

Senator Richard Westman
Chair, Senate Committee on Transportation
February 27, 2026

Dear Chairman Westman,

With all due respect to you and your committee, Senate bill S.211 is flawed legislation. It's flawed legislation because it would cause Vermonters to waste millions of dollars every other year on a safety inspection requirement that continues to be ineffective, and it's flawed legislation because it would increase Vermonters' exposure to air pollution from what is already the largest source of air pollution in Vermont and would put Vermont at risk of violating the federal Clean Air Act.

First, regarding the safety inspection requirements, I agree with the sponsors of S.211 that the current safety inspection is ineffective. There was a time when Vermont's safety inspection program was reasonably effective, primarily because the failure criteria were stringent but clear, and because there were adequate enforcement measures directed at both inspection stations and motorists for non-compliance. Gradually however, the Vermont Department of Motor Vehicles began to add to the list of components requiring inspection, items that were not related to the safety of the vehicle, with failure criteria that were both unclear and unreasonable. And in recent years, under pressure from both Vermont legislators and the Scott administration, DMV has drastically weakened the safety inspection requirements. Today, a vehicle will pass the safety inspection with for example, a non-functioning parking brake, a tire pressure monitoring system that doesn't work, a long list of safety monitoring functions like collision avoidance that are not working, and a vehicle frame that is severely corroded. And soon, when DMV's recently proposed changes to safety inspection requirements become effective, vehicles will also pass inspection with deep cuts and bare spots in tires, a broken power steering system, misaimed headlights, air bag warning lights that don't work, defects in the critical area of the windshield, and windows that won't go up or down.

The safety inspection program as currently administered results in Vermonters wasting over \$32 million per year on a program that does virtually nothing to improve public safety.¹ At best, S.211 would result in Vermonters wasting over \$32 million every *other* year. At worst however, inspection stations will double their inspection fee to compensate for the loss of income resulting from the change to biennial inspections. They would be following the state's lead, because S.211 would double the fee paid to the state for each inspection sticker issued. The end result would be no improvement - Vermonters would be wasting \$64 million every two years, rather than \$32 million every year.

¹ Assuming 500,000 vehicle inspections/year at an average cost of \$65/inspection

So unless the Vermont legislature is willing to provide the leadership and do the hard work of ensuring that the safety inspection program is restored to its former effectiveness, let's just end the charade, and terminate the safety inspection requirements altogether. Inspection stations would undoubtedly complain. But the purpose of a vehicle inspection program is not to provide income to inspection stations or DMV's large out-of-state based contractor that profits from each inspection conducted, nor is it to provide revenue to the state.

Second, regarding the emissions inspection requirements, because motor vehicles are the largest source of air pollution that threatens the health and welfare of Vermonters, it is necessary to have an emissions inspection program that identifies vehicles with malfunctioning emissions controls and causes them to be repaired. It is also a federal Clean Air Act requirement. It was disturbing to hear sponsors of S.211 claim that changing the emissions inspection requirement to biennial would not increase air pollution. That simply defies logic. Has your committee sought out any analysis of the impact making such a change would have on increases to air pollution?

Vermont's current emissions inspection requirement is efficient and effective, utilizing an automated, consistent, and proven electronic test that effectively identifies vehicle malfunctions that result in increased emissions, and provides information that helps automotive technicians effectively diagnose and repair failing vehicles. And because Vermont, like all other Northeast states except New Hampshire, adopted California emissions standards and emissions warranty requirements, Vermont vehicles have extensive emissions warranty coverage that results in repair at no cost to the vehicle owner. Some Vermont vehicles have emissions warranty coverage for up to 150,000 miles or 15 years.

For the above reasons and more, Vermont's annual emissions inspection should be continued. Furthermore, to help ensure a cost effective emissions inspection program for Vermont motorists, consideration should be given to capping the emissions inspection fee at \$40. The emissions test is a non-intrusive test that can be easily completed in less than 15 minutes. Some inspections stations would certainly complain, but most would continue to participate in the program because while they may not earn significant income from performing the test itself, they will continue to benefit from completing the repairs on vehicles that fail the test.

Thank you for considering my comments.

Tom Moyer
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