In turn, NERA applied unverified NY scrappage rates and unknown estimates of new vehicle sales to obtain their [NERA's] result. Furthermore, NERA claims Sierra Research then took this synthesized result and updated the assumptions for the Sierra Research analysis to "keep the vehicle-class VMT mix consistent with external projections." While NERA gives no explanation as to what that means it appears that Sierra Research may have adjusted its assumptions underlying its analysis to make them consistent with NERA's conclusions.
- 2) Rincon Ranch's analysis of the "rebound" effect was based largely on a New York state study and assumed variables based on United States averages with

little apparent Pennsylvania-specific application. No supporting data or methodology was provided in order to evaluate the underlying assumptions or the mechanics of the analysis. It also appears the study used underlying modeling assumptions that, in the Department's opinion, were successfully refuted by CARB. In turn, this analysis was used in the Sierra Research analysis to estimate the aggregate "rebound effect" in Pennsylvania. While the Department did provide considerable information to Sierra Research for Sierra Research's analysis, the nature of that data required significant aggregation and a firm understanding of how Pennsylvania handles, in accordance with federal guidelines, its detailed Pennsylvania-specific data (i.e., an understanding of the PPSuite MOBILE pre-and post-processing software employed across Pennsylvania by the DEP, Pennsylvania Department of Transportation, and Metropolitan Planning Organizations). Sierra Research provided no demonstration of what actual numbers it used to reflect the Pennsylvania-specific data, thus making it impossible to determine if Sierra Research's analysis accurately reflects the data used in the Department analysis.

See also the Department's response to comment #79.

**81. COMMENT:** In evaluating the impact of the California GHG regulations on emissions of criteria and precursor pollutants, two manufacturer compliance scenarios were considered: a Nationwide Scenario, which assumes automakers choose to redesign all vehicles sold nationwide to comply with both federal and California standards; and a Two-Car Scenario, which assumes automakers redesign only those vehicles sold in California and states that have adopted California standards. We consider the Two-Car Scenario to be the most likely manufacturer response to compliance with the California regulations. Automakers will be forced to alter their product lines to the point at which multiple manufacturers will eliminate 75% of their current passenger car models, 100% of their current light light-duty trucks and 15% of their heavier light-duty trucks in 2012. (4346, 4348/4349)

**RESPONSE:** The Department agrees that automakers will make the business and/or marketing decisions needed to comply with California vehicle standards. The commentator provides no evidence or data to support the assertion that automakers will likely choose a two-car scenario. Furthermore, the commentator's assumptions regarding alleged product line alterations seem highly unrealistic given a number of factors:

- 1) Technological innovation to cost-effectively integrate product design changes into production.
- 2) Competition between automakers given demand for passenger cars and light duty trucks.
- 3) Past history of automakers to adapt to regulatory mandates while simultaneously providing vehicles that meet the demands of consumers.

The Department agrees with CARB that the technologies that likely will be needed to comply with the GHG provisions currently exist or will be viable for widespread use in

general production by 2012. The GHG provisions provide sufficient lead time for automakers to integrate these existing technologies in the near-term and to enhance the developing technology to make it cost effective for use in general production in the long-term (i.e., 2012 and beyond).

It is unclear whether the commentators' analysis for Pennsylvania includes consideration of competition between automakers as incentive to deploy these technologies cost effectively in order to meet customer demand. Based on the commentator's own overall assumptions, this incentive must exist as the commentator appears to conclude that passenger car and light light-duty truck availability will likely be severely limited under the GHG provisions. This assumed limitation in model availability, coupled with a constant and/or growing consumer demand, should lead to a supply/demand imbalance thus pressuring the market to offer these vehicles. The Department believes that consideration of the effects of the commentators' proposed scenario and the resulting effects on ultimate vehicle costs must include consideration of the incentive to meet future customer demand for vehicles. The analysis does not provide any supporting documentation of the commentators' conclusion that a two-car scenario will be the option chosen by automakers.

History does not support the assertion that automakers collectively will adopt the two-car scenario, as many automakers are currently producing significant numbers of "Nationwide" or "50-state" cars that meet both current CA LEV II and federal Tier II standards. Furthermore, the commentators' analysis does not appear to consider the much more likely possibility, based on history, that automakers will continue to produce combinations of "50-state," California-only and federal-only vehicles.

Given the conclusions reached by the commentators in addition to the lack of supporting data to substantiate their claims with specific regard to this effect on the Commonwealth, the Department continues to believe that CARB's estimates as to the aggregate response by automakers, and thus the resultant effects on vehicle costs, are more realistic.

**82. COMMENT:** The claim in some other states' rulemakings relating to adoption of GHG standards that ozone concentrations are related to ambient temperatures requires careful examination by the Department. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department has not made that claim for the purpose of this rulemaking nor does the Department claim additional ozone reduction benefits as a result of the GHG provisions. Regardless, it is clear that ambient temperature in addition to other atmospheric and photochemical variables has an effect on ground-level ozone concentrations. The commentator dismisses this by making a blanket assumption that any temperature changes due to ambient warming due to global climate change will only affect daily minimum temperatures and, therefore, are unrelated to ozone formation. This is clearly a flawed argument as ambient changes in temperature will likely affect both maximum and minimum values over time, thus increasing the overall potential for ground-level ozone formation.



83. **COMMENT:** DEP and others have claimed that implementation of the CA LEV program is necessary for Pennsylvania to meet its obligations under the CAA. US EPA has indicated that all areas, other than southeast Pennsylvania, will be in attainment for ozone by the required date of 2010. However, since DEP has called for implementation of CA LEV in 2008 and according to testimony given by the Pennsylvania Department of Transportation at a recent Senate committee hearing that fleet turnover is about 7% per year, it's clear that CA LEV can do very little to bring southeast Pennsylvania into attainment. (4236)

**RESPONSE:** The Department has indicated that the Pennsylvania Clean Vehicles Program will contribute to attainment and maintenance of the eight-hour ozone standard. Both CA LEV II and Tier 2 produce some of their benefits before the attainment date (the ozone season of 2009 to meet the attainment date of April 2010), and most of their benefits after the attainment date. After an area originally designated as nonattainment attains the standard based on actual monitoring of air quality, the Commonwealth must demonstrate that the area will maintain the standard for at least ten years by submitting a maintenance plan as a SIP revision. Eight years after that, the Commonwealth will need to submit a second 10-year maintenance plan as a SIP.

84. **COMMENT:** DEP states that it has relied upon the additional benefits of adopting CA LEV II as a means of achieving attainment. DEP fails to acknowledge that 31 counties are expected to come into compliance with the 8-hour standard by 2009, and that none of the remaining counties' attainment strategy calls for utilizing projected benefits from CA LEV II. No documents provided to the General Assembly or the public by DEP actually show where DEP calculates and anticipates such benefits. To the contrary, several documents, including DEP's August 2003 recommendations to EPA for 8-hour ozone attainment/nonattainment areas (which makes no mention of achieving future credit under CA LEV II) reflect DEP's confidence that, realizing the benefits of cleaner cars under Tier II, the Commonwealth can meet and maintain federal air quality standards. (2439, 2440)

**RESPONSE:** Modeling prepared by EPA for the Clean Air Interstate Rule indicated that many of the current nonattainment counties in Pennsylvania were expected to come into compliance with the eight-hour ozone standard. However, based on studies subsequent to 2003, the Department does not agree with all of the assumptions or conclusions in this modeling. Pennsylvania is therefore working with other states in the Northeast, Mid-Atlantic and Midwest, to consider additional measures to meet the eight-hour standard. Public meetings were held in May 2006 to discuss possible measures in addition to measures like the California low emission vehicle program that have already been adopted by states. The Department agrees that SIP revisions in nonattainment areas submitted to EPA to date have not modeled highway inventories assuming implementation of the California program; these SIPs are primarily for attainment of the one-hour ozone standard. They were prepared before the designation of areas for the eight-hour standard became final and the assessment of both benefits of and need for retaining the California program was performed. After an area originally designated as nonattainment attains the standard based on actual monitoring of air quality, the

Commonwealth must demonstrate that the area will maintain the standard for at least ten years by submitting a maintenance plan as a SIP revision. Eight years after that, the Commonwealth will need to submit a second 10-year maintenance plan as a SIP revision.

In addition, as comments from the American Lung Association emphasized, if EPA revises the ozone standard again as the result of the required five-year review of health evidence, states will be required to prepare SIPs to attain that standard. EPA is in the process of that review at present, with some indications that a further tightening of the standard is possible.

**85. COMMENT:** DEP Secretary McGinty stated in the recent Senate Committee hearing that "...we won't make our attainment requirements with the Air Resources Board standard. We will need measures in addition to the tailpipe standards in order to meet those requirements." If we need "measures in addition to the tailpipe standards" to fulfill our federal obligations, we need to have a clear idea what those measures are. (4236)

**RESPONSE:** The Department recently held a series of public meetings on measures the Ozone Transport Commission is recommending that states implement to attain the eight-hour standard. Most of the measures on that list would apply to stationary or area sources. The Commonwealth will continue to work with interested stakeholders and pursue state-specific rulemakings as needed and appropriate.

**86. COMMENT:** DEP said in 1998 that, "*NOx reduction is most important for states like Pennsylvania which are significantly affected by long range transport.*" This is a notable assertion by DEP since the federal Tier II program focuses on NOx reduction while the CA LEV program does not. The Tier II standards were designed to meet the needs of the Northeast and Mid-Atlantic areas of the country. (1268/2857, 1265/4241, 3192/4526, 4348/4349 )

**RESPONSE:** In 1998, programs affecting long-range transport of NOx and ozone had not yet been implemented. The most significant challenge for ozone attainment and maintenance is in Southeast Pennsylvania. Hydrocarbon reductions are important for attainment and maintenance in this area.

**87. COMMENT:** Some environmental groups have said that the Tier II auto [*sic*] will lead to "dirty air" and that if we don't adopt CA LEV, our air quality will deteriorate. (4236)

**RESPONSE:** This rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. Both Tier II and the California low emission vehicle program require significant improvements in vehicle emission reductions over their predecessor regulations, so that despite vehicle miles travelled continuing to increase, vehicle emissions continue to

decrease under both scenarios. However, the California low emission vehicle program provides additional emission reductions, so it provides better assurance that technology will continue to overcome increases in travel.

88. **COMMENT:** The nature, severity and geography of California's air pollution problem drive California's pollution reduction strategies. California regions are in "extreme" non-attainment while Pennsylvania regions are defined as "moderate" or "marginal." California's pollution reduction strategies may not be appropriate for Pennsylvania. (1268/2857)

**RESPONSE:** The Department agrees that California's ozone air pollution problem is worse than Pennsylvania's. The nature of California's problem has resulted in a dedication of technical resources to air quality problems unequalled in the world, including at the Environmental Protection Agency. The Department agrees that some of California's pollution reduction strategies may not be appropriate for Pennsylvania; however, as motor vehicles will continue to contribute a significant amount of pollution in Pennsylvania, the Pennsylvania Clean Vehicles Program is a cost-effective strategy to further reduce vehicle emissions.

89. **COMMENT:** The proposed regulation would have no measurable impact on the global climate or the climate of Pennsylvania or on the public health concerns and issues described in the Regulatory Impact Statement that accompanied the rulemaking proposal. GHG do not have localized effects. Any theoretical change in temperatures that a rule of this nature could produce would, in turn, have no measurable effect on ozone levels in Pennsylvania, even if the GHG rule was implemented nationwide because the rule would not have measurable effect on temperatures. The means for controlling GHG is being debated internationally and can only be addressed effectively on a global basis. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** This final rulemaking does not adopt the Pennsylvania Clean Vehicles Program or require compliance with the GHG provisions of the California regulation in Pennsylvania but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The Pennsylvania Clean Vehicles Program does not require automakers to meet the GHG fleet average based on sales in Pennsylvania. However, the Commonwealth expects that the existing regulations will make a contribution to the reduction of GHGs, which will help mitigate global warming and its public health and environmental effects. A measurable effect on temperatures or on ozone reduction based on effects on temperatures is not the intent of this rule. (The Department is unsure what document the commentator refers to as the 'Regulatory Impact Statement,' as there was no document by that name accompanying the proposed rulemaking.)

90. **COMMENT:** DEP proposes to require that only California-certified new vehicles can be sold in Pennsylvania and assumes on that basis that they will get the same GHG benefits, proportionally, that California gets from the GHG regulation. But the California

GHG regulation does not impose standards for individual vehicles, but sets only fleet average standards. Without a fleetwide average target, a manufacturer's mix of vehicles sold in Pennsylvania would likely be significantly different from the mix sold in California. How then can DEP rely on modeling developed for a state that uses fleet averaging as its basis for calculating GHG emission reductions?

**RESPONSE:** The Department is not relying on California's GHG modeling for specific emission reductions, but has made the general statement that the Commonwealth anticipates realizing similar GHG reductions due to the Department's general assumption about the overall fleet mix similarity between California and Pennsylvania. The Department disagrees that the fleets are significantly different in the aggregate. See the response to comment #97 regarding fleet mix similarity.

91. **COMMENT:** The California GHG regulations will not improve air quality. These regulations focus predominantly on controlling CO<sub>2</sub>, an inert gas that is not toxic to humans or animals. The control of GHG emissions is not a pollution issue – it is an energy issue. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** This final rulemaking does not adopt the Pennsylvania Clean Vehicles Program or adopt the GHG provisions of the California regulation but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The Pennsylvania Clean Vehicles Program does not require automakers to meet the GHG fleet average based on sales in Pennsylvania. Whether GHGs (CO<sub>2</sub>) is a pollutant is an issue currently in litigation. On June 26, 2006, the Supreme Court of the United States agreed to review whether the Environmental Protection Agency has existing authority under the CAA to regulate GHG emissions from automobiles (*Massachusetts v. EPA*, U.S., No. 05-1120).

#### Comments regarding economic issues

92. **COMMENT:** DEP has not conducted the required cost-benefit analysis required of new regulations. CARB cost and benefit figures may not be appropriate for Pennsylvania. The cost of new regulations should not outweigh the intended realistic measurable benefits. 1268/2857

**RESPONSE:** The Department has considered the costs of this rulemaking as well as the costs of implementing the previously adopted Pennsylvania Clean Vehicles Program regulations. The Department has also considered the benefits. See response to comments # 15, 26, 62, 79 and 93.

CARB estimated in its "Statement of Reasons" for their implementation of the CA LEV II program that retail vehicle prices could rise from \$68 (light duty vehicle) to \$276 (heavier light duty truck) per vehicle. The U.S. EPA estimated that the federal Tier II program could increase per vehicle retail price from \$78 (light duty vehicle) to \$245 (heavier light duty truck). As automakers are already building vehicles that comply with

the Tier II standards, it can be assumed that Pennsylvania new car purchasers are paying the Tier II costs now. Under the Pennsylvania Clean Vehicles Program, consumers theoretically would pay only the difference between the Tier II and CA LEV cost estimates. This would result in no change in price for the light duty vehicles (the Department did not assume a savings) and \$31 per vehicle for heavier light duty trucks. As this initial cost can be amortized over five years (a typical new car loan repayment period), any initial financial impact on an individual consumer is *de minimis*.

The Department conducted a brief survey of most of the automakers' 2006 model year vehicles that were their most popular in 2005. The survey looked at Manufacturers Suggested Retail Price (MSRP) of these models currently on the dealers' lots in New York State (a CA LEV II adopting state) and Pennsylvania. The MSRP was determined by using automakers' websites that allow consumers to look at window stickers for vehicles in current on-lot inventory. The MSRP did not include options packages, incentive discounts, tax, title, transfer and delivery charges and the compared vehicles were of the same configuration so that a true comparison could be made. Of the 21 most popular vehicles compared, 17 showed no MSRP difference, two automakers claimed that the CA LEV II vehicles may cost more but did not allow for viewing window stickers on the internet, one charged a flat \$150 fee for vehicles sold in CA LEV II adopting states, and one made no mention of a difference and did not allow internet viewing of window stickers.

As the purpose of the final rulemaking is mainly to postpone implementation from MY 2006 to MY 2008, there would be a cost impact ranging from a net cost savings to Pennsylvania consumers due to the two-year deferment of costs associated with the purchase of certain heavy light-duty trucks (\$31 per truck), to no additional costs or savings based on the assumption of no near-term difference in the cost between federal Tier II and CARB certified vehicles. In MY 2009 and beyond, once the California GHG provisions take effect, the Department agrees with CARB's per vehicle cost estimate of approximately \$1000 by 2016 and with CARB's estimate that this cost increase will be offset by savings to the consumer due to increased operational efficiency of these vehicles. While CARB predicted that by 2016 the operational efficiency of vehicles meeting GHG requirements may actually afford owners an overall cost savings of \$3.50 to \$7.00 per month (assuming \$1.74 per gallon of gasoline), information on initial cost (which could be related to sticker price) was also estimated. Based on separate CARB estimates for passenger cars/small trucks and large trucks/SUVs and the similar composition of the fleet in Pennsylvania, consumers could see an increase in per vehicle costs of \$21 for MY 2009, \$63 for MY 2010 and \$219 for MY 2011 to about \$1000 in MY 2016. CARB estimates that by 2016 the operational efficiencies realized by GHG technology will result in an overall savings of \$3.50 to \$7.00 per month (\$42 to \$84 dollars per year) based on a model year 2016 vehicle costing an additional \$1029 to \$1064 per vehicle. These savings are probably understated, since the price of gasoline is likely to remain higher than that used in CARB's analysis.

**93. COMMENT:** The Pennsylvania Clean Vehicles Program will produce no air quality benefit relative to the Tier II program, but will instead produce increased

consumer cost in terms of higher prices and limited consumer choices. (1268/4241, 4236, 1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. The Department estimates that implementation of the Pennsylvania Clean Vehicles Program will result in additional benefits of reducing VOC emissions from subject vehicles by 7.8 to 16.9 tons per day NO<sub>x</sub> by and 9.7 tons per day in 2025 over the federal Tier II program. This analysis was conducted using assumptions from EPA as well as assumptions from the Northeast States Coordinated Air Use Management (NESCAUM) study. The lower numbers use the more conservative EPA assumptions. The analysis used Pennsylvania-specific vehicle, travel, fuel and other information.

Enforcement of the current CA LEV II standards in many northeastern U.S. states show that there is little cost difference between California-certified vehicles and federal Tier II vehicles, and that after model year 2009, initial cost increases will be offset by savings due to operational efficiency. See response to comments #92 and 94.

With few exceptions, the same vehicles available in the Commonwealth now will be available when the Pennsylvania Clean Vehicles Program is enforced. The exceptions are mainly light-duty diesel powered automobiles that cannot meet the cleaner California standards for model year 2008 and later. Passenger diesel vehicles comprise a very small percentage (0.09%) of the total passenger cars and trucks registered in the Commonwealth, based on analysis of Pennsylvania motor vehicle registrations provided by the Department of Transportation. This means a little over 8100 cars between model years 1975 and 2006 are passenger diesel vehicles, compared to more than 8.6 million registered vehicles. Out of the over 610,000 new light-duty cars and trucks purchased and registered annually in Pennsylvania, only about 500, on average, have been diesel.

In the normal course of implementing the program, California has been having discussions with the manufacturers that are hoping to market cleaner light-duty diesel vehicles. It appears that there is rapid advancement in developing exhaust clean-up technologies for diesel cars and light-duty trucks. With the coming of ultra-low sulfur diesel (ULSD) fuel across the United States beginning in fall of 2006, the Department believes automakers will be able to certify diesel vehicles to the CARB standard and make them available in Pennsylvania. Many large automakers have already publicly indicated they will be able to certify their light duty diesel vehicles to the California standards once ULSD is widespread. The industry has complied with CARB standards every time CARB has revised them since 1961 when California established the first auto emissions standards two years before the federal government. The Department believes that the automakers will seize the opportunity to develop compliant vehicles if they are in demand by consumers in Pennsylvania and the other states implementing the low emission vehicle program.

In addition, for vehicles meeting requirements in place after MY 2009, California law prohibits the banning of specific vehicle categories, such as SUVs, or adoption of

requirements to reduce vehicle weight. Some of the technologies considered in setting GHG standards may increase costs less in the larger vehicles than in the smaller ones.

This California low emission vehicle program does not restrict consumer choice but should improve it by encouraging as many vehicles as possible to have cleaner, more efficient technology.

94. **COMMENT:** CARB has estimated the additional price of the GHG provisions at over \$1000 per vehicle while the auto industry believes the price of all new vehicles would increase about \$3000 on average per vehicle. (1265/4241, 3192/4526, 4348/4349, 4236, 1268/2857)

**RESPONSE:** The Department agrees with CARB's per vehicle cost increase estimate of approximately \$1000 by 2016 beginning in MY 2009 and beyond as a result of the California GHG provisions and that this cost will be offset by savings to the consumer due to increased operational efficiency of these vehicles. While CARB predicted that by 2016 the operational efficiency of vehicles meeting GHG requirements may actually afford owners an overall cost savings of \$3.50 to \$7.00 per month (assuming \$1.74 per gallon of gasoline), information on initial cost (which could be related to sticker price) was estimated by CARB. Based on separate CARB estimates for passenger cars/small trucks and large trucks/SUVs and the similar composition of the fleet in Pennsylvania, consumers could see an increase in per vehicle costs of \$21 for MY 2009, \$63 for MY 2010 and \$219 for MY 2011 to about \$1000 in MY 2016. CARB estimates that by 2016 the operational efficiencies realized by GHG technology will result in an overall savings of \$3.50 to \$7.00 per month (\$42 to \$84 dollars per year) based on a model year 2016 vehicle costing an additional \$1029 to \$1064 per vehicle. These savings are probably understated, since the price of gasoline is likely to remain higher than that used in CARB's analysis.

The \$3000 average per car estimate used by the auto industry is from a study commissioned by the industry in an attempt to estimate the costs for the GHG provisions enacted by CARB. This same study also estimated a lifetime operational savings of \$1000 per car. According to CARB, the auto industry sponsored study had the following insufficiencies:

- Rejected the use of promising, cost-effective technologies for which automakers are already designing their core engines (e.g. turbochargers & gasoline direct injection systems).
- Rejected any reasonable innovation by the industry in response to regulatory requirements.
- Resorted to expensive weight reduction measures that are untenable for high volume production and are prohibited by California statute.
- Used unreasonable cost estimates for technology and used costs of components for the large car category only.
- Made unrealistic assumptions about vehicle usage to estimate the fuel savings.

The Department believes that the CARB GHG cost estimate is a conservative one. CARB has been a leader in controlling harmful automobile emissions since 1961 (two years before the federal government) and cost estimates for earlier programs have historically been overestimated by both industry and regulators. The Natural Resources Defense Council, in its comments to the CARB's GHG regulation, stated that costs of pollution control for automobiles are generally less than estimated by both government (federal and CARB) and industry. In a study contained in their comments to CARB on the impacts of CARB's GHG provisions, the Natural Resources Defense Council showed that for the history of highway vehicle emissions control programs since 1975, the automobile industry has overestimated actual costs by a factor of 2 to 10 times, and CARB and EPA overestimated by 1 to 2 times.

**95. COMMENT:** Because the costs of new regulation is important in Pennsylvania, DEP needs to make an independent assessment of CARB's assumption that the industry will respond to the regulation by producing vehicles that use all the necessary GHG technologies nationwide. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** This rulemaking does not adopt the Pennsylvania Clean Vehicles Program nor add a GHG component, but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

Based on the Department's review of CARB's analysis of the effects of the California GHG provisions on automakers, the Department believes CARB has sufficiently performed that analysis. Furthermore, the Department concurs with CARB's conclusions regarding the availability of technologies and the feasibility of their deployment. See also the Department's response to comment #97.

**96. COMMENT:** It is important to note that if Pennsylvania tried to enforce the California GHG rule's fleet-average requirement, it might thereby restrict the sale of California-certified vehicles in Pennsylvania. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** Neither the existing regulations nor the final rulemaking adopts a GHG fleet average requirement based on Pennsylvania sales. Even if the final rulemaking were adopting a Pennsylvania sales-based GHG fleet average requirement, the Department disagrees that the requirement would restrict the sale of California-certified vehicles in Pennsylvania.

**97. COMMENT:** There is considerable variation in the sales mix in California and Pennsylvania for certain manufacturers. Therefore, even if these manufacturers could comply with the GHG provisions in California, they could not comply with a Pennsylvania GHG fleet average and would need to restrict the sales of certain automobiles in Pennsylvania. (1265/4241, 3192/4526, 4348/4349)



**RESPONSE:** The Department agrees that there are differences between certain manufacturers' mix of passenger cars / light light-duty trucks and heavier light-duty trucks (e.g., SUV's) in California and Pennsylvania. However, when looking at the aggregate mix (i.e., considering all manufacturers), the Commonwealth's mix of passenger cars / light light-duty trucks and heavier light-duty trucks is similar to California's. The commentator's own analysis of this issue supports the similarity of fleet mixes when looking at seven major manufacturers (DaimlerChrysler, Ford, GM, Honda, Hyundai, Nissan and Toyota). For its analysis, the commentator indicated that in the 2003 California fleet, 53.9% of vehicles were passenger cars / light light-duty trucks and 46.1% were heavier light-duty trucks. The corresponding percentages in Pennsylvania were 54.4% and 45.6%. As the aggregate mix of vehicles is within 0.5% in either category, it is logical to assume that the fleets in Pennsylvania and California are similar.

The Department agrees that some individual automakers may need to adjust their product mix, based on their individual business and/or marketing decisions, in order to comply with the GHG provisions in the California regulations even though the Commonwealth is not adopting a GHG fleet average based on sales in the Commonwealth. However, the Department agrees with the analysis performed by CARB that automakers will be able to employ existing technology in the near term (prior to 2012) and use developed, but not currently fully deployed, technologies in 2012 and beyond. Furthermore, the Department agrees with CARB that automakers will not need to develop new GHG reduction technologies and that the technologies ultimately deployed will not require radical shifting or elimination of product lines in order to comply with the GHG certification provisions.

Based on the similarity between the California and Pennsylvania fleets, the Department continues to believe, as stated in the preamble of the proposed and final regulation, that even without a GHG fleet average requirement based on Pennsylvania sales, the Department will likely receive similar GHG benefits.

98. **COMMENT:** I do not support the Pennsylvania Clean Vehicles Program or its amendments. Current air quality is fine and not worth the cost of improvement. (2225A)

**RESPONSE:** Thirty-seven counties in Pennsylvania currently are in nonattainment of the ozone standard, and EPA is considering whether to make that standard more stringent. There are no present costs to consumers from the program, and over the lifetime of the vehicle there will be a net savings to consumers. See response to comment #93.

99. **COMMENT:** Estimates that take full count of the investment cost and capabilities of the industry indicate that cost increases for vehicles will not be fully recoverable by fuel cost savings. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department believes that CARB has sufficiently analyzed the feasibility of automaker compliance using their expertise and access to manufacturer

confidential information. The Department believes that CARB's assessment of the estimated costs to automakers for compliance with GHG provision is reasonable and, given CARB's, automakers and the EPA tendency to overestimate costs for highway vehicle emissions control programs, conservative.

100. **COMMENT:** A consultant report prepared in response to the California regulation provided a range of estimates of how the California GHG regulation is likely to affect nationwide employment in the automobile industry, estimating that it would cause a net loss of over 55,000 US jobs and affects manufacturers in “disproportionate degrees.” (4348/4349)

**RESPONSE:** This rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The commentator did not provide a copy of the report as a part of their comment for the Department to evaluate the Commentator's claim nor provide any additional data to support that claim.

101. **COMMENT:** Pennsylvania consumers currently have a choice of Tier II vehicles and CA LEV vehicles; a government regulation is not necessary for a Pennsylvania consumer to buy a CA LEV vehicle. (268/2857)

**RESPONSE:** The Department agrees that Pennsylvania consumers have the option to purchase California-certified vehicles in accordance with the federal cross-border sales policy. This rulemaking makes changes to the already existing Pennsylvania regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The final rulemaking provides additional flexibility for automakers in order to comply with the Commonwealth's existing program. Without this rulemaking, automakers would likely experience difficulty in complying with the existing regulation which in turn could adversely affect Pennsylvania consumers' vehicle choice in the near term. The requirement for vehicles to meet an NMOG fleet average will produce emission reductions not obtainable through voluntary purchase of CARB-certified vehicles.

102. **COMMENT:** Consumers should be the ones to decide how much they value fuel economy relative to other factors such as performance or cargo-carrying capability. Measures like these proposed GHG rules fail to account for consumer preferences and have the effect of limiting consumer choice. Consumers are increasingly choosing light trucks, as citizens such as contractors, repair people, builders, farmers, ranchers and other tradespeople rely on such vehicles to earn their livelihoods. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The California regulations recognize both consumer choice and the need for light trucks for business purposes, for example, by setting only a GHG fleet average

rather than a per-vehicle GHG standard. Many of the vehicles used by the persons and enterprises described by the commentators exceed the threshold weight for determining applicability of the GHG provisions of the regulations.

**103. COMMENT:** Dealers could have problems supplying specific vehicles to meet customer needs. Since no dealer can keep all vehicles in stock, dealers work together to trade inventory to satisfy particular needs, even across state lines. Bordering states are in different phases of dealing with the California car issue. Dealers in non-California states would carry non-California cars primarily or exclusively. 2270

**RESPONSE:** One reason the Commonwealth proposed to postpone its enforcement of the California program until model year 2008 was to better ensure vehicle availability. EPA's cross border policy allows dealers in adjacent states to sell California vehicles. If there is enough demand for these inter-dealer trades, the postponement will give the market time to adjust to the requirement.

**104. COMMENT:** Few if any consumers who are not required to purchase a California vehicle will choose to pay the price premium for a vehicle that meets the California standards. To the extent that residents of other states near Pennsylvania are not subject to the California rule, Pennsylvania dealers can expect to lose all or nearly all so-called "cross-border sales" once the California rule comes into effect. Those out-of-state consumers who want vehicles with higher fuel economy will be able to purchase them from dealers located outside Pennsylvania, who currently and in the future will have an ample supply of higher-mileage vehicles for sale. (4348/4349)

**RESPONSE:** There is presently no price differential in states surrounding Pennsylvania for California and non-California vehicles. Once the GHG provisions become effective, CARB predicted that the cost differentials would start at less than \$100 in model year 2009 and rise to about \$1000 in 2016 when the most stringent GHG limit is imposed. DEP disagrees with the implication that Pennsylvania dealers will necessarily lose sales from residents in states that have not adopted the California regulation. The Pennsylvania Clean Vehicles Program does not require automakers to meet the GHG fleet average based on sales in Pennsylvania. Since there is no per-vehicle GHG requirement, it is expected that any differential costs for a specific make or model will be a minor concern in the choice of non-Pennsylvanians to purchase from a Pennsylvania dealership. This rulemaking does not adopt the California low emission vehicle program or require compliance with the California GHG fleet average based on sales in Pennsylvania, but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

#### Comments concerning vehicles and technology

**105. COMMENT:** We do not support the proposed amendments because the proposed regulation sets fuel economy levels that cannot be achieved using technology in the time

periods required, without significant reductions in product offerings for Pennsylvania consumers. The customers of full line manufacturers like DaimlerChrysler whose market mix is focused towards larger vehicles, would be the most negatively affected by the proposed rule. (4348/4349)

**RESPONSE:** This rulemaking does not set fuel economy levels. This rulemaking makes changes to the already existing regulations which incorporate CA LEV II to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The Pennsylvania Clean Vehicles Program does not require automakers to meet the GHG fleet average based on sales in Pennsylvania. The Department agrees that individual automakers may need to adjust their product mix, based on their individual business and/or marketing decisions, in order to comply with the GHG provisions even though the Commonwealth is not adopting a Pennsylvania sales-based GHG fleet average. The Department agrees with the analysis performed by CARB that automakers will be able to employ existing technology in the near term (prior to 2012) and use developed, but not currently fully deployed, technologies in 2012 and beyond. The Department agrees with CARB that automakers will not need to develop new GHG reduction technologies and that the technologies ultimately deployed will not require radical shifting or elimination of product lines in order to comply with the GHG certification provisions.

See also the Department's response to comment s #81 and 97.

106. **COMMENT:** Several commentators expressed concern with the impact of this proposed regulation on the availability of diesel-fueled vehicles. Examples of these statements include:

Light-duty vehicles that operate on diesel are very popular. Will consumers still be able to purchase and operate these vehicles in Pennsylvania under CARB regulations?

Adopting California emission standards will result in the ban of new vehicles sales of diesel-powered passenger and other light-duty vehicles in Pennsylvania. While heavy-duty diesel vehicles with a gross vehicle weight rating over 8,500 pounds (big pick up trucks and vans) will still be permitted to be sold in Pennsylvania, smaller light duty diesel vehicles would be eliminated from the Pennsylvania market.

In a conscious and documented decision by CARB, the California program eliminates consumer access to diesel passenger vehicles. In the minutes of a November 5, 1998 CARB hearing, CARB's Deputy Executive Officer commented that the standard would "prevent any diesel vehicle we are aware of or can see in the future from complying with the LEV standards."

Diesels offer superior fuel economy. Several of the most fuel efficient vehicles for 2006 according to EPA are diesel. With the recent trend of increasing fuel prices, it is hardly a step in the right direction to eliminate access to these vehicles.

California's emission standards and other emission requirements serve as barriers to introduction of light-duty diesel vehicles. EPA has recently modified Tier II requirements to better accommodate diesels by adding flexibility without sacrificing emissions.

While some manufacturers are developing vehicles to meet California standards, this is not a certainty.

While the number of light-duty diesels currently offered in the US is limited, the prospects for future growth are promising.

(1265/4241, 1268/2857, 3192/4526, 4348/4349, 265/4241, 4242, 4673)

**RESPONSE:** Diesel vehicles presently comprise a very small percentage (0.09%) of passenger and light-duty vehicles in Pennsylvania. Based on the Department's analysis, it appears that automakers have not as yet been enthusiastic about offering diesel light-duty vehicles in the United States and Pennsylvanians have not been choosing to buy very many of the small number (six) of models available. Gasoline versions of these vehicles are certified and available in CA LEV states. The heavier diesel pick-up trucks such as those typically used by farmers are not regulated by the Pennsylvania Clean Vehicles Program because of their weight—the only light-duty trucks subject to the program are those 8,500 pounds gross vehicle weight or less.

While today's diesel vehicles are fuel efficient, other vehicles can provide the same fuel economy **and** also emit less pollution. The joint EPA/DOE *Model Year 2006 Fuel Economy Guide*, available at [www.fueleconomy.gov/feg/FEG2006/pdf](http://www.fueleconomy.gov/feg/FEG2006/pdf), lists vehicles with gasoline-powered, diesel and hybrid gasoline-electric technologies in its list of model year 2006 fuel economy leaders.

Currently no diesel vehicles are certified for sale in California because they cannot meet the emission standards, not because they are banned. The smog-forming emissions of current light-duty vehicle diesel engines are much higher than comparable gasoline engines and these diesel vehicles have not been able to meet CA LEV standards. In fact, they are presently certified to the least stringent level (Bin10) of the federal Tier II standard.

DEP agrees with the commentator's description of the historical record of CARB's regulatory development, which shows that predictive capability of government regulators is not infallible, since at least one manufacturer, Daimler Chrysler, has already announced the availability of a model year 2007 light-duty diesel vehicle capable of complying with LEV standards. (The company's January 8, 2006 press release, "*NAIAS 2006 Detroit: DaimlerChrysler to Feature Technology for the Cleanest Diesel in the*

*World,*" is available at [www.daimlerchrysler.com](http://www.daimlerchrysler.com).) In 1998, CARB perhaps did not anticipate the beneficial effects of ultra-low sulfur diesel fuel on the ability of the automakers to develop clean diesel vehicles. This fuel will be available throughout the United States in October 2006.

There is now rapid advancement in developing exhaust clean-up technologies for diesel cars and light-duty trucks. Automakers are therefore expected to be better able to certify diesel vehicles to the CARB standard if they so desire.

The Department believes that CARB, EPA and the manufacturers share similar goals – to ensure clean light-duty diesels can be part of the vehicle mix in the United States. Postponement of the implementation of the CA LEV program in Pennsylvania from model year 2006 until model year 2008 as provided in this rulemaking will help provide time for manufacturers to meet the standards for vehicles anticipated to be sold in CA LEV states. EPA's recent Tier II rule changes (71 Fed. Reg. 16053, Mar. 30, 2006, direct final rule effective June 28, 2006) affect model years 2007-2009 only. After that time, EPA expects that manufacturers will be able to meet the "remaining narrow challenges" facing diesel technology. 71 Fed. Reg. at 16056.

DEP agrees that the prospects for additional light-duty diesel vehicles are promising. Vehicles that can both offer energy efficiency and meet environmental standards will likely be much more acceptable to consumers than they are at present.

**107. COMMENT:** Several manufacturers recently announced that they do not plan on certifying flexible fueled vehicles (FFVs) in California this year. There is uncertainty about the future of FFVs and E85. Industry, federal and state leaders have recently expressed support for "flexible fueled vehicles" that operate on fuels with a greater percentage of ethanol, which is a renewable fuel. What will be the impact of this proposed regulation on the use of ethanol? (4242, 4673)

**RESPONSE:** Ethanol can either be added to gasoline in amounts up to 10%, which can be accommodated in conventional vehicles, or in a blend called E85, which is 85% ethanol. A specially-designed vehicle, known as a "flexible fuel" vehicle, which can run on conventional gasoline or E85, is needed to accommodate E85 fuel. There will be no effect on the use of ethanol in conventional vehicles from the Pennsylvania Clean Vehicles Program. For E85 and new flexible fuel vehicles, the postponement in compliance date in the rulemaking will give the industry time to respond to market situations.

The decision by two manufacturers not to certify flexible fueled vehicles in California for the coming model year (MY 2007) was a business decision, reportedly based on the lack of E85 refueling stations. At least one other manufacturer, General Motors, is continuing to certify FFVs in California for MY 2007. There are few E85 stations outside the Midwest. California has only one and, therefore, there is a small market.

As E85 stations become more common, the Department anticipates that the demand for the vehicles will increase and these manufacturers will again certify FFVs for use in CA LEV programs. Also, E85 can be used in all of the FFVs already in use in Pennsylvania. Pennsylvania has an interest in encouraging renewable fuels, such as ethanol. The first public E85 station in Pennsylvania opened in the spring of 2006.

108. **COMMENT:** Currently available technology cannot meet the proposed fuel efficiency and emissions requirements of CA LEV II without reducing vehicle weight and size but reducing weight and size would reduce consumer utility and contribute to higher traffic fatalities. Weight reductions are likely even if they are not in the CARB staff's view necessary. Also, it has been suggested that there are no safety issues involved in the California rule because vehicles must meet general motor vehicle safety standards. Those standards, however, would be in effect with or without the California rule and the issue is one of incremental risk. (1265/4241, 1268/2857, 3192/4526, 4348/4349)

**RESPONSE:** As indicated by CARB in its Final Statement of Reasons, California law specifically prohibits CARB from using weight reduction or vehicle class elimination as a mechanism to achieve compliance with the GHG provisions of the CARB standard. The Department believes that CARB's analysis of the available technology options for compliance with the GHG requirement is sound and that weight reduction strategies are not necessary. Many of the proposed technologies are either in current production or are in late stage development by automakers, and do not involve weight or size reductions. In addition, the GHG provisions provide sufficient lead-time for automakers to cost-effectively integrate these existing technologies into production. Any weight reduction strategies that may be employed by automakers are business decisions by individual automakers and not the result of requirements of either the CA LEV II standards or the Pennsylvania Clean Vehicles Program. The Department agrees that federal motor vehicle safety standards will continue to apply to any vehicle introduced for sale into the Commonwealth.

#### Comments regarding process and legality

109. **COMMENT:** The program adopted a more stringent (compared to Tier I) federal option available at the time, called NLEV (National Low-Emission Vehicle Program) (2439, 2440)

**RESPONSE:** Subchapter D of Chapter 126 of the regulation adopted in 1998, entitled New Motor Vehicle Emissions Control Program, contained both NLEV and Pennsylvania Clean Vehicles Program provisions to enable the Commonwealth to participate in NLEV as well as the Pennsylvania Clean Vehicles Program, which incorporates the California low emission vehicle program. See also the response to comment #124.

110. **COMMENT:** The current DEP administration has reversed course from its 1998 statements and now claims that the California vehicle emission standard is in fact effective in Pennsylvania for Model Year 2006. If DEP's current interpretation is to be

believed, then the Department has offered no reason to substantiate why it is proposing to postpone implementing the California standard when, per its own argument, the automobile industry and consumers have had advance notice of its effective date for nearly eight years. Our belief is that DEP has failed to revisit the current regulation in a timely fashion to incorporate the federal Tier II standards and that the proposed regulation is actually a conscious decision to codify the California standard in Pennsylvania's regulations. (2439, 2440)

**RESPONSE:** The current rulemaking continues the course begun in 1998, when the EQB adopted the California Low Emission Vehicle program. The 1998 preamble stated that the California program was to be implemented "... if an auto manufacturer opts out of the NLEV program *or at the conclusion of the NLEV program.*" 28 Pa. B. 5873, 5874 (Dec. 5, 1998) (*emphasis added*). In the same rulemaking, the EQB adopted NLEV. The preamble specified that NLEV was only a temporary measure: "The Commonwealth's NLEV program participation ends with model year 2006." 28 Pa. B. 5783, 5875 (Dec. 5, 1998).

The 1998 regulations entitled the Commonwealth's adoption of the California program (*see* 25 Pa. Code §§126.401, 126.402(d), and 126.411-126.441) the "Pennsylvania Clean Vehicles Program." The 1998 regulations provided that "[f]or the duration of the Commonwealth's participation in the NLEV program, manufacturers may comply with the NLEV standards or equally stringent mandatory Federal standards in lieu of compliance with the Pennsylvania Clean Vehicles Program established in §§ 126.411-126.441 ...." 25 Pa. Code §126.402(c). In 2004, EPA established more stringent Federal standards, called "Tier II." Hence, manufacturers were required to comply with Tier II, as part of the NLEV program, for model years 2004 and 2005. Beginning with model year 2006, when the Commonwealth's participation in the NLEV Program ended, the California program took effect. "Except as provided in subsections (a) and (c) [describing NLEV participation], the Pennsylvania Clean vehicles Program applies to all new passenger cars, and light-duty trucks (if designed to operate on gasoline) sold, leased, offered for sale or lease, imported, delivered, purchased, rented, acquired, received or registered in this Commonwealth starting with the model year beginning after December 5, 2000, *and each model year thereafter.*" 25 Pa. Code § 126.402(d) (*emphasis added*).

Hence, the current rulemaking is not an adoption or codification of the California program. The California program was adopted, or codified, in the Commonwealth in 1998. The current rulemaking seeks to postpone the compliance date of the California program in the Commonwealth from model year 2006 to model year 2008, update definitions and cross-references, and clarify the program to specify an early-credit earning period within which vehicle manufacturers must come into compliance with the NMOG fleet average.

The Department proposed postponing implementation of the program to minimize any potential vehicle availability issues and to put in place a specific transition mechanism for compliance.



111. **COMMENT:** The Pennsylvania Clean Vehicles Program included adoption of the LEV standards as a temporary measure or “backstop” in case EPA’s NLEV program was not implemented or if federal standards cleaner than NLEV were not adopted. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** See response to comment #110.

112. **COMMENT:** Proposed Sections 126.431(d) (enforcement actions taken by the CARB will apply equally in Pennsylvania) and 126.451 (the Department will monitor and comment on amendments to CARB’s program) are clearly new innovations to the existing Pennsylvania Clean Vehicles Program. The need to add innovations of this magnitude to the existing program also undermines any argument that the content of those innovations equates to the intent of the original 1998 Pennsylvania Clean Vehicles Program and thus belies a claim that the current proposed rulemaking is simply a clarification of existing PA law. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** DEP agrees that Sections 126.431(d) and 126.451 are being added to the regulations. DEP disagrees with the remainder of the comment. Several clauses were added as a result of the review of the regulations from several states that adopted the California low emission vehicle program subsequent to Pennsylvania to clarify, protect and better inform Pennsylvania citizens and relieve paperwork burdens on the manufacturers. Additions to the existing program affecting its operation in Pennsylvania do not affect the status of the existing adoption of the California standards, themselves.

113. **COMMENT:** DEP documents (for example, minutes of the September 15, 1998) support the view that the CA LEV program was intended solely as a ‘backstop’ to NLEV/Tier II in the event that automakers did not comply with a cleaner, national standard for tailpipe emissions or if the national standards were somehow derailed in another way. Statements attributed to DEP included that the regulation is the final step Pennsylvania needs to take to participate in NLEV, adopting the California standards is a contingency, the language is part of verbatim language that EPA is asking us to adopt, NLEV would have a greater air quality benefit than Tier 1 and be much more equitable for Pennsylvania than a state-by-state approach, without the state ‘backstop’ program, there could not be a compliance alternative and the state program creates the legal mechanism for NLEV as a compliance alternative, the NLEV program is voluntary and may have limited duration, and that language in the 1998 rulemaking is trying to make continuity about clean vehicles from the NLEV vehicle to what is called the Tier two vehicle. DEP has attempted to revise the historical origin of the PA Clean Vehicles program. (2439, 2440, 1268/2857, 4236)

**RESPONSE:** DEP disagrees with the commentators. The California standards were adopted to take effect after the end of the commitment to NLEV after model year 2005. This was stated clearly in the preambles to the 1998 proposed and final rulemakings: “This program will only be implemented if an auto manufacturer opts out of the NLEV program or *at the conclusion of the NLEV program*. (Emphasis added.) 28 Pa. B. 5873,

5874 (Dec. 5, 1998) (final order). (See also the preamble to proposed rulemaking at 27 Pa. B. 6303, 6305 (Nov. 29, 1997). The 1998 regulation itself was and is clear. It expressly adopts and incorporates by reference certain provisions of the California Low Emission Vehicle Program, Title 13, CCR (25 Pa. Code §126.411), requires CARB certification for vehicles sold, imported, delivered, purchased, leased, rented, acquired, received, or registered in Pennsylvania (25 Pa. Code §126.412(a)), and requires compliance with the California NMOG fleet average in Pennsylvania (25 Pa. Code §126.12(b)). The 1998 regulation expressly adopts NLEV as only a temporary measure and a compliance alternative to the California program: “The Commonwealth’s participation in the NLEV program extends until model year 2006...” (25 Pa. Code §126.402(b)); and, “This subchapter allows motor vehicle manufacturers to comply with the voluntary NLEV program ... as a compliance alternative to the Pennsylvania Clean Vehicles Program ...” (25 Pa. Code §126.401(b).) Hence, DEP was clear that the California program was offered as more than just a backstop in the event a manufacturer did not comply with NLEV or the federal standards were not finalized.

114. **COMMENT:** DEP’s January 31, 2006 letter to the General Assembly asserts that DEP adopted and intended to implement the California vehicle emission standards in Pennsylvania. DEP intentionally omits the context of the 1998 rulemaking as well as its own stated intention to revise the regulation to incorporate Tier II when it was finalized. (Madigan/White)

**RESPONSE:** See response to comment #113..

115. **COMMENT:** The Board and Department have been ambiguous about whether they believe that the CA LEV II program is already the law of the Commonwealth. The statement in the preamble of the proposed rulemaking is not sufficiently clear. There needs to be a legal basis for a conclusion that an incorporation by reference has already occurred. It is highly unusual for the Board to claim they have the authority to adopt regulations that automatically incorporate, without further legislative or regulatory action and on an ongoing basis, any amendments that are made to the California program. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees that the Board and Department have been ambiguous or that the statement in the preamble is not sufficiently clear. The purpose of the final rulemaking is not to adopt CA LEV II because by virtue of the 1998 rulemaking CA LEV II is already adopted in Pennsylvania. In a December 2, 2005 letter to Rep. Richard Geist, EPA Region 3 Administrator Donald Welsh stated that it is the EPA’s opinion that the CA LEV standards are “the legally effective program for Pennsylvania” and underscored that the CA LEV standards are a “federally enforceable part of the SIP.”

The Pennsylvania Statutory Construction Act addresses situations in which cross-referenced statutory or regulatory provisions are later revised or replaced. Pennsylvania courts have held that the rules in the Statutory Construction Act apply to regulations as well as to statutes. (*See, e.g., Highway New, Inc. v. Pennsylvania Department of Transportation*, 789 A.2d 802, 808 (Pa. Cmwlth. 2002).) Section 1937(a) of the

Pennsylvania Statutory Construction Act states that, “A reference in a statute to a statute or to a regulation issued by a public body or public officer includes the statute or regulation *with all amendments and supplements thereto and any new statute or regulation substituted for such statute or regulation*, as in force at the time of application of the provision of the statute in which such reference is made, unless the specific language or the context of the reference in the provision clearly includes only the statute or regulation as in force on the effective date of the statute in which such reference is made.” (*Emphasis added.*) (1 Pa.C.S.A. §1937(a).) Hence, California’s post-1998 amendments and supplements to, and any new statute and regulation substituted for, the portions of the California Low Emission Vehicle Program that were adopted in the Commonwealth’s 1998 rulemaking are automatically included in the Commonwealth’s regulations.

116. **COMMENT:** Authority to adopt regulations that automatically incorporate amendments made to the California program delegates statutory implementation authority in 71 Pa. Cons. Stat. Ann. § 745.2(a) to another state’s regulatory authority in violation of Article II, Section 1 of the Pennsylvania Constitution. It strains credulity to imagine that the Pennsylvania legislature would establish a carefully crafted and highly detailed legal regime establishing various levels of state review of proposed regulations, yet allow DEP to authorize by rule a process by which amendments made by CARB to California regulations over which Pennsylvania has no control would automatically become state law. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The current regulations and the final rulemaking are authorized under the Pennsylvania Air Pollution Control Act. Pennsylvania, along with the other states that have adopted the California low emission vehicle program, has the same ability to comment on changes to the California program as it has in commenting on changes to the federal new motor vehicle control program. Elected representatives are part of the Pennsylvania rulemaking process established by the Regulatory Review Act, Act of June 25, 1982 (P.L. 633, No. 181), *as amended*. Additionally, the final rulemaking requires the Department to monitor and advise the EQB of proposed or final CA LEV rulemaking under consideration by CARB, prepare a cost/benefit analysis to be submitted to the EQB and Chairpersons of the House and Senate Environmental Resources and Energy Committees for each proposed or final CARB rulemaking, evaluate and submit to the EQB and the Chairpersons the estimated incremental cost to manufacture vehicles that comply with the CA LEV program compared to the federal program, and submit comments on proposed or final CARB rulemakings on behalf of the residents of this Commonwealth. The Pennsylvania Statutory Construction Act explicitly provides that, “A reference in a statute [or regulation] to a statute or to a regulation issued by a public body or public officer includes the statute or regulation with all amendments and supplements thereto and any new statute or regulation substituted for such statute or regulation, as in force at the time of application of the provision of the statute [or regulation] in which such reference is made... .” (1 Pa.C.S.A. §1937(a).) Thus, the automatic inclusion in the Commonwealth’s regulations of amendments and supplements

to, and of any new statute or regulation substituted for a portion of, the California program are statutorily sanctioned.

117. **COMMENT:** The assertion of authority (to automatically incorporate amendments) seems at odds with federal law because a new waiver of preemption was required for the changeover from LEV I to LEV II. Even if the waiver were denied, Pennsylvania would be pre-committed by such a view to violating the US Constitution's Supremacy Clause. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** States may adopt but not enforce California rules before a waiver is granted (or a finding made that the rule is within the scope of an existing waiver). *Motor Vehicle Manufacturers Association of the United States v. New York State Department of Environmental Conservation*, 17 F.3d 521, 534 (2d Cir. 1994). EPA granted California a waiver for CA LEV II on April 22, 2003 (68 Fed. Reg. 19,811). EPA has not yet ruled on California's waiver request for the GHG provisions of CA LEV II. If California is without waiver coverage, these rules cannot be implemented in California and, therefore, cannot be implemented in Pennsylvania. Should this happen, it would not change the requirement in Pennsylvania that new vehicles sold in the Commonwealth be those certified by CARB.

118. **COMMENT:** The assertion of authority (to automatically incorporate amendments) is also inconsistent with the concession that in 1998, the Department recognized that further regulatory action would be required before the NLEV program expired at the beginning of model year 2006. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees that it made a "concession" of the need for further regulatory action. The 1998 regulation established the CA LEV program as the applicable program for model year 2006 and beyond. The preamble to the 1998 regulation acknowledged that the Board would reassess the air quality need and emission reduction potential of both the California and federal programs. That assessment was completed with the conclusion that the CA LEV program should remain in effect, based on both air quality need for attainment of the eight-hour ozone standard and emission benefits, although a postponement would be advisable to reduce any short-term vehicle availability problems. Should the Department have decided that the federal program was sufficient to meet air quality needs, a rulemaking to revoke the Pennsylvania Clean Vehicles Program would have been necessary.

119. **COMMENT:** The assertion of authority (to automatically incorporate amendments) is in contrast to the careful approach of the CAA and NLEV program, neither of which lightly presume or presumed that state authority exists unless negated. Those federal sources of law require SIPs to provide the necessary assurances of state law authority or state opt ins to the NLEV program to have similarly demonstrated the existence of proper state legal authority. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The CAA does not speak to the basis of state administrative law. Pennsylvania provided the necessary assurances of state legal authority during its adoption of the Pennsylvania Clean Vehicles Program and NLEV opt-in, and in its

submittal to EPA of a SIP revision. EPA approved that SIP revision on December 28, 1999, 64 Fed. Reg. 72564.

120. **COMMENT:** The Board and Department are under an obligation to explain to IRRC why the proposed regulations do not actually represent a policy decision of such a substantial nature that they require legislative review as described in 71 Pa. Cons. Stat. Ann. § 745.5b(b)(4). (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. The current rulemaking seeks to postpone the compliance date of the California program, which is already incorporated-by-reference in the Department's regulations, in the Commonwealth from model year 2006 to model year 2008; update definitions and cross-references; and clarify the program to specify an early-credit earning period within which vehicle manufacturers must come into compliance with the NMOG fleet average. These measures do not represent policy decisions of such a substantial nature that they would require legislative review under the Regulatory Review Act.

121. **COMMENT:** DEP commented in a 1997 report to the General Assembly that NLEV would be more cost-effective and equitable than individual state low emission vehicle programs once contemplated throughout the Ozone Transport Region. (1268/2857)

**RESPONSE:** DEP agrees that the statement was made in 1997 in the context of attainment of the one-hour standard and the NLEV negotiations. The 1998 rulemaking, however, adopted the California program. The instant rulemaking does not adopt the Pennsylvania Clean Vehicles Program but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

122. **COMMENT:** The 1992 Low Emission Vehicle Commission, authorized by the General Assembly to study whether it made sense for the Commonwealth to adopt CA LEV, rejected adoption. (4236)

**RESPONSE:** DEP agrees that the Commission rejected adoption of CA LEV I in the context of considering Tier 1 standards and potential attainment of the one-hour ozone standard. The Commission's analysis is not particularly relevant to the instant rulemaking in light of almost 15 years of automotive technology and regulatory developments, EPA's adoption of the eight-hour ozone standard and the economic conditions in place today.

123. **COMMENT:** Four different ozone stakeholder groups met to recommend control strategies to assist Pennsylvania in meeting their attainment requirements under the CAA. Of the three groups that discussed vehicle options, all clearly opted for federal auto standards instead of CA LEV. The Southeast group endorsed NLEV in 1996. The Lehigh Valley/Reading and Southcentral groups endorsed the Tier II program in 1999.

None of the stakeholder groups recommended CA LEV as an ozone reduction strategy. (1268/2857, 4236)

**RESPONSE:** None of these groups made statements in the context of comparing additional benefits of CA LEV II compared to a federal Tier II program in order to attain and maintain the eight-hour ozone standard. Neither Tier II nor CA LEV II had been finalized at the time these statements were crafted. The Lehigh Valley/Reading and Southcentral groups spoke primarily to the issue of the time – the stringency of the Tier II standard itself. The Southeast group was convened to make recommendations to achieve the one-hour ozone standard. The one-hour standard was revoked in 2005 and replaced by the more stringent eight-hour standard.

124. **COMMENT:** The Board and the Department should acknowledge that SIP modeling demonstrations the Department has filed with EPA, pre- and post-the onset of model year 2006, have relied on the federal Tier II program being applicable in Pennsylvania. Tier II is the program the Department has been functionally applying to vehicle sales in the Commonwealth. (1265/4241, 3192/4526, 4348/4349, 4236)

**RESPONSE:** CA LEV II is the legally applicable program in the Commonwealth. During negotiations instituting NLEV, EPA and the automakers evidently came to an agreement creating a two model-year gap between the practical end of NLEV for model year 2004 (that is, the statutory onset of Tier II, no matter what the emission standard level) and the end of a participating state’s “commitment to NLEV” in model year 2006. Ozone Transport Region states were presented with this language as being non-negotiable in order to participate in NLEV. The Commonwealth adopted this language in its regulations, which were then approved as part of the Commonwealth’s SIP. Consequently, Pennsylvania allowed automakers to comply with Tier II for model year 2004 and 2005. In SIP revisions affecting model year 2006 and later which demonstrated that the nonattainment area could maintain the one-hour ozone or carbon monoxide standards, DEP and/or local air agencies took a conservative approach and accounted only for the less stringent federal standards, given that that the analysis of need and benefits described in the preamble to the 1998 regulations was not yet completed. As EPA Region 3 Administrator Donald Welsh stated in a December 2, 2005 letter to Rep. Richard Geist, it is the EPA’s opinion that the CA LEV standards are “the legally effective program for Pennsylvania” and the CA LEV standards are a “federally enforceable part of the SIP.”

125. **COMMENT:** Pennsylvania’s concessions that it has relied on Tier II in SIPs for credit and applied Tier II to vehicle sales would establish that correcting the formal SIP on file with EPA would be a ministerial matter. It was error after the Department made the viable decision to select and apply the Tier II program beginning in model year 2004 for it not to take this step. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees with the implications of the actions described by the commentator. Revising the SIP would entail a regulatory revision to revoke the California program, public hearing and EPA approval. In addition, Pennsylvania would

have to find other measures to attain and maintain the eight-hour health-based standard. With regard to the suggestion that the Department made the viable decision to select and apply Tier II, see the response to comment 138.

**126. COMMENT:** The Department should file corrective SIP papers in light of the lawsuit filed against the Department seeking improperly to enforce such an inaccurate SIP provision. The Department should want to file such papers to eliminate any possibility the suit might limit the Commonwealth's discretion to choose either the federal Tier II program or CA LEV II program for Pennsylvania, discretion both EPA and DEP have acknowledged exists. DEP must separate its policy preference for the CA LEV II program from its legal duties to defend the interests and prerogatives of the Commonwealth, particularly its duties to preserve the discretion of the elected representatives of Pennsylvania. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** There is no need for a SIP revision. The Commonwealth's approved SIP accurately reflects that the Department's current regulations incorporate the California program. The Commonwealth intends to seek a SIP revision when this final rulemaking is adopted in order to reflect the revisions to the existing regulations.

**127. COMMENT:** The Board and Department should confirm that Pennsylvania is under no federal legal compulsion to adopt the California vehicle program. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The current rulemaking does not adopt the California vehicle program. The Commonwealth adopted the California vehicle program in 1998. At that time, the Commonwealth was under no legal obligation to adopt the program. As EPA Region 3 Administrator Donald Welsh stated in a December 2, 2005 letter to Rep. Richard Geist, it is the EPA's opinion that the CA LEV standards are "the legally effective program for Pennsylvania" and the CA LEV standards are a "federally enforceable part of the SIP."

**128. COMMENT:** A legal interpretation of the CAA Section 177 says states adopting California standards must do so as a package, including the Zero Emission Vehicle (ZEV) sales mandate. A lawsuit in federal court could leave the Commonwealth at risk of having to adopt all sections of the California regulation. (1268/2857)

**RESPONSE:** DEP disagrees. Section 177 of the CAA does not require adoption of all California standards, but only requires that if a state adopts motor vehicle standards, those standards be identical to the California standards. Congress included the "identity" requirement in Section 177 to prevent states from requiring manufacturers to develop a "third vehicle" and to prevent states from limiting the manufacture or sale of California-certified vehicles. See, e.g., *Motor Vehicle Manufacturers Assoc. v. New York State Department of Environmental Conservation*, 17 F.3d 521, 536 (2d Cir. 1994). Not having the ZEV provisions does not require a third vehicle or limit the manufacture or sale of California vehicles. The United States Environmental Protection Agency (EPA) similarly concludes that states adopting a Section 177 program need not adopt

California's ZEV requirements to comply with the CAA requirements for identical standards under section 177 of the CAA. See 60 Fed. Reg. 4712 (Jan. 24, 1995).

129. **COMMENT:** One reason the corrective SIPs have not been filed is that Pennsylvania understands that the existing Pennsylvania Clean Vehicles Program incorporating LEV I can no longer be enforced or in any way be applied in Pennsylvania as a matter of federal law in order to comply with the identity requirement of Section 177. Therefore, the proposed rulemaking here attempting to adopt LEV II must be acknowledged as a regulatory change necessary to achieve that objective and not as a voluntary “clarification” that LEV II is already state law. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. The existing regulations already incorporate CA LEV II. The final rulemaking seeks to postpone the compliance date of the California program in the Commonwealth from model year 2006 to model year 2008, update definitions and cross-references, and clarify the program to specify an early-credit earning period within which vehicle manufacturers must come into compliance with the NMOG fleet average.

130. **COMMENT:** By adopting and attempting to enforce the CA fleet NMOG average, PA will violate the CAA. Since it is highly unlikely that a manufacturer will sell exactly the same products in exactly the same proportions in Pennsylvania as it will in California and Pennsylvania consumers determine that a particular manufacturer’s sales mix in Pennsylvania results in a higher fleet NMOG average, the manufacturer may be required to artificially limit sales of certain CARB-certified cars to comply with Pennsylvania’s fleet average requirement. This would be an indirect limit on the sale of a motor vehicle certified to CA standards and thus would violate Section 177. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. This rulemaking does not adopt the Pennsylvania Clean Vehicles Program or adopt the NMOG fleet average, but makes changes to the already existing regulations which already incorporate by reference the NMOG fleet average. This rulemaking postpones the program compliance date from model year 2006 to model year 2008, specifies the early credit earning period for automobile manufacturers and updates definitions and cross-references.

Even if this rulemaking were adopting the California NMOG fleet average, adopting the fleet average would not violate CAA Section 177. Section 177 specifically authorizes states like Pennsylvania to “adopt and enforce standards relating to control of emissions from new motor vehicles or new motor vehicle engines” if the “standards are identical to the California standards for which a waiver has been granted for such model year... .” Courts accept California’s NMOG fleet average as a “standard relating to control of emissions”. See, e.g., *Motor Vehicle Manufacturers Assoc. v. New York State Department of Environmental Conservation*, 17 F.3d 521, 537 (2d Cir. 1994) (“It would be inappropriate to view the 1990 [CAA] amendments in a manner that would effectively prohibit any state from opting into the California program since Congress so obviously



planned for the several states to have that option.”); *American Automobile Manufacturers Assoc. v. Cahill*, 152 F.3d 196, 200 (2d Cir. 1998) (“For example, the LEV Program is clearly a “standard”...). EPA also accepts California’s NMOG fleet average as a “standard relating to control of emissions,” as EPA has approved the SIP revisions of at least three states that have adopted it, namely Maine, Massachusetts and New York. (70 Fed. Reg. 21959 (Apr. 28, 2005) (ME); 67 Fed. Reg. 78179 (Dec. 23, 2002) (MA); and 70 Fed. Reg. 4773 (Jan. 31, 2005) (NY).)

Moreover, the Second Circuit Court of Appeals has stated that the purpose of the sales limitation prohibition in Section 177 is to prohibit Section 177 opt-in states from attempting to regulate against the sale of a particular *type*, not *number*, of California-certified cars. *Motor Vehicle Manufacturers Assoc.*, *supra*, 17 F.3d at 536. The CAA does not require automakers to “sell exactly the same products in exactly the same proportions” in a state that adopts or implements a program requiring CARB standards. As sales hinge on marketing factors, the ultimate decision on what type of vehicle to introduce for sale in an implementing state in order to meet the fleet average is a marketing decision. The Commonwealth’s final-form regulation does not limit any type of highway vehicle from being introduced for sale in the Commonwealth. The Pennsylvania Clean Vehicles Program only requires that any such vehicle have CARB certification and that in the aggregate the automaker’s mix of vehicles introduced for sale in the Commonwealth complies with the NMOG fleet average specified by CARB.

131. **COMMENT:** Adopting the CA LEV program ties Pennsylvania to any and all changes made to the program by the California Air Resources Board, on which Pennsylvania has no representation. Policy decisions regarding the control of air pollution in Pennsylvania should be made by Pennsylvania’s elected representatives, not by a California bureaucracy that is unaccountable to Pennsylvanians. (1268/2857)

**RESPONSE:** The current rulemaking is not an attempt to adopt the California program. That program was adopted in the 1998 rulemaking. The final rulemaking, like the proposed rulemaking, requires the Department to monitor and advise the Environmental Quality Board of proposed or final LEV rulemakings under consideration by CARB, prepare a cost/benefit analysis to be submitted to the EQB and Chairpersons of the House and Senate Environmental Resources and Energy Committees for each proposed or final CARB rulemaking, evaluate and submit to the EQB and the Chairpersons the estimated incremental cost to manufacture vehicles that comply with the CA LEV program compared to the federal program, and submit comments on proposed or final CARB rulemakings on behalf of the residents of this Commonwealth. Pennsylvania, along with the other states that have adopted the California low emission vehicle standards, has the same ability to comment on changes to the California program as it has in commenting on changes to the federal new motor vehicle control program. Elected representatives are part of the Pennsylvania rulemaking process established by the Regulatory Review Act, Act of June 25, 1982 (P.L. 633, No. 181), as amended. See response to comment #116.

132. **COMMENT:** Pennsylvania should not look to California for anything. (2489, 2876)

**RESPONSE:** The Department disagrees. The National Academy of Sciences recently found that California's leadership role in automotive standards is beneficial to the nation.

133. **COMMENT:** The Chamber remains unconvinced that PA's best option for meeting our attainment standards lies in ceding control over our vehicle standards to another state. (4236)

**RESPONSE:** The current rulemaking is not an attempt to adopt the California program. That program was adopted in the 1998 rulemaking. Section 177 of the CAA does not require adoption of all California standards, but only requires that if a state adopts motor vehicle standards those standards be identical to the California standards. Pennsylvania has made decisions in this regard that tailor the program to the needs of the Commonwealth and meet the identity provisions of the CAA. Pennsylvania, along with the other states that have adopted the California low emission vehicle standards, has the same ability to comment on changes to the California program as it has in commenting on changes to the federal new motor vehicle control program.

134. **COMMENT:** California revises its standards more frequently than the USEPA. In fact, one comment to the California regulations noted that California has changed its regulation 49 times. (1268/2857)

**RESPONSE:** DEP agrees that California has revised its standards more often than EPA, which has amended its light-duty vehicle standards only when explicitly directed by statute. The National Research Council (NRC) recently found that the process by which California revises its standards is scientifically and technically valid and is a benefit to the country. Compared to the federal government, the ability of California to respond better to changing conditions including technological advances, was viewed by the NRC as an advantage. Most of the revisions to the California program were revisions to California's Zero Emission Vehicles program, which is excluded from adoption in the Pennsylvania Clean Vehicles Program.

135. **COMMENT:** Section 126.451 is susceptible of being interpreted consistently with the law but the commentary about the purpose of this provision in the Preamble to the proposed rule suggests that its drafters think that the DEP's only role will be to monitor and suggest revisions to CARB-initiated amendments to that state's vehicle program, which if rejected by CARB, would be binding in Pennsylvania. In reference to Section 126.451, the Alliance believes that allowing CARB rulemakings to directly regulate Commonwealth residents without separate confirmatory legal action in Pennsylvania is among other things an unconstitutional violation of the nondelegation doctrine in Pennsylvania. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** Section 126.451 is consistent with the law. The Department's responsibilities under this section are spelled out in the section. The current regulations and the final rulemaking are authorized under the Pennsylvania Air Pollution Control Act. In addition, see response to comment #116.

136. **COMMENT:** The proposed regulations fail to satisfy the “stringency” limitation in 35 Pa. Cons. Stat. Ann. § 4004.2(b), which requires rules to be no more stringent than those required by the CAA unless authorized or required by the Pennsylvania Air Pollution Control Act or specifically required by the CAA. Section 4004.2(b) goes on to list certain exceptions to this stringency limitation. But none are applicable here. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department disagrees. The existing regulation automatically incorporates the current California program, which at this time is CA LEV II, not CA LEV I. Section 4.2(b) of the Air Pollution Control Act is inapposite because this rulemaking is not a rulemaking that adopts the California standards, since they are already adopted. The final rulemaking postpones the compliance date of the Pennsylvania Clean Vehicles Program by two years. Furthermore, the Department disagrees with the commentator’s characterization of the stringency provision of the Pennsylvania Air Pollution Control Act. Section 4.2 authorizes adoption of regulations that are more stringent than federal requirements if they are reasonably necessary to achieve or maintain the ambient air quality standards. Adoption of the California program under section 177 of the federal CAA was reasonably necessary to achieve and maintain the health-based 1-hour ozone ambient standard in Pennsylvania and the successor 8-hour ozone ambient standard.

137. **COMMENT:** The Board and Department appear to be arguing that the regulations are no more stringent than the existing regulations. That attempted reformulation of the controlling legal standard differs from the stringency limitation imposed by Section 4004.2(b). Moreover, the CA LEV I program currently incorporated into existing Pennsylvania regulations is a legal nullity that can no longer be enforced under the CAA. Hence, any comparisons to the level of stringency of those regulations is also legally irrelevant. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department agrees that this rulemaking is no more stringent than the existing regulations. The Department disagrees that the Department has attempted to reformulate the legal standard or that CA LEV I is the program currently incorporated into existing Pennsylvania regulations. The existing regulation incorporates the current California low emission vehicle program, which is CA LEV II, not CA LEV I, and will continue automatically to include amendments and supplements to California’s low emissions vehicle program, in accordance with section 1937(a) of the Pennsylvania Statutory Construction Act. See response to comment #116. Comparisons in the preamble between the proposed rulemaking and the existing program are for purposes of describing the impacts of the proposed rulemaking: in particular the rulemaking’s postponement of compliance with the Pennsylvania Clean Vehicles Program by two years. Finally, Section 4.2(b) of the Air Pollution Control Act is inapposite because this rulemaking is not a rulemaking that adopts the California standards, since they are already adopted. In any event, Section 4.2 authorizes adoption of regulations that are more stringent than federal requirements if they are reasonably necessary to achieve or maintain the ambient air quality standards, and adoption of the California program under

section 177 of the federal CAA is reasonably necessary to achieve and maintain the health-based 8-hour ozone ambient standard.

138. **COMMENT:** It is difficult to see how the Department can even attempt to assert that the CA LEV II program that the proposed regulations would adopt is not more stringent than the CA LEV I program referenced in the existing regulations. (1265/4241, 3192/4526, 4348/4349)

**RESPONSE:** The Department is not asserting that the CA LEV II program is not more stringent than the CA LEV I program. The existing regulation incorporates the current California low emission vehicle program, which is CA LEV II, not CA LEV I, and will continue automatically to include amendments and supplements to California's low emissions vehicle program, in accordance with section 1937(a) of the Pennsylvania Statutory Construction Act. The final rulemaking postpones the compliance date of the Pennsylvania Clean Vehicles Program by two years. See response to comment #116.

139. **COMMENT:** The proposed rulemaking should not proceed at this time. A stakeholder process (as included in SB 1025) should be instituted to help analyze state options for meeting air quality standards. SB 1025 also requires DEP to report back to the General Assembly by June 30, 2010. (2439, 2440, 4236)

**RESPONSE:** The Department does not agree. Neither a stakeholder process, nor the schedule in SB 1025, accounts for the timetables of the CAA nor the Commonwealth's regulatory process. Specifically, DEP must submit State Implementation Plan revisions for meeting the eight-hour ozone standard by June 2007 and for meeting the fine particulate standard by April 2008. The stakeholder processes which took place in 1996 and 1997 took more than a year; it took a minimum of one additional year subsequent to those groups submitting recommendations to DEP to finalize recommendations in regulation. Furthermore, this rulemaking is not designed to adopt the California program, since adoption occurred in 1998; rather, it makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references.

140. **COMMENT:** An October 28, 2005 letter from DEP to members of the House of Representatives states that passage of HB 2141 [a bill to abrogate the Pennsylvania Clean Vehicles Program] and repeal of the Clean Vehicles Program "puts us in violation of federal law." Subsequently, DEP changed its argument, conceding that Pennsylvania can in fact maintain the federal Tier II standards but in DEP's view would need additional reductions from stationary sources to meet air quality standard. (2439, 2440)

**RESPONSE:** The statement that repealing the Pennsylvania Clean Vehicles Program would violate federal law and the statement that Pennsylvania has the option to return to the federal new motor vehicles program are not contradictory. Pennsylvania adopted the Pennsylvania Clean Vehicles Program in 1998 and submitted the regulation to EPA as a SIP revision. That SIP revision was effective February 28, 2000. Approval of a SIP by

EPA makes the SIP federally enforceable. In a December 2, 2005 letter to Rep. Richard Geist, EPA Region 3 Administrator Donald Welsh stated that it is the EPA's opinion that the CA LEV standards are "the legally effective program for Pennsylvania" and underscored that the CA LEV standards are a "federally enforceable part of the SIP." This means that federal law needs to be followed if this part of the Commonwealth's SIP is to be changed. The Commonwealth's adoption of California emission standards could not be revoked without holding public hearings on a proposed SIP revision to do so, responding to comments received and submitting the proposed SIP revision to EPA for approval. Just as DEP had the authority in 1998 to choose to adopt the California standards, DEP has the authority to choose to participate in the federal program, but only if these steps are followed.

Pennsylvania is required by the federal CAA to achieve and maintain the national ambient air quality standards in all areas of the state designated as nonattainment. The available emission reduction options are "a shrinking slate," as characterized by Mr. Welsh in the December 2005 letter. Since states do not have many strategies relating to motor vehicles available to them, most of the strategies are indeed reductions from stationary sources.

141. **COMMENT:** A November 1, 2005 email from the PENNDOT Secretary to all members of the General Assembly insinuates that passage of HB 2141 [a bill to abrogate the Pennsylvania Clean Vehicles Program] would jeopardize \$1.6 billion in federal transportation funding. The email failed to include a detailed discussion of the implications of HB 2141, the likelihood of whether the Commonwealth in fact would lose federal funding, or whether the Commonwealth actually relied upon the California vehicle emission standards as part of its SIP compliance strategy. A December 2005 letter from the EPA Region 3 Administrator stated that he believed passage of the bill would not result in application of federal sanctions against the Commonwealth because at present, the Commonwealth's SIP does not rely upon such emission reductions. (2239, 2240)

**RESPONSE:** The interpretation that revocation of the Pennsylvania Clean Vehicles Program might trigger federal sanctions was based upon the fact that the program is a federally enforceable portion of Pennsylvania's SIP. The December letter referenced by the commentators provided a different interpretation of the application of mandatory sanctions under the federal CAA and also indicated that it is unlikely that EPA would impose discretionary sanctions because DEP had not relied upon the benefits of the CA LEV program in its SIP revisions for the one-hour ozone standard. DEP agrees that the emission reduction benefits of the California low emission vehicle program in one-hour ozone SIPs were not relied upon in SIP submissions to date, but DEP has included the benefits in its development of SIP revisions to attain and maintain the eight-hour standard. Pennsylvania will begin submitting these SIP revisions in the fall of this year.

142. **COMMENT:** DEP's preamble touts the California standard as a means of controlling carbon dioxide (GHG) emissions. DEP fails to acknowledge that reduction of carbon dioxide emissions is not a requirement of the SIP or the federal CAA. Further

DEP ignores a September 2003 EPA General Counsel determination that EPA does not have the authority under federal law to regulate motor vehicle emissions of carbon dioxide or other GHGs. (2239, 2240)

**RESPONSE:** This rulemaking does not add the GHG provisions of the California regulations but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The preamble to the proposed regulation stated that California recently added a GHG fleet average requirement to its LEV II program beginning with MY 2009, which will have to be met in California to obtain CARB certification. DEP is not requiring auto manufacturers to meet a fleet average for GHGs based on Pennsylvania sales, but, as stated in the preamble, DEP expects that the Commonwealth will realize the benefits of California's GHG-certified vehicles through the Commonwealth's existing requirement that new vehicles have CARB certification. The preamble explained that California estimates that the program, when fully phased-in, will provide about a 30% reduction in GHG emissions from new vehicles required to comply compared to the 2002 fleet. The Department anticipates that this Commonwealth will achieve similar results. DEP did not state or imply that reducing CO<sub>2</sub> emissions in the Pennsylvania Clean Vehicles Program is a requirement of the SIP or the CAA. DEP does not ignore the September 2003 EPA General Counsel opinion regarding GHGs; to the contrary, the preamble expressly acknowledged that California is currently defending its greenhouse gas regulations against legal challenges filed by the auto industry. EPA's position on regulation of GHGs from motor vehicles is currently under review by the Supreme Court of the United States in the case of *Massachusetts v. EPA*, U.S., No. 05-1120.

143. **COMMENT:** The EQB states that one of the purposes of the proposed regulation is to reduce carbon dioxide. (1268/2857)

**RESPONSE:** DEP disagrees with the comment. This rulemaking does not adopt the Pennsylvania Clean Vehicles Program or add the GHG component; this rulemaking makes changes to the already existing Pennsylvania regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. DEP stated in the preamble that because California had adopted standards to reduce GHGs, the Commonwealth would realize similar benefits.

144. **COMMENT:** States have no statutory authority and are, in fact, expressly prohibited from passing or enforcing any statute or regulation that attempts to reduce carbon dioxide through the regulation of vehicle fuel economy. The National Highway Traffic Safety Administration made such statements in both its proposed and final rule for average fuel economy standards for light trucks. (1265/4241, 3192/4526, 4348/4349 1268/2857)

**RESPONSE:** This rulemaking does not adopt the California regulation but makes changes to the already existing regulations to postpone the program compliance date from

model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The Pennsylvania Clean Vehicles Program does not require automakers to meet the California GHG fleet average based on sales in Pennsylvania. The issue of whether California's GHG regulation attempts to regulate vehicle fuel economy is currently being litigated in federal court in California, in *Central Valley Chrysler-Jeep, Inc. v. Catherine E. Witherspoon*, 1:04-cv-06663-AWI-LJO. If the California regulation is overturned in court, the Commonwealth will not realize GHG benefits from California's GHG provisions. The statements made by the National Highway Traffic Safety Administration were made in a preamble, not a regulation, and do not carry the authority of law.

**145. COMMENT:** The command and control type of regulation adopted in California and under consideration by the EQB stands in sharp contrast to the consumer- and market-oriented approach recently developed in Canada. The voluntary agreement between vehicle manufacturers and the Canadian government to attempt to achieve reductions in CO2 levels in Canada demonstrates nothing about the feasibility or impacts of the California rule. The Canadian rule does not specify limits on any one manufacturer's CO2 and reductions need not be obtained exclusively through emissions of new vehicles. The Department needs to take a position on the significance of the Canadian agreement .(1265/4241, 3192/4526, 4348/4349

**RESPONSE:** This rulemaking does not adopt the California regulation but makes changes to the already existing regulations to postpone the program compliance date from model year 2006 to model year 2008, specify the early credit earning period for automobile manufacturers and update definitions and cross-references. The California regulations were already adopted in Pennsylvania; the Pennsylvania Clean Vehicles Program automatically includes the amendments and supplements to California's low emission vehicle program, in accordance with the Pennsylvania Statutory Construction Act. Pennsylvania does not have the option to participate in the voluntary Canadian agreement for reduction of GHG. The Canadian approach does not provide the public health benefits of the California program from control of NMOG, NOx and toxic pollutants.

Other comments.

**146. COMMENT:** The way to cure the air pollution problem, instead of inspecting the California vehicles that will cost the consumer more money, is to tighten specifications of the dynamometer machines that are in place in the Philadelphia five-county area. (2241, 2242, 2243)

**RESPONSE:** The Pennsylvania vehicle emission inspection program is not the subject of this rulemaking. It should be noted, however, that California vehicles will be able to be tested on the emissions inspection equipment in the 25 Pennsylvania counties in which vehicle emissions testing is required. All states, whether or not they have adopted the California low emission vehicle program, are ensuring that any new on-board diagnostics communications protocols required in California for future model years are

accommodated in their vehicle emission inspection programs, since automakers may be using them in all vehicles.

147. **COMMENT:** A seemingly internal October 27, 2005 email exchange between DEP administrators was leaked by DEP to an activist organization. The email listed large energy generators and manufacturers that would face additional and costly emission restrictions if HB 2141 was enacted. Entities on the list were privately urged to oppose HB 2141 and SB 1025. The email was utilized to browbeat legislators into opposing HB 2141; was never formally or informally shared with legislators by DEP; and contained facilities located in politically targeted regions, not necessarily the largest emitters. (2439, 2440)

**RESPONSE:** To the extent that the Commonwealth can rely on emission reductions from the Pennsylvania Clean Vehicles Program to attain and maintain the health-based ambient air quality standards, the Commonwealth's need to find additional reductions from industry, power plants, commercial operations, consumer activities or other mobile sources of pollution will be reduced. The Department's October 2005 list of largest emitters in the Commonwealth for 2002 was not tailored in any way other than being limited to sources of VOC and NO<sub>x</sub> because these are the ozone precursors. A list of largest emitters of all pollutants (including sulfur oxides and particulate matter) would have differed from this list. The Department also provided a list as requested by the commentators via their December 27, 2005 letter of the top twenty Title V companies for VOC and NO<sub>x</sub> for the most recent year available in response to a December 27 letter from Senators Madigan and White.



**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

This is a list of corporations, organizations and interested individuals from whom the Environmental Quality Board has received comments regarding the above referenced regulation.

- |   |  |  |   |
|---|--|--|---|
| 1. Levana Layendecker<br>Philadelphia PA  | 24. Katherine Paul<br>Philadelphia PA      | 52. David Hersh<br>Philadelphia PA             | 79. Yasmine Wasfi<br>Jenkintown PA                |
| 2. Tim Kelly<br>Philadelphia PA   | 25. Mary Wagner<br>Norristown PA           | 53. Terry Bremer<br>Philadelphia PA            | 80. Noelle Slusarski<br>Ardley PA                 |
| 3. Arthur Stamoulis<br>Philadelphia PA  | 26. Tara Leas<br>East Berlin PA            | 54. Michael Duerr<br>Drexel Hill PA            | 81. Tom Diederich<br>Merion Station PA            |
| 4. Charles Marshall<br>Paoli PA   | 27. Jaffray Edens<br>Chadds Ford PA        | 55. Walter Smith<br>Glenmoore PA               | 82. Rachael Petrozza<br>Bartonsville PA           |
| 5. Emily Linn<br>Philadelphia PA  | 28. Jeanne Cecil<br>Pittsburgh PA          | 56. Matthew<br>Bartholomew<br>Philadelphia PA  | 83. Joseph Werzinski<br>New Hope PA               |
| 6. Kristi Fox<br>Philadelphia PA  | 29. Nancy Reese<br>Pittsburgh PA           | 57. Jennifer Briggs<br>Pittsburgh PA           | 84. Helen Weber<br>Media PA                       |
| 7. Deborah Lyons<br>West Chester PA   | 30. Virginia Cassidy<br>Harleysville PA    | 58. Jean Mansell<br>Willow Grove PA            | 85. Tara Yaney<br>Pittsburgh PA                   |
| 8. Frank Bartell<br>Community College<br>of Phila.<br>Philadelphia PA                         | 31. Kara Hammond<br>Media PA               | 59. Anne Wood<br>Philadelphia PA               | 86. J Rosario<br>jrosario@churchofgo<br>dhome.org |
| 9. Rev. and Mrs.<br>Edward C.<br>Thornburg<br>Presbyterian Church<br>(USA)<br>Philadelphia PA | 32. Elizabeth Prugh<br>Edgeworth PA        | 60. Karen McCann<br>Souderton PA               | 87. Sheila Erlbaum<br>Philadelphia PA             |
| 10. Stanley J. Miller, Jr.<br>Malvern PA  | 33. John T. Maniatis<br>Morrisville PA     | 61. Peter Crownfield<br>Bethlehem PA           | 88. John Ferreira<br>Pittsburgh PA                |
| 11. Janice McGrane<br>sjmcgrane@yahoo.c<br>om   | 34. Joel Hecker<br>Bala Cynwyd PA          | 62. Elizabeth Keech<br>Wynnewood PA            | 89. Mary Angert<br>State College PA               |
| 12. Alice Kelley<br>University of<br>Pennsylvania<br>Philadelphia PA                          | 35. Don Stone<br>Philadelphia PA           | 63. Virginia O'Connell<br>Swarthmore PA        | 90. Stephan Potts<br>Philadelphia PA              |
| 13. Rich Kahmer<br>SPA79810@allstate.<br>com  | 36. Donn Nolan<br>Yardley PA               | 64. Sharna Olfman<br>Pittsburgh PA             | 91. Mary Fineran<br>North Arlington NJ            |
| 14. William H. Ewing<br>Philadelphia PA   | 37. Jason Harkcom<br>Greensburg PA         | 65. T DeAngelis<br>Yardley PA                  | 92. Kevin Jude<br>Philadelphia PA                 |
| 15. Tom Maslanka<br>Ardmore PA  | 38. Daria Hajioannou<br>Riegelsville PA    | 66. Kathy Billig<br>Lancaster PA               | 93. Jason Saylor<br>Liverpool PA                  |
| 16. Scott Alberts<br>Upper Darby PA   | 39. Gail Massey<br>Philadelphia PA         | 67. John Smith<br>Philadelphia PA              | 94. Chris Rickards<br>Pottstown PA                |
| 17. Sarah Singh<br>Bryn Mawr PA   | 40. Helen Kopp<br>Grafton OH               | 68. Lisa Brown<br>Spring House PA              | 95. Katy Ruckdeschel<br>Merion Station PA         |
| 18. Sarah Kolb<br>Philadelphia PA   | 41. Joseph Sweeney<br>Ardmore PA           | 69. Pamela Pike<br>Pittsburgh PA               | 96. Bruce Herring<br>Newtown PA                   |
| 19. Christopher Linn<br>Philadelphia PA   | 42. Sharon Sauro<br>Holland PA             | 70. Wojciech<br>Makalowski<br>State College PA | 97. Carla Garcia<br>Gulph Mills PA                |
| 20. Lisa Lazar<br>Allison Park PA   | 43. Sunshine Stadelman<br>State College PA | 71. Stephen Baker<br>York PA                   | 98. Barbara Docs<br>Revere PA                     |
| 21. Lori WidELITZ-<br>Cavallucci<br>Elkins Park PA  | 44. Mary Madeira<br>Glenside PA            | 72. Susan Rose<br>Rydal PA                     | 99. Jenny Ruckdeschel<br>Haverford PA             |
| 22. Alan Peterson, M.D.<br>Lancaster PA   | 45. Kathy Kifer<br>Royersford PA           | 73. Liz Mengucci<br>Philadelphia PA            | 100. Andrew Bockis<br>Carlisle PA                 |
| 23. Audrey Pancoe<br>Elkins Park PA   | 46. John Duda<br>Malvern PA                | 74. Susan S. Gotwals<br>West Chester PA        | 101. Sidney Goldstein<br>Philadelphia PA          |
|   | 47. Megan Clark<br>Pequea PA               | 75. Thomas Flynn III<br>Malvern PA             | 102. Delia Guzman<br>State College PA             |
|   | 48. Alexandra Kanoff<br>Wynnewood PA       | 76. Jeannine Harris<br>Devon PA                | 103. Barbara Durkin<br>Green Lane PA              |
|   | 49. Debra Langer<br>Pittsburgh PA          | 77. Eugene Aleci<br>Lancaster PA               | 104. Lawrence Coburn<br>Ardmore PA                |
|   | 50. Stephanie<br>McCullough<br>Ardmore PA  | 78. David Housel<br>Narberth PA                | 105. Dawn Serra<br>Riegelsville PA                |
|   | 51. Peter Paige<br>Yardley PA              |  | 106. Pouné Saberi<br>Philadelphia PA              |

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

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| 107. Anita Juni<br>Paoli PA                  | 135. John and Lenore<br>Walsh<br>Olyphant PA | 164. Maria Teresa Saenz<br>Robles<br>Pittsburgh PA | 191. Randi Weinberg<br>Philadelphia PA                               |
| 108. Katherine<br>O'Flanagan<br>Bryn Mawr PA | 136. Stephanie Aguila<br>Collegeville PA     | 165. Alex Van Alen<br>Newtown Square PA            | 192. Gordon N. Fleming<br>Boalsburg PA                               |
| 109. Deborah Wolf<br>Lansdale PA             | 137. James Plowden<br>State College PA       | 166. Shanna Massad<br>Clifton Heights PA           | 193. Daniel Lieberfeld<br>Pittsburgh PA                              |
| 110. Lucy Boyce<br>Port Matilda PA           | 138. Lisa Wetherby<br>Secane PA              | 167. Joe Shirk<br>Pittsburgh PA                    | 194. Fiona Allison<br>West Chester PA                                |
| 111. David Leonard<br>West Chester PA        | 139. Jay Gertzman<br>Philadelphia PA         | 168. Daniel Moyer<br>Kintnersville PA              | 195. Kim Steininger<br>Chadds Ford PA                                |
| 112. Todd Stevenson<br>Budd Lake NJ          | 140. Jay C. Treat<br>Boothwyn PA             | 169. Charles Sprunger<br>Trappe PA                 | 196. Penny Ellison<br>Merion Station PA                              |
| 113. Donna Adamson<br>Curlis<br>Houtzdale PA | 141. Sam Simon<br>Philadelphia PA            | 170. Dave and Maryann<br>Sanner<br>Erie PA         | 197. Barbara Silverstein<br>Mansfield PA                             |
| 114. James R. Moser<br>Philadelphia PA       | 142. E. Kevin McGlynn<br>Flourtown PA        | 171. Kimberly Empson<br>Philadelphia PA            | 198. John MacDonald<br>Levittown PA                                  |
| 115. Lori DeWalt<br>Boyertown PA             | 143. Aniruddha Railkar<br>Ambler PA          | 172. Erica Mensch<br>Bloomsburg PA                 | 199. Carol Clark<br>West Chester PA                                  |
| 116. Michael Long<br>Latrobe PA              | 144. Carol Dole<br>Trooper PA                | 173. Amy Full<br>Indiana PA                        | 200. Deborah Pestrak<br>Narberth PA                                  |
| 117. M. Zoe Warner<br>Wayne PA               | 145. Michelle Robinson<br>Malvern PA         | 174. Chris Cieslak<br>Pittsburgh PA                | 201. Jeanette Wintjen<br>Philadelphia PA                             |
| 118. John and Lenore<br>Walsh<br>Olyphant PA | 146. Clifford Hritz<br>Philadelphia PA       | 175. Alana Balogh<br>Revere PA                     | 202. Christopher Thawley<br>Media PA                                 |
| 119. Jim McGowan<br>Penns Park PA            | 147. Carol Hart<br>Narberth PA               | 176. Susi Godfrey<br>Wayne PA                      | 203. Patricia Parker<br>Lewisburg PA                                 |
| 120. Faith Vis<br>New Milford PA             | 148. Randy Sklar<br>Perkasie PA              | 177. David Pratt<br>Pittsburgh PA                  | 204. Priscilla Mattison<br>Narberth PA                               |
| 121. Gina Makal<br>Pittsburgh PA             | 149. Patrick Grill<br>Mechanicsburg PA       | 178. Brian Gillin<br>Lafayette Hill PA             | 205. Ruth A Rin<br>Wynnewood PA                                      |
| 122. Kelly A. Weinberg<br>Malvern PA         | 150. Ginger North<br>Landenberg PA           | 179. Laurence Buxbaum<br>Lansdowne PA              | 206. Lynn C. Jaeger<br>Roslyn PA                                     |
| 123. Debra Morris<br>Pittsburgh PA           | 151. Mandy Weinberg<br>Holland PA            | 180. Dom Mazzulo<br>Broomall PA                    | 207. Carol Gisselquist<br>Hershey PA                                 |
| 124. Tim Baker<br>York PA                    | 152. Jean Brooks<br>Ardmore PA               | 181. Anne L. Hearn<br>Pottstown PA                 | 208. Joan Werblin<br>Wayne PA  |
| 125. Jennifer Burdick<br>Philadelphia PA     | 153. Mary Shaw<br>Norristown PA              | 182. John Sedia<br>Willow Grove PA                 | 209. Stephen Kunz<br>Phoenixville PA                                 |
| 126. Bill Martin<br>Dallas PA                | 154. Sharon Strauss<br>Philadelphia PA       | 183. Richard Boardman<br>Philadelphia PA           | 210. Jody Roberts<br>Philadelphia PA                                 |
| 127. Erin Bradley<br>Springfield VT          | 155. Brian Steffes<br>Coraopolis PA          | 184. Michelle Pasquino<br>North Huntingdon<br>PA   | 211. Jon Brams<br>Exton PA   |
| 128. James Dougherty<br>Philadelphia PA      | 156. Roger Lund<br>New Oxford PA             | 185. Julia Dewey<br>Harrisburg PA                  | 212. Cynthia Iberg<br>McAlisterville PA                              |
| 129. Kevin Mock<br>Oxford PA                 | 157. Michael Rottinger<br>Wynnewood PA       | 186. Patricia Mensing<br>Plymouth Meeting<br>PA    | 213. Joe Friend III<br>Philadelphia PA                               |
| 130. Monica Baziuk<br>Philadelphia PA        | 158. Erika Floyd<br>Hatboro PA               | 187. Mary Ann Ahearn<br>King of Prussia PA         | 214. Mary Durando<br>New Bolton Center -<br>Upenn<br>Philadelphia PA |
| 131. Jamie Caito<br>Pittsburgh PA            | 159. Hal Lehman<br>Philadelphia PA           | 188. Jay Erb<br>Pottstown PA                       | 215. Richard Zaccone<br>Lewisburg PA                                 |
| 132. David Hunter<br>Chester Springs PA      | 160. Michael Schwarting<br>Malvern PA        | 189. Wolfram Arendt<br>Philadelphia PA             | 216. Sarah Osborne<br>Bala Cynwyd PA                                 |
| 133. Neville Kallenbach<br>Philadelphia PA   | 161. Randall Blackwell<br>Ambler PA          | 190. Kathy DiBiase<br>Sewickley PA                 | 217. Kimberly Clemens<br>Shillington PA                              |
| 134. Erin Casey<br>Philadelphia PA           | 162. Daniel Klein<br>Philadelphia PA         |  | 218. Charles Miller<br>West Chester PA                               |
|  | 163. Dan Kulp<br>Doylestown PA               |  |  |

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

219. Flavia Colgan Wynnewood PA	247. Gail Tunick Lafayette Hill PA	275. Todd Madden Pittsburgh PA	304. Christopher Cretella Bloomsburg PA
220. Christopher Keane Pittsburgh PA	248. H. Campbell New Cumberland PA	276. Sharon Aveni Philadelphia PA	305. Katherine Daley State College PA
221. Vaughan Boleky Utica PA	249. Jerome Grunnagle Pittsburgh PA	277. Nancy Runk Lansdowne PA	306. Jean Wright Hellertown PA
222. Mark Fiorini Blandon PA	250. Michael Drake Elkins Park PA	278. John Sedia Willow Grove PA	307. Barbara Grover Pittsburgh PA
223. Caroline Cahill Philadelphia PA	251. Bruce G. Grimes Sumneytown PA	279. Roman and Evann Garrison New Wilmington PA	308. Jacob Strano State College PA
224. Jerry Tamburino Lords Valley PA	252. Jeanine Vermillion State College PA	280. James Gagne Phoenixville PA	309. Christina Hagan Bangor PA
225. Julie Angel Wyndmoor PA	253. Marlene Stiffler Dillsburg PA	281. Jeannine Petardi Easton PA	310. Julianne Gould Bushkill PA
226. Morgan Plant Carlisle PA	254. Adrienne Greenawalt Pittsburgh PA	282. Linda Leeuwrik Bryn Mawr PA	311. Loree Speedy West Newton PA
227. Franz Birgel Allentown PA	255. William Beeson Harrisburg PA	283. Susan McGarvey Erdenheim PA	312. Soren Meisheid Philadelphia PA
228. John Marchioni Washington Crossing PA	256. Marion M. Kyde Ottsville PA	284. Christina Haas Radnor PA	313. A Moyer Creamery PA
229. Elvia Beach Devon PA	257. David Clawson Pittsburgh PA	285. Victoria Howitz Allentown PA	314. Anna May O'Neill Flourtown PA
230. Beth Lucabaugh Glen Rock PA	258. Peter Commons Philadelphia PA	286. Linda Frye Lock Haven PA	315. Carl Miller Wallingford PA
231. Mustafa Kamal North Wales PA	259. Jeff Abrahamson Philadelphia PA	287. Christina Arlt Lancaster PA	316. Thomas S. Robinson, III Easton PA
232. Rachel Cohen Abington PA	260. April Robinson Malvern PA	288. Jen Morse Pittsburgh PA	317. Kelli Wilson Port Matilda PA
233. Perry Gower Milford PA	261. Marian Demcisak Hatboro PA	289. Joshua Block Philadelphia PA	318. Jessica Likens Los Angeles CA
234. Karen Herbison Macungie PA	262. Karen Brannon- Johnson Landenberg PA	290. Darrin Britting Philadelphia PA	319. Jessica DePete Stroudsburg PA
235. Christine Serbanic Media PA	263. Heather Brinn Haddonfieldn NJ	291. Tom Ganzelli Drexel Hill PA	320. Elaine Deluca Wapwallopen PA
236. Kelly Kurtas Shippensburg PA	264. Matt Quinn Philadelphia PA	292. Robert Botto Philadelphia PA	321. Damon Jones State College PA
237. Sanjeev Surati Wayne PA	265. Karim Aref Downingtown PA	293. Andrew Hunsinger Catawissa PA	322. Sadie White Philadelphia PA
238. Greg McGarvey Levittown PA	266. Jennifer Costello Philadelphia PA	294. Elyse Jurgen Lititz PA	323. Joseph Escher Roslyn PA
239. Clair Arocho Fairless Hills PA	267. Ellie Francis Swarthmore PA	295. Arcenia Rosal Philadelphia PA	324. MaryAnne Sears Drexel Hill PA
240. Rachel McKay Bala Cynwyd PA	268. Richard D. Ludwig East Stroudsburg PA	296. John Yerger State College PA	325. Lesley Fleischman Haverford PA
241. Kelly Singel Pittsburgh PA	269. Dianne Cooper Morgantown PA	297. Jack Wishnow Langhorne PA	326. Emily Escalante Pittsburgh PA
242. Sydney and Margaret Heese Washington Crossing PA	270. Brett Mapp Philadelphia PA	298. Bianca Morales Philadelphia PA	327. Steven Mavros Philadelphia PA
243. Michael McElroy Lansdowne PA	271. Mary Luke West Chester PA	299. Shirley Palmer Hatboro PA	328. Diana Auteri Drexel Hill PA
244. Jesse Brenner Wayne PA	272. Dave Sobal Pittsburgh PA	300. Tony Acquaviva Elmhurst PA	329. William N Whaley Ardmore PA
245. Lorenza Patitucci Philadelphia PA	273. Diana Brueckner Lemont PA	301. Heath Eddy Exton PA	330. Kathleen Schmick Wallingford PA
246. Anthony Barr Claysburg PA	274. Janet MacColl Nicholson Media PA	302. Michelle Warren York PA	331. Nancy Jo Mulry Macungie PA
		303. Ann Conroy Glenside PA	332. Michael Greenle Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

333. Paul Burroughs Fairview PA	362. Libby J. Goldstein Philadelphia PA	390. Anne Riconosciuto Pittsburgh PA	418. Carolyn Lewis Pittsburgh PA
334. Donalee McElrath Port Matilda PA	363. Amanda Esrey Ridley Park PA	391. Gail Harp Bala Cynwyd PA	419. Grace Soltis Blue Bell PA
335. Tom Bissinger Pottstown PA	364. James Hayes Pittsburgh PA	392. Jeff Travis Lafayette Hill PA	420. Eric Salsburg Philadelphia PA
336. Chris Rice Ardmore PA	365. Francisco Escalante Pittsburgh PA	393. Peter Kallin Doylestown PA	421. Tim McIntyre Broomall PA
337. Karen Mauch Philadelphia PA	366. Linda Say Polk PA	394. Suzanne Buller Stockertown PA	422. Daniel Gray Pittsburgh PA
338. Brent & Carli Younce Drexel Hill PA	367. Jack Lebeau Jenkintown PA	395. Sarah Hakala Philadelphia PA	423. Larry Meehan Philadelphia PA
339. Karl Klingmann Downingtown PA	368. Ruth A. Zittrain Pittsburgh PA	396. C. Kate Borger Pittsburgh PA	424. Lucia Dorsey West Chester PA
340. Philip Watt York PA	369. Matt Borden mborden583@aol.com	397. Elizabeth Schlingmann Philadelphia PA	425. Justin DeVore Pittsburgh PA
341. Marla McConnell Philadelphia PA	370. Diane Grant Leola PA	398. Paul T. Wentworth Phoenixville PA	426. Maria Foltz Dauphin PA
342. Dan Herman West Chester PA	371. Joyce Donohue Hallstead PA	399. Michael Balsai Philadelphia PA	427. Anne Ewing Philadelphia PA
343. Joan Welch West Chester PA	372. Kim Brenneman Philadelphia PA	400. Jonathon Reinhardt State College PA	428. Jere Martin Lancaster PA
344. Esther and Harry Buck Chambersburg PA	373. Dennie Baker Warrington PA	401. John Colgan-Davis Philadelphia PA	429. Jeanne Flaherty Upland PA
345. Bruce Birchard Glen Mills PA	374. Amy Guskin Malvern PA	402. Brett Nadan State College PA	430. Matthew Bower Downingtown PA
346. Martha Sharples Haverford PA	375. Gayle Shisler Doylestown PA	403. Sylvia Monogld Kennett Square PA	431. Bridget Salantri Doylestown PA
347. Christina Gubicza Camp Hill PA	376. Eileen Killeen Yardley PA	404. Matthew Zipin Philadelphia PA	432. Cathy Weiss Plymouth Meeting PA
348. Jamie Heimbach Avis PA	377. Amy Pischke Pittsburgh PA	405. Virginia Alpaugh Glenside PA	433. Sara W. Funk Malvern PA
349. Gary Smith Lancaster PA	378. Gertrude Cohen Wynnewood PA	406. William Nelson Wayne PA	434. Kate Shapero Lafayette Hill PA
350. Mary Roman Hershey PA	379. Anne Hoban Newtown PA	407. Joe O'Connor Willow Grove PA	435. Stephanie O'Neill McKenna Upper Darby PA
351. Richard Hoesch Bethel Park PA	380. Andrew Arata Media PA	408. Alice Dubroff Swarthmore PA	436. Alina Macneal Philadelphia PA
352. Ann Holzman Lebanon PA	381. Liz Tymkiw Rosemont PA	409. Shanon Hunt Chalmers Loveland CO	437. Bunny Driban Philadelphia PA
353. Ella Forsyth Carlisle PA	382. Howard Gittler Lords Valley PA	410. Joan Gucken Narberth PA	438. Michele Salsburg Philadelphia PA
354. Bruce Hansen Philadelphia PA	383. Jon-Paul Jaworski Conshohocken PA	411. Terry Schultz Glenmoore PA	439. Chad Murren York PA
355. Betty Loeb Martinsburg PA	384. Brenda Rydstrom Bryn Athyn PA	412. Ethan Klein San Francisco CA	440. Louis Cinquino Bethlehem PA
356. Janey Guidarelli Gibsonia PA	385. Christine DuBois- Buxbaum Lansdowne PA	413. Linda Stiles Pittsburgh PA	441. Norman Carter Philadelphia PA
357. Rodney Saylor Easton PA	386. Charlie Hoyer Tyrone PA	414. Linda Jordan Point Marion PA	442. Craig Duncan Audubon PA
358. Brad Gething State College PA	387. Joan Gordon Pittsburgh PA	415. Paul Albrecht Philadelphia PA	443. Tim Pearce Pittsburgh PA
359. Katie Klingensmith Meadville PA	388. Bernadette Kegelman West Chester PA	416. Erin Dunleavy Jersey Shore PA	444. Lisa Ganzer Buckingham PA
360. Priscilla Laws Carlisle PA	389. Sharon Speerhas Ambridge PA	417. James Madson Philadelphia PA	445. Petra S. Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

446. Louis Holdstock West Chester PA	474. Daniel Sauder Wyomissing PA	501. Suzanne Cresswell West Chester PA	530. Richard Grainer Bethel Park PA
447. Stephen Hopkins State College PA	475. Shelly Lukon Pittsburgh PA	502. Mary Ann Bentz Morrisville PA	531. Barbara McKenzie Philadelphia PA
448. Kelly Riley Hummelstown PA	476. Milton Shapiro Philadelphia PA	503. Carla Stull Lititz PA	532. David Benner New Hope PA
449. Fran Berge Philadelphia PA	477. Charles Grant Hatboro PA	504. Sharon Bleiler Chalfont PA	533. Richard Linsenber Philadelphia PA
450. Sandra Folzer Glenside PA	478. Chad Dougherty Pittsburgh PA	505. J. Alex Cordaro Philadelphia PA	534. Patrick McElhone Pittsburgh PA
451. Benjamin Mudry West Chester PA	479. Jason Perkins Swarthmore PA	506. Lauri Peacock Hobbs NM	535. Peter Foltz Hershey PA
452. Heather Scott State College PA	480. Kris Rust Pittsburgh PA	507. Barbara Mistichelli Rutledge PA	536. Sheila Weinhardt Wyncote PA
453. Martha Straus Oxford PA	481. Blossom Backal Philadelphia PA	508. Merrill C. Horine Lancaster PA	537. Mary Willis Huntingdon Valley PA
454. Ryan and Rebecca Holdstock West Chester PA	482. Cathy Block Furlong PA	509. Robert Deming Villanova PA	538. Toni McIntosh Lansdowne PA
455. Melissa Tesoroni East Stroudsburg PA	483. Mischa Gelman Pittsburgh PA	510. Russ Savit Havertown PA	539. Jarrett Slaughter Philadelphia PA
456. Timothy Westberg Philadelphia PA	484. Suzy Gerst PA PTA Legislative and Advocacy Chairman Philadelphia PA	511. Frank Groll Pittsburgh PA	540. Anuj Gupta Philadelphia PA
457. Kenneth Janosko Pittsburgh PA	485. Michelle Boyle Pittsburgh PA	512. Karen Winey Philadelphia PA	541. Mary Maria Philadelphia PA
458. David and Kaethe Zeamch-Bersin Doylestown PA	486. Pei Ling Chen West Chester PA	513. Gail Schwartzberg Philadelphia PA	542. Sandra Gerhart Sinking Spring PA
459. Shirley Ellsworth Schnecksville PA	487. Roberta Bash Downingtown PA	514. Tracy L. Markland Ambler PA	543. Julie Graf Pittsburgh PA
460. Judith Roberts State College PA	488. Deb Wood Westtown PA	515. Martin Jacobs Fort Washington PA	544. Jennifer Shrewder Gettysburg PA
461. Ruth Finley Malvern PA	489. Kimberly Glovas Holland PA	516. Ashley Meisheid Philadelphia PA	545. Steve Heitzenrater Harborcreek PA
462. Roanna Kong Philadelphia PA	490. Lydia Tackett Philadelphia PA	517. Anna Adamson Pottsville PA	546. Brett Taubman State College PA
463. Shirley Trostle Waynesboro PA	491. Regina Dougherty Conshohocken PA	518. Susanne Iannece Philadelphia PA	547. Ron Edwards Fayetteville PA
464. Sharon Buazard Rockford IL	492. Laura Lind Baltimore MD	519. Gary Dukart Ambler PA	548. Michael Baurer Jenkintown PA
465. Anne Tiracchia Stroudsburg PA	493. Jennifer Hunsinger Catawissa PA	520. Melissa Dyas Bloomsburg PA	549. Pamela Meade Dayton PA
466. Kate Hall Philadelphia PA	494. Barbara Seiple Philadelphia PA	521. Wendy Osher Pittsburgh PA	550. Mitchell Price Saegertown PA
467. Rose Flood Fairless Hills PA	495. Elizabeth Scheer Oreland PA	522. Kevin Scoles Havertown PA	551. Kate Semmens Perkiomenville PA
468. John Neff Abington PA	496. Jeff Ayres North Huntingdon PA	523. Kaaren Lobel Huntingdon Valley PA	552. Eric Palmer Pittsburgh PA
469. Susan Taylor Lancaster PA	497. Julie Rizzo New Milford PA	524. Joan Schmitt Philadelphia PA	553. Jordan Offutt Pittsburgh PA
470. Tennyson Wellman Philadelphia PA	498. Carol Hilton Irvine GA	525. Thomas McKernan Philadelphia PA	554. Kyle Gradinger Philadelphia PA
471. Autumn Thomas Newtown PA	499. Sarah Alessio Pittsburgh PA	526. Donald Sutton Royersford PA	555. Allison Turner Springfield PA
472. Claire Witmer Harrisburg PA	500. Robert O'Connor Pleasant Gap PA	527. Margaret Schiavo Collegeville PA	556. Dawn Scheets Newtown PA
473. Barbara Brigham Philadelphia PA		528. Rick Shiner Pocono Pines PA	557. Carissa Shipman North Wales PA
		529. Thomas Witholt Pittsburgh PA	558. Rhonda Saylor Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

559. Donna Held Pottstown PA	587. Michael Raftogianis Elkins Park PA	615. Henry Frank Philadelphia PA	643. Herbert Bawden Southampton PA
560. Wayne Thompson Frazer PA	588. Richard Shapero Layfayette Hill PA	616. Sarah Coppinger Philadelphia PA	644. Bud & Phyl Morello Abrightsville PA
561. Derek and Amory Stedman Newtown Square PA	589. Robert DuPlessis Philadelphia PA	617. Michelle Minyon Pittsburgh PA	645. Brian Umstead Whitehall PA
562. Ty Bernhard Havertown PA	590. Allie Baurer Jenkintown PA	618. Alison Greifenstein Havertown PA	646. Karen Boujoukos Wexford PA
563. Roy Wetterholt Kennett Square PA	591. David Mertz Sellersville PA	619. Kara Popowich Hellertown PA	647. Marie Gallagher Wyncote PA
564. Jennifer Brackbill Pine Grove Mills PA	592. Marilyn Long Pittsburgh PA	620. Dennis Coffman Harrisburg PA	648. Noel Bednaz Southwick MA
565. Stanley and Judy Miller Pottstown PA	593. KC Carney Pittsburgh PA	621. Pamela Zimmerman Philadelphia PA	649. Winifred Shaw-Hope Wayne PA
566. David A. Walker, Jr. Philadelphia PA	594. Jonathan Kleinman Jenkintown OH	622. Clare Mundell Pittsburgh PA	650. Carol Brown Gettysburg PA
567. Tom Maduzia Philadelphia PA	595. Catherine O'Rourke West Chester PA	623. William Linkenheimer III Pittsburgh PA	651. Nancy Bernstein Pittsburgh PA
568. Christine Ware Narberth PA	596. Anjuli Kronheim King of Prussia PA	624. Ed Barboni Norristown PA	652. Luise Davis Pittsburgh PA
569. Lucinda Rogers Indiana PA	597. Mickey Bannon Pittsburgh PA	625. Joseph Biebel Audubon PA	653. H. P. Denenberg Philadelphia PA
570. Anne Searl Chester Heights PA	598. Tina Shelton Havertown PA	626. Will Galiano Lancaster PA	654. Nancy Vintilla Mt. Lebanon PA
571. Kris Becker Erwinna PA	599. Barbara Bloom Philadelphia PA	627. Charles & Audrey Hois Pittsburgh PA	655. Sherrill Brown Gettysburg PA
572. Lois Hluhan Eighty Four PA	600. Donald Waltman State College PA	628. Lisa Westerterp Philadelphia PA	656. Brett & Cindy Snyder Biglerville PA
573. D. Mettler damettler@aol.com	601. Carol S. Huff Pittsburgh PA	629. Lori Giagnacova Harleysville PA	657. Michelle Gasperine Waterville PA
574. Attila Csokai Pittsburgh PA	602. Levana Layendecker Philadelphia PA	630. David Skellie Erie PA	658. Sue Bumbaugh Cashtown PA
575. Mary Ellen Kendgia Pittsburgh PA	603. Phyllis Anastasio Stackhouse Dresher PA	631. Jan Culton Orrtanna PA	659. Kristi Fox Philadelphia PA
576. D. Deibler Selinsgrove PA	604. Steve Blum Philadelphia PA	632. Chris Striegel Philadelphia PA	660. Mirjana Jelic Hermitage PA
577. Karen L. Montgomery Bethlehem PA	605. Donald Bristol Reading PA	633. Kevin Meehan Newtown Square PA	661. Claire & Lucia Surmik Erie PA
578. Beth Rockwell Erie PA	606. Kevin Ryan Yardley PA	634. Allyson Rogers Glenside PA	662. Lucia Schlossberg Havertown PA
579. Thomas D. Nehrer Brackenridge PA	607. Ellen Smith Havertown PA	635. Tracy Neilson Havertown PA	663. Rochelle Krowinski McKean PA
580. Kathleen Letts Philadelphia PA	608. Lisa Rosenkoetter Carlisle PA	636. Amanda Briggs York PA	664. Dianne Dillman Merion Station PA
581. Edward Thornton Swarthmore PA	609. Lisa Simonetti Toby PA	637. Lawrence Bloom Elkins Park PA	665. Bill Wood Pittsburgh PA
582. Margaret Dillon Kansas City PA	610. Adam Drake Elkins Park PA	638. Kevin Muller Bath PA	666. Yvonne Appeltans Philadelphia PA
583. Helen Pacchione Wyndmoor PA	611. Elaine and Grant Kalson Yardley PA	639. Audrey Jaros Philadelphia PA	667. Maureen Rose PA
584. Jason Gulvas DuBois PA	612. Kara Savastio Downingtown PA	640. Ann Foley Glenside PA	668. Tina Horowitz Philadelphia PA
585. Dave Frohman Carlisle PA	613. Keefe Keeley Swarthmore PA	641. Elsa Kerschner Kunkletown PA	669. Carol Atwell W. Sunbury PA
586. Annie Leary Philadelphia PA	614. Judith Sanders Pittsburgh PA	642. Virginia Arndt Lancaster PA	670. Helen Uhrik Collingdale PA
			671. Dieter Rollfinke Carlisle PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

672. Ruth Davis Waynesboro PA	701. Mike Anderson Pittsburgh PA	730. Elizabeth C. Klimowicz Conshohocken PA	759. Jane Branyan Marysville PA
673. Valerie Glauser Philadelphia PA	702. Kathleen Mackerer Flourtown PA	731. Michael Piersol Sinking Spring PA	760. Julia Dugan Marysville PA
674. Nokomis Patterson Doylestown PA	703. Susan Patrone Philadelphia PA	732. Charles Jacobs Pittsburgh PA	761. Kyle Gracey Johnstown PA
675. George Seman Scranton PA	704. Justin Dula Upper Darby PA	733. Russell Sarkis rgsarkis@yahoo.com	762. Sandra Freid Philadelphia PA
676. Brad Horn Havertown PA	705. Carolyn Freeman Canonsburg PA	734. Dustin Drew Fort Washington PA	763. Ed Kwedar Downingtown PA
677. Carlyn Nelson Hockessin DE	706. Molly Shearer Gabel Good Spring PA	735. Sherri Sternberg Elkins Park PA	764. Meghan Mitzel York PA
678. Kathleen Smedley Haverford PA	707. Julia Sheetz-Willard Bryn Mawr PA	736. Armando Rotondi Pittsburgh PA	765. Thomas Thomassen miltec@online.no
679. Tim Dolan Somerset PA	708. Lori Griffin Kennett Square PA	737. Betty & John Mellor Hatboro PA	766. Peter Doris Philadelphia PA
680. Margarita Rose Kingston PA	709. Michael Lucek Philadelphia PA	738. Katie Ferry Wayne PA	767. Anne Phillips Philadelphia PA
681. Carol Katarsky Philadelphia PA	710. Lisa Mayo Churchville PA	739. Eileen Conner Gillett PA	768. Kevin Scott Philadelphia PA
682. Barbara Thomas Wescosville PA	711. Jon Bjornson Philadelphia PA	740. Eileen Flanagan Philadelphia PA	769. Janet Miller Phialadelphia PA
683. Sarah M Rohan State College PA	712. Wiliam Hollenbach Havertown PA	741. Carol Palmer Collegeville PA	770. Garry Doll Williamsport PA
684. Gregory Pais Trout Run PA	713. Victoria Todd Williamsport PA	742. Jane Ferry Media PA	771. Matt Wrbican Pittsburgh PA
685. Dale Lakatosh Walnutport PA	714. Edward Waxman York PA	743. Carole Markus Pittsburgh PA	772. Amy Shook Glen Mills PA
686. Gary & Juli Delp Sellersville PA	715. Daniel Volz Pittsburgh PA	744. George Heid Pittsburgh PA	773. Rebecca Harris Carnegie PA
687. Barbara Mcllvaine Smith West Chester PA	716. Cadence Anderson Philadelphia PA	745. Helen Appell Indiana PA	774. Robin Harper Wallingford PA
688. Teri Dignazio Oxford PA	717. Frances & William Wisdom Bryn Mawr PA	746. Becky Kadingo King of Prussia PA	775. William Ellsworth Schnecksville PA
689. Robin Schaef Guys Mills PA	718. David Rivers Wyncote PA	747. Madeline Frankel Wellfleet PA	776. Patricia Eyre Berwyn PA
690. Michael Lawlor North Wales PA	719. Elinor Seaman Collegeville PA	748. Brooks Clark West Chester PA	777. Mary D'Aiuto Philadelphia PA
691. Richard S. Boshart Lebanon PA	720. Julie Rivers Julies1225@aol.com	749. Lynne & Bill Starrett Lansdale PA	778. Ryan Smith Pittsburgh PA
692. Patricia Moore Havertown PA	721. Piers Marchant Philadelphia PA	750. Natalie Minkovsky Philadelphia PA	779. Dalene Neopolitan Willow Grove PA
693. Daniel Van Wert Philadelphia PA	722. Steven Prekup Sellersville PA	751. Staci Doss Havertown PA	780. Clare Szilagyi Audubon PA
694. Dorothea Leicher Philadelphia PA	723. James Wray Unionville PA	752. James Parker Lansdale PA	781. Barry Grossman Philadelphia PA
695. Daniel Williams Pittsburgh PA	724. Louis Peirce Erdenheim PA	753. Carol Delaney West Chester PA	782. Tim Kearney Philadelphia PA
696. Anthony Spadaro Philadelphia PA	725. Brian McCullough Morton PA	754. Andrew Dorman Bethlehem PA	783. William Hance Media PA
697. Linda D. Finkelstein Narberth PA	726. Nina Fritsch Philadelphia PA	755. Jocelyn McIntosh Lititz PA	784. Griffith Jones Harrisburg PA
698. Norma Brooks Philadelphia PA	727. Judith LaLonde Havertown PA	756. Howard Seaton Fayetteville PA	785. Robert Steffes Aliquippa PA
699. Stana Lennox Erwinna PA	728. Danielle Wright Philadelphia PA	757. Alan Greenspan Philadelphia PA	786. Beverly Gast Ambler PA
700. Sarah V. Parker Pittsburgh PA	729. Elizabeth Farwell Philadelphia PA	758. Dale Morra Media PA	787. Ellen Perchonock Haverford PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

788. Jed Feffer Laurel MD	817. Jennifer Hess hess.jen@gmail.com	846. Beryl Sternagle Hollidaysburg PA	875. Donna Howarth Newtown Square PA
789. Maggie Levinson Pittsburgh PA	818. Gregory Linn Berwyn PA	847. Robin Imhof Sellersville PA	876. Ben Greenstone Pittsburgh PA
790. Eric Damon Drexel Hill PA	819. Karen Bernard Glenshaw PA	848. Suzanne Seckinger Wynnewood PA	877. Taryn Toma Larksville PA
791. Richelle Luster Philadelphia PA	820. Alida Spry Quakertown PA	849. James Orcutt Oxford PA	878. Jerry Bianco Reading PA
792. Ilene Greenstone Pittsburgh PA	821. Barbara Cicalese Philadelphia PA	850. Trish Lea Glen Rock PA	879. Ken Hull Boalsburg PA
793. Ronald Wagner Boyertown PA	822. Ted Sariyski Dresher PA	851. Khry Myrddin Pittsburgh PA	880. Ronald Jones Newtown Square PA
794. David Simpson Emmaus PA	823. Angela Gillem Philadelphia PA	852. Anna Weisberg Philadelphia PA	881. Joanne Stearns Wynnewood PA
795. Joseph Tesoroni East Stroudsburg PA	824. Kathleen Zunic Allentown PA	853. Mark Gillespie Bloomsburg PA	882. Joshua Andrzejewski Levittown PA
796. Joyce Remillard Ebensburg PA	825. Lloyd Curt Mangel III Philadelphia PA	854. Liz Mackenzie Philadelphia PA	883. Kristin Dormuth Lafayette Hill PA
797. Jonathan Aldrich Pittsburgh PA	826. Stephanie Genovese Port Matilda PA	855. Amy Freeman Philadelphia PA	884. Mary E. Corbett Philadelphia PA
798. Wendy & Edward Aughe Perkasie PA	827. Cecilia Sheehan Abington PA	856. Kevin Gallagher Philadelphia PA	885. Amy Weigand Ardmore PA
799. William Daniels Lancaster PA	828. Bonnie De Bold York PA	857. Ellen Poist Philadelphia PA	886. Ann Cohen Philadelphia PA
800. Shively shively@iup.edu	829. Janice Maulick Wyomissing PA	858. Jason Kopanic Ambler PA	887. Kathy Everett Carlisle PA
801. Shannon Null Grove City PA	830. Barbara Likens Yardley PA	859. Leslie Gall Glenmoore PA	888. Eric Miller Pittsburgh PA
802. Robert Kettell Philadelphia PA	831. Chuck & Erin Wilkinson Horsham PA	860. David Gurule Red Lion PA	889. Brian Revak Fayette City PA
803. Selena Spry Quakertown PA	832. Sandra DeSmedt Boonton NJ	861. Margaret Harrison Philadelphia PA	890. Ed Harkins Philadelphia PA
804. Rachsl Steffan Whiteford MD	833. Grace Pasquarello Phelps KY	862. Adele Bon-Shannon Center Valley PA	891. Carl Denlinger Philadelphia PA
805. Wilma Beacher Exton PA	834. Suzanne Cubbison Pittsburgh PA	863. Janet Jones Downingtown PA	892. Vince Pettinato Upper Moreland Twp. Parks & Rec. Advisory Board Philadelphia PA
806. Sharon Levin Elkins Park PA	835. Marcia Angermann New Hope PA	864. Antoinette Munafo Wallingford PA	893. Mandy Gaydash Pittsburgh PA
807. Paul Rosier Wallingford PA	836. Peter Stone Bethlehem PA	865. Linda Curry Perkasie PA	894. Meghan Coyle Wyomissing PA
808. Rosemary Colson Philadelphia PA	837. Anne Jackson Morgantown PA	866. Alice Seidel Malvern PA	895. Eileen M. Andrzejewski Levittown PA
809. Henry Rhoads Audubon PA	838. Greg Pasquarello Phoenixville PA	867. Angela Ludovici Philadelphia PA	896. Milton Alter MD PhD Wynnewood PA
810. Hazel Cope copes@verizon.net	839. Carol A. Little Kennett Square PA	868. Pat Boyce Philadelphia PA	897. Patricia St. Georges Glenmoore PA
811. Anne Stullken Sewickley PA	840. David Forde, Jr. Philadelphia PA	869. Margaret Duda State College PA	898. Amanda Battisti Kennett Square PA
812. Lisa Martinko Wynnewood PA	841. Brad Nahill Lower Gwynedd PA	870. Maureen Cotton Oil City PA	899. A. Brennan Philadelphia PA
813. Carl Kugel Pacific Palisades CA	842. Toni McIntosh Lansdowne PA	871. Margaret Collins Scranton PA	900. Deborah Myers Middleburg PA
814. Betty C. Ruz Erie PA	843. Carol Bertrand Audubon PA	872. Paul Pasles Villanova University Philadelphia PA	901. Carrie Wilson Dallas PA
815. Jeremiah Blatz Pittsburgh PA	844. Jeff Landis Jenkintown PA	873. Linda Roosa Center Valley PA	
816. Holly Williams Lancaster PA	845. Jane L. Hutton Pittsburgh PA	874. Joan Fabrega Pittsburgh PA	



**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

902. Adam Kapp West Chester PA	931. Alex McConaghy Philadelphia PA	958. Atsuko Lin Plymouth Meeting PA	986. Derek Markley York PA
903. Edward Harkins Philadelphia PA	932. Harry and Esther Buck Chambersburg PA	959. James H. Fitch Pittsburgh PA	987. Meghan Mitzel York PA
904. John Redmon Middletown PA	933. Garry Garry Williamsport PA	960. Tim McDougall Quakertown PA	988. Ken Hull Boalsburg PA
905. Clay Reed Manville NJ	934. Mark Fiorini Blandon PA	961. Tim Ifill Philadelphia PA	989. Stephen Baker York PA
906. Steven Bielinski Scranton PA	935. Brian Fink Brooklyn NY	962. Eileen Conner Gillett PA	990. Diane Selvaggio Gibsonia PA
907. Nancy Grundman Pittsburgh PA	936. Hal Lehman Philadelphia PA	963. Rebecca Neborsky Philadelphia PA	991. Bryan Murphy Souderton PA
908. Jake Witherell Mars PA	937. Steve Lindsay Havertown PA	964. William Turner Dillsburg PA	992. Kim Eisen Doylestown PA
909. Andrew Dorman Bethlehem PA	938. Barbara Litt Pittsburgh PA	965. Aaron Warren Scarsdale NY	993. Lucy Horton Allentown PA
910. Daryl Rice Perkasie PA	939. Christopher Luczkowiak Wind Gap PA	966. Francis Mercier Philadelphia PA	994. Lisa Marie Keech Turtlepoint PA
911. William Mellon Collingdale PA	940. Bob Flatley Kempton PA	967. Anni Frick Chambersburg PA	995. Brian Henderson Pittsburgh PA
912. Patience Sharp Edinboro PA	941. Renee Adam Kutztown PA	968. Jerry Tamburino Hawley PA	996. Jeannine Petardi Easton PA
913. Elaine Rubinstein Pittsburgh PA	942. Anna Haughwout White Oak PA	969. Marianne Amspacher Glen Rock PA	997. Mollie Harms Lewisburg PA
914. Martin Gromulat Harrisburg PA	943. James Mayer Haverford PA	970. Rebekah Goodwin Harrisburg PA	998. John G. Lentz Orefield PA
915. Michael Frailey Lancaster PA	944. Phyl Morello Albrightsville PA	971. Jacqueline Magness State College PA	999. Gregory Pais Trout Run PA
916. Mary Ann Baron Philadelphia PA	945. Sharon & Tony Capobianco South Park PA	972. Carl Kugel Pacific Palisades CA	1000. Brett Nadan State College PA
917. Audrey Summa Scranton PA	946. Ann Kiefer Chalfont PA	973. Jennifer Layman Pittsburgh PA	1001. Melissa Dyas Bloomsburg PA
918. James M. Rogers Indiana PA	947. Steven Patterson Sunbury PA	974. Melissa Tesoroni East Stroudsburg PA	1002. Margaret S. Maurin Bryn Mawr PA
919. Juliana Brafa Winfield PA	948. Linda Sopp Coal Township PA	975. Ronald Freed Carlisle PA	1003. Jane Malyn Radnor PA
920. Anne Stocker Kutztown PA	949. Joe Shaw Quakertown PA	976. Jay Angert State College PA	1004. Richard Yowell Horsham PA
921. Eileen McElhone Pittsburgh PA	950. Maria Evers Pittston PA	977. D. Deibler Selinsgrove PA	1005. Rosemary Reshetar New Hope PA
922. Dawn Gilliland Bensalem PA	951. William Sayenga Fayetteville PA	978. Judy Sereni Merion Station PA	1006. Lisa Snell Carlisle PA
923. Brian Reed Manville NJ	952. Jacquelynne M. Lapitsky Camp Hill PA	979. Meghan Mazick Hershey PA	1007. Albert M Comly Jr. Ambler PA
924. Kelly Riley Hummelstown PA	953. John Fowler Newtown PA	980. Joanne Feldman State College PA	1008. Peter Black Bellevue PA
925. Carol F. Hershey Pittsburgh PA	954. Terrence E. Fahy Abington PA	981. Kathleen Smith Cheswick PA	1009. Shawn Radcliffe Media PA
926. William Willis Mercersburg PA	955. Mary Mesaros Allentown PA	982. Joanna Karraker Philadelphia PA	1010. Josh Whitcraft Pittsburgh PA
927. Kyle Gracey Johnstown PA	956. Curtis Johnson Fairless Hills PA	983. Kelly Riley Hummelstown PA	1011. Anita Rinehart New Freedom PA
928. Patrick Joseph Mahoney Nicholson PA	957. Richard Voldstad Kennett Square PA	984. Lee Ann Draud Philadelphia PA	1012. Jennifer Ray Philadelphia PA
929. Lindsay Chamberlain Bound Brook NJ		985. Vaughan Boleky Utica PA	1013. Mary Lois B. Eberle Gwynedd PA
930. Jeffrey Campbell Pittsburgh PA			1014. Michelle Gasperine Waterville PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1015. Ethan Lavine Johnstown PA	1043. Heather Brinn Haddonfield NJ	1071. E. Bryan Crenshaw III Philadelphia PA	1099. Rev. Gordon Hills Pittsburgh PA
1016. Rachel Sanders Whitehall PA	1044. Kevin Meehan Newtown Square PA	1072. Virginia Harden Middletown PA	1100. Shuvya Arakali Allentown PA
1017. Peggy Maloof Montrose PA	1045. Pamela Fritzsche Coatesville PA	1073. Noel A. Bednaz Southwick MA	1101. Sharon Buazard Rockford IL
1018. M. H. Martin mhmartin8@yahoo.com	1046. Alexander Hallowell Saint Davids PA	1074. Angie Halaja- Henriques Harrisburg PA	1102. Rachel Collins Philadelphia PA
1019. Katherine Cunningham Pittsburgh PA	1047. Charles Millman Plymouth Meeting PA	1075. Sheri Young Kennett Square PA	1103. Terrence McManus Pittsburgh PA
1020. Alexander Panis Moon Township PA	1048. Merryl Gladstone Philadelphia PA	1076. Lucy Boyce Port Matilda PA	1104. Agnes Brennan Dallas PA
1021. Sean V. Howard Indiana PA	1049. Valerie Dorn Folcroft PA	1077. Miriam Berrigan Allentown PA	1105. Ray Jones Carlisle PA
1022. Garry Doll Williamsport PA	1050. David Roy Royersford PA	1078. Howard Rife Reading PA	1106. Don Bradley Havertown PA
1023. Krysten Jones Langhorne PA	1051. David Hrobuchak Harrisburg PA	1079. Greg Bear Carlisle PA	1107. Peter Stone Bethlehem PA
1024. Alberta Kateiva Roslyn PA	1052. Karen Salvadore Fort Washington PA	1080. Barbara Benson Coopersburg PA	1108. Diane Redner Churchville PA
1025. Helen Magnavita Slatington PA	1053. Jill Henke Columbia PA	1081. Emily Davis Meyers Philadelphia PA	1109. Ann Bruner Berrysburg PA
1026. Suzanne Hall Mont Alto PA	1054. Guy Gray Bethlehem PA	1082. Paul Stocker Bethlehem PA	1110. Auden Thomas Harrisburg PA
1027. R. Renee Dolney Pittsburgh PA	1055. Louis DeJoseph Wayne PA	1083. Karen Barbi Indiana PA	1111. Jeanine Vermillion State College PA
1028. Dennis Coffman Harrisburg PA	1056. Burr McFarlane Hershey PA	1084. Susan Charles Camp Hill PA	1112. Chris Hudock Bethlehem PA
1029. Kathryn Churi Philadelphia PA	1057. George Madeira Wyndmoor PA	1085. Justin Dula Upper Darby PA	1113. Jerry Wilson Bethel Park PA
1030. Betty Montana Lansdale PA	1058. Rosemarie McShane Pittsburgh PA	1086. Krista Kahler Philipsburg PA	1114. Donna Allen Trafford PA
1031. Kim Merville Pittsburgh PA	1059. Karl Krohn Reading PA	1087. Craig Conn Pittsburgh PA	1115. Meredith Stone Philadelphia PA
1032. Daniel Costanza Collegetown PA	1060. Daniel Shively Indiana PA	1088. Karen Barbi Indiana PA	1116. April Reiss Quakertown PA
1033. Phil Roberts State College PA	1061. Emily Middlecamp Emmaus PA	1089. Howard Seaton Fayetteville PA	1117. Karen Peterson Pittsburgh PA
1034. Mary Fineran North Arlington NJ	1062. Charile Miller West Chester PA	1090. Grace Pasquarello Phelps KY	1118. Bronwen Thompson Lititz PA
1035. Heather Ambrose Leesport PA	1063. Mike Elliot Irwin PA	1091. Paulette Schreiber Kersey PA	1119. Mary Little Brownsville PA
1036. Matthew Mizdail Emmaus PA	1064. Frank Bartell Philadelphia PA	1092. Karen Rudy New Cumberland PA	1120. Deborah Kauffman State College PA
1037. Jean Scherfcunningham Hatboro PA	1065. Coralee Dixon Philadelphia PA	1093. Mark Helman Perkasie PA	1121. Philip Maffei Wynnewood PA
1038. Amber Messer Jefferson PA	1066. Kent James Washington PA	1094. Chara Armon Havertown PA	1122. Robert Maffei Wynnewood PA
1039. Bryn Richard Morton PA	1067. Jason Phillips East Stroudsburg PA	1095. Susan Kreider Philadelphia PA	1123. Kathryn Maffei Wynnewood PA
1040. Claire B. Saalbach Pittsburgh PA	1068. Marie Fisher Telford PA	1096. Danielle Hardoon Philadelphia PA	1124. Barbara Pugliese Sharpsburg PA
1041. Nick Sabetto Fort Loudon PA	1069. Donald Waltman State College PA	1097. Ryan Delaney Pittsburgh PA	1125. Karen Wood- Campbell Pittsburgh PA
1042. Mary Jean Maxwell Pittsburgh PA	1070. Matthew Allenbaugh Creekside PA	1098. Zachry Warren Levittown PA	1126. Heather Jensen Ambler PA
			1127. Virginia Melick Doylestown PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1128. Brinton Culp Lititz PA	1157. Emily Paulus Tannersville PA	1184. Matthew Piltch Bryn Mawr PA	1213. Lynn Mather Philadelphia PA
1129. Gregory Hess Wayne PA	1158. Mary Kane Chester Springs PA	1185. Meghan Stevenson- Krausz Wynnewood PA	1214. Annette Ballard Philadelphia PA
1130. Rebecca Denison Philadelphia PA	1159. Jon Levin Macungie PA	1186. Mary Beth Castillo Steelton PA	1215. Heather Ehrlich Penllyn PA
1131. Beth Daubert Northampton PA	1160. Steven Patterson Sunbury PA	1187. Alec Faggen aleceff@aol.com	1216. Bruce Arkwright, Jr. Erie PA
1132. Justin Corvino Coopersburg PA	1161. Dan Poresky Allentown PA	1188. Nicole Bloom Houtzdale PA	1217. Evelyn Hutchinson Bryn Mawr PA
1133. Benita J. Campbell Burgettstown PA	1162. Hal Lehman Philadelphia PA	1189. Mark Russo Wayne PA	1218. Malcolm B. Seaholm Pittsburgh PA
1134. John Dziak State College PA	1163. Adam Eyring Philadelphia PA	1190. Seth Holzman Ardmore PA	1219. Suzanne Flood Pittsburgh PA
1135. Margaret Troha Pittsburgh PA	1164. Janice Milburn Ligonier PA	1191. Alex Gamburg Berwyn PA	1220. Rose Evosevic Pittsburgh PA
1136. Suzanne Seppi GASP Philadelphia PA	1165. Michael Mueller Greenville PA	1192. Tom Bruner Berrysburg PA	1221. Richard Wodzinski Munhall PA
1137. Rachel Filippini Export PA	1166. Nathan Bronstein Ardmore PA	1193. Tim Kelly Philadelphia PA	1222. Anne and Ken Rawson Swarthmore PA
1138. Heather Sage Pittsburgh PA	1167. Steve Karas karas [gbh65@verizon.net]	1194. Carla Tayoun Lansdowne PA	1223. Ellen Zaleta Philadelphia PA
1139. Rachel Martin Pittsburgh PA	1168. Julia Kalloz Gettysburg PA	1195. Carissa Shipman North Wales PA	1224. Joel Hecker Bala Cynwyd PA
1140. Steve Karas Pittsburgh PA	1169. Paul Davis Pittsburgh PA	1196. Sean Jacobs Philadelphia PA	1225. Lisa Corrado Claymont DE
1141. Donald Gibbon Pittsburgh PA	1170. Marcia Hole Radnor PA	1197. David Mindel Jenkintown PA	1226. Adam Eyring Philadelphia PA
1142. Andrea Boykowycz Pittsburgh PA	1171. Emma Jo Phipps Upper Darby PA	1198. Rajpal Malik Philadelphia PA	1227. Kevin Rayph West Chester PA
1143. Brian G. Ramsey Pittsburgh PA	1172. Catherine Zeldman Pittsburgh PA	1199. Christopher Linn Philadelphia PA	1228. Carol Seeley Brookhaven PA
1144. Joseph Shirk Pittsburgh PA	1173. Sharon Gross Collegeville PA	1200. Charles Marshall Paoli PA	1229. Judith Moffett Swarthmore PA
1145. Al Bennett Castle Shannon PA	1174. Vivek Stalam Bryn Mawr PA	1201. Julie Chadwick Wilmington DE	1230. Emily Bittler Easton PA
1146. Liz Hughes Pittsburgh PA	1175. Bradley Harris Narberth PA	1202. Leesa Portale Wilmington DE	1231. Elise Annunziata Philadelphia PA
1147. Laryn Finder Pittsburgh PA	1176. Donna Kilgore Lititz PA	1203. Deane Rosen Philadelphia PA	1232. Lois Sellers Springfield PA
1148. Janice Hodge Verona PA	1177. gkovacovsky@yahoo.com	1204. Jesseca Davis Philadelphia PA	1233. Eric Wagner Media PA
1149. Nancy Bocchino Haverford PA	1178. Charles Alan Yurek Alan Yurek [alan1234cy@yahoo.com]	1205. Donald Williams Philadelphia PA	1234. Meghan Ganser Philadelphia PA
1150. Thomas Ippolito Chester Springs PA	1179. Alex Severance Wayne PA	1206. Martin Gromulat Harrisburg PA	1235. Michael Burri Bala Cynwyd PA
1151. Norman Hanson Edinboro PA	1180. Robert Drummond Broomall PA	1207. Maurine Devine Narberth PA	1236. John H. Barnes Harrisburg PA
1152. James Butt Cheltenham PA	1181. Molly Cousins Wallingford PA	1208. Bradley Layton Havertown PA	1237. Jim Kippen Wyndmoor PA
1153. Barbara Mathers Newtown Square PA	1182. Emily White Wayne PA	1209. Nancy Shaw Havertown PA	1238. Eric Stone Pittsburgh PA
1154. Josh Roseboro Bensalem PA	1183. Mike Reinert State College PA	1210. Sara Steele Philadelphia PA	1239. Sarah Kinner York PA
1155. Tom Butler Chambersburg PA		1211. Evelyn Reitz Lansdale PA	1240. Kathy Welsh Harrisburg PA
1156. David Popkin Yardley PA		1212. Mara Natkins Philadelphia PA	1241. Myra Vallianos Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1242. Clarence Burgher  
Linden PA

1243. Paula Stackonis  
Gilbertsville PA

1244. Victoria Ferguson  
Philadelphia PA

1245. Mark Merdinger  
Allentown PA

1246. Chelsea Johnson  
Philadelphia PA

1247. FaJoy@aol.com

1248. Gina Arasin  
Paoli PA

1249. Libby Frank  
Philadelphia PA

1250. B Soltis  
Philadelphia PA

1251. Estella M. Elesh  
Merion PA

1252. David Elesh  
Merion PA

1253. Marion Meyer  
Wayne PA

1254. Emily J. Barnhart  
Wyncote PA

1255. Commale@aol.com

1256. J. Lucas Elrath  
Philadelphia PA

1257. Richard Metz  
Erdenheim PA

1258. Vivian Schatz  
Philadelphia PA

1259. Anna Mindel  
Jenkintown PA

1260. Freyda Black  
Cheltenham PA

1261. Nancy Parks  
PA Sierra Club  
Philadelphia PA

1262. Rev. Sandra Strauss  
PA Council of  
Churches  
Philadelphia PA

1263. Michael Fedor  
PA League of  
Conservation Voters  
Philadelphia PA

1264. Kevin Stewart  
American Lung  
Association of PA  
Philadelphia PA

1265. Greg Dana  
Alliance of  
Automobile  
Manufacturers  
Philadelphia PA

1266. Jan Jarrett  
PennFuture  
Philadelphia PA

1267. Kim Anderson  
Dillsburg PA

1268. Ted Leonard  
PA AAA Federation  
Philadelphia PA

1269. Jeff Schmidt  
Shermansdale PA

1270. James Elliott  
Camp Hill PA

1271. Joel Toluba  
Harrisburg PA

1272. Holly Williams  
Lancaster PA

1273. Mary Hoffman  
Harrisburg PA

1274. Anna Emers  
Harrisburg PA

1275. John Lenahan  
Camp Hill PA

1276. Jessica Van Antwerp  
Northampton PA

1277. Jason Van Velsor  
State College PA

1278. Anusha  
Balasubramanian  
Pittsburgh PA

1279. David Orenstein  
Pittsburgh PA

1280. Gary Gill  
Lewistown PA

1281. Michael Hackman  
Paoli PA

1282. Janie Richardson  
Jersey Shore PA

1283. Saul Flieder  
Hatboro PA

1284. Virginia Cassidy  
Harleysville PA

1285. Wade Berrettini  
Philadelphia PA

1286. Sam Simon  
Philadelphia PA

1287. Shawn Radcliffe  
Media PA

1288. Karen Elias  
Lock Haven PA

1289. Marylou Gross  
Norristown PA

1290. Shawnya Calp  
Hanover PA

1291. Kimberly Clemens  
Shillington PA

1292. J. Alex Cordaro  
Philadelphia PA

1293. John Disston  
Philadelphia PA

1294. Melissa Dyas  
Bloomsburg PA

1295. Bruce G. Grimes  
Sumneytown PA

1296. Karl Jones  
narberth PA

1297. Lisa Bain  
Elverson PA

1298. Allison Karpyn  
Wallingford PA

1299. Tobiah Horton  
Philadelphia PA

1300. Quentin Wenzel  
Stroudsburg PA

1301. Charles  
Bartholomew  
Southeastern PA

1302. Mickey Bellet  
State College PA

1303. Bryn Richard  
Morton PA

1304. Ajayi Harris  
Philadelphia PA

1305. Jane Marron  
Malvern PA

1306. Bruce Freedman  
Merion Station PA

1307. Jeff Abrahamson  
Philadelphia PA

1308. Laurence Kruckman  
Indiana PA

1309. Anne Mascelli  
State College PA

1310. Erica Tschanz  
Philadelphia PA

1311. Chelsea Martin  
Dallas PA

1312. Daniel Licht  
Wallingford PA

1313. Karl Schreiter  
Conshohocken PA

1314. Karen Brandes  
State College PA

1315. Cheri Petrovich  
Gibsonia PA

1316. Christine Kling  
Schwenksville PA

1317. Edmund Weisberg  
Philadelphia PA

1318. Scott Carlton  
Stroudsburg PA

1319. Jason Caslavka  
Philadelphia PA

1320. Bernadette Szekeres  
Harleysville PA

1321. Rachel Buchman  
Furlong PA

1322. Marilyn Toole  
Radnor PA

1323. Terese M. Terry  
Washington  
Crossing PA

1324. Gabrielle Brick  
Philadelphia PA

1325. Charles Armstrong  
Chambersburg PA

1326. Kay Gering  
Morrisville PA

1327. Deborah Myers  
Middleburg PA

1328. Elizabeth A. Williams  
Philadelphia PA

1329. Nancy Hartsock  
Upper Darby PA

1330. Richard Boardman  
Philadelphia PA

1331. Joseph Werzinski  
New Hope PA

1332. June Edwards  
Pittsburgh PA

1333. Kevin Ryan  
Yardley PA

1334. Charles Fischer  
Philadelphia PA

1335. Wilburn Hayden  
Pittsburgh PA

1336. Stephan Potts  
Philadelphia PA

1337. Newman Quach  
Philadelphia PA

1338. Claire Birney  
Chatham PA

1339. Betty Kunze  
Pittsburgh PA

1340. Kelly Stoner  
Hudson OH

1341. William Reyes  
Philadelphia PA

1342. Jill Katherine Smith  
Chalfont PA

1343. David Benner  
New Hope PA

1344. Sarah Gelles  
Philaelphia PA

1345. Barbara Solarz  
Swarthmore PA

1346. Trish & Patricia Fries  
Philadelphia PA

1347. Stephen Baker  
York PA

1348. Mark Allain  
Wyomissing PA

1349. Susan Mazus  
Harrisburg PA

1350. Alex Wing  
Oakmont AL

1351. Christine Kitchen  
Bellefonte PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1352. Kate Cassidy Philadelphia PA	1379. Jean Forsberg Julian PA	1406. Yasmine Wasfi Jenkintown PA	1434. Denise Gurz Scranton PA
1353. M. Zoe Warner Wayne PA	1380. Katherine Straub Selinsgrove PA	1407. Alana Balogh Revere PA	1435. Brett & Cindy Snyder Biglerville PA
1354. Sharon Johnson- Cramer Lewisburg PA	1381. Maren Cooke Pittsburgh PA	1408. Mary Frances Baugh Fairview PA	1436. David Cope Philadelphia PA
1355. Sheri Cramblit Pittsburgh PA	1382. Margaret Murphy Washington Crossing PA	1409. Jane Kronick Haverford PA	1437. Linda Say Polk PA
1356. Dean Kline Philadelphia PA	1383. Kim Wright Berwyn PA	1410. Julie Staroschuck Pittsburgh PA	1438. Walter Garvin Bethlehem PA
1357. Pierce Bounds Carlisle PA	1384. Kathleen M. Beaver, M.D. Philadelphia PA	1411. Phyllis Anastasio Stackhouse Dresher PA	1439. Wayne Laubscher Lock Haven PA
1358. Brian Okey Indiana PA	1385. Dana Herman Pittsburgh PA	1412. Ozzie Perez Philadelphia PA	1440. Linda Shanahan Doylestown PA
1359. Paul Meister State College PA	1386. Richard D. Ludwig East Stroudsburg PA	1413. John Sedia Willow Grove PA	1441. JoAnne Matty Exton PA
1360. Demie Kurz Glen Mills PA	1387. Rita Kehoe Philadlephia PA	1414. Mary Volpe Newtown PA	1442. Matt Borden mborden583@aol.com
1361. Suzanne V. Bernhardt Bryn Athyn College Philadelphia PA	1388. Ronald Miros Malvern PA	1415. Daniel Volz Pittsburgh PA	1443. Andrea Karsh Pittsburgh PA
1362. Nancy Jo Mulry Macungie PA	1389. Tennyson Wellman Philadelphia PA	1416. Kimberly R. Empson Philadelphia PA	1444. David Shoemaker Quakertown PA
1363. Jonathan Frank Lancaster PA	1390. Anita Bower Nottinagham PA	1417. Betsy Ragan Allentown PA	1445. Dan Herman West Chester PA
1364. Michael Pfeiffer Narberth PA	1391. Laura Van Velsor State College PA	1418. Lisa Mayo Churchville PA	1446. Kathleen Vagnoni Chalfont PA
1365. Dave Carr Pittsburgh PA	1392. David Twining Carlisle PA	1419. Sherrill Brown Gettysburg PA	1447. Betsy and Elizabeth Moore Berwyn PA
1366. Lisa Sayre Downingtown PA	1393. Stefanie Chitester Columbus PA	1420. Joe Friend III Philadelphia PA	1448. Rita Hawrot Bridgeville PA
1367. David Aiken Philadelphia PA	1394. Suzy Gerst PA PTA Legislation and Advocacy Chairman Philadelphia PA	1421. Heather Alt State College PA	1449. Robin Stelly Yardley PA
1368. Michael Piersol Sinking Spring PA	1395. Rebecca Stetser Pittsburgh PA	1422. Ruth A. Rin Wynnewood PA	1450. Jon Brams Exton PA
1369. Bernadette Kegelman West Chester PA	1396. Dale Dye Wyndmoor PA	1423. Christopher Clements Media PA	1451. Eizabeth Hancox Elverson PA
1370. Marybeth Panaro Devon PA	1397. Marna Sternbach Philadelphia PA	1424. Kelli Wilson Port Matilda PA	1452. Heather Hurlock Pottstown PA
1371. Juliet Waldron Hershey PA	1398. Martha Perkins Swarthmore PA	1425. Carol Brown Gettysburg PA	1453. James Eadie Greencastle PA
1372. MaryAnne Sears Drexel Hill PA	1399. Jennifer Schreiter Conshohocken PA	1426. Auden Thomas, Ph.D. Harrisburg PA	1454. Jane Kauer Philadelphia PA
1373. Alex Horn Philadelphia PA	1400. Terry Clemons Doylestown PA	1427. Anne McCoy Philadelphia PA	1455. Sheila Erlbaum Philadelphia PA
1374. Vaughan Boleky Utica PA	1401. Eric Corson Philadelphia PA	1428. Douglas Martínez Lansdale PA	1456. Harmon Zuckerman Philadelphia PA
1375. Jessica Chamberlin Philadelphia PA	1402. Jennifer Costello Philadelphia PA	1429. William Goldsmith Philadelphia PA	1457. Matthew Bower Downingtown PA
1376. Joe McLoughlin Drexel Hill PA	1403. Barton French Pittsburgh PA	1430. Alice Dubroff Swarthmore PA	1458. David Rogers Wayne PA
1377. Gayle Shisler Doylestown PA	1404. Michael Lillys Ardmore PA	1431. Emily Schiller Philadelphia PA	1459. Helen Cleaver Orangeville PA
1378. Joel Hecker Bala Cynwyd PA	1405. Rosemary Colson Philadelphia PA	1432. Kelly Vresilovic Ardmore PA	1460. David Fleece Philadelphia PA
		1433. Anne Riconosciuto Pittsburgh PA	1461. Richard Pearce Jenkintown PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1462. Candie Wilderman Shermans Dale PA	1491. Amy Chalmers Sewickley PA	1520. Carol Morotti-Meeker Glenside PA	1547. Barb Lupica Newtown PA
1463. Alexandra Gruskos Pittsburgh PA	1492. Tod L. Benedict West Chester PA	1521. Helyn Whitman Collegeville PA	1548. Linde Fiore Newtown Square PA
1464. Karen Davish Quakertown PA	1493. Mickey Bannon Pittsburgh PA	1522. Stacey Daman Elkins Park PA	1549. Todd Stevenson Bethlehem PA
1465. Cynthia Iberg McAlisterville PA	1494. Kathy Everett Carlisle PA	1523. Kimberly Walker Carlisle PA	1550. George Heid Pittsburgh PA
1466. Kelly Riley Hummelstown PA	1495. Daniel Kuestner Jamison PA	1524. Niamh Gallagher Villanova University Philadelphia PA	1551. Michael Zuckerman Philadelphia PA
1467. Grant Kalson Yardley PA	1496. Thais Kuestner Jamison PA	1525. Julie Delp Sellersville PA	1552. Gordon F. Macklem Jr. Wyndmoor PA
1468. Sherri Fried Phoenixville PA	1497. Jim Higgins Newtown Square PA	1526. Courtney Sexton Villanova PA	1553. Sherri Sternberg Elkins Park PA
1469. Myrna Newman Clinton PA	1498. Lisa Rosenkoetter Carlisle PA	1527. Clare Bohn Philadelphia PA	1554. Mary Pietrusko King of Prussia PA
1470. Margaret Hynosky Scranton PA	1499. Andrea Finn Kennett Square PA	1528. Karina Bongaarts Lancaster PA	1555. Jesse Brenner Wayne PA
1471. Ginny Altieri Chadds Ford PA	1500. Sister Kathleen Coll, SSJ Philadelphia PA	1529. Dorothy L. Klemas Plymouth Meeting PA	1556. Joseph Peter Bridy, AIA Philadelphia PA
1472. David Christiansen Mechanicsville PA	1501. Mary Durando Landenberg PA	1530. Keith Parsons Wayne PA	1557. Barbara Eklund Yardley PA
1473. Christine Kennedy New Freedom PA	1502. Phyllis Chapell Bala Cynwyd PA	1531. Helen Pacchione Wyndmoor PA	1558. Kristin Scali Kennett Square PA
1474. Rhona Candeloro Lansdowne PA	1503. Myles Zuckerman Mt. Lebanon PA	1532. Silvana Gross Scranton PA	1559. Joanne Feldman State College PA
1475. Chris Meck Philadelphia PA	1504. Kate Hall Philadelphia PA	1533. Jenny Ruckdeschel Haverford PA	1560. Bob Boleky Bellevue PA
1476. Carol Levy Lansdale PA	1505. Maurice Tierney Pittsburgh PA	1534. A. Moyer Creamery PA	1561. Barbara Dively Lansdale PA
1477. Wayne Cluff Holland PA	1506. Judith Wolf Richboro PA	1535. Donna Smith- Remick Bensalem PA	1562. Jolynn Haney Schwenksville PA
1478. Samantha Starr Collegeville PA	1507. Ida Holman Fairview PA	1536. Barney Oursler Pittsburgh PA	1563. Gregory Pais Trout Run PA
1479. Toby Carlson State College PA	1508. Clare Mundell Pittsburgh PA	1537. De Yarrison Schwenksville PA	1564. Lawrence Horwitz Philadelphia PA
1480. Ian Thomas Media PA	1509. Virginia O'Connell Swarthmore PA	1538. Katherine Daley State College PA	1565. Shanon Hunt Chalmers Loveland CO
1481. Jeanine Foster Avondale PA	1510. Sandra Ballard Hershey PA	1539. James Strick Franklin & Marshall College Philadelphia PA	1566. Joyce Akins Strasburg PA
1482. Pamela Tudor Philadelphia PA	1511. Bridget Miller Pittsburgh PA	1540. Rhea Hoch Dedham MA	1567. Mary Fineran North Arlington NJ
1483. Jamie Caito Pittsburgh PA	1512. Genevieve Becker Camp Hill PA	1541. Lauren Braun Havertown PA	1568. Mary Willis Huntingdon Valley PA
1484. Cameron Akins Coatesville PA	1513. Monica Baziuk Philadelphia PA	1542. Sidney Goldstein Philadelphia PA	1569. Lizzy Berryman Philadelphia PA
1485. Danielle Wright Philadelphia PA	1514. Al Lutz Philadelphia PA	1543. Sally Hess Swarthmore PA	1570. Mike Greenwald Pittsburgh PA
1486. Erik Chappelle Saint Davids PA	1515. Sean V. Howard Indiana PA	1544. Anjuli Kronheim King of Prussia PA	1571. Walter Kaufman Washington Crossing PA
1487. Nancy Daniel Devon PA	1516. Ellen Somekawa Philadelphia PA	1545. Eleanor Brownstein Philadelphia PA	1572. Brett Taubman State College PA
1488. Kira Chappelle Saint Davids PA	1517. Bill Turner Dillsburg PA	1546. Rita Cubranich Souderton PA	1573. James Madson Philadelphia PA
1489. Elizabeth Eccleston Philadelphia PA	1518. Erica Strang Harrisburg PA		
1490. Emily Gilbert Lancaster PA	1519. Peter Commons Philadelphia PA		

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1574. Sharon Aveni Philadelphia PA	1602. Fred Baurer Wynnewood PA	1630. Rebecca Rehr Baltimore MD	1659. William Willis Mercersburg PA
1575. Mark Garvin Cheltenham PA	1603. Barbara Hyde Conyngham PA	1631. Mark Fiorini Blandon PA	1660. Caroline Cotugno Croydon PA
1576. Eric Nelson Berwyn	1604. Jean Barrell New Hope PA	1632. Suzanne Parker Philadelphia PA	1661. Lauren Steele Maple Glen PA
1577. Norma Brooks Philadelphia PA	1605. Linda Murray Mansfield PA	1633. Ethan Birchard Philadelphia PA	1662. Alan Biehn Philadelphia PA
1578. Jay Tarler Philadelphia PA	1606. Carissa Shipman North Wales PA	1634. Stacy Bodow Pittsburgh PA	1663. David Sheridan Camp Hill PA
1579. Donna Fabyonic Philadelphia PA	1607. Marion Constantinides Pittsburgh PA	1635. George Aulisio Bloomsburg PA	1664. Mary Ciarrocchi West Chester PA
1580. Elizabeth Trainor Canton PA	1608. Harry and Esther Buck Chambersburg PA	1636. Aaron Warren Scarsdale NY	1665. John Frazier Villanova PA
1581. Darcy Trumpler King of Prussia PA	1609. Charles Grant Hatboro PA	1637. John Gerber State College PA	1666. Reed Dunn York PA
1582. Kenneth Marino Warren NJ	1610. Breen Masciotra Pittsburgh PA	1638. Danielle Miller Philadelphia PA	1667. Stephen Baker York PA
1583. Jackie Dearborn Seegers Union 0470 Philadelphia PA	1611. Sandi Clark Erie PA	1639. Jeff Warner Factoryville PA	1668. Heidi Nottingham Altoona PA
1584. Janette Adams yoganut02@yahoo.com	1612. Nora Schumacher Wayne PA	1640. Paco Verin Kennett Square PA	1669. Ron Dellapenna Frazer PA
1585. Ann Moskowitz Phoenixville PA	1613. Jason Perkins Swarthmore PA	1641. Bonnie Cline Fair Oaks PA	1670. Julia Johns McMurray PA
1586. Tom Korey Pittsburgh PA	1614. Patricia Ludwig Hellertown PA	1642. Eric VanderHyde Doylestown PA	1671. Patience Sharp Edinboro PA
1587. Eric Miller Pittsburgh PA	1615. Randal Stroup Kane PA	1643. Sara Allen Philadelphia PA	1672. Himani Shishodia Philadelphia PA
1588. Mary Jo Brinker Ellwood City PA	1616. Ina C. & William D. Elliot Lancaster PA	1644. Eileen Palmer Elkton MD	1673. Stephen L. Wood Media PA
1589. Douglas Kupferman Allentown PA	1617. Rachel R. Noll Annville PA	1645. Mark Fiorini Blandon PA	1674. Cathy Nace York PA
1590. Roy LaPlante Wynnewood PA	1618. Edward Waxman York PA	1646. Gary Cribbs Newville PA	1675. Cynthia Iberg McAlisterville PA
1591. Etta Albright Cresson PA	1619. Lionel Ruberg Newtown PA	1647. Alfred Mann Pittsburgh PA	1676. Scott Geryk Philadelphia PA
1592. Judith Springer Exton PA	1620. Andy Summa Scranton PA	1648. Pamela Moore Philadelphia PA	1677. Marie Mack Monroeville PA
1593. George Bradley Ambler PA	1621. Audrey Summa Scranton PA	1649. Beth Daubert Northampton PA	1678. Susan Kreider Philadelphia PA
1594. Richard Linnsenberg Philadelphia PA	1622. Christina Ward Havertown PA	1650. William Ehler Pittsburgh PA	1679. John Dickerson Wallingford PA
1595. Kate Galer Ardmore PA	1623. Christine Erimias Wexford PA	1651. Hal Lehman Philadelphia PA	1680. Mary Dawn Edwards Pittsburgh PA
1596. Adrian Shanker Allentown PA	1624. Jill Swensen Oakmont PA	1652. Kristen Budris Aliquippa PA	1681. Marsha Brofka- Berends Exton PA
1597. James Armour Villanova PA	1625. Howard Gittler Lords Valley PA	1653. Melvin Williams Corning NY	1682. Kathy Stewart Harrisburg PA
1598. Robert Sims Yardley PA	1626. David DiPasquale Pipersville PA	1654. Christina S. Lawless Flourtown PA	1683. Harriet Stone Birchrunville PA
1599. Jeannette Ayoob- Urban Aliquippa PA	1627. Amy Sockaci Ellwood City PA	1655. Eloise Laskowski Halifax PA	1684. Glenn Frantz Paoli PA
1600. Lauren Sweeney Ardmore PA	1628. Tina Horowitz Philadelphia PA	1656. Milton Shapiro Philadelphia PA	1685. Sarah Dziedzic Lancaster PA
1601. F. David Marschka Lancaster PA	1629. Catherine O'Rourke West Chester PA	1657. Steven Coulson Lancaster PA	1686. Jon Clark Dover PA
		1658. Peter Stone Bethlehem PA	1687. Gary Miller Altoona PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1688. Mark Hirschman Gladwyne PA	1717. Lisa Peterman Bensalem PA	1745. Grace Pasquarello SSJ	1773. Frank X. Kleshinski Jeannette PA
1689. Joseph Pryber Norristown PA	1718. Louis Incognito Abington PA	Phelps KY	1774. Joan Schmitt Philadelphia PA
1690. Stephen L. Wood Media PA	1719. Caroline DeClerque Haverford PA	1746. Laura Wigtil Bridgeville PA	1775. B. Soltis Philadelphia PA
1691. Colleen Kriebel Hatboro PA	1720. Renee Abrams Pittsburgh PA	1747. Eric Sudano Exton PA	1776. John Gauker Newtown PA
1692. Richard Hoesch Bethel Park PA	1721. Ruth Rogers Levittown PA	1748. Tom Diederich Merion Station PA	1777. Brian Raynor Ottsville PA
1693. Mary Ellen Snyder Zionsville PA	1722. Carol Wren Schwartz	1749. Deborah Dunton Pittsburgh PA	1778. Meghan Mitzel York PA
1694. Addie Liddic Clarks Summit PA	Wayne PA	1750. Emily Paulus Tannersville PA	1779. Monika McDole- Russell
1695. Lillian Cavanagh Carlisle PA	1723. Denise Kaufman Glen Mills PA	1751. April Esterly Philadelphia PA	Elverson PA
1696. Russ Savit Havertown PA	1724. Barbara Cicalese Philadelphia PA	1752. Andrew Oldham Harrisburg PA	1780. Bill Waddington West Chester PA
1697. Ron Edwards Fayetteville PA	1725. Paul Brogan Thornton PA	1753. Sue Bumbaugh Cashtown PA	1781. Trish Lea Glen Rock PA
1698. Anthony Capobianco South Park PA	1726. Stephanie Thomas Lemoyne PA	1754. Peggy Goldman Jenkintown PA	1782. Merrill C. Horine mchorine@dejazzd.c om
1699. Chad Murren York PA	1727. Joan Pelc Newtown Square PA	1755. Judy Grossman Elkins Park PA	1783. Kathleen Kindig Danville PA
1700. Kait McKenzie Wayne PA	1728. Sharon Buazard Rockford IL	1756. Vivek Stalam Bryn Mawr PA	1784. Noel Bednaz Southwick MA
1701. Ray Migneco Exton PA	1729. Carol Geraghty Philadelphia PA	1757. Matthew Zipin Philadelphia PA	1785. Michael Babitch Kimberton PA
1702. Kay Garrity-Roth Lititz PA	1730. Chad Murren York PA	1758. Michael Balsai Philadelphia PA	1786. Kay Cloud Willow Street PA
1703. Cynthia Sinclair Gladwyne PA	1731. Stephen Rogness Harrisburg PA	1759. Jean Vogel Yardley PA	1787. Daryn Edwards Philadelphia PA
1704. Jim Ewing Bensalem PA	1732. Hillel Brande State College PA	1760. Mark Jewett Media PA	1788. Dennie Baker Warrington PA
1705. Agnes Keiser Quakertown PA	1733. Julia Haines Philadelphia PA	1761. Sherry George Bethel Park PA	1789. Ellen Smith Havertown PA
1706. Elizabeth Scheer Oreland PA	1734. Kate Doms Berwyn PA	1762. Hugh Watkins Pittsburgh PA	1790. Harriet Taylor Mendenhall PA
1707. Nancy Stevenson Wynnewood PA	1735. Terry Hoodak Yardley PA	1763. William Dautremont- Smith	1791. Z. B. Bornemann Pittsburgh PA
1708. Eric Palmer Pittsburgh PA	1736. Doug Gonze Holland PA	1764. Bunny Driban Philadelphia PA	1792. Clifton Wigtil Bridgeville PA
1709. Scott Hagelin Swarthmore PA	1737. Jane Moffett Honey Brook PA	1765. Eric Salsburg Philadelphia PA	1793. Melissa Vanasek Wyomissing PA
1710. Andrew Dorman Bethlehem PA	1738. Tina Ziff Springfield PA	1766. Michele Salsburg Philadelphia PA	1794. William Sharpe Spring Mills PA
1711. Kaitlyn Bendik Shavertown PA	1739. Donna Howarth Newtown Square PA	1767. Lauren Shetler Robsonia PA	1795. Penny Ordway Philadelphia PA
1712. Jarrett Slaughter Philadelphia PA	1740. Joseph Sweeney Ardmore PA	1768. Daniel Klein Philadelphia PA	1796. Ronald Horiszny Bethlehem PA
1713. Susan Holinsworth Shermans Dale PA	1741. Christy Carty Doylestown PA	1769. Janet Saunders Allentown PA	1797. Virginia Cassidy Harleysville PA
1714. Michael Mann Harrisville PA	1742. Robin Anderson State College PA	1770. Kyle Gracey Johnstown PA	1798. Leah Akins Strasburg PA
1715. David Keefe Audubon PA	1743. Burr McFarlane Hershey PA	1771. Justin Laplante Allentown PA	1799. William Jones Downingtown PA
1716. Alisha Fowler Newtown PA	1744. Patti Vargo Murrysville PA	1772. John Redmon Middletown PA	1800. Doris Loud Millerton PA



**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

1801. Christopher Townsend Sassamansville PA	1829. Jennifer Beck Emsworth PA	1858. Scott A. Todd Bala Cynwyd PA	1887. Jane Ferry Media PA
1802. Sister Margaret J. Oravez, SSJ Philadelphia PA	1830. Erika Ingato Zionsville PA	1859. Francesca di Poppa Pittsburgh PA	1888. David Kenosian Berwyn PA
1803. William Shaffner Pittsburgh PA	1831. Cathy Fant Big Cove Tannery PA	1860. Odakwei Mills Easton PA	1889. Joseph Volk Ardmore PA
1804. Rebekah Sheeler Slippery Rock PA	1832. Lori DeWalt Boyertown PA	1861. Hope Punnett Philadelphia PA	1890. Nadine Goldman Allentown PA
1805. Elizabeth Sterner York PA	1833. Richard Hess Philipsburg PA	1862. Richard Schultz Lansdowne PA	1891. Marjorie Rathbone Lansdowne PA
1806. Jonathan Strickland Lansdale PA	1834. Jennifer Chilcote Hawk Run PA	1863. Joseph Alan Cope Pittsburgh PA	1892. Flora Powell Philadelphia PA
1807. Curt Wary New Hope PA	1835. Dale Hendricks Landenberg PA	1864. Jill Gleeson Philipsburg PA	1893. Eric Feld Allentown PA
1808. Susanne Iannece Philadelphia PA	1836. Natalie Minkovsky Philadelphia PA	1865. Signe Sundberg-Hall Downingtown PA	1894. Shelly Lukon Pittsburgh PA
1809. S. Smith Lafayette College Philadelphia PA	1837. Liz Dudley Newport PA	1866. Christy Goff Attleboro MA	1895. Sarah Miller Altoona PA
1810. Richard Meisheid Philadelphia PA	1838. Ronald Jones Newtown Square PA	1867. Ann Fuchs Chadds Ford PA	1896. Stefanie Van Pelt Bethlehem PA
1811. Ashley Meisheid Philadelphia PA	1839. Cecilia Dougherty Erdenheim PA	1868. Jennifer Lavelle Clarks Summit PA	1897. Jacqueline Jones Philadelphia PA
1812. Derek Reese Lancaster PA	1840. Dale Hair Dillsburg PA	1869. Adam White Mansfield PA	1898. John McGillian West Chester PA
1813. Chris Tromley Narberth PA	1841. James Stewart Towanda PA	1870. Rebecca Hunter Collingswood NJ	1899. Anna DeCosmo Stewartstown PA
1814. Dan Schwartz Bath PA	1842. Robert McCarthy Green Lane PA	1871. Wendy Ward Yardley PA	1900. Maureen Smyth Doylestown PA
1815. Derek Reese Ephrata PA	1843. Priscilla Becroft Philadelphia PA	1872. Michael Wagner Colmar PA	1901. Maggie Allio Philadelphia PA
1816. Jeanine Vermillion State College PA	1844. Art Schiavo Hershey PA	1873. Char Magaro Enola PA	1902. Elizabeth Farwell Philadelphia PA
1817. Daniel Weaver Berwyn PA	1845. Patricia Roeske Lebanon PA	1874. M. J. Khalsa mjjobs@comcast.net	1903. David Eldridge Wynnewood PA
1818. Edgar Reed York PA	1846. Anthony DiMenno Pittsburgh PA	1875. Ralph Fishkin Bala Cynwyd PA	1904. Ellen Grosskurth North Wales PA
1819. Harriet Stucke Philadelphia PA	1847. Mary Ann Sircely Wycombe PA	1876. Marcia Bonta Tyrone PA	1905. Dieter Rollfinke Carlisle PA
1820. Lois Sellers Springfield PA	1848. Harry Sircely Wycombe PA	1877. Karen Matroni East Petersburg PA	1906. Mike Bodak Cambridge Springs PA
1821. S. William Stezoski Pittsburgh PA	1849. Jim Earhart Schwenksvillle PA	1878. Jill and Jim Henke Columbia PA	1907. Kelli Wilson Port Matilda PA
1822. John Motz Stroudsburg PA	1850. Thomas Graves Holtwood PA	1879. Kathy Sherman Merion Station PA	1908. Liz Tymkiw Rosemont PA
1823. Kate Bronstein Allentown PA	1851. Ned Brockmeyer Pittsburgh PA	1880. Mary Kane Harrisburg PA	1909. Kathleen Woody Jenkintown PA
1824. Eileen Conner Gillett PA	1852. Louis Kovach Glen Mills PA	1881. Emilie Erich Wyalusing PA	1910. Robin Imhof Sellersville PA
1825. Stanley Hoffman York PA	1853. William Sitman Malvern PA	1882. James Parker Lansdale PA	1911. Carl Kugel Pacific Palisades CA
1826. Dorene Pasekoff Phoenixville PA	1854. Aline Otero Morrisville PA	1883. Rita Margraff Roslyn PA	1912. Bryan Wienand Pittsburgh PA
1827. Bonita Hay Wyncote PA	1855. Doug Balog Pittsburgh PA	1884. Roman and Evann Garrison New Wilmington PA	1913. Julia Kling Schwenksville PA
1828. Charles Macdonald Center Valley PA	1856. Casey Pfeifer Allentown NJ	1885. Brian Humm State College PA	1914. Susan Parker Glenshaw PA
	1857. Dorothea Leicher Philadelphia PA	1886. Steven Masters Philadelphia PA	1915. Dan Drecksage Philadelphia PA

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1916. Sam Gillin Wayne PA	1944. Helen Hoover Oley PA	1974. Don Stewart Reading PA	2002. Suzanne Lamborn Nottingham PA
1917. Kevin Scott Philadelphia PA	1945. Agnes Fells Dalton PA	1975. Suzan Frecon Boyertown PA	2003. Patricia Kennedy Harrisburg PA
1918. Juliana Brafa Winfield PA	1946. Kathleen Meridionale Reading PA	1976. Guy McUmber Meadvile PA	2004. Jamie L. Hafer Carlisle PA
1919. Victoria Gold Philadelphia PA	1947. Beverly Rae Hellertown PA	1977. Lindsay Young Collegeville PA	2005. Marsha Lorenz Carlisle PA
1920. Kirsten Ditzler Willow Street PA	1948. Stephanie Parke West Chester PA	1978. Mary Grace Gainer Indiana PA	2006. Diane Lello Carlisle PA
1921. Kathy Allio Cochranton PA	1949. Ann Marie Ranalli Downingtown PA	1979. Vicki Lish Pittsburgh PA	2007. Beth Lyon Glenside PA
1922. Carla Mannix Reading PA	1950. Loretta Pietrangelo Glen Mills PA	1980. Soheila Nikpour Philadelphia PA	2008. Donna McKee Lederach PA
1923. Erica Rothstein Perkasie PA	1951. Annette Slater Saint Marys PA	1981. Connie Wolfe Allentown PA	2009. Brigitta Arden Pittsburgh PA
1924. Matthew Odhner Bryn Athyn PA	1952. Zoe Warner Wayne PA	1982. Rudelle Wert Carlisle PA	2010. Ann S. Cook Carlisle PA
1925. Edward O'Mara, III Wayne PA	1953. Dina Vargo Brentwood PA	1983. John and Lenore Walsh Olyphant PA	2011. Deborah Tracey Albrightsville PA
1926. Vicky Frerotte Ford City PA	1954. Stephanie Perles Mechanicsburg PA	1984. Anne Horvath Honesdale PA	2012. Jacy Good Allentown PA
1927. Asmita Ranganathan Pittsburgh PA	1955. Sarah Lombardi Glenmoore PA	1985. Jean-Yves Rwakazina Harrisburg PA	2013. Mary McLoughlin Malvern PA
1928. Victoria Ross Hop Bottom PA	1956. Alexander Hall Philadelphia PA	1986. Andrea Likovich Aston PA	2014. Katie Daniels Mount Holly Springs PA
1929. Suzanne Adams West Chester PA	1957. Jessica Sheils Harleysville PA	1987. Liz Ladd Wayne PA	2015. Carla Stull Lititz PA
1930. Kenneth Ely Brooklyn PA	1958. Jocelyn McIntosh Lititz PA	1988. Juli Daniels Gardners PA	2016. Kimberly Clash Carlisle PA
1931. Marguerite Nicholson-Schenk Philadelphia PA	1959. Bianca Morales Philadelphia PA	1989. Pamela Foster Carlisle PA	2017. John R. McGrail Broomall PA
1932. Rona Goldstein Philadelphia PA	1960. Peter Adams Ardmore PA	1990. Joan Drake Lancaster PA	2018. Rita McGrail Broomall PA
1933. Cheryl Sheen Ellwood City PA	1961. Nancy Stultz Camden NJ	1991. Elaine Rampulla Carlisle PA	2019. Michael McGrail Allentown PA
1934. Alan Musselman Millerstown PA	1962. Amy Lidle West Chester PA	1992. Deborah Pestrak Narberth PA	2020. Sidne Bagliri Newtown Square PA
1935. Linda Fitzpatrick Jermyn PA	1963. Sheila Erlbaum Philadelphia PA	1993. Mary Franco Plainfield PA	2021. Barbara Sonies Narberth PA
1936. Candace Duclos Washington Crossing PA	1964. Barbara VanHorn Duncannon PA	1994. Karen Lobel Huntingdon Valley PA	2022. Jean Weaver Pittsburgh PA
1937. Jerry Wilson Finleyville PA	1965. Jennifer Morse Pittsburgh PA	1995. Lynne & Bill Starrett Lansdale PA	2023. Jon Bjornson, MD Philadelphia PA
1938. Robert M. Goodman Mechanicsburg PA	1966. Melissa McSwigan Pittsburgh PA	1996. B. Soltis Philadelphia PA	2024. Roger Lieux Media PA
1939. Caroline Baumgartner Allentown PA	1967. Grayfred Gray, J.D. Lancaster PA	1997. Peter Koros Pittsburgh PA	2025. Claude Mirois Philadelphia PA
1940. Lindsay Mattes Allentown PA	1968. Zoe Fox Allentown PA	1998. Donnie Null Grove City PA	2026. Betty Cruz Erie PA
1941. Adam Wynn Allentown PA	1969. Ed McGovern Mechanicsburg PA	1999. Bernadette Clark Philadelphia PA	2027. Peggy Mirois Malvern PA
1942. Janice Karuza Harleysville PA	1970. mjsonly@yahoo.com	2000. Patty Laswick Shipperville PA	2028. Cheryl Parsons Carlisle PA
1943. Ronald Girsch Harrisburg PA	1971. Josephine Fitts Rosemont PA	2001. Will Welliver Lititz PA	2029. Irene Pendze Philadelphia PA
	1972. Lois Sayers New Kensington PA		2030. Jennifer Danner Nazareth PA
	1973. Jennifer Harayda Bethlehem PA		

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2031. Michelle Gasperine Waterville PA	2060. Louise Fahnestock Lansdale PA	2088. William H. Seybold West Chester PA	2117. Sameer Jadhav West Chester PA
2032. Ronald Beck Pittsburgh PA	2061. Christy Bowersox New Columbia PA	2089. Stephen Natalie West Chester PA	2118. Kate Hoch West Chester PA
2033. Ellen Creveling Perkasie PA	2062. Mary Otto State College PA	2090. Antonio Zamudio Boothwyn PA	2119. Marsha F. Miller West Chester PA
2034. Cheryl Bittner Wayne PA	2063. Bonnie Boylan Bethlehem PA	2091. Dorothy B. Bosley Scranton PA	2120. Kerry McElhiney West Chester PA
2035. Keith Camilli Harrisburg PA	2064. Jeff Allio Cochranon PA	2092. Christine Weigand Beach Lake PA	2121. Marie Hines West Chester PA
2036. Patricia Moore Havertown PA	2065. Dorothy Newcomer Carlisle PA	2093. Charles Sherrouse Philadelphia PA	2122. Gerald A. Olsyn West Chester PA
2037. Barbara Elliot Wayne PA	2066. Jean Pendze Philadelphia PA	2094. My Somsanith Philadelphia PA	2123. Melissa Salach West Chester PA
2038. Maggie Christy Downingtown PA	2067. Rebekah Baglini Bryn Mawr College Philadelphia PA	2095. Tina D. Shelton Havertown PA	2124. Trent Wells West Chester PA
2039. Jennifer Pour Philadelphia PA	2068. Daniel P. McHugh Newtown Square PA	2096. Stefania Trovarelli Philadelphia PA	2125. Richard Ruf West Chester PA
2040. David Deardorff Fairfield PA	2069. Lourdes Fernandez Ardmore PA	2097. Jaclyn Rhoads Folcroft PA	2126. Hbalcio Solon West Chester PA
2041. Gerogi Anderson Gardners PA	2070. Ruth Ann Purchase Chadds Ford PA	2098. Victoria Schmidt Media PA	2127. Alice Malick West Chester PA
2042. Cynthia Snyder Biglerville PA	2071. Christopher W. James Downingtown PA	2099. Marcelle Baroby Upper Darby PA	2128. E. H. Wolverson West Chester PA
2043. Beth Rockwell Erie PA	2072. Lynn McConville Philadelphia PA	2100. Terry Heng Folsom PA	2129. Shirl Offutt West Chester PA
2044. Lorraine Poore Muncy Valley PA	2073. Ramona Caligiuri Media PA	2101. Amelia L. Sass Exton PA	2130. Helen Hutchison West Chester PA
2045. Michelle DiMeglio Morton PA	2074. David Houck Philadelphia PA	2102. Candice D'Orazio Boothwyn PA	2131. Martha M. Broad Wynnewood PA
2046. Mary McMahan Yardley PA	2075. Traci Confer Philadelphia PA	2103. Kelly Fielden Malvern PA	2132. Susan M. Swider Downingtown PA
2047. Jay Sweeney Dalton PA	2076. Jennifer Rule Folcroft PA	2104. Sandra Retzloff West Chester PA	2133. Toni McIntosh Lansdowne PA
2048. Robert Cannell Norristown PA	2077. Margaret Devaney West Chester PA	2105. Amaturshin Boatar Bryn Mawr PA	2134. George Hubbard Philadelphia PA
2049. Fairlee Gamble Philadelphia PA	2078. Mark DeVito Milmont Park PA	2106. Rebecca M. Lee Media PA	2135. Maureen Wade Upper Darby PA
2050. Emily Hauseman Carlisle PA	2079. Bradley Krueger West Chester PA	2107. Mariano Oropeza Chester PA	2136. John Haigis Darby PA
2051. Clifford Hritz Philadelphia PA	2080. George E. Braun Exton PA	2108. Linda Nguyen Broomall PA	2137. Robert Williams West Chester PA
2052. Jean Weaver Pittsburgh PA	2081. Mary Ciarrocchi West Chester PA	2109. Joseph Dinn Upper Darby PA	2138. Carly Vecchione Drexel Hill PA
2053. Jon Bjornson, MD Philadelphia PA	2082. Kate Galer Ardmore PA	2110. Louis Govinden Lansdowne PA	2139. Rochelle Pierre Upper Darby PA
2054. Roger Lieux Media PA	2083. John J. Furth Lansdowne PA	2111. Lori Bilder Media PA	2140. Jennifer Hastings Drexel Hill PA
2055. Claude Miros Philadelphia PA	2084. Cassie Goodrich Philadelphia PA	2112. Dlep Nguyen Upper Darby PA	2141. Brittany Hastings Drexel Hill PA
2056. Betty Cruz Erie PA	2085. Linda Doyle West Chester PA	2113. Deborah Reeder Narberth PA	2142. Alexander Gillett Philadelphia PA
2057. Peggy Miros Malvern PA	2086. James Baumann Allentown PA	2114. Robin Dailey Aldan PA	2143. Guy Gray Bethlehem PA
2058. Cheryl Parsons Carlisle PA	2087. Gerri S. Test West Chester PA	2115. Maureen Kelleher West Chester PA	2144. Andrew Lukurano Aldan PA
2059. Kay Kunkel Lansdale PA		2116. Mary L. Dougherty West Chester PA	2145. Greta Browne Bethlehem PA

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2146. Hillary Aisenstein  
Philadelphia PA
2147. Blyden Potts  
Shippensburg PA
2148. Thomas Rayeski  
Scranton PA
2149. David Selters  
Wilkes-Barre PA
2150. Elizabeth Widmaier  
Plymouth Meeting  
PA
2151. James M. Spak  
Ashley PA
2152. John J. Visci  
White Mills PA
2153. Ellen C. Kelleher  
Milmont Park PA
2154. Stan Richman  
Philadelphia PA
2155. Ryan Cole  
Conshohocken PA
2156. Barbra Ross  
Philadelphia PA
2157. Robert O. Shaner  
Havertown PA
2158. Robert W. Mask  
Swarthmore PA
2159. Mariann Rybarczyk  
Glen Mills PA
2160. Michelle Smith  
Philadelphia PA
2161. Leanore K. Vizer  
Wynnewood PA
2162. Adrienne Lukaski  
Elkton MD
2163. Carolyn Laws  
West Chester PA
2164. Jean M. Keiser  
West Chester PA
2165. Susan Luu  
Marietta PA
2166. Cathy Layland  
Philadelphia PA
2167. Jon Levin  
Macungie PA
2168. Kim LaBadie  
Henryville PA
2169. Rosemary Tullio  
Wallingford PA
2170. Josh Yonas  
Pittsburgh PA
2171. Emily Young  
Effort PA
2172. Janet Oser  
Huntingdon Valley  
PA
2173. Margaret S. Maurin  
Bryn Mawr PA
2174. Milton Wolfson  
Munhall PA
2175. Avery Pollack  
Pittsburgh PA
2176. Miles Davison  
Allentown PA
2177.  
mhmartin8@yahoo  
.com
2178. Lori L. Osmolinski  
Hollidaysburg PA
2179. Patricia Stairiker  
Doylestown PA
2180. Jim Cooper  
Morgantown PA
2181. Edith Strong  
Greensburg PA
2182. Dianne Cooper  
Morgantown PA
2183. Barry Lavery  
Pittsburgh PA
2184. Marc Willner  
Penn Valley PA
2185. Susan McGivern  
Pittsburgh PA
2186. Jason Kopanic  
Ambler PA
2187. Sam Talucci  
West Chester PA
2188. Mary Ann Evans  
Newville PA
2189. Christina Talucci  
Flourtown PA
2190. Wood Bouldin  
Havertown PA
2191. Bridget Salantri  
Doylestown PA
2192. Ken Shepley  
Flourtown PA
2193. Elinor Seaman  
Collegeville PA
2194. P Morello  
Abrightsville PA
2195. Bud Morello  
Abrightsville PA
2196. Taylor Lamborn  
Shillington PA
2197. Carol Golding  
Doylestown PA
2198. Jane Ober  
Carlisle PA
2199. Karen Barnett  
Malvern PA
2200. Katherine Daley  
State College PA
2201. Marian Freed  
State College PA
2202. Gregory Bookhultz  
Fairfield PA
2203. George Carlisle  
Harleysville PA
2204. Oksana Putyatina  
Walton NC
2205. Jan Terpening  
Carlisle PA
2206. Anna Talucci  
West Chester PA
2207. Margaret Van  
Naerssen  
Wayne PA
2208. Allison Still  
Philadelphia PA
2209. Virginia Dixon  
Panama City FL
2210. Joseph DeMatt  
Butler PA
2211. Shobhana Kanal  
Bala Cynwyd PA
2212. Cynthia Iberg  
McAlisterville PA
2213. Lauri Peacock  
Hobbs NM
2214. John P. Stevens  
Langhorne PA
2215. Michael Florijn  
Blue Bell PA
2216. Emily Dozor  
Media PA
2217. Stacy Weathers  
Lansdowne PA
2218. Kayly Newcomer  
Harrisburg PA
2219. John Engstrom  
Walton NY
2220. Charles McCrae  
Marysville PA
2221. Kevin Shoher  
Allegheny College  
Philadelphia PA
2222. Jane Wilshusen  
Harrisburg PA
2223. Kevin Bird  
Easton PA
2224. David Bragg  
Wayne PA
2225. Roy Djuvik  
Boiling Springs PA
2226. Eileen Flanagan  
Philadelphia PA
2227. Merritt Rhoad  
Glenside PA
2228. Dave Lange  
Philadelphia PA
2229. Dana Moss  
Philadelphia PA
2230. Melissa Merdinger  
Allentown PA
2231. Andrea Sherman  
Lebanon PA
2232. Amy Howe  
Pittsburgh PA
2233. Ryan Dodson  
Lancaster PA
2234. Kathryn Harrison  
Marlton NJ
2235. Steven Kokol  
Wallingford PA
2236. Monica Rudy  
Boiling Springs PA
2237. Bryan Hutchinson  
West Chester PA
2238. David Woodbury  
Media PA
2239. Nathan Willcox  
PennEnvironment  
Philadelphia PA
2240. Dennis Winters  
Southeastern PA  
Group of the Sierra  
Club  
Philadelphia PA
2241. Claude Baldino  
PA Gas Retailers  
Association  
Philadelphia PA
2242. Ross DiBono  
PA Gas Retailers  
Association  
Philadelphia PA
2243. James Carson  
Newtown Square PA
2244. William R. Brainerd  
Media PA
2245. Joy Bergey  
The Pennsylvania  
Interfaith Climate  
Change Campaign  
Philadelphia PA
2246. Sister Mary  
Elizabeth Clark  
Cecilian Center for  
Earth, Arts and Spirit  
Philadelphia PA
2247. Sidne Bagline  
Newtown Square PA
2248. Dr. Steve Gallop  
Broomall PA
2249. Jason Brady  
Philadelphia PA
2250. Vincent O'Grady  
Plymouth Meeting  
PA
2251. Mary Traves  
The Center for the  
Celebration of

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

Creation Philadelphia PA	2279. Carol Matthews Wayne PA	2308. Resident Erie PA	2335. Alan Kaufman Philadelphia PA
2252. Erika Martin St. Davids PA	2280. Jean Dankosky New Cumberland PA	2309. Adrienne M. Bucci Cheltenham PA	2336. Thomas W. & Anne H. T. Moore West Chester PA
2253. Bill Seybold West Chester PA	2281. Karen Smiga Trumbull CT	2310. Kathleen Lunn Lafayette Hill PA	2337. Susan Racobaldo Kennett Square PA
2254. Christine Knapp Philadelphia PA	2282. Nicholas Sanders Philadelphia PA	2311. Frances Ann Hall Flourtown PA	2338. Terry Kramzar Kennett Square PA
2255. Dr. Kenneth R. Brown Philadelphia PA	2283. Margaret Collins Scranton PA	2312. Dorothy Ruffin Philadelphia PA	2339. B. Taylor Liska Kennett Square PA
2256. Kathy Sherman Merion Station PA	2284. Linda Harrison Philadelphia PA	2313. Janice McGrane Flourtown PA	2340. Robyn Liska Kennett Square PA
2257. Annie Leary Philadelphia PA	2285. Shannon Dunham Philadelphia PA	2314. Tameka Calec Philadelphia PA	2341. Sandy Mayer Chadds Ford PA
2258. Juliette Pryor King of Prussia PA	2286. Eric Wagner Royersford PA	2315. Eileen Sobel Philadelphia PA	2342. Gary & Veronique Liska Kennett Square PA
2259. Arthur Stamoulis Philadelphia PA	2287. Margaret Clark Havertown PA	2316. Lamar Muriel James Upper Darby PA	2343. J. B. & Karen D. Liska Kennett Square PA
2260. Thurm Brendlinger Swarthmore PA	2288. K. C. Carney Pittsburgh PA	2317. Mary McGrath Flourtown PA	2344. Thomas Winkler Springfield PA
2261. Jim Black Cheltenham PA	2289. Elizabeth Kury Harrisburg PA	2318. Sister Cordata Dunn Philadelphia	2345. Gretchen Roth Downingtown PA
2262. Brian Zeck Philadelphia PA	2290. Tamara Cobaugh Narberth PA	2319. Sister Anne Roberta Ruckey	2346. Marilyn Lee Havertown PA
2263. Anne M. Bellwoar Moscony Media PA	2291. Lois Smith Camp Hill PA	2320. Patricia Moscony Glen Mills PA	2347. Mollie Moscony Media PA
2264. Diana Mizer Devon PA	2292. Mel Brownstein Shillington PA	2321. William Brinkhoff Pittsburgh PA	2348. Charles E. Moscony Media PA
2265. Ed Larsen Philadelphia PA	2293. Rich Dixon Apollo PA	2322. Audrey Fisher East Petersburg PA	2349. Katelyn Moscony Media PA
2266. Al Haynes Conshohocken PA	2294. Virginia Maus Camp Hill PA	2323. Elizabeth C. Prugh Edgeworth PA	2350. Cathy Drager West Chester PA
2267. David Mindel Jenkintown PA	2295. Donna Pope Harrisburg PA	2324. Ralph Thompson Crane Bryn Mawr PA	2351. Mark R. Drager West Chester PA
2268. Matt Nicholas Philadelphia PA	2296. JoAnne Fogelman Turbotville PA	2325. Jane Grant Newtown Square PA	2352. Rev. Dr. Bruce T. Davis Messiah Evangelical Lutheran Church Philadelphia PA
2269. Tim Kearney Philadelphia PA	2297. Mary Ellen Snyder Zionsville PA	2326. Richard G. Mulvaney Newtown Square PA	2353. Mark Hummer Glenside PA
2270. Peter Bauer PA Automotive Association Philadelphia PA	2298. Bonnie L. Balabon Downingtown PA	2327. Terri Murphy East Norriton PA	2354. Hallie Rozansky Rydal PA
2271. Rob Acheson Philadelphia PA	2299. Rick Balabon Downingtown PA	2328. Jane C. Valdes- Dapena Media PA	2355. Christina Brenner Huntingdon Valley PA
2272. Henry Frank Philadelphia PA	2300. Resident Newtown Square PA	2329. Catherine Verrier Piersol Merion Station PA	2356. Anna Mindel Jenkintown PA
2273. Bernard McPherson Philadelphia PA	2301. Paula Cosden King of Prussia PA	2330. Carla J. DeWald East Norriton PA	2357. Sara Mindel Jenkintown PA
2274. Dorothy Reichardt Media PA	2302. William D. Foden Havertown PA	2331. Stephanie Gallagher Aston PA	2358. David Mindel Jenkintown PA
2275. Sam Gillin Wayne PA	2303. Craig Cosden King of Prussia PA	2332. Sharon M. Gallagher Aston PA	2359. Silvia Bloise Jenkintown PA
2276. Lorrie Preston Mechanicsburg PA	2304. Gertrude McGranier Drexel Hill PA	2333. Elizabeth George Aston PA	2360. Scott Simons Rydal PA
2277. Alanna Cleary Lansdale PA	2305. Thomas Ganzelli Drexel Hill PA	2334. Jennifer George Aston PA	
2278. DavNuge4@aol.com	2306. Alan Huldswort Bensalem PA		
	2307. Peggy Dougherty Easton PA		

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2361. Lynda Simons Rydal PA	2389. Faith R. Sipe West Chester PA	2418. Chuck Sherman Merion Station PA	2442. Jenne Turner Philadelphia PA
2362. Dena Reese Newtown Square PA	2390. Rona Obert Downingtown PA	2419. L. F. Filipone Wayne PA	2443. Lizzy Berryman Philadelphia PA
2363. Sidne Baglini Newtown Square PA	2391. Sylvia W. Fuller West Chester PA	2420. Mike Mostardi Wayne PA	2444. Matthew Curtis Philadelphia PA
2364. Lynn O. Schickling, Jr. Media PA	2392. F. R. Struckmeyer West Chester PA	2421. Jesse Yanneill Wayne PA	2445. Cecily Anderson Philadelphia PA
2365. Susan R. Brastow Broomall PA	2393. Olga Taylor West Chester PA	2422. Laura Caracini Philadelphia PA	2446. Beth McConnell Philadelphia PA
2366. Rochelle Solow Broomall PA	2394. Thomas Tollefsen West Chester PA	2423. Jess Knight Philadelphia PA	2447. Stephanie Haynes Philadelphia PA
2367. Alan S. Kauffman Broomall PA	2395. Kathy Parker Exton PA	2424. Meredith Carty Philadelphia PA	2448. Daniel Favre Philadelphia PA
2368. William O'Grady Plymouth Meeting PA	2396. Barry Lewis West Chester PA	2425. Jen Zimmerman Philadelphia PA	2449. Amy Fox Harrisburg PA
2369. Barbara Silbert Wyndmoor PA	2397. Renate Haeckler West Chester PA	2426. Joseph Matteo Philadelphia PA	2450. Garret Godwin Mechanicsburg PA
2370. Jeffrey T. Chappelle St. Davids PA	2398. Judith Wadsworth West Chester PA	2427. Ona Hamilton Haverford PA	2451. John Kesich Millerton PA
2371. Lt. Col. Theodore C. Martin Ambler PA	2399. Katherine J. Johnson West Chester PA	2428. Robert Potter Chester PA	2452. Wade Wright Stillwater PA
2372. William S. Aiken Villanova PA	2400. Sydney Rachall Downingtown PA	2429. Meg Miller Wynnewood PA	2453. Bruce Fink McKees Rocks PA
2373. Lois M. Shenk Narberth PA	2401. Rev. Ruth H. Woodlen West Chester PA	2430. JoAnne Wallen Narberth PA	2454. Karen Rudy New Cumberland PA
2374. Lesley A. Nicol Newtown PA	2402. Bev Hoehing West Chester PA	2431. Deborah McKnight Narberth PA	2455. Brian Gelletly Chambersburg PA
2375. Bonita Hay Wyncote PA	2403. Sharon Thompson West Chester PA	2432. Elizabeth Drummond Eagleville PA	2456. Margaret Clark Havertown PA
2376. Dorothy Wells Berwyn PA	2404. Linda S. Seybold West Chester PA	2433. Carol Witzeman Camp Hill PA	2457. Melissa Merdinger Allentown PA
2377. Caroline Brubaker West Chester PA	2405. William H. Seybold West Chester PA	2434. Anne Harman- Menke Lancaster PA	2458. Joseph Zairo Allentown PA
2378. Joanna Bau West Chester PA	2406. Kathy Parker	2435. Emily Bittler Easton PA	2459. Jennifer Gladue Media PA
2379. Margaret A. Wood Exton PA	2407. Jan Wilcox Philadelphia PA	2436. Lisa Tomkosky Johnstown PA	2460. Maryann Wagner Whitehall PA
2380. Michael D. Wood Exton PA	2408. Linda Smith West Chester PA	2437. Claudia Kirk Paradise PA	2461. Jeff Brown Bryn Athyn PA
2381. Barbara E. Drake Havertown PA	2409. Jill Herman Audubon PA	2438. Stefan Ellis Philadelphia PA	2462. Barbara Field Schnupp PA
2382. Nancy C. Moses West Chester PA	2410. Monique Lazard Bryn Mawr PA	2439. Senator Roger Madigan Senate Environmental Resources and Energy Committee Philadelphia PA	2463. John Leisenring Berwyn PA
2383. Owen D. Owens West Chester PA	2411. Larry Hirshland Devon PA	2440. Senator Mary Jo White Senate Environmental Resources and Energy Committee Philadelphia PA	2464. Christine E. Fiduccia Pittsburgh PA
2384. Everett Marsh West Chester PA	2412. Tom O'Neill St. Davids PA	2441. Dana Dorman Philadelphia PA	2465. Jim Miles Philadelphia PA
2385. Betty U. Green West Chester PA	2413. Patricia Salvitti Media PA		2466. Dan Pohlig Philadelphia PA
2386. Karen Slyman Exton PA	2414. Lynn Racey Conshohocken PA		2467. Sabiha Basrai Philadelphia PA
2387. John Wright Coatesville PA	2415. Jim Nicol Newtown PA		2468. Greta Keltz Mohnton PA
2388. Mary Ella Fuquay Exton PA	2416. Marc Silbert Glenside PA		2469. William Hance Media PA
	2417. Bill Fantini Bala Cynwyd PA		2470. Patricia Johnson Blue Bell PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2471. Amanda Esrey Ridley Park PA	2500. Nancy Ohm Breinigsville PA	2528. Julia Johns McMurray PA	2557. Julia T. Wolfe Kennett Square PA
2472. Trish Tchume Philadelphia PA	2501. Marion Constantinides Pittsburgh PA	2529. Jesse Brenner Wayne PA	2558. Ann G. Albani Newtown Square PA
2473. George Seman Scranton PA	2502. Laurie Plank Hummelstown PA	2530. Wendy McClure North Wales PA	2559. Paul Brown Pittsburgh PA
2474. Carolyn Booz Langhorne PA	2503. Eric Jensen Swarthmore PA	2531. Audrey Kent Langhorne PA	2560. Richard Boardman Philadelphia PA
2475. Rebecca Farabaugh Philadelphia PA	2504. Alex Stillman Philadelphia PA	2532. Rosemary Frain Holland PA	2561. Edgar Reed York PA
2476. Donna Hutchinson Furlong PA	2505. Chad Murren York PA	2533. John Carricato Harrisburg PA	2562. Susan Prendergast Pocono Summit PA
2477. Ilse Frank Philadelphia PA	2506. Thomas Graves Holtwood PA	2534. Otto Lehrbach Alburtis PA	2563. Tim Potts Carlisle PA
2478. JoEllen Exner Langhorne PA	2507. Evan Mull Philadelphia PA	2535. Averill Shepps Mechanicsburg PA	2564. John Shearer Harrisburg PA
2479. David Martin Blue Bell PA	2508. Cynthia Iberg McAlisterville PA	2536. Lynn Stauffer Bath PA	2565. Shannon Dunham Philadelphia PA
2480. Janae Lamoureux Philadelphia PA	2509. Reed Dunn York PA	2537. Iona Conner Shade Gap PA	2566. Linda Blythe Philadelphia PA
2481. Meghan Dinneen Lewisburg PA	2510. Susan Wilmerding Haverford PA	2538. Brian Gillin Lafayette Hill PA	2567. Stephanie Harmon Jonestown PA
2482. Mary Kinney Mt. Pocono PA	2511. Anthony DiMenno Pittsburgh PA	2539. Jim Wurster Springfield PA	2568. Mike Caffrey Greensburg PA
2483. Jean Weaver Pittsburgh PA	2512. Mike DellaPenna Malvern PA	2540. John Willard Philadelphia PA	2569. Jack Lebeau Jenkintown PA
2484. John Fowler Newtown PA	2513. Carla Burkett Mount Holly Springs PA	2541. John Redmon Middletown PA	2570. Matthew Smuts Pittsburgh PA
2485. Louis Harris Philadelphia PA	2514. Harry and Esther Buck Chambersburg PA	2542. Frank X. Kleshinski Jeannette PA	2571. Charlie McNutt Mechanicsburg PA
2486. Laurel Person Pittsburgh PA	2515. Rita Hawrot Bridgeville PA	2543. Patty Phillips Altoona PA	2572. H. Campbell New Cumberland PA
2487. Mary Lou Artim Freeland PA	2516. Christian Vise Mt. Pleasant PA	2544. Nicole Cicalese Finleyville PA	2573. Gail Roberts Rutledge PA
2488. Bonnie Cline Fair Oaks PA	2517. Clare Shumway Dillsburg PA	2545. Mary Dawn Edwards Pittsburgh PA	2574. Christina Lawless Flourtown PA
2489. R. Lange Blanchard PA	2518. Richard Hess Philipsburg PA	2546. William Shaffner Pittsburgh PA	2575. Kelli Wilson Port Matilda PA
2490. Lauren Ivy Chiong Swarthmore PA	2519. Anthony Capobianco South Park PA	2547. Darwin Hollinger Mechanicsburg PA	2576. Harriet Stucke Philadelphia PA
2491. John Fowler Newtown PA	2520. Carol McCullough Pittsburgh PA	2548. Katherine Baker Schwenksville PA	2577. Quentin Wenzel Stroudsburg PA
2492. Matthew Cleveland Elizabethtown PA	2521. Kathy Stewart Harrisburg PA	2549. Camille Lore Walnutport PA	2578. Geoffrey Seger Tunkhannock PA
2493. Sally Zaino Hummelstown PA	2522. Barbara Dahlberg Pittsburgh PA	2550. Molly Duffy Paoli PA	2579. M. Zoe Warner Wayne PA
2494. James Armour Villanova PA	2523. Jill Gleeson Philipsburg PA	2551. Emily Bragonier Pittsburgh PA	2580. Aimee Cronin Pittsburgh PA
2495. Stephen Bennett West Chester PA	2524. Janet Tagg Mechanicsburg PA	2552. Brigitta Arden Pittsburgh PA	2581. Emily Seger Tunkhannock PA
2496. Virginia Fitzpatrick East Norriton PA	2525. Coleen Kinlin Philadelphia PA	2553. Peg Thompson Glenmoore PA	2582. Penny Ordway Philadelphia PA
2497. Sarah Batchelor Springfield PA	2526. Charles O'Brien Glenside PA	2554. Stephen Loughin Bala Cynwyd PA	2583. Andrea Likovich Aston PA
2498. Elizabeth Sterner York PA	2527. Judith Springer Exton PA	2555. Ed McGovern Mechanicsburg PA	2584. Jill & Jim Henke Columbia PA
2499. Lorin Snyder Pittsburgh PA		2556. Thomas P. Wolfe Kennett Square PA	2585. Marjorie Rathbone Lansdowne PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2586. Diane Hollinger Mechanicsburg PA	2615. Jessica Krow Philadelphia PA	2642. Barbara Field Pittsburgh PA	2669. Mr. & Mrs. Ralph DiDonato Broomall PA
2587. Sarah Gelletly Chambersburg PA	2616. Bonnie Bristow Ardmore PA	2643. Bill Dietrich Indiana PA	2670. Resident Broomall PA
2588. Audrey Fisher East Petersburg PA	2617. Daniel Simotas Upper Darby PA	2644. Tisha Walmer Newmanstown PA	2671. Shirley Law Broomall PA
2589. Cindi Varcoe Doylestown PA	2618. Donald & Barbara Brown Media PA	2645. Marian Freed State College PA	2672. Resident Broomall PA
2590. Priscilla Mattison Narberth PA	2619. Roy LaPlante Wynnewood PA	2646. Mary Ellen Snyder Zionsville PA	2673. Judith I. Hedtke Broomall PA
2591. Michael Arnold Carlisle PA	2620. Cynthia Yewdall Palmyra PA	2647. Robert Nyce Souderton PA	2674. Thomas M. Burns Broomall PA
2592. Aletheia Fkiaras Southampton PA	2621. Estelle Wynn Philadelphia PA	2648. Thomas and Justina Au Harrisburg PA	2675. Jay Tarpey Broomall PA
2593. John Amadio Bryn Mawr PA	2622. Patricia P. Reifsnyder Gwynedd PA	2649. William Marston Philadelphia PA	2676. Rich Pezick Broomall PA
2594. Bryan Wienand Pittsburgh PA	2623. Robert E. & Eva E. Gould Gwynedd PA	2650. Nancy A. Berry Chadds Ford PA	2677. Marie Rantz Broomall PA
2595. William Willis Mercersburg PA	2624. Ingrid A. Ruda Coatesville PA	2651. The Honorable Charles T. McIlhinney, Jr. Harrisburg PA	2678. James Morrison Broomall PA
2596. Shannon Elliott Bensalem PA	2625. Rosa T. Mallon West Chester PA	2652. Lazarus Saritsoglou Broomall PA	2679. T. F. McCullough Broomall PA
2597. Peter Stone Bethlehem PA	2626. Stephen Gilmour Newtown Square PA	2653. Rose Bove Broomall PA	2680. A. R. Subbiv Broomall PA
2598. Alice Forner Wynnewood PA	2627. William Hance Media PA	2654. Resident Philadelphia PA	2681. Lisa Plotts Broomall PA
2599. Michael Helfrich York PA	2628. Carli Dale Carlisle PA	2655. Resident Broomall PA	2682. Warren Fisher Broomall PA
2600. Amy Howe Pittsburgh PA	2629. Richard Whiteford Downingtown PA	2656. Patricia Foley Broomall PA	2683. Colleen O'Connor Broomall PA
2601. Kathy Plavko State College PA	2630. Jon Levin Macungie PA	2657. James Glotfelty Havertown PA	2684. Robert E. Drew Broomall PA
2602. Teri Dignazio Oxford PA	2631. Sal Ferraro Havertown PA	2658. Deanne M. Kerrigan Broomall PA	2685. Eleanor McDonough Broomall PA
2603. Alse H. Sakheim Gwynedd PA	2632. Kayly Newcomer Harrisburg PA	2659. Johanna Manning Wallingford PA	2686. Christopher Ricciuti Broomall PA
2604. Frances Sonne Catasauqua PA	2633. Angela Szesciorka Pittsburgh PA	2660. Jun Soetanto Broomall PA	2687. Resident Broomall PA
2605. Kristen Budris Aliquippa PA	2634. Larry Burkett Mount Holly Springs PA	2661. Don Goodman Broomall PA	2688. Peg Drew Broomall PA
2606. Henry & Linda Berkowitz Sabinsville PA	2635. Robert Calhoun Shohola PA	2662. Robert Shillingford Broomall PA	2689. Cheryl Michielli Broomall PA
2607. Penny Ordway Philadelphia PA	2636. Christopher Irwin North Versailles PA	2663. Charles Brown King of Prussia PA	2690. Victoria A. Gerstenfeld Broomall PA
2608. Amy Lidle West Chester PA	2637. Deborah Tracey Albrightsville PA	2664. Kate Peitrowski King of Prussia PA	2691. Darrell Boyd Broomall PA
2609. Hollister Knowlton Philadelphia PA	2638. David Kenosian Berwyn PA	2665. Resident West Chester PA	2692. Resident Broomall PA
2610. Kim LaBadie Henryville PA	2639. Barbara Knickerbocker West Chester PA	2666. James R. Hedtke Broomall PA	2693. Valentina Sciulli Broomall PA
2611. Kathy Burkett Mt Holly Springs PA	2640. Lisa Cohen Croton NY	2667. Christine Semanyk Broomall PA	2694. Joanne Lynch Broomall PA
2612. Evalyn F. Segal Philadelphia PA	2641. Anne Horvath Honesdale PA	2668. Joseph Shuster Broomall PA	2695. Patricia Migliori Broomall PA
2613. Edward Thornton Swarthmore PA			2696. Mary Kane Broomall PA
2614. John S. Sloyer Julian PA			



**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2697. Al DeFruscio Jr. Broomall PA	2726. Francis DeMarco Broomall PA	2754. Leslie Grissom Media PA	2783. George Greenberg Broomall PA
2698. Michael Losacco Broomall PA	2727. Joanne Gueriera Broomall PA	2755. William Poteau Media PA	2784. Gail Morgan Broomall PA
2699. K. Kloton Broomall PA	2728. Al Dreyer Broomall PA	2756. Mary Elizabeth Clark Philadelphia PA	2785. Andy King Media PA
2700. Resident Broomall PA	2729. Bernadette McCaffrey Broomall PA	2757. Maggie Allio Philadlephia PA	2786. Frederick Gautzsch Broomall PA
2701. William J Hanlon Broomall PA	2730. Tiffany Holdeman Broomall PA	2758. Margaret Bell Broomall PA	2787. Brian McDonald Broomall PA
2702. Robert Luke Broomall PA	2731. Mary Riley Broomall PA	2759. Frank Bellace Broomall PA	2788. Tom Duffy Broomall PA
2703. Fred Beatty Broomall PA	2732. Betsy McFadden Broomall PA	2760. Anne Marie Trioic Broomall PA	2789. David Owen Broomall PA
2704. Stephanie McCoy Broomall PA	2733. Maryann Tallman Broomall PA	2761. Robert C. Leunis Broomall PA	2790. Mary Mikus Ardmore PA
2705. Kimberly Wolferth Broomall PA	2734. James Masterson Broomall PA	2762. Robert Hogg Broomall PA	2791. Lucy Charles Broomall PA
2706. D. O'Mally Broomall PA	2735. Mr. & Mrs. Joseph DiMarco Broomall PA	2763. Mary Woods Broomall PA	2792. Mike Grassi Broomall PA
2707. Andrew King Ardmore PA	2736. Emilia Solipaca Broomall PA	2764. Susan Drake Broomall PA	2793. S. Garfield Broomall PA
2708. William McCloskey Broomall PA	2737. William McGlove Broomall PA	2765. W. Powell Broomall PA	2794. Otto Vincen Broomall PA
2709. Rich Pfeffinger Broomall PA	2738. Paul R. Landman Broomall PA	2766. Joseph N. Diendio Broomall PA	2795. Lauren Dobbins Broomall PA
2710. Carl Medori Broomall PA	2739. Susan Conley Broomall PA	2767. Mike Fierras Broomall PA	2796. Jerry Brown Broomall PA
2711. Jason McDonald Collegetville PA	2740. David S. Caviness Broomall PA	2768. Frank Scarduzio Broomall PA	2797. Joseph Gentile Broomall PA
2712. Ari Topelidis Broomall PA	2741. Lillian Jones Broomall PA	2769. James & Julie Perri Broomall PA	2798. George Charles Sr. Broomall PA
2713. Chintal Shah Broomall PA	2742. John Zoccola Broomall PA	2770. John McGee Broomall PA	2799. Arlene Savarese Broomall PA
2714. Mary K. Kazanjian Broomall PA	2743. Marie E. Neiburg Broomall PA	2771. Michael Cella Broomall PA	2800. Marvin G. Collins Broomall PA
2715. Rich Collings Broomall PA	2744. Peter Dolhancryk Broomall PA	2772. Betty Wienchowski Broomall PA	2801. T. Capretti Broomall PA
2716. Laura Mechan Newtown Square PA	2745. Gary Baron Broomall PA	2773. Paul D. Scota Broomall PA	2802. Alan Moore Broomall PA
2717. Andy Dokmanian Broomall PA	2746. Liz Booth Haverford PA	2774. Mary Lou Zimmerman Broomall PA	2803. Egidio N Ricci Broomall PA
2718. Mike Glenn Broomall PA	2747. Robert Handschuh Broomall PA	2775. Hanh Nguyen Broomall PA	2804. Colleen Smith Broomall PA
2719. Julia M. Wilson Broomall PA	2748. Carmela Mraz Broomall PA	2776. Shaun Hamilton Broomall PA	2805. Derek Coren Broomall PA
2720. M. Magnotta Broomall PA	2749. Jolene Petras Broomall PA	2777. Fotios Michos Broomall PA	2806. T. Gekas Broomall PA
2721. Richard Terroni Broomall PA	2750. H. Granate Broomall PA	2778. John K. Murphy Broomall PA	2807. Garr E. Groff Broomall PA
2722. Francessa Gentillo Broomall PA	2751. Fay E. Morgan Broomall PA	2779. Jim Lanno Broomall PA	2808. Dan Funkhouser Broomall PA
2723. Jon Garnet Broomall PA	2752. Marie Collas Broomall PA	2780. Carl Yost Broomall PA	2809. Kevin Ryan Broomall PA
2724. Wafa Ayoub Broomall PA	2753. William Collins Broomall PA	2781. L. Vanover Broomall PA	2810. Joan B. Howe Broomall PA
2725. Stella Varvarezis Broomall PA		2782. Catherine Langorotti Broomall PA	2811. Pete McGinnis Broomall PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2812. Helen R. Hurley Broomall PA	2841. Ted Nawalinski Downingtown PA	2869. Beth Stauber Allison Park PA	2895. Luther Van Ummersen Philadelphia PA
2813. Resident Broomall PA	2842. Barbara Seymour Media PA	2870. Meenal Raval Philadelphia PA	2896. Susan Cole Philadelphia PA
2814. Ruth Besden Broomall PA	2843. Charles Miller West Chester PA	2871. Sanderson Caesar Media PA	2897. Byron Woodman Wayne PA
2815. The Gore Family Broomall PA	2844. Resident Media PA	2872. James Jones New Cumberland PA	2898. Michael L. Hoppus Media PA
2816. Michael Lubragge Broomall PA	2845. Rosemarie Torres Zuppo Rutledge PA	2873. Daylin Leach DLeach@pahouse.n et	2899. Lydia M. Erwine Abington PA
2817. Donna Palmerio Broomall PA	2846. Neil R. Dreibelbis Exton PA	2874. Ellen Creveling Perkasie PA	2900. Mary Washington Elkins Park PA
2818. Bernard Casey Broomall PA	2847. David Eldredge Lansdowne PA	2875. Krista Iskra Langhorne PA	2901. Sally Weaver Hatboro PA
2819. Stephen E. Pavlo Broomall PA	2848. Bernard Greenberg West Chester PA	2876. Louis D Bettermann Seneca PA	2902. Esther Wilson Hatboro PA
2820. M. A. Nocella Broomall PA	2849. Roberta J. Roberts West Chester PA	2877. Randal Stroup Kane PA	2903. Margery Reith Willow Grove PA
2821. Resident Gwynedd PA	2850. Jack Armstrong West Chester PA	2878. Scotty Stuart- Whistler Gwynedd PA	2904. Gwen S. Gutekunst Hatboro PA
2822. Kenneth Haughton Newtown Square PA	2851. Mary Emmett Ardmore PA	2879. Robert Reifsnnyder Gwynedd PA	2905. Gladys Parsons Willow Grove PA
2823. Beth Rowe West Chester PA	2852. Janet Vokoun West Chester PA	2880. Resident Philadelphia PA	2906. Patricia D. Levin Jenkintown PA
2824. John Masek Downingtown PA	2853. Michelle Ralph West Chester PA	2881. Ben Wagman Ambler PA	2907. Susan G. Farrell Willow Grove PA
2825. Marshall D. Strode West Chester PA	2854. Paul Farkas West Chester PA	2882. Mary Lou Zimmerman Broomall PA	2908. Lois G. Wilson Jenkintown PA
2826. David Kelley Glenmore PA	2855. Barbara Cossaboon West Chester PA	2883. Amber R. Wagman Ambler PA	2909. Trudy Roman Wyndmoor PA
2827. Penny K. Davis Exton PA	2856. Rose Buckwalter Moon Township PA	2884. Ann E. Schilling Media PA	2910. Charlotte M. Goerlich Glenside PA
2828. Marilyn Brarton West Chester PA	2857. Ted Leonard Pennsylvania AAA Federation Philadelphia PA	2885. M. Tracy Gallagher Erdenheim PA	2911. Nancy A. Weiss Ambler PA
2829. Christine N. Dioni Chester Springs PA	2858. Bryan Kemper Melrose Park PA	2886. Nancy Nolde Wyndmoor PA	2912. Sara L. Lang Glenside PA
2830. Julie Spencer Downingtown PA	2859. Rob Steffes Aliquippa PA	2887. Gordon F. Macklem, Jr. Wyndmoor PA	2913. George J. Schefield III Royersford PA
2831. Julius S. Heyman West Chester PA	2860. Neil J. Nitzberg Scranton PA	2888. Margaret Van Ummersen Philadelphia PA	2914. Hal Taussig Philadelphia PA
2832. Carol Nevulis West Chester PA	2861. Charlene Wittman Allentown PA	2889. Beth Wolff Lansdale PA	2915. Bronwyn Yocum Berwyn PA
2833. Marc Romishir West Chester PA	2862. Ruth Davis Waynesboro PA	2890. E. J. Traves Wyncote PA	2916. Amy Dwyer Havertown PA
2834. Jamie Scott Brice West Chester PA	2863. Rebecca Robertson Pittsburgh PA	2891. Barbara Haig Ft. Washington PA	2917. Elizabeth Killough Glenside PA
2835. Ted Anderson West Chester PA	2864. Jerome Glickstein Quakertown PA	2892. David Bore Blue Bell PA	2918. Cathrine Baumbach Newtown Square PA
2836. Cora Gemil West Chester PA	2865. Jennifer Danner Nazareth PA	2893. Jane Benge Philadelphia PA	2919. Katehrine Duncan Philadelphia PA
2837. Resident West Chester PA	2866. Mary Armstrong Kennett Square PA	2894. Julia H. Haines Philadelphia PA	2920. Hydalker Amaral Media PA
2838. Johanna Manning Wallingford PA	2867. Leslie Fenton Devon PA		2921. Ellen Peters West Chester PA
2839. Victor G. Vely West Chester PA	2868. Julie Merrifield-Mull Philadelphia PA		2922. Peter A. Novick Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

2923. Andrea Szyper Philadelphia PA	2952. Beth Fox Philadelphia PA	2981. Isobel Cashman Ardmore PA	3010. Amy Kietzman Philadelphia PA
2924. Resident Media PA	2953. Ann Croxson Doylestown PA	2982. Carolyn Schodt Philadelphia PA	3011. Marita Roos Philadelphia PA
2925. Dee McConnell Media PA	2954. Doug McClure North Wales PA	2983. Laura Melly Philadelphia PA	3012. Laura Lynds Philadelphia PA
2926. Kim Pascher Philadelphia PA	2955. Wendy A. McClure North Wales PA	2984. Vivienne Hawkins Philadelphia PA	3013. Sharon J. Bender Philadelphia PA
2927. Francy Breon Media PA	2956. Sara McClure North Wales PA	2985. O. Cresson Lumberton NJ	3014. William M. Burrison Philadelphia PA
2928. Gil Frost Glenside PA	2957. Patricia F. Klenk Blue Bell PA	2986. J. Harry Rothwell Horsham PA	3015. Mary E. Berryman Philadelphia PA
2929. Elisabeth McGlynn Merion PA	2958. Susan Bond Blue Bell PA	2987. Molly Mahoney Philadelphia PA	3016. Beatriz Garcia Philadelphia PA
2930. Margaret Vance Merion PA	2959. Deb DeVries Oreland PA	2988. Joseph N. Newland Philadelphia PA	3017. Robin MacArthur Philadelphia PA
2931. Judy Satofield Royersford PA	2960. Rosemary Burke Philadelphia PA	2989. Anne Julie White Glenside PA	3018. James J. Menasion Philadelphia PA
2932. Wayne Ackes Phoenixville PA	2961. C. D. Buckley Glenside PA	2990. Amy A. Carter Wyncote PA	3019. Elizabeth Menasion Philadelphia PA
2933. Sherrill Baugartner Phoenixville PA	2962. L. H. Rector Philadelphia PA	2991. Henry Elsner, Jr. Philadelphia PA	3020. Dominic Maldonado Philadelphia PA
2934. Jann Nielsen Collegeville PA	2963. Deborah Doyle Philadelphia PA	2992. Iris Marie Bloom Philadelphia PA	3021. James Lilly Philadelphia PA
2935. Barbara E. Drake Havertown PA	2964. Karen Clemente Pennsburg PA	2993. Carol A. Fritz Philadelphia PA	3022. Sam N. Long Philadelphia PA
2936. Robin M. Hynicka Philadelphia PA	2965. Melinda, Tatum & Jay Kaiser Wyndmoor PA	2994. Rachel Hubbs Conshohocken PA	3023. Jennifer Klapner Philadelphia PA
2937. James N. Sicks Philadelphia PA	2966. Alicia & Jess Lomba Philadelphia PA	2995. Bruce Bayue Ardmore PA	3024. Frank L. Chance Philadelphia PA
2938. Elaine Dushoff Philadelphia PA	2967. Mary Foster Philadelphia PA	2996. Susan Bloch Philadelphia PA	3025. Gretchen A. Hilyard Philadelphia PA
2939. Gerald D. Wright Philadelphia PA	2968. Daniel Guest Philadelphia PA	2997. Paul Haughton Philadelphia PA	3026. Marianne Sellert Philadelphia PA
2940. Richard Nourie Philadelphia PA	2969. Kathryn Guest Philadelphia PA	2998. D. Edwards Philadelphia PA	3027. Kenneth Thomforde Philadelphia PA
2941. Bill Levering Philadelphia PA	2970. John Guest Philadelphia PA	2999. Katie Flanagan Philadelphia PA	3028. Harrsion Prentice- Molt Philadelphia PA
2942. Susan Beetle Philadelphia PA	2971. Anthony J. Clemente Pennsburg PA	3000. Bettina Herbert, M.D. Wyncote PA	3029. Paul Preston Wayne PA
2943. Dieter Littles Philadelphia PA	2972. Daniel Smith Jenkintown PA	3001. Martha L. Kemper Philadelphia PA	3030. Robert Rosanic Phoenixville PA
2944. Amy Gendall Philadelphia PA	2973. Eileen Gemmell Jenkintown PA	3002. Maleka Fruean Philadelphia PA	3031. Viola Allen Wayne PA
2945. Barbara H. Waters Philadelphia PA	2974. Albert Bixler Philadelphia PA	3003. Resident Philadelphia PA	3032. Maurice Earl Wayne PA
2946. Eric Wilden Philadelphia PA	2975. Beth & Jim Logue Blue Bell PA	3004. Theresa Camerota Wyncote PA	3033. Jamie Sims Wayne PA
2947. Jim Ballengee Philadelphia PA	2976. Paul Gordon Glenside PA	3005. William J. Marston Philadelphia PA	3034. Leonora K. Carr Philadelphia PA
2948. Philip H. Jones Abington PA	2977. Jim & Sue Wyatt Glenside PA	3006. W. Scott Anderson III Wrightstown PA	3035. Janine Marks Philadelphia PA
2949. Jo Busser Philadelphia PA	2978. Karen Smith Philadelphia PA	3007. William L. Clovis Philadelphia PA	3036. Valerie Whaon Ardmore PA
2950. Judy Wenstein Philadelphia PA	2979. Patricia Finley Ardmore PA	3008. Erin L. Schramm Broomall PA	3037. Elaine Freeman Philadelphia PA
2951. Willie D. Little Philadelphia PA	2980. Kevin Cashman Ardmore PA	3009. Vince Baker Philadelphia PA	3038. Claire Baker Springfield PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3039. Cathleen Young Berwyn PA	3067. Roger Estes Philadelphia PA	3095. Edward J. Binns Philadelphia PA	3124. Ellen Cutshall Narberth PA
3040. Edward Ronovas Sellersville PA	3068. Amanda J. Heck Philadelphia PA	3096. Pawel Machura Philadelphia PA	3125. Pamela A. Cloud Narberth PA
3041. Jennifer M. Wasnick Philadelphia PA	3069. Michelle Lavaller Philadelphia PA	3097. George Lakey Philadelphia PA	3126. Jason Rash Narberth PA
3042. Brian de Villa Plymouth Meeting PA	3070. Michael Landers Philadelphia PA	3098. Teodoro Calabretta E. Norriton PA	3127. Jane Murray Narberth PA
3043. Haniyyah Sharpe Philadelphia PA	3071. Paul Levering Philadelphia PA	3099. Bryan Howard Philadelphia PA	3128. Patricia D'Antonio Narberth PA
3044. Michael Schafer Collingswood NJ	3072. Resident Philadelphia PA	3100. Suzanne Minnis Philadelphia PA	3129. Nick Talbos Narberth PA
3045. Lindsay Hall Philadelphia PA	3073. Tim Daily Wyncote PA	3101. Paul Chhour Philadelphia PA	3130. Robert Schiatone Narberth PA
3046. Robert K. Rawlings IV Philadelphia PA	3074. Robert Klebanoff Wyncote PA	3102. Sylvia Elias Philadelphia PA	3131. Resident Narberth PA
3047. Philip Chapalas Jenkintown PA	3075. Allison Stryd Wyncote PA	3103. Nicole Dolin Philadelphia PA	3132. Richard McKnight Narberth PA
3048. Peters J. Stevens Philadelphia PA	3076. Albert E. Weinhardt Wyncote PA	3104. Ken Yanoviak Philadelphia PA	3133. Kristen Mayock Narberth PA
3049. Olivia Gibb Philadelphia PA	3077. Dominic Yanni Philadelphia PA	3105. Paul Fenske Philadelphia PA	3134. Jim Semmler Narberth PA
3050. Resident Philadelphia PA	3078. Carol Ha Philadelphia PA	3106. Joy L. Converse Philadelphia PA	3135. Marjorie Caplan Narberth PA
3051. Bruce Fairfield Upper Darby PA	3079. Joe Black Philadelphia PA	3107. Joseph Kuna Philadelphia PA	3136. Helen Walton Narberth PA
3052. Erin M. Johnson Philadelphia PA	3080. Cecelia Brooke Barnett Philadelphia PA	3108. Alina Macneal Philadelphia PA	3137. Robert Desipio, Jr. Narberth PA
3053. Chris Kahn Philadelphia PA	3081. Wendy Schwartz Philadelphia PA	3109. Danielle Rousseau Philadelphia PA	3138. Hiroko Matsukawa Narberth PA
3054. Karen Wargo Blue Bell PA	3082. Theos McKinney Philadelphia PA	3110. David Ford Philadelphia PA	3139. John Bryan Narberth PA
3055. Resident Mays Landing NJ	3083. Sarah Englander Philadelphia PA	3111. Robert Ranando Philadelphia PA	3140. Diane Tyler Narberth PA
3056. Richard Wargo Blue Bell PA	3084. Paula McHarg Philadelphia PA	3112. Frank T. Inner Philadelphia PA	3141. Charles Paige Narberth PA
3057. Marilyn Friedman Havertown PA	3085. Nancy Goldenberg Philadelphia PA	3113. Sheila Lechner Philadelphia PA	3142. Resident Narberth PA
3058. Carrie Powell Philadelphia PA	3086. Randi Thompson Philadelphia PA	3114. Rebecca Kochman Philadelphia PA	3143. Bernard G. Prusak Narberth PA
3059. Oren Hechtman Philadelphia PA	3087. Robert G. Sanders Philadelphia PA	3115. Tammy Doyle Philadelphia PA	3144. Miriam Regan Narberth PA
3060. Kristine Montgomery Philadelphia PA	3088. Jordan Spivack Philadelphia PA	3116. Joan E. Halbert Philadelphia PA	3145. Resident Narberth PA
3061. Jason M. Stewart Philadelphia PA	3089. Nancy A. Morrow Philadelphia PA	3117. Hetavi Naik Philadelphia PA	3146. Kim Lipetz Narberth PA
3062. Susannah Carrole Philadelphia PA	3090. Joshua J. Mills Philadelphia PA	3118. Barbara Zanelli Philadelphia PA	3147. Amy E. Slaton Narberth PA
3063. Scott Black Boothwynn PA	3091. Resident Philadelphia PA	3119. Gerhard Dietrich Conshohocken PA	3148. Allison Schadel Narberth PA
3064. Susan Sparkler Philadelphia PA	3092. Kathy Phillips Philadelphia PA	3120. Tamra Dietrich Conshohocken PA	3149. Mary Jane Cobbs Narberth PA
3065. Lawanna Handwerk Philadelphia PA	3093. Warren B. Cederholm, Jr. Philadelphia PA	3121. David Stein Conshohocken PA	3150. Mary F. Ivory Narberth PA
3066. Janice D. Poleon Philadelphia PA	3094. Lee Garner Philadelphia PA	3122. Anthony Moral Conshohocken PA	3151. Spencer Golden Narberth PA
		3123. Howard Rosenthal Narberth PA	3152. Marissa Golden Narberth PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3153. Kathy Bromley  
Narberth PA

3154. Resident  
Narberth PA

3155. John Allen  
Narberth PA

3156. Joyce Krajian  
Narberth PA

3157. Resident  
Narberth PA

3158. Nancy McGarry  
Narberth PA

3159. Mary Beth Alonzo  
Narberth PA

3160. John E. Flynn  
Narberth PA

3161. Joan E. Gucken  
Narberth PA

3162. Graceanne Ginn  
Narberth PA

3163. Rebecca Shore  
Narberth PA

3164. Wendy Flegal  
Narberth PA

3165. Constance Gibson  
Narberth PA

3166. Lawrence  
Greenspan  
Narberth PA

3167. James Termini  
Narberth PA

3168. Petra Termini  
Narberth PA

3169. Judith G. Linker  
Narberth PA

3170. Kersti Macdonald  
Elkins Park PA

3171. Bruce Slemmer  
Philadelphia PA

3172. Cynthia Peditto  
Collingswood NJ

3173. Andrea Dixon  
Philadelphia PA

3174. Patricia Courtney  
Aston PA

3175. Isabelle Jackson  
Bellmawr NJ

3176. Robert Porter  
Cochranville PA

3177. Christina Harris  
Philadelphia PA

3178. Jennifer Buchanan  
Exton PA

3179. Lara M. Herzig  
Conshohocken PA

3180. Joe Sergio  
Plymouth Meeting  
PA

3181. Olga Dvornikova  
Media PA

3182. The Honorable  
Babette Josephs  
Pennsylvania House  
of Representatives  
Philadelphia PA

3183. Helen Jacobson  
Aston PA

3184. Neil Bhaerman  
Pittsburgh PA

3185. Mary Wright  
Aston PA

3186. Phyl Morello  
Albrightsville PA

3187. Kyle Gracey  
Johnstown PA

3188. Nancy F. Parks  
Aaronsburg PA

3189. Neil Bhaerman  
Clean Water Action  
Philadelphia PA

3190. The Honorable  
Phyllis Mundy  
Pennsylvania House  
of Representatives  
Philadelphia PA

3191. Nikki L. Lopez  
Office of the  
Honorable Phyllis  
Mundy  
Philadelphia PA

3192. Fred Sciance  
General Motors  
Philadelphia PA

3193. Michelle DiMeglio  
Morton PA

3194. Mariya Dimov  
Philadelphia PA

3195. Hollace Detwiler  
Philadelphia PA

3196. Juliene Ebner  
Philadelphia PA

3197. Marjorie Kriebel  
Philadelphia PA

3198. Linda Smyth  
Philadelphia PA

3199. Eric V. Nielsen  
Philadelphia PA

3200. R. Andrew Angell  
Philadelphia PA

3201. Bernadette Paesz  
Philadelphia PA

3202. Miriam Harlan  
Philadelphia PA

3203. Robert Garvan  
Snyder  
Philadelphia PA

3204. Lowell Steinberg  
Glenside PA

3205. Jeffrey A. Harlan  
Philadelphia PA

3206. William S. Kriebel  
Philadelphia PA

3207. Bishop Ernest  
Mannis  
Philadelphia PA

3208. Ronald Scott Jr.  
Philadelphia PA

3209. Linda Blythe  
Philadelphia PA

3210. David A. Blythe  
Philadelphia PA

3211. Dr. Janice Hollis  
Wyndmoor PA

3212. Jean Axelrod  
Philadelphia PA

3213. Katie Eberhart  
Philadelphia PA

3214. Donald Scott Sr.  
Elkins Park PA

3215. Julie Curson  
Philadelphia PA

3216. Gary Bromberg  
Philadelphia PA

3217. Stephanie Than  
Philadelphia PA

3218. Elizabeth A. Durkee  
Philadelphia PA

3219. David Taylor  
Philadelphia PA

3220. Emily Lind Baker  
Philadelphia PA

3221. Thomas D. Elkinton  
Philadelphia PA

3222. Mr. Szacowny  
Philadelphia PA

3223. Ursula Reed  
Philadelphia PA

3224. Eleanor M. Elkinton  
Philadelphia PA

3225. Theresa Canto  
Philadelphia PA

3226. M. Collins  
Upper Darby PA

3227. Alexandra Holmes  
Philadelphia PA

3228. Marci Serota  
Philadelphia PA

3229. Khalid A. Asar  
Philadelphia PA

3230. Nyesha Taliaferro  
Philadelphia PA

3231. Valerie Joseph-  
Darden  
Philadelphia PA

3232. Auvel McLaughlin  
Philadelphia PA

3233. Steven Zinn  
Philadelphia PA

3234. Mark D'Annunzio  
Glenside PA

3235. Dawn D'Annunzio  
Glenside PA

3236. Jennifer Hairston  
Philadelphia PA

3237. Benjamin Brandt  
Philadelphia PA

3238. Laura Grove  
Philadelphia PA

3239. Marian C. Nowell  
Philadelphia PA

3240. Paris Hardin  
Philadelphia PA

3241. Tamara White  
Philadelphia PA

3242. Judith Penn  
Philadelphia PA

3243. Elliott White  
Philadelphia PA

3244. Jeff Buckingham  
Wyndmoor PA

3245. Alison Woods  
Philadelphia PA

3246. Nicholas Gregory  
Philadelphia PA

3247. Elizabeth Conston  
Philadelphia PA

3248. J. Bright  
Philadelphia PA

3249. Pamela Schreiber  
Philadelphia PA

3250. Nadine M. Dubosky  
Philadelphia PA

3251. James Maddox  
Philadelphia PA

3252. Alian Watson  
Philadelphia PA

3253. Mike Corboy  
Philadelphia PA

3254. Andrew Jackson  
Philadelphia PA

3255. Vince N. Baker  
Philadelphia PA

3256. Elizabeth McDonald  
Philadelphia PA

3257. Robert Fluhr  
Philadelphia PA

3258. Jody Berg  
Philadelphia PA

3259. Mary Halfpenny  
Philadelphia PA

3260. Donald Black  
Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3261. Elizabeth A. Klein Philadelphia PA	3290. Paul Socolar Philadelphia PA	3319. Livingstone Parris Philadelphia PA	3348. Christine Sullivan Philadelphia PA
3262. George W. French Philadelphia PA	3291. Robert J. Ellis Philadelphia PA	3320. Etta Washington Philadelphia PA	3349. Tammy Miller Philadelphia PA
3263. Mary Ferguson Philadelphia PA	3292. Diane B. Gottlieb Philadelphia PA	3321. Keith Rolland Philadelphia PA	3350. Susan N. Haidar Philadelphia PA
3264. Kenneth P. Swartz Philadelphia PA	3293. Marc Stier Philadelphia PA	3322. Katelyn Allen Philadelphia PA	3351. Janine M. Gibbons Philadelphia PA
3265. Eric Mitchell Philadelphia PA	3294. Chris Kleckner Glenside PA	3323. Bimal Desai Philadelphia PA	3352. Richard Gaven Philadelphia PA
3266. Christine D. Caputo Philadelphia PA	3295. Edward C. McAllister Philadelphia PA	3324. Naomi Balamuth Philadelphia PA	3353. A. W. Efremoff Philadelphia PA
3267. Nicole Marks Philadelphia PA	3296. Brendan Gallagher Havertown PA	3325. Stephanie Weirich Philadelphia PA	3354. Jason Neugent Philadelphia PA
3268. Maureen Chappelle Philadelphia PA	3297. William Grigsby Newtown Square PA	3326. D. Swingley Philadelphia PA	3355. Adryael Tong Philadelphia PA
3269. David Mitchell Philadelphia PA	3298. Aliocha Haynes Conshohocken PA	3327. Charlotte M. Elsner Philadelphia PA	3356. John Jewell Philadelphia PA
3270. Carol Lorenz Glenside PA	3299. Matt Brown Glenside PA	3328. Valerie Knox Philadelphia PA	3357. Abigail Gray Philadelphia PA
3271. Jason Seggern Glenside PA	3300. Brian C. Ligi Glenside PA	3329. Stephanie L. Vroman Philadelphia PA	3358. Marianne Das Philadelphia PA
3272. Stephanie Weitzman Glenside PA	3301. Jason Butsch Philadelphia PA	3330. Caroline Couser Philadelphia PA	3359. Alina Badus Philadelphia PA
3273. R. C. Plumer Glenside PA	3302. Jennifer O'Donnell Havertown PA	3331. Leah Stradling Telford PA	3360. Charlotte Hollinger Philadelphia PA
3274. Susan Hoban-Dye Glenside PA	3303. Ryan Fitzgerald Philadelphia PA	3332. Monica Preston Philadelphia PA	3361. Carmaig de Forest Philadelphia PA
3275. James Stasik Glenside PA	3304. Lauren Berg Philadelphia PA	3333. Aaron Gannon Philadelphia PA	3362. Kristin L. Doughty Philadelphia PA
3276. John Jeffers Glenside PA	3305. David Rosenblatt Philadelphia PA	3334. Dianna Beck Philadelphia PA	3363. Melissa Ip Philadelphia PA
3277. David Gallagher Glenside PA	3306. Ryan Budd Philadelphia PA	3335. Takeisha Allen Philadelphia PA	3364. Phillip K. Smith Philadelphia PA
3278. Doris Chin Glenside PA	3307. Adam Dean Philadelphia PA	3336. Bernard P. Ryan Glenside PA	3365. Thomas W. Roberts Bala Cynwyd PA
3279. Cliff Kirstein Glenside PA	3308. Eric Dierenber Philadelphia PA	3337. Liz Moore Glenside PA	3366. Aaron Matzkin Philadelphia PA
3280. Leslie McNeil Philadelphia PA	3309. Nelson R. Royes Philadelphia PA	3338. Linda Moulton Glenside PA	3367. John Phillips Philadelphia PA
3281. Ellen D. Stoddard Philadelphia PA	3310. Patrick Sherlock Philadelphia PA	3339. Robert Scott Lee Glenside PA	3368. Shannon N. Wells Philadelphia PA
3282. Lisa Brownstein Philadelphia PA	3311. Caroline Cyzkowski Philadelphia PA	3340. Diane L. Hamburg Glenside PA	3369. Joyce D. Miller Philadelphia PA
3283. Steven Laden Philadelphia PA	3312. Kelly O'Laughlin Philadelphia PA	3341. Horace S. Furman Glenside PA	3370. Kathryn Kurtz Philadelphia PA
3284. Josephine Taylor Philadelphia PA	3313. Sarah Eggleston Philadelphia PA	3342. Paul W. Gordon Glenside PA	3371. Herbert Glazer Philadelphia PA
3285. Mohamad Manar Albari Philadelphia PA	3314. Aaron J. Dinkin Philadelphia PA	3343. James Morrison Philadelphia PA	3372. Melanie M. Yolmar Philadelphia PA
3286. Hazel H. Lee-Taylor Philadelphia PA	3315. Dana Tashjian Philadelphia PA	3344. Elizabeth L. Noll Philadelphia PA	3373. Eva Gold Philadelphia PA
3287. Michael J. Goldberg Philadelphia PA	3316. Jeffrey Singer Philadelphia PA	3345. John Signature Philadelphia PA	3374. Scott D. Ryder Philadelphia PA
3288. Nancy Day Gavin Philadelphia PA	3317. Tyson Mitman Philadelphia PA	3346. Theresa Wau Philadelphia PA	3375. Sandra Folzer Glenside PA
3289. David C. Brown Philadelphia PA	3318. Gus David Philadelphia PA	3347. Erik Moe Philadelphia PA	3376. Joseph H. Wilson Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3377. Suraj Pandya Philadelphia PA	3404. Paulette Greenwell Philadelphia PA	3430. Richard Meritzer Pittsburgh PA	3457. Robert D. Sonoski Oil City PA
3378. Michael Safley Philadelphia PA	3405. Rachel Saks Philadelphia PA	3431. Daniel Holland Pittsburgh PA	3458. Linda S. Gwinn Blairsville PA
3379. Calder Daenzer Philadelphia PA	3406. C. J. Alaptatt Philadelphia PA	3432. Breen Masciotra Pittsburgh PA	3459. Edith Strong Greensburg PA
3380. Rodman A. Boston, Jr. Philadelphia PA	3407. Gregory R. Smith Philadelphia PA	3433. Amy A. Langham Pittsburgh PA	3460. David Hiebert Scottdale PA
3381. Joan C. Wells Philadelphia PA	3408. Rubina Whan Philadelphia PA	3434. Rebecca Burdick Pittsburgh PA	3461. Dennis Groce Point Marion PA
3382. Sheryl Conkelton Philadelphia PA	3409. Robert Helms Philadelphia PA	3435. Douglas C. Stewart Pittsburgh PA	3462. Gerry Walsh Claysville PA
3383. Galen Dorpalen- Barry Philadelphia PA	3410. Phil Cox Philadelphia PA	3436. James W. McCue Pittsburgh PA	3463. Lars Lange Washington PA
3384. Keelin S. Barry Philadelphia PA	3411. Lynn Wetherbee Philadelphia PA	3437. Robert Steffes Aliquippa PA	3464. Jeanne Zang Sewickley PA
3385. Michael Clark Philadelphia PA	3412. Andrew Lees Philadelphia PA	3438. Marcia L. Lehman Ambridge PA	3465. Carole M. Wiedmann Sewickley PA
3386. Arwa Hijazi Philadelphia PA	3413. Jennie Graves Philadelphia PA	3439. John Bobak Ambridge PA	3466. Sister Rose Marie Tumicki Coraopolis PA
3387. Lawrence F. Motyka Philadelphia PA	3414. Vladimir Hartman Philadelphia PA	3440. Amy Stiffey Beaver PA	3467. Mary Sweet Moon Township PA
3388. Elizabeth F. Campion Philadelphia PA	3415. Elicia Blodgett Philadelphia PA	3441. Mtume Imani New Brighton PA	3468. Anna Stoddard Moon Township PA
3389. Gordon R. Callaghan Philadelphia PA	3416. Reid Copeland Philadelphia PA	3442. Heath S. Gamache Prospect PA	3469. Sister Mary Naomi Suba Coraopolis PA
3390. Ronald B. Giemza Philadelphia PA	3417. Sally Strickler Philadelphia PA	3443. Allison Plummer Slippery Rock PA	3470. Sister Mary Pulcheria Saukaitis Coraopolis PA
3391. Whitney VanWinkle Philadelphia PA	3418. Christopher Blinn Philadelphia PA	3444. Stanley J. Kabala Pittsburgh PA	3471. Sister Mary Justice Przybocki Coraopolis PA
3392. Robert Joseph Achesa, Jr. Philadelphia PA	3419. Margaret Hennefeld Philadelphia PA	3445. Court Gould Pittsburgh PA	3472. Sister M. Christopher Moore Coraopolis PA
3393. Nancy A. Drye Philadelphia PA	3420. Jennifer Klein Philadelphia PA	3446. Sister Mary Sharon Iacobucci Coraopolis PA	3473. Sister Mary Cabrini Procopio Coraopolis PA
3394. Najma A. Davis Philadelphia PA	3421. The Honorable Vincent J. Fumo Senate of Pennsylvania Philadelphia PA	3447. Beryl R. Johnson Coraopolis PA	3474. Sister Mary Adrian Jumbelic Coraopolis PA
3395. Derek Alsbach Philadelphia PA	3422. The Honorable Constance H. Williams Senate of Pennsylvania Philadelphia PA	3448. Francine Horos Coraopolis PA	3475. Sister Mary A. Klawinski Coraopolis PA
3396. Paul T. Steege Philadelphia PA	3423. Kevin P. Meehan Newton Square PA	3449. Sister Roseann Godel Coraopolis PA	3476. Stanley S. Sattinger Pittsburgh PA
3397. David Schreiner Philadelphia PA	3424. Timothy W. Kirk Paradise PA	3450. Sister M. Georgiana Biznkowski Coraopolis PA	3477. James W. Richter Bethel Park PA
3398. Dale E. Adams Philadelphia PA	3425. Claude de Lannee Quarryville PA	3451. Sister Mary Faith Balawejder Moon Township PA	3478. Rose Carberry Bethel Park PA
3399. Howard Holtzer Philadelphia PA	3426. Deborah Garver Kirkwood PA	3452. Fran Staret Philadelphia PA	3479. Richard Rothhaar Venetia PA
3400. Sybil W. Holtzer Philadelphia PA	3427. Kathleen McAvoy Warren PA	3453. George Hoguet Media PA	3480. David N. McGuirk Jefferson Hills PA
3401. Dave Berson Philadelphia PA	3428. Ann Jones Gerace Pittsburgh PA	3454. Stephanie E. Pulaski Middletown PA	3481. Ben Long Pittsburgh PA
3402. Phillip Berryman Philadelphia PA	3429. Jeb Feldman Pittsburgh PA	3455. Charles L. Klinger Middletown PA	
3403. John Rothfuss Philadelphia PA		3456. Iona Conner Shade Gap PA	

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3482. John A. Harper Pittsburgh PA	3510. Daniel R. Dziubeh Pittsburgh PA	3539. Janis W. Schmahbach Philadelphia PA	3567. Jennifer Aiello Philadelphia PA
3483. Judith Brizek- Oreskovic Pittsburgh PA	3511. Mary V. Davidson Pittsburgh PA	3540. Neil Acter Philadelphia PA	3568. Walter G. Grissell Philadelphia PA
3484. John Fetterman Braddock PA	3512. Beverly L. Darwin Pittsburgh PA	3541. Paris L. Frazier III Philadelphia PA	3569. Gertrude M. Walters Philadelphia PA
3485. Steve Karas Pittsburgh PA	3513. April Clisura Pittsburgh PA	3542. Michele M. Johnson c/o Weavers Way Philadelphia PA	3570. Dina Pinsky Philadelphia PA
3486. Dianne Burnham Pittsburgh PA	3514. Katherine R. Boykowycz Pittsburgh PA	3543. James D. Peterson Philadelphia PA	3571. Sharon Browning Philadelphia PA
3487. Bennett C. Gould Cheswick PA	3515. Francis Bertonaschi Pittsburgh PA	3544. Genie Ravital Philadelphia PA	3572. Russell Davenport Philadelphia PA
3488. Laurie Plummer Slippery Rock PA	3516. K. Hawkins Philadelphia PA	3545. Richard P. Bansen Philadelphia PA	3573. Coy Lay Philadelphia PA
3489. Renata G. Nelson Pittsburgh PA	3517. Bennett H. Turner Philadelphia PA	3546. Peter Davis Philadelphia PA	3574. John M. Evans Philadelphia PA
3490. Paul M. Brown Pittsburgh PA	3518. Robert Behr Philadelphia PA	3547. Joseph Sullivan Philadelphia PA	3575. Carrie Askin Philadelphia PA
3491. Frank Kirkwood Wexford PA	3519. Nancy Juergens Philadelphia PA	3548. Amy Rose Kurland Philadelphia PA	3576. David Bennett Philadelphia PA
3492. Marilyn Skolnick Monroeville PA	3520. David L. Miller Philadelphia PA	3549. William B. Bird Philadelphia PA	3577. David Updike Philadelphia PA
3493. Justin Rothshank Pittsburgh PA	3521. Jill Galloway Philadelphia PA	3550. Alphonso Williamson Philadelphia PA	3578. Gregory Fornia Philadelphia PA
3494. Chad Martin Pittsburgh PA	3522. Angela Coghlan Philadelphia PA	3551. Claire E. Goldman Philadelphia PA	3579. D. Andre Dhondt Philadelphia PA
3495. Rachel Martin Pittsburgh PA	3523. Mark McGuine Philadelphia PA	3552. Ronald A. Little Philadelphia PA	3580. Jane Beckmann Narberth PA
3496. Christopher P. Sandvig Pittsburgh PA	3524. Guenter Steguer Philadelphia PA	3553. Merri E. Baldus Philadelphia PA	3581. Susan Gingerich Narberth PA
3497. Jessica King Pittsburgh PA	3525. Stephen Donnelly Philadelphia PA	3554. Julie Perreault Philadelphia PA	3582. Joseph L. Zenobi Narberth PA
3498. Rachael E. Kelley Pittsburgh PA	3526. Patricia Warner Philadelphia PA	3555. Evan Seplow Philadelphia PA	3583. Kate Shackelford Narberth PA
3499. Marijke Hecht Pittsburgh PA	3527. Timothy E. O'Meara Philadelphia PA	3556. Colette Kleitz Philadelphia PA	3584. Bobbi Cassidy Narberth PA
3500. Jonathan Robison Pittsburgh PA	3528. Patricia Isakowitz Philadelphia PA	3557. Petra Hoelchele Philadelphia PA	3585. Valerie Coursan Narberth PA
3501. Tom Wolper Pittsburgh PA	3529. Anne Kringel Philadelphia PA	3558. Carolyn Seplow Philadelphia PA	3586. Gail Estes Narberth PA
3502. Lindsay Patross Pittsburgh PA	3530. Kathleen F. Ross Philadelphia PA	3559. M. Diane Wood Philadelphia PA	3587. Robert DeNault Narberth PA
3503. Dane Menger Pittsburgh PA	3531. Robert Monk Philadelphia PA	3560. F. C. Achenbach Philadelphia PA	3588. Ann Barolak Narberth PA
3504. Jeff S. Maurin Pittsburgh PA	3532. Sharon McCullough Philadelphia PA	3561. Alexandra S. Bartlett, MD Philadelphia PA	3589. Timothy Corrigan Narberth PA
3505. Kate H. Maurin Pittsburgh PA	3533. Ian B. Kimball Ardmore PA	3562. Natalie Ridel Philadelphia PA	3590. Michele Sokoloff Narberth PA
3506. Golan Levin Pittsburgh PA	3534. Carrie L. Kimball Philadelphia PA	3563. Wadell J. Cazter Philadelphia PA	3591. Robert Alexander Narberth PA
3507. Mike Isaac Pittsburgh PA	3535. Fred Coy Philadelphia PA	3564. Charles Brenton Philadelphia PA	3592. Ur Simonsohn Narberth PA
3508. Thomas Hoffman Pittsburgh PA	3536. John E. Williams, Jr. Philadelphia PA	3565. Susan L. Lytle Philadelphia PA	3593. Beth Schuster Narberth PA
3509. Nathan Hart Pittsburgh PA	3537. Dennis Richardson Philadelphia PA	3566. Andrew H. Hutchison Philadelphia PA	3594. Richard Franco Philadelphia PA
	3538. Dawn C. Stewart Philadelphia PA		3595. Andris Peterson Merion PA



**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3596. Patti Milsop Merion PA	3625. Chaim Dworkin Philadelphia PA	3654. Anna Fontenot Philadelphia PA	3683. Olive J. Richter Philadelphia PA
3597. Barsel Gilbert Merion PA	3626. M. Fairlee Gamble Philadelphia PA	3655. Karl Baker Philadelphia PA	3684. Andrew S. Wood Philadelphia PA
3598. Ken Cloud Narberth PA	3627. Carole A. Harmon Philadelphia PA	3656. David Doggett Philadelphia PA	3685. Michael L. Gross Philadelphia PA
3599. Vivian Schatz Philadelphia PA	3628. Stephen Mack Philadelphia PA	3657. Harry B. Reiff Philadelphia PA	3686. Robert R. Ream Philadelphia PA
3600. Sylvia T. Lotspeich Philadelphia PA	3629. F.W. Kraemer Philadelphia PA	3658. James H. Massey Philadelphia PA	3687. Manuel J. Malia Philadelphia PA
3601. Heather Drew Philadelphia PA	3630. Herbert M. Birtha Philadelphia PA	3659. Joseph M. Flaville Philadelphia PA	3688. Catherine A. Spearman Philadelphia PA
3602. John Ascenzi Philadelphia PA	3631. Alan E. Ankeny Philadelphia PA	3660. Roger V. Ashodiam Philadelphia PA	3689. Julie Kiene Philadelphia PA
3603. Robert Lopata Philadelphia PA	3632. Walt Holland Philadelphia PA	3661. Ana Bach Philadelphia PA	3690. Zoa Getzer Philadelphia PA
3604. Mohte Payette Philadelphia PA	3633. Amy Yellin Philadelphia PA	3662. Bruce Augustine Philadelphia PA	3691. Vellen Colbert Philadelphia PA
3605. Irv Rosenstein Philadelphia PA	3634. John Janick Philadelphia PA	3663. Noah Wier Philadelphia PA	3692. Jennifer Godwin Philadelphia PA
3606. Claire Rosenstein Philadelphia PA	3635. Janette Clements Philadelphia PA	3664. Jason Stevens Philadelphia PA	3693. Connie Flood Philadelphia PA
3607. Stan Shubilla Philadelphia PA	3636. Janet D. Jones Philadelphia PA	3665. Matthew E. Clowney Philadelphia PA	3694. Paul Mack Philadelphia PA
3608. Lauren Greenbaum Philadelphia PA	3637. Cynthia E. Hinson Philadelphia PA	3666. Cynthia Branham Wyncote PA	3695. Sally Siddiqi Philadelphia PA
3609. Amber Sloan Philadelphia PA	3638. Steve Lewis Philadelphia PA	3667. Jeremy Hollis Philadelphia PA	3696. Rosemarie Kamal Philadelphia PA
3610. Rick S. Hock Philadelphia PA	3639. Theresa M. Jones Philadelphia PA	3668. Steven Way Philadelphia PA	3697. Alicia R. Johnson Philadelphia PA
3611. Paula Lewkowski Philadelphia PA	3640. Devonnie Johnson Philadelphia PA	3669. Marina La Verde Philadelphia PA	3698. Rick Thomas Philadelphia PA
3612. Hans Robert Nelson Philadelphia PA	3641. Rebecca Yamin Philadelphia PA	3670. Marie Nicole La Verde Philadelphia PA	3699. Anthony DeJoseph Philadelphia PA
3613. Helene Ferrantello Philadelphia PA	3642. Tim Margerum Philadelphia PA	3671. Linda Johnson Philadelphia PA	3700. Marisa Reeve Philadelphia PA
3614. Matthew Schrag Philadelphia PA	3643. Nancy Post Philadelphia PA	3672. Jennifer Foster Philadelphia PA	3701. Giovanni C. Ingegneri Philadelphia PA
3615. Nicholas Torres Philadelphia PA	3644. David F. Bushnell Philadelphia PA	3673. Kevin Smith Philadelphia PA	3702. Marie Mercaldo Philadelphia PA
3616. Robin Lawson Philadelphia PA	3645. Jessica Gremillon Philadelphia PA	3674. Karen E. Walker Philadelphia PA	3703. David Pierson Philadelphia PA
3617. June Hawkins Philadelphia PA	3646. June Krebs Philadelphia PA	3675. Julie Horwitz Philadelphia PA	3704. Ray Riling Philadelphia PA
3618. Anne Ballard Philadelphia PA	3647. Jane Willis Philadelphia PA	3676. Hedio P. Kelly Philadelphia PA	3705. Florence Tumaszk Philadelphia PA
3619. Richard Feder Philadelphia PA	3648. E.L. Gerber Philadelphia PA	3677. Stephen M. Kelly Philadelphia PA	3706. Calvin Collier Philadelphia PA
3620. Deborah Schwartzman Philadelphia PA	3649. Matthew Ferragame Philadelphia PA	3678. Patricia Massie Philadelphia PA	3707. Valerie L. Dorsey Philadelphia PA
3621. Pamela Lubker Philadelphia PA	3650. Jacqueline Dupsat Philadelphia PA	3679. J. E. Meiers Philadelphia PA	3708. Barbara Cairo Philadelphia PA
3622. David Rudorsky Philadelphia PA	3651. Carla White Philadelphia PA	3680. Sarah Besadny Philadelphia PA	3709. Jayne C. Jakrai Philadelphia PA
3623. Linda M. Bernstein Philadelphia PA	3652. Alan M. Windle Philadelphia PA	3681. Susan Buchanan Philadelphia PA	3710. Abigail Ley Philadelphia PA
3624. Emma J. Kiett Philadelphia PA	3653. Leni G. Windle Philadelphia PA	3682. Mark C. Richter Philadelphia PA	

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3711. John Siemiarowski Philadelphia PA	3739. Katherine Kolpan Philadelphia PA	3768. Angela A. Hecthecker Philadelphia PA	3796. Luis Sanchez Philadelphia PA
3712. Rahad Coulter- Stevenson Philadelphia PA	3740. David Smith Philadelphia PA	3769. Maria Kaisla Philadelphia PA	3797. Paul Ginnang Philadelphia PA
3713. Carl Gedeik Philadelphia PA	3741. Chris McDonnell Philadelphia PA	3770. Alan Gardner Philadelphia PA	3798. Sydney M. Parker- Williams Philadelphia PA
3714. Shawn Craig-Parker Philadelphia PA	3742. Carl Peterson Philadelphia PA	3771. James L. Nathaniel Philadelphia PA	3799. Julie Kimmel Philadelphia PA
3715. Kathleen Flaherty Philadelphia PA	3743. Daniel Friedman Philadelphia PA	3772. Patrice J. Rhodes Philadelphia PA	3800. Grant Alger Philadelphia PA
3716. Jill M. Price Philadelphia PA	3744. John Dobbs Philadelphia PA	3773. Stephanie Washburn Philadelphia PA	3801. Katherine Hochner Philadelphia PA
3717. Joseph V. F. Clay Philadelphia PA	3745. Dylan Davis Philadelphia PA	3774. Ronald Taylor Philadelphia PA	3802. Ronald Hatcher Philadelphia PA
3718. Jared J. Rardin Philadelphia PA	3746. Jessica Miles Philadelphia PA	3775. Thomas Graham Philadelphia PA	3803. Jon Rohrer Philadelphia PA
3719. Janet I. Filing Philadelphia PA	3747. Alyssa Rickels Philadelphia PA	3776. Steve Grzywinsky Philadelphia PA	3804. Amy L. Cohen Philadelphia PA
3720. Heather Gee Philadelphia PA	3748. Susannah Richards Philadelphia PA	3777. Daniel Husted Philadelphia PA	3805. Brad Rude Philadelphia PA
3721. Lois Arlene Philadelphia PA	3749. Alex Cohen Philadelphia PA	3778. Teresa DeFrancisco Philadelphia PA	3806. Mark Spiller Philadelphia PA
3722. Tarik Hall Philadelphia PA	3750. Izak Martin Philadelphia PA	3779. Brian Donahue Glenside PA	3807. Brendon Ardieta Philadelphia PA
3723. Muriel Clark Philadelphia PA	3751. Chris Cardi Philadelphia PA	3780. Sharon Anderson Glenside PA	3808. Tilahun Afessa Philadelphia PA
3724. Jean Y. Durbin Philadelphia PA	3752. Nicole Hagiwara Philadelphia PA	3781. Alexander C. Chadwick Oreland PA	3809. Mary Klein Philadelphia PA
3725. James Browne Philadelphia PA	3753. Meghan Ganser Philadelphia PA	3782. Josh Schreiber Philadelphia PA	3810. Frank Aloise, Jr. Philadelphia PA
3726. Karen Scott Philadelphia PA	3754. David Wade Philadelphia PA	3783. Maya McAllister Philadelphia PA	3811. Helen Davison Philadelphia PA
3727. Kathy Lehman Philadelphia PA	3755. Tyne M. Hauft Philadelphia PA	3784. Michael McAllister Philadelphia PA	3812. Patti A. Williams Conshohocken PA
3728. Judith A. Spindt Philadelphia PA	3756. Janet L. Dingle Philadelphia PA	3785. Victoria Grant Philadelphia PA	3813. Lauren Foley Conshohocken PA
3729. Geoffrey Selling Philadelphia PA	3757. Mary N. Marks Philadelphia PA	3786. Barbara A. Evans Philadelphia PA	3814. Katherine Peters Conshohocken PA
3730. Jen Manion Philadelphia PA	3758. Audrey C. Ralph Glenside PA	3787. Debra Klebanoff Philadelphia PA	3815. Merian Soto Philadelphia PA
3731. Aprile Castagna Philadelphia PA	3759. Sheila Rivers Glenside PA	3788. Bill Hudson Philadelphia PA	3816. Louise Lisi Philadelphia PA
3732. Anthonie P. Prinsen Philadelphia PA	3760. Mea Fleming Glenside PA	3789. Angela F. Jones Philadelphia PA	3817. Burton Froom, Jr. Philadelphia PA
3733. Marcia L. Dyson Philadelphia PA	3761. Justin Max Glenside PA	3790. Robin Lawson Philadelphia PA	3818. Laurance Rosenzweig Philadelphia PA
3734. Alexander M. Dragovich Philadelphia PA	3762. Judi Shabbat Glenside PA	3791. Anna Beresin Philadelphia PA	3819. Christiaan Morssink Philadelphia PA
3735. David Owens Philadelphia PA	3763. Hannah Mazzaccaro Glenside PA	3792. Brenda Lazin Philadelphia PA	3820. Shinihi Kukanyika Philadelphia PA
3736. Edward M. Larsen Philadelphia PA	3764. Kerry A. Dond Glenside PA	3793. Jacob Feldman Philadelphia PA	3821. Laura C. Churchman Philadelphia PA
3737. Brian Lederman Philadelphia PA	3765. Juliane Caviston Glenside PA	3794. L. Weightman Philadelphia PA	3822. Nancy Verruto Philadelphia PA
3738. Sarah Goldfine-Ward Philadelphia PA	3766. Eugen Buehler Glenside PA	3795. David Tukey Philadelphia PA	3823. Allyson Katzman Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3824. R. Wilson Philadelphia PA	3853. Tina DiTocca Philadelphia PA	3882. Erika Okgucak Philadelphia PA	3911. Paul Chase Philadelphia PA
3825. Bruce Conover Philadelphia PA	3854. Jason Butsch Philadelphia PA	3883. Michael Thomas Bensalem PA	3912. Anna Ferguson Philadelphia PA
3826. Kenneth Allen Philadelphia PA	3855. Alfred DiTocca Philadelphia PA	3884. Walter Beben Philadelphia PA	3913. Kathleen Bachus Philadelphia PA
3827. Greg McMichael Philadelphia PA	3856. Eva Monheim Glenside PA	3885. Sinae Pitts Upper Darby PA	3914. Ned Bachus Philadelphia PA
3828. Sharon Mullally Philadelphia PA	3857. Esther Ward Thorefare NJ	3886. Brian Zeck Philadelphia PA	3915. Janet J. Elfant Philadelphia PA
3829. Thomas F. Johnson Philadelphia PA	3858. Rachel Ward Thorefare Nj	3887. Jeanne June-Mayer Philadelphia PA	3916. John C. Keogh Philadelphia PA
3830. Barbara Breitman Philadelphia PA	3859. Jason Curtis Philadelphia PA	3888. Horace Sanders Conshohocken PA	3917. Judith Mealing Philadelphia PA
3831. Joel Nanni Philadelphia PA	3860. Heather Cowley Philadelphia PA	3889. Donna McLean Conshohocken PA	3918. Susan Embender Philadelphia PA
3832. Russell Carter Philadelphia PA	3861. Dennis Harney Philadelphia PA	3890. Peter Mayne Philadelphia PA	3919. Geo B. Luks Philadelphia PA
3833. Stephanie Carter Philadelphia PA	3862. Kermit Moore Swarthmore PA	3891. Lindi Wilcor Philadelphia PA	3920. Henry J. Sommers Philadelphia PA
3834. John Macoretta Philadelphia PA	3863. Brett Mapp Philadelphia PA	3892. Evelyn Minick Philadelphia PA	3921. Bruce H. Sacks Philadelphia PA
3835. Hector Badean Philadelphia PA	3864. Beth Mohan Philadelphia PA	3893. Edwina Nolan Cheltenham PA	3922. Amy D. Gross Philadelphia PA
3836. Kenneth Weiss Philadelphia PA	3865. Darva Sommers Glenside PA	3894. Jennifer Monanan Philadelphia PA	3923. Augusta M. Lemon Philadelphia PA
3837. Michael R. Robinson Philadelphia PA	3866. Collin Robinson Philadelphia PA	3895. Rita Berger-Morrison Philadelphia PA	3924. Lynn Riley Philadelphia PA
3838. Jeanine Vivona Philadelphia PA	3867. Kathryn Harrison Philadelphia PA	3896. Christian J. Rupertus Philadelphia PA	3925. Margaret S. Brunton Philadelphia PA
3839. Alan Dawley Philadelphia PA	3868. Beth Scheraga Philadelphia PA	3897. Phebe B. Runyon Philadelphia PA	3926. Teresa Glover Philadelphia PA
3840. Rosalind Dutton Philadelphia PA	3869. Meenal Raval Philadelphia PA	3898. Justina R. Calgiano Philadelphia PA	3927. Carolyn Placke Philadelphia PA
3841. Rachel Falkove Philadelphia PA	3870. Janet Boys Philadelphia PA	3899. Cindy DiLulimo Philadelphia PA	3928. Phyllis Levitt Philadelphia PA
3842. Keith Knuckle Philadelphia PA	3871. Betsy Tentson Philadelphia PA	3900. Malachi Adens Philadelphia PA	3929. Michelle Broughton Philadelphia PA
3843. Katherine Watson Philadelphia PA	3872. Chloe Barton Philadelphia PA	3901. Marshal McDonald Philadelphia PA	3930. C. Collings Philadelphia PA
3844. Teja Sepinuck Philadelphia PA	3873. Joy Lawrence Philadelphia PA	3902. George Heck Philadelphia PA	3931. Isaac Stanford Philadelphia PA
3845. Jane L. Abbott Philadelphia PA	3874. Sue Cochrane Newton Square PA	3903. John Barone Philadelphia PA	3932. Maria Helena M. Baronheid Philadelphia PA
3846. Marie-Jeanne Lambert Philadelphia PA	3875. Julia Braton Philadelphia PA	3904. Julie Feinberg Philadelphia PA	3933. Leigh Hopkins Philadelphia PA
3847. A. C. Smith Philadelphia PA	3876. Ursula Reed Philadelphia PA	3905. Jacque Anderson Philadelphia PA	3934. Thomas Mooers Philadelphia PA
3848. Courtney Stoll Philadelphia PA	3877. Priscilla Molina Philadelphia PA	3906. Michael Pavelsky Philadelphia PA	3935. Chris Hart Philadelphia PA
3849. Michelle Kaczovich Philadelphia PA	3878. Mike Ewall Philadelphia PA	3907. Kristen Mermagen Philadelphia PA	3936. Sheryl Richman Philadelphia PA
3850. Aiza Rodriguez Philadelphia PA	3879. David Houck Philadelphia PA	3908. Jeffrey E. Sutton Philadelphia PA	3937. Bradley Crandall Philadelphia PA
3851. Rhonda Edwards Philadelphia PA	3880. Thomas Crowley Philadelphia PA	3909. Jayna Calgiano Philadelphia PA	3938. Marc Hatton Philadelphia PA
3852. Lisa Burns Philadelphia PA	3881. Robert Lawendola Philadelphia PA	3910. Kathleen Wall Elkins Park PA	

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

3939. James Forest  
Calland  
Philadelphia PA

3940. Donald M. McGuire,  
Ph.D.  
Philadelphia PA

3941. Natasha A. Jones  
Philadelphia PA

3942. Steve Newman  
Philadelphia PA

3943. Anne Teitelman  
Philadelphia PA

3944. Darragh Muldoon  
Philadelphia PA

3945. Aaron Christman  
Philadelphia PA

3946. George Newman  
Philadelphia PA

3947. Heather Gibson  
Philadelphia PA

3948. Lisa Basil  
Philadelphia PA

3949. Allan Dupes  
Philadelphia PA

3950. Dave Walsh  
Philadelphia PA

3951. Penelope Myer  
Philadelphia PA

3952. J. A. Dalessandro  
Philadelphia PA

3953. Celeste Zappala  
Philadelphia PA

3954. Evelyn Fernandez  
Cheltenham PA

3955. Keith C. Britton  
Cheltenham PA

3956. Lori Thodde  
Elkins Park PA

3957. Debra J. Amberg  
Cheltenham PA

3958. Mary Coffey  
Elkins Park PA

3959. Marie Y. Blanchard  
Cheltenham PA

3960. Jeanne Buerkel  
Philadelphia PA

3961. Axel Haynes Martine  
Conshohocken PA

3962. Ralph Camardelli II  
Philadelphia PA

3963. Debra S. Gehlman  
Johnstown PA

3964. Ryan Thompson  
Media PA

3965. Emily E. Williams  
Mountain Top PA

3966. Gregory  
Quackenbush  
Upper Darby PA

3967. Keith Rangnow  
Philadelphia PA

3968. Randy Tiffany  
Philadelphia PA

3969. Greg Williams  
Philadelphia PA

3970. Jennifer Woodfin  
Philadelphia PA

3971. Beverly J. Cohen  
Plymouth Meeting  
PA

3972. Margaret A. Hagele  
Philadelphia PA

3973. Kathleen Miceli  
Philadelphia PA

3974. Bernard McPherson  
Philadelphia PA

3975. Gary H. Dudek  
Harrisburg PA

3976. Linda L. Dudek  
Harrisburg PA

3977. Madieu Singh  
Wyncote PA

3978. Daniel Wahl  
Wyncote PA

3979. Gwendolyn Torres  
Wyncote PA

3980. George D. Forman  
Wyncote PA

3981. Rochelle Grady  
Wyncote PA

3982. Gail K. Post  
Wyncote PA

3983. Ruth Colten  
Wyncote PA

3984. Peter Heinemann  
Wyncote PA

3985. Julia Rivers  
Wyncote PA

3986. Monica Liggins  
Wyncote PA

3987. O. Tsugankora  
Wyncote PA

3988. A. Tsugankora  
Wyncote PA

3989. Marian J. Schurz  
Wyncote PA

3990. Dorothy Shue  
Wyncote PA

3991. John Basile  
Wyncote PA

3992. Susan Wexler  
Philadelphia PA

3993. Susan M. Arteaga  
Wyncote PA

3994. Adam Unsworth  
Wyncote PA

3995. Gregory D. Rodney

3996. Michele Levy  
Wyncote PA

3997. Bryan Margenum  
Wyncote PA

3998. Elizabeth Johnson  
Wyncote PA

3999. Deborah Meyer  
Wyncote PA

4000. Michele Schwegler  
Wyncote PA

4001. Benjamin Mosko  
Wyncote PA

4002. Barbara Duffy  
Wyncote PA

4003. Bryan Mosko  
Wyncote PA

4004. Susan D. Clark  
Wyncote PA

4005. Jeff Rosenberg  
Wyncote PA

4006. Gail Greenburg  
Melrose Park PA

4007. Karen Lefebvre-  
Christou  
Melrose Park PA

4008. Ruth Bluethenthal-  
Appel  
Elkins Park PA

4009. Karen Schwartz  
Elkins Park PA

4010. Jonathan Zaslou  
Elkins Park PA

4011. Laura W. Harbeson  
Elkins Park PA

4012. Kelly L. Joell  
Elkins Park PA

4013. Bill England  
Elkins Park PA

4014. Lisa J. Bowman  
Elkins Park PA

4015. Shira Badanes  
Elkins Park PA

4016. Brice L. Horwath  
Philadelphia PA

4017. Daniel G. Foster  
Rydal PA

4018. Brian Zeck  
Philadelphia PA

4019. K. Hammersmith  
Philadelphia PA

4020. Jan Greenberg  
Philadelphia PA

4021. Sarah H. Kogen  
Philadelphia PA

4022. Brian D. Miller  
Philadelphia PA

4023. Melissa Lerman  
Philadelphia PA

4024. Matthew D. Freund  
Philadelphia PA

4025. James G. Wilson  
Bensalem PA

4026. Melissa K. Romero  
Philadelphia PA

4027. Michael Levine  
Philadelphia PA

4028. Daphne Holzman  
Philadelphia PA

4029. Sanjeev Khanna  
Philadelphia PA

4030. C. Dauahber  
Philadelphia PA

4031. Elizabeth Block  
Philadelphia PA

4032. Macy L. Harton  
Philadelphia PA

4033. Marisa Mandos  
Conshohocken PA

4034. Resident  
Conshohocken PA

4035. Marta Sanchez-  
Dallam  
Philadelphia PA

4036. Juaneta Richards  
Philadelphia PA

4037. Joan Blaustein  
Philadelphia PA

4038. Phyllis T. Woods  
Philadelphia PA

4039. Deborah Aron  
Philadelphia PA

4040. Dveera Segal  
Philadelphia PA

4041. Jessica Roland  
Philadelphia PA

4042. Eric Wilden  
Philadelphia PA

4043. Ellen Furstenberg  
Philadelphia PA

4044. Kathleen Bradley  
Philadelphia PA

4045. Laura Lynch  
Philadelphia PA

4046. Madeline Rambo  
Philadelphia PA

4047. J. C. Lew  
Philadelphia PA

4048. Lillie Kizack  
Philadelphia PA

4049. Mia Calvitti  
Philadelphia PA

4050. Sheila Williams  
Philadelphia PA

4051. Douglas Buchholz  
Philadelphia PA

4052. Kathryn Gontarck  
Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

4053. Dan McDevitt Philadelphia PA	4082. Mitchell Keingrushon Philadelphia PA	4111. Roland Dessus Philadelphia PA	4140. W. Wallace Dyer, Jr. Philadelphia PA
4054. Angelo Pulido Philadelphia PA	4083. Deane H. Bartlett Philadelphia PA	4112. Jennifer Bisicchir Philadelphia PA	4141. Janet R. Thomas Philadelphia PA
4055. M. Joyce Thomason Philadelphia PA	4084. David D. Ward Philadelphia PA	4113. Meg Smith Folsom PA	4142. Lorrin Thomas Philadelphia PA
4056. Michael Blackman Philadelphia PA	4085. Joseph Michael Smith Philadelphia PA	4114. Helen Hionas Philadelphia PA	4143. Kristen Haugen Philadelphia PA
4057. Carlton L. Sampson Philadelphia PA	4086. Katie Day Philadelphia PA	4115. Joan Buckley Philadelphia PA	4144. Timothy P. Martin Philadelphia PA
4058. Phyllis Myers Philadelphia PA	4087. Amy Martinez Philadelphia PA	4116. Marian Flaherty Philadelphia PA	4145. Paula D. Brown Philadelphia PA
4059. Katie Behan, M.D. Philadelphia PA	4088. Cynthia Thomas Philadelphia PA	4117. Polly Kanevsky Philadelphia PA	4146. Lynette Burgess Philadelphia PA
4060. Katherine Sherfud Philadelphia PA	4089. Jeanette C. Aaron Philadelphia PA	4118. Aspen R. Alford Philadelphia PA	4147. Deborah Wyse Philadelphia PA
4061. Carol A. Allison Philadelphia PA	4090. Richard H. Knox Philadelphia PA	4119. Ethan Rowe Philadelphia PA	4148. Anne Kelsh Philadelphia PA
4062. William Elfring Philadelphia PA	4091. Robert E. Taylor Philadelphia PA	4120. Julie Regnier Philadelphia PA	4149. Wendy Kern Philadelphia PA
4063. Kathy Sutton Philadelphia PA	4092. Mark J. Webb Philadelphia PA	4121. Margaret T. Kovich Philadelphia PA	4150. Peter Berson Philadelphia PA
4064. Charles Sutton Philadelphia PA	4093. Keith DeStefano Philadelphia PA	4122. Josed Biehl Philadelphia PA	4151. Alexander Molot Philadelphia PA
4065. Charles J. McMahon Philadelphia PA	4094. Johannes W. Ponser Philadelphia PA	4123. Fran Berge Philadelphia PA	4152. John Knapich Philadelphia PA
4066. Eleanor M. Daly Philadelphia PA	4095. Glenn Bengman Philadelphia PA	4124. Shannon Dunham Philadelphia PA	4153. Robin Miller Philadelphia PA
4067. Sharon Strauss Philadelphia PA	4096. Debbie Mote Philadelphia PA	4125. Bonnie Reichert Philadelphia PA	4154. Cynthia L. Rutherford Philadelphia PA
4068. Resident Philadelphia PA	4097. George Chu Philadelphia PA	4126. Paul Reichert Philadelphia PA	4155. Robert G. Munger Philadelphia PA
4069. Robert W. Haynes Conshohocken PA	4098. Doug Coleman Philadelphia PA	4127. Susan Joshi Philadelphia PA	4156. Jay S. Efran Philadelphia PA
4070. Jenny Blair Philadelphia PA	4099. Carl Amos Philadelphia PA	4128. Howard S. Deck Philadelphia PA	4157. Lisa Mullins Philadelphia PA
4071. Earl L. Nelson Philadelphia PA	4100. Connie Mast Philadelphia PA	4129. Mary L. Goldman Philadelphia PA	4158. Joseph Powers Philadelphia PA
4072. Judith Nelson Philadelphia PA	4101. Terry Freeland Philadelphia PA	4130. Dean Khan Philadelphia PA	4159. N. Nina Ahmad Philadelphia PA
4073. Mia A. Mengucci Philadelphia PA	4102. E. P. Stridiron Philadelphia PA	4131. Jeannie Nester Philadelphia PA	4160. J. M. Leigh Philadelphia PA
4074. Claire Ippolitti Philadelphia PA	4103. Jennie McPherson Philadelphia PA	4132. William Clee Philadelphia PA	4161. Thomas D. Elkinton Philadelphia PA
4075. Albutt L. Gardner Philadelphia PA	4104. Sofia Barre Philadelphia PA	4133. Elizabeth B. Lukens Philadelphia PA	4162. Marsha L. Johnson Philadelphia PA
4076. Victoria Weigelt Philadelphia PA	4105. Mounir Draissi Philadelphia PA	4134. Ellen Murphey Philadelphia PA	4163. Roy N. Gay Philadelphia PA
4077. David Eaton Philadelphia PA	4106. Clarence Roberts Philadelphia PA	4135. Peter M. Jacory Philadelphia PA	4164. Margaret Rabinawitz Philadelphia PA
4078. Aurora Neromiliotis Philadelphia PA	4107. Mary S. Ashman Philadelphia PA	4136. Jennifer Graham Philadelphia PA	4165. Carl D. Bennett Philadelphia PA
4079. Bruce L. Bloy Philadelphia PA	4108. Monica Bryant Philadelphia PA	4137. Jonathan A. Moselle Philadelphia PA	4166. B. Frank Aycox Philadelphia PA
4080. Annie B. Richardson Philadelphia PA	4109. David A. Scott Philadelphia PA	4138. Chris Taranta Philadelphia PA	4167. Carol W. Faris Philadelphia PA
4081. The Rev. Dianne O. Loufman Philadelphia PA	4110. Marie Witherspoon Philadelphia PA	4139. Barbara Eason Watson Philadelphia PA	4168. Winona P. Boyd Philadelphia PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

4169. Kira deLong  
Philadelphia PA

4170. John M. Bies  
Philadelphia PA

4171. Afshin Kaighobady  
Philadelphia PA

4172. Jennifer Jaffe  
Philadelphia PA

4173. David A. Council  
Philadelphia PA

4174. Jeffery Hayes  
Philadelphia PA

4175. Laura Oliver  
Philadelphia PA

4176. Meredith Molloy  
Philadelphia PA

4177. Michael Brown  
Philadelphia PA

4178. Andrea Gordon  
Philadelphia PA

4179. Jeneva Perry  
Philadelphia PA

4180. Jane Mills  
Philadelphia PA

4181. Heather Black  
Philadelphia PA

4182. Kristin Coopat  
Philadelphia PA

4183. Sydney D. White  
Philadelphia PA

4184. Shawn Hart  
Philadelphia PA

4185. Julie R. Klein  
Philadelphia PA

4186. Mansa Crandall  
Philadelphia PA

4187. Marcie Hammond  
Philadelphia PA

4188. Ruth Lachman  
Sueker  
Philadelphia PA

4189. John Darling Wolf  
Philadelphia PA

4190. Ruth Changler  
Philadelphia PA

4191. Judith Rossman  
Philadelphia PA

4192. Will S. Bricker  
Philadelphia PA

4193. Ameet Ravital  
Philadelphia PA

4194. Barbara Hoffman  
Philadelphia PA

4195. Melissa Milford  
Philadelphia PA

4196. Chris Amicucci  
Philadelphia PA

4197. Amanda Mitchell-  
Boyask  
Philadelphia PA

4198. Ramesh H. Ehuri  
Philadelphia PA

4199. R. B. Bojar  
Philadelphia PA

4200. Richard M. Dow  
Philadelphia PA

4201. Troy Tucker  
Philadelphia PA

4202. Eleanore K. Pabarue  
Philadelphia PA

4203. Elsie B. Viehman  
Philadelphia PA

4204. Mara Natkins  
Philadelphia PA

4205. Vera L. Glassman  
Philadelphia PA

4206. Peter Buffur  
Philadelphia PA

4207. David Brodsky  
Philadelphia PA

4208. Jan Robertson  
Philadelphia PA

4209. C. Kenneth Lovett  
Philadelphia PA

4210. Jeff Perkins  
Philadelphia PA

4211. Adam M. Levy  
Philadelphia PA

4212. Michael Daub  
Philadelphia PA

4213. Sarah Davis  
Philadelphia PA

4214. Stephen B. Stone  
Philadelphia PA

4215. Van Williams  
Philadelphia PA

4216. Milton Cohen  
Philadelphia PA

4217. Andrew Rosebury  
Philadelphia PA

4218. Judith Dutton  
Philadelphia PA

4219. Hannah Dutton-Shen  
Philadelphia PA

4220. Ben Craig  
Philadelphia PA

4221. Vic Gatmaitan  
Philadelphia PA

4222. Leslie Klinefelter  
Philadelphia PA

4223. Barbara A.  
McLaughlin  
Philadelphia PA

4224. Sonia Hulman  
Philadelphia PA

4225. Belinda Davis  
Philadelphia PA

4226. Carl Tannuenbaum  
Philadelphia PA

4227. Earl Gray  
Philadelphia PA

4228. Alex B. Humes  
Philadelphia PA

4229. Tracey Diehl  
Philadelphia PA

4230. Mary L. Nolan  
Philadelphia PA

4231. Elizabeth M. Gillin  
Philadelphia PA

4232. Nancy Sen  
Philadelphia PA

4233. James R. Fries  
Philadelphia PA

4234. Barbara J. Collom  
Philadelphia PA

4235. The Honorable  
Michael F. Gerber  
Pennsylvania House  
of Representatives  
Philadelphia PA

4236. Gene Barr  
sroth@pachamber.org

4237. Bertha Dougherty  
Morton PA

4238. Cynthia Paetow  
Quakertown PA

4239. Carole Deal  
caroledeal@msn.com

4240. Dennis Miller  
Pottstown PA

4241. Julie Becker  
Alliance of  
Automobile  
Manufacturers  
Philadelphia PA

4242. Timothy MacCarthy  
AIAM  
Philadelphia PA

4243. Rev. David G. Arnold  
Harrisburg PA

4244. Marjorie E. Stout  
Lehigh PA

4245. Shirley Radler  
Lehigh PA

4246. David E. Schrader  
Washington PA

4247. Christina M. Terhune  
Wind Gap PA

4248. Rev. C. Frank  
Terhune  
Wind Gap PA

4249. Kenneth C. Feinour,  
Jr.  
Jenkintown PA

4250. Elaine B. Molnar  
Bethlehem PA

4251. Priscilla S. Kinney  
Fleetwood PA

4252. Edward C. Cool  
Bethlehem PA

4253. Edward J. Robbins  
York PA

4254. Peter Bredlan  
Allentown PA

4255. Janet S. Reinbrecht  
Mechanicsburg PA

4256. Alexander Nye  
Corgan  
Allentown PA

4257. Thomas E. McKee  
York PA

4258. Pastor Judith A.  
McKee  
York PA

4259. Paula L. Lubold  
Pittsburgh PA

4260. Barbara YY.  
DiveBliss  
Eighty Four PA

4261. Terry L. DiveBliss  
Eighty Four PA

4262. Warren M. Eshbach  
Thomasville PA

4263. Donald J. McCoid  
Pittsburgh PA

4264. Roger J. Olson  
Hershey PA

4265. Deborah Olson  
Hershey PA

4266. Marjorie L. Coons-  
Torn  
Etters PA

4267. Dr. Karen Elizabeth  
King  
Lancaster PA

4268. Brenda Waleff  
Harrisburg PA

4269. Sandra L. Strauss  
Harrisburg PA

4270. Bruce R.  
Druckenmiller  
Milroy PA

4271. Abera B. Hellemo  
Gettysburg PA

4272. Jeffrey A. Whitman  
Harrisburg PA

4273. Marie E. Wood  
Rome PA

4274. Gregory S. Wood  
Rome PA

**Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)**

4275. Rev. Catrina Ciccione Lewisburg PA	4302. Arnold L. Tiemeyer Blue Bell PA	4328. Shirley Aliferis West Chester PA	4354. Gregory S. Charovock Philadelphia PA
4276. David Newman Easter PA	4303. A. Donald Main Sunbury PA	4329. Francine Marinar Exton PA	4355. Mac Caderlern Bala Cynwyd PA
4277. Peggy L. Bohart Cogan Station PA	4304. David R. Strobel Bowers PA	4330. T. Lee West Chester PA	4356. Laura Halkras Philadelphia PA
4278. Serena S. Sellers Quakertown PA	4305. Carol S. Hendrix Dillsburg PA	4331. Anthony Ciarrocchi West Chester PA	4357. Sean DeLuca Ardmore PA
4279. Diana H. Rooker Williamsport PA	4306. Allen M. Flueore Lewisburg PA	4332. Bill Brarnerd Broomall PA	4358. Ray W. Vance Philadelphia PA
4280. Helen B. Henninger Elizabethville PA	4307. The Honorable Joshua D. Shapiro Pennsylvania House of Representatives Philadelphia PA	4333. Resident State College PA	4359. Mariel P. Weber Philadelphia PA
4281. Lois Ann Griffiths Harrisburg PA	4308. The Honorable Jim Ferlo Senate of Pennsylvania Philadelphia PA	4334. William Jordan West Chester PA	4360. Nancy Charkes Wynnewood PA
4282. Linda Van Tic Lititz PA	4309. Frances E. Harkins Munhall PA	4335. Resident Philadelphia PA	4361. Liz Newhaus-Booth Philadelphia PA
4283. Jean A. Dickey Cogan Station PA	4310. Abby Block Drexel Hill PA	4336. Resident Philadelphia PA	4362. Carolina Dominguez West Chester PA
4284. Rev. Detlef Huckfelot Cogan Station PA	4311. Robert F. Markley Drexel Hill PA	4337. Tyler Croak Lock Haven PA	4363. Lydia and Jaran Santana West Chester PA
4285. Robert A. Massing Greenville PA	4312. James Fahringer Drexel Hill PA	4338. Resident North East PA	4364. Joan G. Roscoe West Chester PA
4286. Bernie Massing Greenville PA	4313. Herbert M. Meyers Media PA	4339. Resident Drexel Hill PA	4365. Joe Hernandez Guitierrez West Chester PA
4287. Ellen Doughty York PA	4314. M. J. Rossi Drexel Hill PA	4340. Kate Ward Drexel Hill PA	4366. Juan Luis Flores West Chester PA
4288. Amy Fazio Freedom PA	4315. Cordelia Butler Philadelphia PA	4341. L. Sexton Narberth PA	4367. C. Ansley West Chester PA
4289. Eileen A. Lutz Allentown PA	4316. Giovanni Areamone Drexel Hill PA	4342. Resident Philadelphia PA	4368. Karen Townsend West Chester PA
4290. Ruth R. Dex Emmaus PA	4317. J. E. Maley Drexel Hill PA	4343. Angelina Flores West Chester PA	4369. Carlos Yuste West Chester PA
4291. Stephen A. Schresing Williamsport PA	4318. Marsha Upshaw Drexel Hill PA	4344. Stew Morgan State College PA	4370. Saletia West Chester PA
4292. S. Christine Mummert Harrisburg PA	4319. Dorothy M. Kapp Drexel Hill PA	4345. Brittany Baney No City No State	4371. William Romeika West Chester PA
4293. Joseph A. Serafin Ringtown PA	4320. Kevin Carr Drexel Hill PA	4346. Kingsley Macomber Sierra Research Philadelphia PA	4372. Mark DeWitte Downingtown PA
4294. Dennis K. Orsen Pittsburgh PA	4321. John K. Maus, Jr. Gwynedd PA	4347. Ray Scheetz Palmyra PA	4373. Harry C. Jamison, Jr. West Chester PA
4295. Sandra T. Schrader Washington PA	4322. Mary Jean Maus Gwynedd PA	4348. Reginald Modlin DaimlerChrysler Corporation Philadelphia PA	4374. Claudia L. Henrie West Chester PA
4296. Mary E. Wolfe Reading PA	4323. Patricia L. Bourne Gwynedd PA	4349. Gary Oshnock DaimlerChrysler Corporation Philadelphia PA	4375. Lee Woolf West Chester PA
4297. D. Michael Bennethum Reading PA	4324. Richard Stiller Gwynedd PA	4350. Donald Fonte The Hertz Corporation Philadelphia PA	4376. Dr. Neil Sloane King of Prussia PA
4298. William A. Hower Moon Township PA	4325. Karen Slossburg West Chester PA	4351. Hannah Miller Philadelphia PA	4377. David Voigtsberger Drexel Hill PA
4299. Peggy M. Wuertele Allentown PA	4326. Gerald Gabel West Chester PA	4352. Josh Robeson Philadelphia PA	4378. Donald E. Cohen Drexel Hill PA
4300. Elizabeth S. Gnazzo Harrisburg PA	4327. Bruce J. Rubin Downingtown PA	4353. Kate Leshco Langhorn PA	4379. Anthony DiGregorio Drexel Hill PA
4301. Gary L. Harke Harrisburg PA			4380. J. Gordon Drexel Hill PA
			4381. Colleen DeJohn Drexel Hill PA

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4382. Pat Leicht Drexel Hill PA	4411. Robert Jaoude West Chester PA	4440. Regina Altieri Drexel Hill PA	4468. Matt Nicholas Philadelphia PA
4383. Ann Maguire Drexel Hill PA	4412. Patricia DeHart West Chester PA	4441. Jean Schmidt Drexel Hill PA	4469. George Reinhart Philadelphia PA
4384. Bridget Hegarty Broomall PA	4413. Suzy Keenar West Chester PA	4442. Tom McDermott Drexel Hill PA	4470. Brian Kisielewski Philadelphia PA
4385. David Hill Drexel Hill PA	4414. Monica Saunders Drexel Hill PA	4443. Darren Hazlett Aston PA	4471. Nevin Sherlock Port Matilda PA
4386. Kerri Fahringer Drexel Hill PA	4415. Veronica Donoghue Drexel Hill PA	4444. Rosetta Jacobini Drexel Hill PA	4472. Kevin Clark Morrisdale PA
4387. Al Kryst Drexel Hill PA	4416. Mark Vuocolo Drexel Hill PA	4445. Ed McElray Drexel Hill PA	4473. Pradeep Indrakanti University Park PA
4388. Philip T. Van Zile IV Mechanicsburg PA	4417. C. DeCarlo Drexel Hill PA	4446. Donald Doucette, Jr. Drexel Hill PA	4474. Gregory W. Crews Watsontown PA
4389. Ed Melenski Drexel Hill PA	4418. Maureen Carr Drexel Hill PA	4447. Erica Lewandosky Drexel Hill PA	4475. Mark Colassy University Park PA
4390. Teresa Murray Drexel Hill PA	4419. Mike DelBuono Drexel Hill PA	4448. Steve Smith Upper Darby PA	4476. Dave Irvin Lock Haven PA
4391. D. Engell Drexel Hill PA	4420. Andrew Johnson West Norriton PA	4449. Joe Stanislawczyk, Jr. Drexel Hill PA	4477. Jason Little State College PA
4392. Fran Marinaro Drexel Hill PA	4421. Loretta Sabatino Drexel Hill PA	4450. Paul Wilkans Drexel Hill PA	4478. Liv Detrick State College PA
4393. Helen Carney Drexel Hill PA	4422. Mary Cianciarulo Drexel Hill PA	4451. Larry Finnicum Drexel Hill PA	4479. Valerie Sebesty State College PA
4394. Brian Scanlan Smethport PA	4423. M. Mahoney Drexel Hill PA	4452. A.H. Catanach, Jr. West Chester PA	4480. Deborah J. Nardone State College PA
4395. W. Donald Braceland West Chester PA	4424. John F. Foy Drexel Hill PA	4453. Sue Messner Drexel Hill PA	4481. Chad Eichfeld State College PA
4396. Kristine Krueger West Chester PA	4425. Donna Miller Drexel Hill PA	4454. Sherri Eyer Drexel Hill PA	4482. Chad Willcox State College PA
4397. Jeronino Rosado West Chester PA	4426. Mary Keller Drexel Hill PA	4455. Joan S. Schmidt Gwynedd PA	4483. Nicholas Mass McVeytown PA
4398. Melissa Wright West Chester PA	4427. Eleanor Baoslin Drexel Hill PA	4456. Anna Buscimi Drexel Hill PA	4484. Leroy H. Kane West Chester PA
4399. Ignacio Martinez West Chester PA	4428. Jeanette Mancini Drexel Hill PA	4457. Stephen Master Drexel Hill PA	4485. Douglas Wosley Haverford PA
4400. Juana Alvarez West Chester PA	4429. Modele Fister Drexel Hill PA	4458. John T. Sheehan Drexel Hill PA	4486. Robert Ward Williamsport PA
4401. Ivan Avellano Mezia West Chester PA	4430. Jennifer Lombardi Drexel Hill PA	4459. Robert Holloway Drexel Hill PA	4487. Daniel Robins West Chester PA
4402. Amy Rice West Chester PA	4431. Elizabeth A. Tidball West Chester PA	4460. Sandra and Christopher Franz West Chester PA	4488. Kate McKinnon West Chester PA
4403. Jim Malin West Chester PA	4432. Melissa Laws West Chester PA	4461. Regina Pilling Drexel Hill PA	4489. John Grunwell Downingtown PA
4404. Peg Forchetti West Chester PA	4433. Hilda Hotley Gwynedd PA	4462. Lisa Comalli Lansdowne PA	4490. William J. Mellon Collingdale PA
4405. Jack Dalton West Chester PA	4434. Susan O'Grady Drexel Hill PA	4463. James F. Deasey Downingtown PA	4491. June Mento West Chester PA
4406. Leo Kenny West Chester PA	4435. Marianne Heib Ray Drexel Hill PA	4464. James Kotch Gwynedd PA	4492. Stacy Esch West Chester PA
4407. Nancy Crum West Chester PA	4436. Dan Fieldz Drexel Hill PA	4465. Lou Perseghin Philadelphia PA	4493. Nan Miller State College PA
4408. Ulrich Klabunde West Chester PA	4437. Stephen Anzaldo Drexel Hill PA	4466. John J. and Christina M. Brett West Chester PA	4494. Craig Wolf Holidaysburg PA
4409. Joyce Rizzo West Chester PA	4438. Chris Hotz Drexel Hill PA	4467. Mary Donahue New Brunswick NJ	4495. Jordan Kohler Meadville PA
4410. K. Dolan West Chester PA	4439. J. Stefanker Drexel Hill PA		4496. Alexei Main University Park PA



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4497. Andrew Kucher State College PA	4526. Alan Weverstad General Motors Corporation Philadelphia PA	4554. Jeff Crater West Chester PA	4582. Kathleen Vogelmann Drexel Hill PA
4498. Dave Dayon Lewisburg PA	4527. Kevin S. O'Connor Haverford PA	4555. Carl Weir West Chester PA	4583. Syed Zaman Drexel Hill PA
4499. Jesse Yonkovich State College PA	4528. Jim Esch West Chester PA	4556. Margaret Twomey West Chester PA	4584. Nancy Bailine Leavertown PA
4500. Emily Mahon State College PA	4529. Linda Capron West Chester PA	4557. Courtney Davis West Chester PA	4585. Thomas Greenly Drexel Hill PA
4501. Peter C. Listino Media PA	4530. Vincent Ciarrocchi West Chester PA	4558. W R Siebold West Chester PA	4586. Willie Rupert Drexel Hill PA
4502. Pamelie Gagne State College PA	4531. Lynne and Blair Ives Newtown Square PA	4559. H. Thomas Sutton West Chester PA	4587. Celeste Rupert Drexel Hill PA
4503. Kyle Sewartzert Mertztown PA	4532. Kathryn S. Stone Narberth PA	4560. Bridget Locke West Chester PA	4588. Joe Nestor Drexel Hill PA
4504. Lori A. Cook-Stabley S. Williamsport PA	4533. Elizabeth Kurtz Downingtown PA	4561. Emily Michaels West Chester PA	4589. Pamela Lunardi Drexel Hill PA
4505. Betty J. Hicks Huntingdon PA	4534. Mariel P. Weber Philadelphia PA	4562. Dan Moran West Chester PA	4590. Robert Ferreri Drexel Hill PA
4506. Ernie McNeely West Chester PA	4535. Jenny Best West Chester PA	4563. Tom and Dianne Walsh West Chester PA	4591. Joshua Richard Upper Darby PA
4507. Susan Gillespie West Chester PA	4536. Joy Cypher West Chester PA	4564. James Majors West Chester PA	4592. Ciaran Bellwoar Drexel Hill PA
4508. C.G. Ruth West Chester PA	4537. Brenda Olson Exton PA	4565. Stephen Cleary Ledebach PA	4593. Cathy Luongo Drexel Hill PA
4509. Sara Gruner West Chester PA	4538. Tim Lutz West Chester PA	4566. Bernie McCabe Philadelphia PA	4594. Florence Putnam Drexel Hill PA
4510. Harold Ross West Chester PA	4539. Clifford Wagner West Chester PA	4567. Bill Myers Morton PA	4595. Laurie Zepka Drexel Hill PA
4511. John Gruner West Chester PA	4540. Angelo A. Durso Drexel Hill PA	4568. Lauren Amos Philadelphia PA	4596. Jeanne Squillaciotti Philadelphia PA
4512. Brian Banson West Chester PA	4541. Leif Olson Exton PA	4569. Bill Kephart Drexel Hill PA	4597. Christina Stallings West Chester PA
4513. Thomas Kelmartin West Chester PA	4542. Jeanne F. Ward West Chester PA	4570. Richard Tabb Drexel Hill PA	4598. Suzanne Kelmartin West Chester PA
4514. Nancy Lawville Drexel Hill PA	4543. Sarah Burke West Chester PA	4571. Terry Hirst-Hermans Drexel Hill PA	4599. Greg Bauer West Chester PA
4515. Jane Richards West Chester PA	4544. R F Bauer West Chester PA	4572. Kathleen S. Caporizzo Drexel Hill PA	4600. Mike Startup West Chester PA
4516. Paul S. Foster West Chester PA	4545. Joe Grillo West Chester PA	4573. John Kacala Upper Darby PA	4601. Stephanie Andersen Newark DE
4517. Jess Abramson West Chester PA	4546. Stephen DeLeo West Chester PA	4574. Pat Donohue Drexel Hill PA	4602. Jennifer Johannsson Drexel Hill PA
4518. Carl Shafer West Chester PA	4547. Lee Javens West Chester PA	4575. Helene Shovlin Drexel Hill PA	4603. Pharns Auctustin West Chester PA
4519. Matt Brown West Chester PA	4548. Richard B. Crable West Chester PA	4576. Barbara Airasian Drexel Hill PA	4604. Jack Nolte West Chester PA
4520. Chris Lang West Chester PA	4549. D. Felice West Chester PA	4577. Ethel M. Hollaway Drexel Hill PA	4605. Sharon Lawson West Chester PA
4521. Patricia D. Woodward West Chester PA	4550. Chris Bell West Chester PA	4578. Mary Jo Miller Springfield PA	4606. Greg Halvorsen West Chester PA
4522. Robin Howson Princeton NJ	4551. Monica Keller West Chester PA	4579. John Simpson Drexel Hill PA	4607. Marie Potter West Chester PA
4523. Caroline Grunwell Downingtown PA	4552. Gary Hewilt West Chester PA	4580. Peter O'Neill Drexel Hill PA	4608. Pat Cunningham West Chester PA
4524. Dianne Horvath West Chester PA	4553. Ray Ott West Chester PA	4581. Susan O'Neill Drexel Hill PA	4609. Karen Wolf West Chester PA
4525. Sarah Grupp West Chester PA			4610. William F. Dolan West Chester PA

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4611. Charles Keller Drexel Hill PA	4639. Connie Neatty Drexel Hill PA	4669. Erika Sauders 4670. Andrew Malatestz Conshohocken PA	4696. Robert W. Spencer Phoenixville PA
4612. Judy Walker West Chester PA	4640. Steven Couch Ardmore PA	4671. Helene Z. Speer Narberth PA	4697. Liane Anderson Flourtown PA
4613. Ken Schretlin West Chester PA	4641. Cara Gavin Drexel Hill PA	4672. Molly Stoch Conshohocken PA	4698. Jane Shepard Wyndmoor PA
4614. Neil Shovlin Drexel Hill PA	4642. Violet Heniss Drexel Hill PA	4673. IRRC Harrisburg, PA	4699. Portia Robert Newtown PA
4615. Allison McConnell Drexel Hill PA	4643. Joan Kenney Drexel Hill PA	4674. Philip H. Spencer Media PA	4700. Britta Volz Ardmore PA
4616. John Vogelmann Drexel Hill PA	4644. P.J. Finnegan Drexel Hill PA	4675. Mafalda Primavera Havertown PA	4701. V. List Rosemont PA
4617. John Wilkerson Abingdon MD	4645. M. Yuknek Drexel Hill PA	4676. Albert Primavera Havertown PA	4702. Eva Krausz Glen Mills PA
4618. Daniel Solomon Philadelphia PA	4646. Jane Master Drexel Hill PA	4677. James O'Brien Havertown PA	4703. S. Marie Michael Wanzie St. Joseph Villa Philadelphia PA
4619. Vanessa Hershberger Bedford PA	4647. Steve Healy Drexel Hill PA	4678. Mary Bronti Havertown PA	4704. Julie Kiene Philadelphia PA
4620. Tosif Fabian Erial NJ	4648. Mark Maholick Drexel Hill PA	4679. Carol Primavera- Paris Broomall PA	4705. Elizabeth Giblin Philadelphia PA
4621. Zach Cullimore Philadelphia PA	4649. Margaret Spaoss Drexel Hill PA	4680. Lynne M. O'Brien Havertown PA	4706. Pat Brotman Bala Cynwyd PA
4622. Christina Michaels Philadelphia PA	4650. Kathleen M. Daly Malvern PA	4681. Laura E. O'Brien Havertown PA	4707. Sister Cyrillan Hoad S.S. J. Saint Joseph Villa Philadelphia PA
4623. Steven May Wyomissing PA	4651. Sue Timlin Drexel Hill PA	4682. Massimo Paris Broomall PA	4708. Sister Kathleen Mc Peak Flourtown PA
4624. Jessica Gildea Bryn Mawr PA	4652. Kevin Farrell Philadelphia PA	4683. Barbara G. Reilly West Chester PA	4709. Sister Alexander Machain Saint Joseph Villa Philadelphia PA
4625. Paul DesRocher Philadelphia PA	4653. Kaitlyn Muller Lafayette Hill PA	4684. Mr. and Mrs. Charles E. Slavin, Jr. West Chester PA	4710. Cindy Powell Philadelphia PA
4626. Jessica Milliagan Severna Park MD	4654. Kelly C. Robinson Wayne PA	4685. Joseph and Nancy Durant Drexel Hill PA	4711. Elizabeth Buchanan Philadelphia PA
4627. Alice DiMascio Philadelphia PA	4655. Eric Wiediger Turkhaven PA	4686. Dr. and Mrs. Gary D. Salkind Drexel Hill PA	4712. Terri Erbacher Philadelphia PA
4628. Drew Stephen Philadelphia PA	4656. Joan Gracie Drexel Hill PA	4687. Margaret A. Chambers Gwynedd PA	4713. Todd Zielinski Philadelphia PA
4629. Tammy Leigh DeMont Philadelphia PA	4657. John R. McGrail Broomall PA	4688. Steve Gallop Glen Mills PA	4714. Stan Zawiscak Philadelphia PA
4630. Emily Morse Newark DE	4658. Nicole Patience Havertown PA	4689. Marie O' Brien Havertown PA	4715. Nicole Mosser Philadelphia PA
4631. Lynn D'Angelo Sinking Spring PA	4659. Barbara Ann Harris Media PA	4690. S. Bale Narberth PA	4716. David E. Hunter Philadelphia PA
4632. Justin Schmidt Ridgewood NJ	4660. Nicole Rangers Broomall PA	4691. Dot O'Connor Springfield PA	4717. A. Clare Philadelphia PA
4633. Debbie Carr Philadelphia PA	4661. Dan Marx Broomall PA	4692. Sally Weaver Narberth PA	4718. Jacqueline Ann Coren Philadelphia PA
4634. Karyn Konzet Philadelphia PA	4662. Julia B. Schultz Havertown PA	4693. Sally M. Seligum Pittsgrove NJ	4719. Matthew Miller Philadelphia PA
4635. Shruti Mehta Philadelphia PA	4663. Paul Sukeema Mechanicsburg PA	4694. Lenore Denbin Ardmore PA	4720. Resident Philadelphia PA
4636. Lark Rambo Philadelphia PA	4664. Philip Dahl Philadelphia PA	4695. Grace Spencer Phoenixville PA	
4637. Robert Partridge, M.D. Drexel Hill PA	4665. Rachel Mueller Philadelphia PA		
4638. Larry Martin Drexel Hill PA	4666. Brian O'Keefe Philadelphia PA		
	4667. David Harms Philadelphia PA		
	4668. Dorothy Guy		

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4721. Katie Huynh Philadelphia PA	4749. Harry Thorn Philadelphia PA	4777. Dawn Fisher Philadelphia PA	4805. James Wilson, Jr. Philadelphia PA
4722. Long T. Huynh Philadelphia PA	4750. Gerald Kaufman Philadelphia PA	4778. H. Feibish Philadelphia PA	4806. Pamela O'Neil Philadelphia PA
4723. Alison Simpson Philadelphia PA	4751. Michael O' Connor Township of Abington Philadelphia PA	4779. Anderson King Philadelphia PA	4807. Mark Haas Philadelphia PA
4724. Anne R. Hess Philadelphia PA	4752. Veronica Becker Philadelphia PA	4780. Larry Trexler Philadelphia PA	4808. Itzahek Kornfeld Glenside PA
4725. Jim Petty Glenside PA	4753. Floyd Platton Philadelphia PA	4781. Megan Hess Philadelphia PA	4809. Constance Moody Philadelphia PA
4726. Bernie Wilke Philadelphia PA	4754. Vanessa Chan Philadelphia PA	4782. Laurence S. Klugman Philadelphia PA	4810. Todd Moody Philadelphia PA
4727. Marie Knibbe Philadelphia PA	4755. Amanda Rothstein Philadelphia PA	4783. Julia Lehman- McTigue Philadelphia PA	4811. Lisa Fitzpatrick Conshohocken PA
4728. Mary Andrews Philadelphia PA	4756. Marla McDermott Philadelphia PA	4784. Bonnie F. Stone Philadelphia PA	4812. Daniel Gundaker Conshohocken PA
4729. Peter Knibbe Philadelphia PA	4757. Mark Van Der Helm Philadelphia PA	4785. Jarrod C. Finlay Philadelphia PA	4813. Michael A. Harrison Conshohocken PA
4730. Oscar P. Dungan Philadelphia PA	4758. Colin Carr Philadelphia PA	4786. Jan Marquardt Philadelphia PA	4814. Cara Dempsey Conshohocken PA
4731. Arlene Downs Philadelphia PA	4759. Rita A. Calvan Philadelphia PA	4787. Lonny M. Knowlton Philadelphia PA	4815. Shannon McCann Conshohocken PA
4732. Paul Maurizio Philadelphia PA	4760. Carl J. Spizzirri Philadelphia PA	4788. Heather A. Dudek Philadelphia PA	4816. E. Mick Detweiler Conshohocken PA
4733. Alice Van Burer Kelley Strafford PA	4761. Joseph DelGiorno Philadelphia PA	4789. Barbara Fuchs Philadelphia PA	4817. Jody Marcucci Conshohocken PA
4734. Pamela Haines Philadelphia PA	4762. Mary Mullins Philadelphia PA	4790. Todd Lynch Philadelphia PA	4818. Carolyn Heck Conshohocken PA
4735. Paula Kline West Chester PA	4763. Michael Granato Philadelphia PA	4791. Naina Michaud Philadelphia PA	4819. Helene Clegg Conshohocken PA
4736. Alan Wright West Chester PA	4764. Mark Willie Philadelphia PA	4792. E. Vaughn Philadelphia PA	4820. E. Stewart Pittenger Conshohocken PA
4737. Carol Spitz Philadelphia PA	4765. Missy Maxwell Philadelphia PA	4793. Christopher Kutzler Philadelphia PA	4821. J. Shamash Philadelphia PA
4738. Greg Barnes Haverford PA	4766. Janet Milkman Philadelphia PA	4794. Rory Murphy Philadelphia PA	4822. James Walsh Media PA
4739. Elizabeth Mason Philadelphia PA	4767. Judith B. Smith Philadelphia PA	4795. Joshua Kopel Philadelphia PA	4823. Tara Lyons Media PA
4740. Margaret Walters Philadelphia PA	4768. James Walker Philadelphia PA	4796. Madeline Pendleton Philadelphia PA	4824. Alice Dubroff Swarthmore PA
4741. Allan Walters Philadelphia PA	4769. Donna E. Baker Philadelphia PA	4797. John Kouroupas Philadelphia PA	4825. Joseph Peter Bridy, AIA Philadelphia PA
4742. Beth Kline-Pederson Willow Street PA	4770. Charles W. Bliss Philadelphia PA	4798. Josh Lauer Philadelphia PA	4826. George Merritt Franklin PA
4743. Jan Kenney Nottingham PA	4771. Maion McGowan Philadelphia PA	4799. Amy A. Birge, Ph.D. Philadelphia PA	4827. Milton Wolfson Munhall PA
4744. James Lynch Philadelphia PA	4772. C. L. McNabb Philadelphia PA	4800. Toby Kessler Philadelphia PA	4828. John Nacchio Brinton Estates Philadelphia PA
4745. Clyde Putnam Philadelphia PA	4773. Raymond B. Webster Philadelphia PA	4801. Mark Stern Philadelphia PA	4829. Carolyn Andrews Philadelphia PA
4746. Kathy Williamson Philadelphia PA	4774. Gregory Huth Philadelphia PA	4802. Pamela Cooper- White Philadelphia PA	
4747. Jennifer Karsten Philadelphia PA	4775. Natalie Bliss Philadelphia PA	4803. Joanne Davis Philadelphia PA	
4748. Susan Burpee Phillips Philadelphia PA	4776. Eileen Levinson Philadelphia PA	4804. Joshua Redman Philadelphia PA	