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S.84 I am speaking for myself today. My employer, Capstone Community Action, has no official position on S.84. S.84 would have an immediate, beneficial impact on access to mobility for Vermonters with low incomes. This is critical. But I do not have a clear understanding of the negative consequences of allowing some cars to pollute more than others. The data and arguments I have heard to date do not appear to tell the whole story. There are alternatives that may provide better results than S.84, but they come at a cost.

For example, providing targeted, income-sensitive support to make on-board diagnostic system (OBD) repairs could solve problems. California has programs that help low income households in critical air quality districts with funding to make OBD II-related repairs. Wisconsin, Texas, and Utah all have programs in place that may assist in the repair or possible replacement of vehicles that do not pass emissions inspection. Unlike Vermont's one-time waiver approach, these programs have a benefit of compensating the mechanic who assists the car owner to file for the benefit.

Should the House choose to move forward with S.84, I suggest consideration of the following:

- limit PZEV vehicles to a 15 year OBD waiver, since that is the OBD II warranty period for these vehicles;
- limit OBD II waivers to cars that were rated better than the State Average Mile Per Gallon (22.2 MPG in 2017);
- limit OBD II waivers to counties that do not present chronic violations of auto-emission-related air quality standards.
- exclude vehicles from the waiver if the MIL (Malfunction Indicator Light, aka Check Engine Light) is flashing. The flashing light generally indicates a misfire condition, which, if not corrected, can cause more serious damage to the vehicle and result in far greater particulate emissions.

It would be helpful to see data that better illuminates the consequences of changes presented in S.84. Some of this information presumably exists in the DMV Inspections database. With two years data logged in the Inspection database there should be the ability to refine assumptions about the Vermont vehicle fleet that are weighted by *actual* vehicle miles traveled (VMT). Currently most of the reaction related to S.84 appears to be drawn from data similar to the chart below:

The Vermont Transportation Energy Profile — 2017

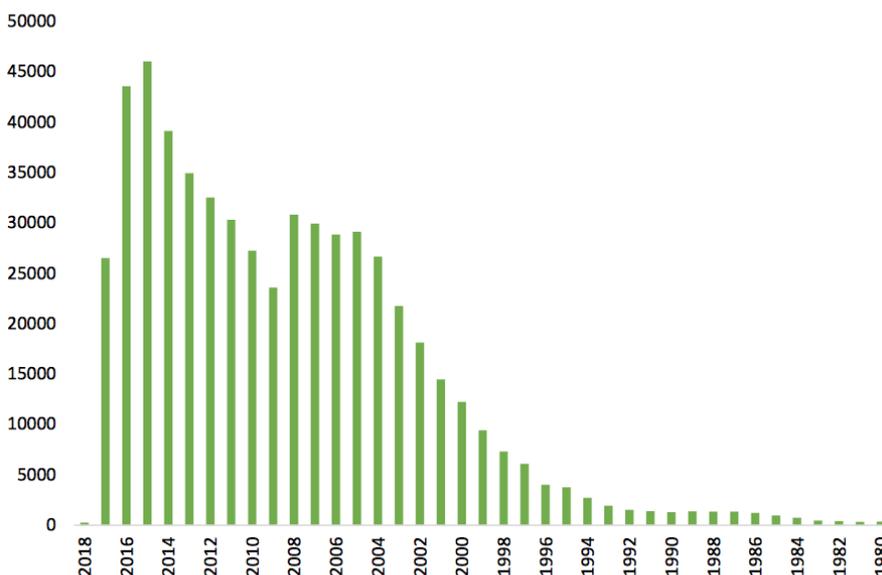


Figure 3-5. Distribution of Model Years for Vehicles in Vermont, 2017 (VDMV, 2017)

What would this chart look like if it were presented by **VMT per model year**? In my experience the older vehicle in a multi-vehicle family often travels less miles than the newer vehicle. I used to hang onto a “beater-truck” for runs to the dump and other household projects. If the profile for Miles Traveled per Model Year produces a steeper slope than Registrations by Model Year, what does that mean for S.84? Wouldn't the environmental impacts be less than currently projected?

An additional level of analysis could look at the actual models of vehicles on the road in the out years. Are the models that are most popular currently logging miles commensurate with their percent purchased after 10 years? Clearly the new model trends favor lower MPG vehicles. But does the data from a year of activity in the Inspection database suggest that the trend is consistent for vehicles that are 10 or 15 years old?

The Vermont Transportation Energy Profile — 2017

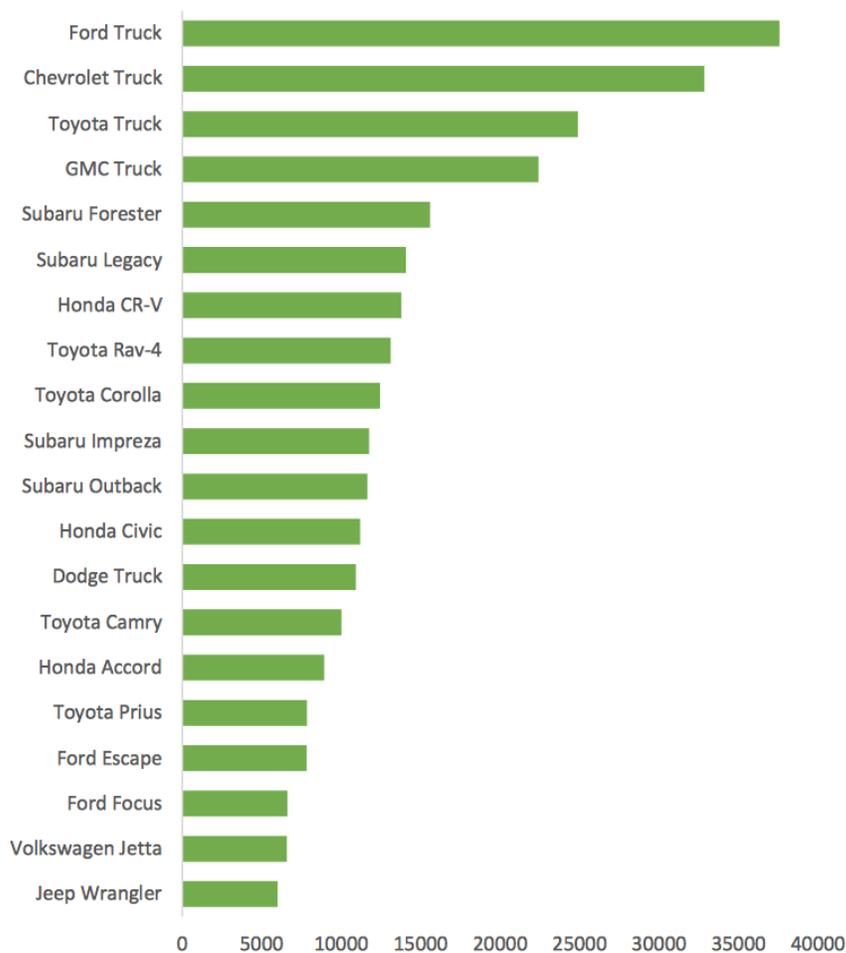


Figure 3-3. Top 20 Vehicle Models Registered in Vermont, 2017 (VDMV, 2017)

Nobody is suggesting that mechanical safety be compromised: brakes, ball joints, and lights all matter to everyone on the road. But I wonder if there is there room to relax a little bit on vehicle emissions for cars that may represent a small minority of the actual gallons of fuel burned in Vermont's transportation profile?