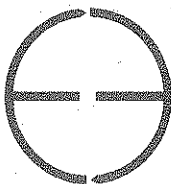


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California Council for Environmental and Economic Balance

100 Spear Street, Suite 805, San Francisco, CA 94105 • (415) 512-7890 • FAX (415) 512-7897

October 19, 2010

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The Honorable Mary Nichols, Chair
California Air Resources Board
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

RE: Proposed Minor Amendment to the Periodic Smoke Inspection Program in
Response to the Inclusion of Diesel Vehicles in Smog Check

Dear Chairwoman Nichols:

The California Council for Environmental and Economic Balance ("CCEEB") is pleased to offer the following comments on the "Proposed Minor Amendments to the Periodic Smoke Inspection Program ("PSIP") in Response to Diesel Vehicle Smog Check ("DVSC" or "Smog Check") Implementation" ("Proposed Amendment") as a follow up to our original comments submitted to Ms. Annette Hebert on July 6, 2010 (Attached).

CCEEB is a coalition of California business, labor and public leaders which strive to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization.

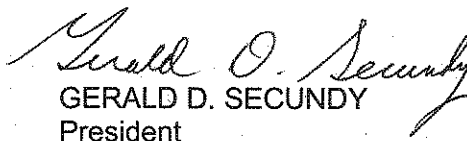
We appreciate the time and effort you and your staff have dedicated to a regulatory solution. We have reviewed the staff's proposal and respectfully continue to suggest you eliminate the PSIP requirement for diesel vehicles subject to the Diesel Smog Check requirement for vehicles between the 6,000 lbs to 14,000 lbs GVWR.

We believe our proposal will continue to provide emission reductions, prevent duplicative testing, decrease regulatory costs on businesses and maintain the integrity and intent of both the PSIP and the smog check programs.

If you have comments or questions concerning the enclosed comments, please contact me or Ms. Kendra Daijogo of The Gualco Group, Inc. at 916/441-1392.

Thank you for your consideration of the comments submitted.

Sincerely,


GERALD D. SECUNDY
President

cc: Honorable Linda Adams
Honorable Sherry Mehl
Mr. James Goldstene
Ms. Annette Hebert
Mr. Robert Ianni

Mr. Wayne Sobieralski
Mr. William J. Quinn
Mr. Jackson R. Gualco
Ms. Kendra Daijogo



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Ms. Annette Hebert
Chief
Mobile Source Operations Division
California Air Resources Board
9480 Telstar Avenue, Suite 4
El Monte, CA 91731

RE: Proposed Minor Amendment to the Periodic Smoke Inspection Program in Response to Diesel Vehicle Smog Check Implementation

Dear Ms. Hebert:

The California Council for Environmental and Economic Balance ("CCEEB") is pleased to offer the following comments on the "Proposed Minor Amendments to the Periodic Smoke Inspection Program ("PSIP") in Response to Diesel Vehicle Smog Check ("DVSC" or "Smog Check") Implementation" ("Proposed Amendment").

CCEEB is a coalition of California business, labor and public leaders who work together to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization.

Periodic Smoke Inspection Program

In 1990, the California Air Resources Board ("CARB") Periodic Smoke Inspection Program was signed into law (Senate Bill 2330) and requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance.

Currently, the PSIP requires owners of California-based fleets of two or more diesel vehicles to conduct annual smoke opacity inspections of their diesel vehicles over 6,000 pounds gross vehicle weight rating ("GVWR").

Diesel Vehicle Smog Check

In 2008, the Bureau of Automotive Repair was required by law (Assembly Bill 1488) to include diesel-powered vehicles manufactured after 1997 with a vehicle weight of less than 8,500 pounds in the biennial smog check program beginning January 1, 2010. The Diesel Smog Check inspection will consist of three parts: a visual check of the emission control equipment; a check of the on-board diagnostic system; and, a test for visible smoke.

This recently implemented Diesel Smog Check is required biennially for diesel vehicles less than or equal to 14,000 lbs GVWR.



Compliance Impacts

CCEEB has several members that have vehicles that require them to comply with both the PSIP and DVSC programs. Vehicles weighing between 6,000 lbs and 14,000 lbs GVWR are impacted by the duplicative requirements. Vehicles in this weight range are typically heavier pick-up trucks. A conservative estimate finds that our members have a significant number of vehicles affected.

The CARB proposal requires that implementation of the PSIP continue during the years in which Diesel Smog Check is not required. This is an onerous requirement that is prone to error and confusion while doing little to reduce emissions.

Suggested Changes

CCEEB would respectfully suggest the following changes:

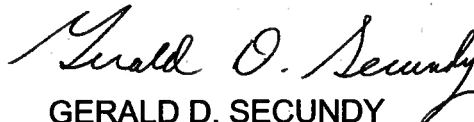
- Eliminate the PSIP requirement for diesel vehicles subject to the Diesel Smog Check requirement for vehicles between the 6,000 lbs to 14,000 lbs GVWR
- Continue to require PSIP for diesel vehicles between the 6,000 lbs to 14,000 lbs GVWR manufactured prior to MY1998

We believe these proposed changes will prevent a duplication of efforts and increase emission reductions while maintaining the integrity and intent of both the PSIP and the DVSC programs.

We appreciate the time and effort required to develop the Proposed Minor Amendments to the Periodic Smoke Inspection Program in Response to Diesel Vehicle Smog Check Implementation. If you have comments or questions concerning the enclosed comments, please contact me or Ms. Kendra Daijogo of The Gualco Group, Inc. at 916/441-1392.

Thank you for your consideration of the comments submitted.

Sincerely,


GERALD D. SECUNDY
President

cc: Honorable Linda Adams
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