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 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.

---

* 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
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 (NOx) 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 NOx, 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 NOx. 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$_{2.5}$) implementation rule, which will also identify NOx emissions as a precursor to the formation of PM$_{2.5}$. 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 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. (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 NOx 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.

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.

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

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

12
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 11th 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”.

15
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.
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.
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...
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.

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

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.

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.

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.

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.

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.
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 toxins into water affecting wildlife, and reduced productivity of agriculture.

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.
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.
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.

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.

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.

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.”

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.

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.

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.
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.

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.
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.

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.

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.

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.
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)
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 its 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 (NOx 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 (PM10 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 PM2.5 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 NOx in 2025 by implementing the Pennsylvania Clean Vehicles Program. The Department continues to agree with CARB that there would be a slight decrease in NOx 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 PM2.5 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 CO2, 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 (CO2) 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 NOx 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 Counsel 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 comments #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, 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
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 “identicality” 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 identicality 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 identicality 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.
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.

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 CO2 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 NOx 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 NOx for the most recent year available in response to a December 27 letter from Senators Madigan and White.
This is a list of corporations, organizations and interested individuals from whom the Environmental Quality Board has received comments regarding the above referenced regulation.

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Levana Layendecker</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2</td>
<td>Tim Kelly</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3</td>
<td>Arthur Stamoulis</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>4</td>
<td>Charles Marshall Paoli</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>5</td>
<td>Emily Linn</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>6</td>
<td>Kristi Fox</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>7</td>
<td>Deborah Lyons</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>8</td>
<td>Frank Bartell</td>
<td>Community College of Phila.</td>
</tr>
<tr>
<td>9</td>
<td>Rev. and Mrs. Edward C.</td>
<td>Presbyterian Church (USA)</td>
</tr>
<tr>
<td>10</td>
<td>Stanley J. Miller, Jr.</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>11</td>
<td>Janice McGrane</td>
<td><a href="mailto:sjmcgrane@yahoo.com">sjmcgrane@yahoo.com</a></td>
</tr>
<tr>
<td>12</td>
<td>Alice Kelley</td>
<td>University of Pennsylvania</td>
</tr>
<tr>
<td>13</td>
<td>Rich Kahmer</td>
<td><a href="mailto:SPA79810@allstate.com">SPA79810@allstate.com</a></td>
</tr>
<tr>
<td>14</td>
<td>William H. Ewing</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>15</td>
<td>Tom Maslanka</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>16</td>
<td>Scott Alberts</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>17</td>
<td>Sarah Singh</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>18</td>
<td>Sarah Kolb</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>19</td>
<td>Christopher Linn</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>20</td>
<td>Lisa Lazar</td>
<td>Allison Park PA</td>
</tr>
<tr>
<td>21</td>
<td>Lori Widelitz-Cavallucci</td>
<td>Elkins Park PA</td>
</tr>
<tr>
<td>22</td>
<td>Alan Peterson, M.D.</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>23</td>
<td>Audrey Pancoe</td>
<td>Elkins Park PA</td>
</tr>
<tr>
<td>24</td>
<td>Katherine Paul</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>25</td>
<td>Mary Wagner</td>
<td>Norristown PA</td>
</tr>
<tr>
<td>26</td>
<td>Tara Leas</td>
<td>East Berlin PA</td>
</tr>
<tr>
<td>27</td>
<td>Jaffrey Edens</td>
<td>Chadds Ford PA</td>
</tr>
<tr>
<td>28</td>
<td>Jeanne Cecil</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>29</td>
<td>Nancy Reese</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>30</td>
<td>Virginia Cassidy</td>
<td>Harleysville PA</td>
</tr>
<tr>
<td>31</td>
<td>Kara Hammond</td>
<td>Media PA</td>
</tr>
<tr>
<td>32</td>
<td>Elizabeth Prugh</td>
<td>Edgeworth PA</td>
</tr>
<tr>
<td>33</td>
<td>John T. Maniatis</td>
<td>Morrisville PA</td>
</tr>
<tr>
<td>34</td>
<td>Joel Hecker</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>35</td>
<td>Don Stone</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>36</td>
<td>Jason Harkcom</td>
<td>Greensburg PA</td>
</tr>
<tr>
<td>37</td>
<td>Daria Hajoianou</td>
<td>Riegelsville PA</td>
</tr>
<tr>
<td>38</td>
<td>Gail Massey</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>39</td>
<td>Helen Kopp</td>
<td>Grafton OH</td>
</tr>
<tr>
<td>40</td>
<td>Joseph Sweeney</td>
<td>Spring House PA</td>
</tr>
<tr>
<td>41</td>
<td>Sharon Sauro</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>42</td>
<td>Shawl Holand</td>
<td>State College PA</td>
</tr>
<tr>
<td>43</td>
<td>Sunshine Stadelman</td>
<td>State College PA</td>
</tr>
<tr>
<td>44</td>
<td>Mary Madeira</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>45</td>
<td>Kathy Kifer</td>
<td>Royal Oak PA</td>
</tr>
<tr>
<td>46</td>
<td>John Duda</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>47</td>
<td>Megan Clark</td>
<td>Pequea PA</td>
</tr>
<tr>
<td>48</td>
<td>Alexandra Kanoff</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>49</td>
<td>Debra Langer</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>50</td>
<td>Stephanie McCullough</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>51</td>
<td>Peter Paige</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>52</td>
<td>David Hersh</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>53</td>
<td>Terry Bremer</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>54</td>
<td>Michael Duerr</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>55</td>
<td>Walter Smith</td>
<td>Glenmore PA</td>
</tr>
<tr>
<td>56</td>
<td>Matthew</td>
<td>Bartholomew</td>
</tr>
<tr>
<td>57</td>
<td>Jennifer Briggs</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>58</td>
<td>Jean Mansell</td>
<td>Willow Grove PA</td>
</tr>
<tr>
<td>59</td>
<td>Anne Wood</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>60</td>
<td>Karen McCann</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>61</td>
<td>Peter Crownfield</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>62</td>
<td>Elizabeth Kreech</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>63</td>
<td>Virginia O'Connell</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>64</td>
<td>Sharna Olffman</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>65</td>
<td>T DeAngelis</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>66</td>
<td>Kathy Billig</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>67</td>
<td>John Smith</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>68</td>
<td>Lisa Brown</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>69</td>
<td>Pamela Pike</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>70</td>
<td>Wojciech</td>
<td>Makalowski</td>
</tr>
<tr>
<td>71</td>
<td>Stephen Baker</td>
<td>State College PA</td>
</tr>
<tr>
<td>72</td>
<td>Susan Rose</td>
<td>York PA</td>
</tr>
<tr>
<td>73</td>
<td>Liz Mengucci</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>74</td>
<td>Susan S. Gotwals</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>75</td>
<td>Thomas Flynn III</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>76</td>
<td>Jeanine Harris</td>
<td>Devon PA</td>
</tr>
<tr>
<td>77</td>
<td>Eugene Aleci</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>78</td>
<td>David Housel</td>
<td>Narberth PA</td>
</tr>
<tr>
<td>79</td>
<td>Yasmine Wasfi</td>
<td>Jenkintown PA</td>
</tr>
<tr>
<td>80</td>
<td>Noelle Slusarski</td>
<td>Ardsley PA</td>
</tr>
<tr>
<td>81</td>
<td>Tom Diederich</td>
<td>Merion Station PA</td>
</tr>
<tr>
<td>82</td>
<td>Rachael Petrozza</td>
<td>Bartonsville PA</td>
</tr>
<tr>
<td>83</td>
<td>Joseph Werzinski</td>
<td>New Hope PA</td>
</tr>
<tr>
<td>84</td>
<td>Helen Weber</td>
<td>Media PA</td>
</tr>
<tr>
<td>85</td>
<td>Tara Yaney</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>86</td>
<td>J Rosario</td>
<td><a href="mailto:jrosario@churchofgodhome.org">jrosario@churchofgodhome.org</a></td>
</tr>
<tr>
<td>87</td>
<td>Sheila Erbaum</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>88</td>
<td>John Ferreira</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>89</td>
<td>Mary Angert</td>
<td>State College PA</td>
</tr>
<tr>
<td>90</td>
<td>Stephan Potts</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>91</td>
<td>Mary Fineran</td>
<td>North Arlington NJ</td>
</tr>
<tr>
<td>92</td>
<td>Kevin Jude</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>93</td>
<td>Jason Saylor</td>
<td>Liverpool PA</td>
</tr>
<tr>
<td>94</td>
<td>Chris Rickards</td>
<td>Pottstown PA</td>
</tr>
<tr>
<td>95</td>
<td>Katy Ruckdeschel</td>
<td>Merion Station PA</td>
</tr>
<tr>
<td>96</td>
<td>Bruce Herring</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>97</td>
<td>Carla Garcia</td>
<td>Gulph Mills PA</td>
</tr>
<tr>
<td>98</td>
<td>Barbara Docs</td>
<td>Revere PA</td>
</tr>
<tr>
<td>99</td>
<td>Jenny Ruckdeschel</td>
<td>Haverford PA</td>
</tr>
<tr>
<td>100</td>
<td>Andrew Bockis</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>101</td>
<td>Sidney Goldstein</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>102</td>
<td>Delia Guzman</td>
<td>State College PA</td>
</tr>
<tr>
<td>103</td>
<td>Barbara Durkin</td>
<td>Green Lane PA</td>
</tr>
<tr>
<td>104</td>
<td>Lawrence Coburn</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>105</td>
<td>Dawn Serra</td>
<td>Riegelsville PA</td>
</tr>
<tr>
<td>106</td>
<td>Poune Saberi</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td></td>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>107</td>
<td>Anita Juni</td>
<td>Paoli PA</td>
</tr>
<tr>
<td>108</td>
<td>Katherine O'Flanagan</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>109</td>
<td>Deborah Wolf</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>110</td>
<td>Lucy Boyce</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>111</td>
<td>David Leonard</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>112</td>
<td>Todd Stevenson</td>
<td>Budd Lake NJ</td>
</tr>
<tr>
<td>113</td>
<td>Donna Adamson</td>
<td>Curls</td>
</tr>
<tr>
<td>114</td>
<td>Anita Juni</td>
<td>Paoli PA</td>
</tr>
<tr>
<td>115</td>
<td>Katherine O'Flanagan</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>116</td>
<td>Deborah Wolf</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>117</td>
<td>Lucy Boyce</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>118</td>
<td>David Leonard</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>119</td>
<td>Todd Stevenson</td>
<td>Budd Lake NJ</td>
</tr>
<tr>
<td>120</td>
<td>Donna Adamson</td>
<td>Curls</td>
</tr>
<tr>
<td>121</td>
<td>Anita Juni</td>
<td>Paoli PA</td>
</tr>
<tr>
<td>122</td>
<td>Katherine O'Flanagan</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>123</td>
<td>Deborah Wolf</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>124</td>
<td>Lucy Boyce</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>125</td>
<td>David Leonard</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>126</td>
<td>Todd Stevenson</td>
<td>Budd Lake NJ</td>
</tr>
<tr>
<td>127</td>
<td>Donna Adamson</td>
<td>Curls</td>
</tr>
<tr>
<td>128</td>
<td>Anita Juni</td>
<td>Paoli PA</td>
</tr>
<tr>
<td>129</td>
<td>Katherine O'Flanagan</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>130</td>
<td>Deborah Wolf</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>131</td>
<td>Lucy Boyce</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>132</td>
<td>David Leonard</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>133</td>
<td>Todd Stevenson</td>
<td>Budd Lake NJ</td>
</tr>
<tr>
<td>134</td>
<td>Donna Adamson</td>
<td>Curls</td>
</tr>
</tbody>
</table>

- Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)
<table>
<thead>
<tr>
<th></th>
<th>Name</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>219</td>
<td>Flavia Colgan</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>220</td>
<td>Christopher Keane</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>221</td>
<td>Vaughan Boleky</td>
<td>Utica PA</td>
</tr>
<tr>
<td>222</td>
<td>Mark Fiorini</td>
<td>Blandon PA</td>
</tr>
<tr>
<td>223</td>
<td>Caroline Cahill</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>224</td>
<td>Jerry Tamburino</td>
<td>Lords Valley PA</td>
</tr>
<tr>
<td>225</td>
<td>Julie Angel</td>
<td>Wyndmoor PA</td>
</tr>
<tr>
<td>226</td>
<td>Morgan Plant</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>227</td>
<td>Franz Birgel</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>228</td>
<td>John Marchioni</td>
<td>Washington Crossing PA</td>
</tr>
<tr>
<td>229</td>
<td>Elvia Beach</td>
<td>Devon PA</td>
</tr>
<tr>
<td>230</td>
<td>Beth Lucabaugh</td>
<td>Glen Rock PA</td>
</tr>
<tr>
<td>231</td>
<td>Mustafa Kamal</td>
<td>North Wales PA</td>
</tr>
<tr>
<td>232</td>
<td>Rachel Cohen</td>
<td>Abington PA</td>
</tr>
<tr>
<td>233</td>
<td>Perry Gower</td>
<td>Milford PA</td>
</tr>
<tr>
<td>234</td>
<td>Karen Herbison</td>
<td>Macungie PA</td>
</tr>
<tr>
<td>235</td>
<td>Christine Serbian</td>
<td>Media PA</td>
</tr>
<tr>
<td>236</td>
<td>Kelly Kurtas</td>
<td>Shippensburg PA</td>
</tr>
<tr>
<td>237</td>
<td>Sanjeev Surati</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>238</td>
<td>Greg McGarvey</td>
<td>Levittown PA</td>
</tr>
<tr>
<td>239</td>
<td>Clair Arocho</td>
<td>Fairless Hills PA</td>
</tr>
<tr>
<td>240</td>
<td>Rachel McKay</td>
<td>Bala Cynwyd PA</td>
</tr>
<tr>
<td>241</td>
<td>Kelly Singel</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>242</td>
<td>Sydney and Margaret Heese</td>
<td>Washington Crossing PA</td>
</tr>
<tr>
<td>243</td>
<td>Michael McElroy</td>
<td>Lansdowne PA</td>
</tr>
<tr>
<td>244</td>
<td>Jesse Brenner</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>245</td>
<td>Lorenzo Patitucci</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>246</td>
<td>Anthony Barr</td>
<td>Claysburg PA</td>
</tr>
<tr>
<td>247</td>
<td>Gail Tunick</td>
<td>Lafayette Hill PA</td>
</tr>
<tr>
<td>248</td>
<td>H. Campbell</td>
<td>New Cumberland PA</td>
</tr>
<tr>
<td>249</td>
<td>Jerome Grunnagle</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>250</td>
<td>Michael Drake</td>
<td>Elkins Park PA</td>
</tr>
<tr>
<td>251</td>
<td>Bruce G. Grimes</td>
<td>Sunnyside PA</td>
</tr>
<tr>
<td>252</td>
<td>Jeanine Vermillion</td>
<td>State College PA</td>
</tr>
<tr>
<td>253</td>
<td>Marlene Stifler</td>
<td>Dillsburg PA</td>
</tr>
<tr>
<td>254</td>
<td>Adrienne Greenawalt</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>255</td>
<td>William Beeson</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>256</td>
<td>Marion M. Kye</td>
<td>Ottsville PA</td>
</tr>
<tr>
<td>257</td>
<td>David Clawson</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>258</td>
<td>Peter Commons</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>259</td>
<td>Jeff Abrahamson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>260</td>
<td>April Robinson</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>261</td>
<td>Marian Demcisak</td>
<td>Hatboro PA</td>
</tr>
<tr>
<td>262</td>
<td>Karen Brannon-Johnson</td>
<td>Landenberg PA</td>
</tr>
<tr>
<td>263</td>
<td>Heather Brinn</td>
<td>Haddonfield NJ</td>
</tr>
<tr>
<td>264</td>
<td>Matt Quinn</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>265</td>
<td>Karim Aref</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>266</td>
<td>Jennifer Costello</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>267</td>
<td>Ellie Francis</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>268</td>
<td>Richard D. Ludwig</td>
<td>East Stroudsburg PA</td>
</tr>
<tr>
<td>269</td>
<td>Dianne Cooper</td>
<td>Morgantown PA</td>
</tr>
<tr>
<td>270</td>
<td>Brett Mapp</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>271</td>
<td>Mary Luke</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>272</td>
<td>Dave Sobal</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>273</td>
<td>Diana Bruecker</td>
<td>Lemont PA</td>
</tr>
<tr>
<td>274</td>
<td>Janet MacColl</td>
<td>Nicholson Media PA</td>
</tr>
<tr>
<td>275</td>
<td>Todd Madden</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>276</td>
<td>Sharon Aveni</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>277</td>
<td>Nancy Runk</td>
<td>Lansdowne PA</td>
</tr>
<tr>
<td>278</td>
<td>John Sedia</td>
<td>Willow Grove PA</td>
</tr>
<tr>
<td>279</td>
<td>Roman and Evann Garrison</td>
<td>New Wilmington PA</td>
</tr>
<tr>
<td>280</td>
<td>James Gagne</td>
<td>Phoenixville PA</td>
</tr>
<tr>
<td>281</td>
<td>Jeannine Petardi</td>
<td>Easton PA</td>
</tr>
<tr>
<td>282</td>
<td>Linda Leeuwirk</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>283</td>
<td>Susan McGarvey</td>
<td>Erdenheim PA</td>
</tr>
<tr>
<td>284</td>
<td>Christina Haas</td>
<td>Radnor PA</td>
</tr>
<tr>
<td>285</td>
<td>Victoria Howitz</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>286</td>
<td>Linda Frye</td>
<td>Lock Haven PA</td>
</tr>
<tr>
<td>287</td>
<td>Christina Art</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>288</td>
<td>Jen Morse</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>289</td>
<td>Joshua Block</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>290</td>
<td>Darrin Britting</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>291</td>
<td>Tom Ganzelli</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>292</td>
<td>Robert Botto</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>293</td>
<td>Andrew Hunsinger</td>
<td>Catawissa PA</td>
</tr>
<tr>
<td>294</td>
<td>Elyse Jurgen</td>
<td>Litzt PA</td>
</tr>
<tr>
<td>295</td>
<td>Arcenia Rosal</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>296</td>
<td>John Yerger</td>
<td>State College PA</td>
</tr>
<tr>
<td>297</td>
<td>Jack Wishnow</td>
<td>Langhorne PA</td>
</tr>
<tr>
<td>298</td>
<td>Bianca Morales</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>299</td>
<td>Shirley Palmer</td>
<td>Hatboro PA</td>
</tr>
<tr>
<td>300</td>
<td>Tony Acquaviva</td>
<td>Elmhurst PA</td>
</tr>
<tr>
<td>301</td>
<td>Heath Eddy</td>
<td>Exton PA</td>
</tr>
<tr>
<td>302</td>
<td>Michelle Warren</td>
<td>York PA</td>
</tr>
<tr>
<td>303</td>
<td>Ann Conroy</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>304</td>
<td>Christopher Cretella</td>
<td>Bloomsburg PA</td>
</tr>
<tr>
<td>305</td>
<td>Katherine Daley</td>
<td>State College PA</td>
</tr>
<tr>
<td>306</td>
<td>Jean Wright</td>
<td>Hellertown PA</td>
</tr>
<tr>
<td>307</td>
<td>Barbara Grover</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>308</td>
<td>Jacob Strano</td>
<td>State College PA</td>
</tr>
<tr>
<td>309</td>
<td>Christina Hagan</td>
<td>Bangor PA</td>
</tr>
<tr>
<td>310</td>
<td>Julianne Gould</td>
<td>Bushkill PA</td>
</tr>
<tr>
<td>311</td>
<td>Loree Speedy</td>
<td>West Newton PA</td>
</tr>
<tr>
<td>312</td>
<td>Soren Meischeid</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>313</td>
<td>A Moyer</td>
<td>Creamery PA</td>
</tr>
<tr>
<td>314</td>
<td>Anna May O'Neill</td>
<td>Flourtown PA</td>
</tr>
<tr>
<td>315</td>
<td>Carl Miller</td>
<td>Wallingford PA</td>
</tr>
<tr>
<td>316</td>
<td>Thomas S. Robinson, III</td>
<td>Easton PA</td>
</tr>
<tr>
<td>317</td>
<td>Kelli Wilson</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>318</td>
<td>Jessica Likens</td>
<td>Los Angeles CA</td>
</tr>
<tr>
<td>319</td>
<td>Jessica DePete</td>
<td>Stroudsburg PA</td>
</tr>
<tr>
<td>320</td>
<td>Elaine Deluca</td>
<td>Wapwallopen PA</td>
</tr>
<tr>
<td>321</td>
<td>Damon Jones</td>
<td>State College PA</td>
</tr>
<tr>
<td>322</td>
<td>Sadie White</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>323</td>
<td>Joseph Escher</td>
<td>Roslyn PA</td>
</tr>
<tr>
<td>324</td>
<td>MaryAnne Sears</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>325</td>
<td>Lesley Fleischman</td>
<td>Haverford PA</td>
</tr>
<tr>
<td>326</td>
<td>Emily Escalante</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>327</td>
<td>Steven Mavros</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>328</td>
<td>Diana Auteri</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>329</td>
<td>William N Whaley</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>330</td>
<td>Kathleen Schmick</td>
<td>Wallingford PA</td>
</tr>
<tr>
<td>331</td>
<td>Nancy Jo Mulry</td>
<td>Macungie PA</td>
</tr>
<tr>
<td>332</td>
<td>Michael Greenle</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td>------------------</td>
<td></td>
</tr>
<tr>
<td>Paul Burroughs</td>
<td>Fairview PA</td>
<td></td>
</tr>
<tr>
<td>Donalee McElrath</td>
<td>Port Matilda PA</td>
<td></td>
</tr>
<tr>
<td>Tom Bissinger</td>
<td>Pottstown PA</td>
<td></td>
</tr>
<tr>
<td>Chris Rice</td>
<td>Ardmore PA</td>
<td></td>
</tr>
<tr>
<td>Karen Mauch</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Brent &amp; Carli Younce</td>
<td>Drexel Hill PA</td>
<td></td>
</tr>
<tr>
<td>Karl Klingmann</td>
<td>Downingtown PA</td>
<td></td>
</tr>
<tr>
<td>Philip Watt</td>
<td>York PA</td>
<td></td>
</tr>
<tr>
<td>Marla McConnell</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Dan Herman</td>
<td>West Chester PA</td>
<td></td>
</tr>
<tr>
<td>Joan Welch</td>
<td>West Chester PA</td>
<td></td>
</tr>
<tr>
<td>Esther and Harry Buck</td>
<td>Chambersburg PA</td>
<td></td>
</tr>
<tr>
<td>Bruce Birchard</td>
<td>Glen Mills PA</td>
<td></td>
</tr>
<tr>
<td>Martha Sharples</td>
<td>Haverford PA</td>
<td></td>
</tr>
<tr>
<td>Christina Gubicza</td>
<td>Camp Hill PA</td>
<td></td>
</tr>
<tr>
<td>Jamie Heimbach</td>
<td>Avis PA</td>
<td></td>
</tr>
<tr>
<td>Gary Smith</td>
<td>Lancaster PA</td>
<td></td>
</tr>
<tr>
<td>Mary Roman</td>
<td>Hershey PA</td>
<td></td>
</tr>
<tr>
<td>Richard Hoesch</td>
<td>Bethel Park PA</td>
<td></td>
</tr>
<tr>
<td>Ann Holzman</td>
<td>Lebanon PA</td>
<td></td>
</tr>
<tr>
<td>Ella Forsyth</td>
<td>Carlisle PA</td>
<td></td>
</tr>
<tr>
<td>Bruce Hansen</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Betty Loeb</td>
<td>Martinsburg PA</td>
<td></td>
</tr>
<tr>
<td>Janey Guidarelli</td>
<td>Gibsonia PA</td>
<td></td>
</tr>
<tr>
<td>Rodney Saylor</td>
<td>Easton PA</td>
<td></td>
</tr>
<tr>
<td>Brad Gething</td>
<td>State College PA</td>
<td></td>
</tr>
<tr>
<td>Katie Klingensmith</td>
<td>Meadville PA</td>
<td></td>
</tr>
<tr>
<td>Priscilla Laws</td>
<td>Carlisle PA</td>
<td></td>
</tr>
<tr>
<td>Brittany Croll</td>
<td>Lancaster PA</td>
<td></td>
</tr>
<tr>
<td>Libby J. Goldstein</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Amanda Esrey</td>
<td>Ridley Park PA</td>
<td></td>
</tr>
<tr>
<td>James Hayes</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Francisco Escalante</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Linda Say</td>
<td>Polk PA</td>
<td></td>
</tr>
<tr>
<td>Jack Lebeau</td>
<td>Jenkintown PA</td>
<td></td>
</tr>
<tr>
<td>Ruth A. Zitrain</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Matt Borden</td>
<td>Warrington PA</td>
<td></td>
</tr>
<tr>
<td>Amy Guskine</td>
<td>Malvern PA</td>
<td></td>
</tr>
<tr>
<td>Gayle Shisler</td>
<td>Doylestown PA</td>
<td></td>
</tr>
<tr>
<td>Eileen Killeen</td>
<td>Yardley PA</td>
<td></td>
</tr>
<tr>
<td>Amy Pischke</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Gertrude Cohen</td>
<td>Wynnewood PA</td>
<td></td>
</tr>
<tr>
<td>Anne Hoban</td>
<td>Newtown PA</td>
<td></td>
</tr>
<tr>
<td>Andrew Arata</td>
<td>Media PA</td>
<td></td>
</tr>
<tr>
<td>Liz Tymkiw</td>
<td>Rosemont PA</td>
<td></td>
</tr>
<tr>
<td>Howard Gittler</td>
<td>Lords Valley PA</td>
<td></td>
</tr>
<tr>
<td>Jon-Paul Jaworski</td>
<td>Conshohocken PA</td>
<td></td>
</tr>
<tr>
<td>Brenda Rydstrom</td>
<td>Bryn Athyn PA</td>
<td></td>
</tr>
<tr>
<td>Christine DuBois-Buxbaum</td>
<td>Lansdowne PA</td>
<td></td>
</tr>
<tr>
<td>Charlie Hoyer</td>
<td>Tyrone PA</td>
<td></td>
</tr>
<tr>
<td>Joan Gordon</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Bernadette Keigelman</td>
<td>West Chester PA</td>
<td></td>
</tr>
<tr>
<td>Sharon Speerhas</td>
<td>Ambridge PA</td>
<td></td>
</tr>
<tr>
<td>Anne Riconosciuto</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Gail Harp</td>
<td>Bala Cynwyd PA</td>
<td></td>
</tr>
<tr>
<td>Jeff Travis</td>
<td>Lafayette Hill PA</td>
<td></td>
</tr>
<tr>
<td>Peter Kallin</td>
<td>Doylestown PA</td>
<td></td>
</tr>
<tr>
<td>Suzanne Buller</td>
<td>Stockertown PA</td>
<td></td>
</tr>
<tr>
<td>Sarah Hakala</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>C. Kate Borger</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Elizabeth Schlingmann</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Paul T. Wentworth</td>
<td>Phoenixville PA</td>
<td></td>
</tr>
<tr>
<td>Michael Balsai</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Jonathon Reinhardt</td>
<td>State College PA</td>
<td></td>
</tr>
<tr>
<td>John Colgan-Davis</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Brett Nadan</td>
<td>State College PA</td>
<td></td>
</tr>
<tr>
<td>Sylvia Monogld</td>
<td>Kennett Square PA</td>
<td></td>
</tr>
<tr>
<td>Matthew Zipin</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Virginia Alpaugh</td>
<td>Glenside PA</td>
<td></td>
</tr>
<tr>
<td>William Nelson</td>
<td>Wayne PA</td>
<td></td>
</tr>
<tr>
<td>Joe O'Connor</td>
<td>Willow Grove PA</td>
<td></td>
</tr>
<tr>
<td>Alice Dubroff</td>
<td>Swarthmore PA</td>
<td></td>
</tr>
<tr>
<td>Sharon Hunt</td>
<td>Chalmers Loveland CO</td>
<td></td>
</tr>
<tr>
<td>Joan Gucken</td>
<td>Narberth PA</td>
<td></td>
</tr>
<tr>
<td>Terry Schultz</td>
<td>Glenmore PA</td>
<td></td>
</tr>
<tr>
<td>Ethan Klein</td>
<td>San Francisco CA</td>
<td></td>
</tr>
<tr>
<td>Linda Stiles</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Linda Jordan</td>
<td>Point Marion PA</td>
<td></td>
</tr>
<tr>
<td>Paul Albrecht</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Erin Dunleavy</td>
<td>Jersey Shore PA</td>
<td></td>
</tr>
<tr>
<td>James Madson</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Carolyn Lewis</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Grace Soltis</td>
<td>Blue Bell PA</td>
<td></td>
</tr>
<tr>
<td>Eric Salsburg</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Tim McIntyre</td>
<td>Broomall PA</td>
<td></td>
</tr>
<tr>
<td>Daniel Gray</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Larry Meehan</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Lucia Dorsey</td>
<td>West Chester PA</td>
<td></td>
</tr>
<tr>
<td>Justin DeVore</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Maria Foltz</td>
<td>Dauphin PA</td>
<td></td>
</tr>
<tr>
<td>Anne Ewing</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Jere Martin</td>
<td>Lancaster PA</td>
<td></td>
</tr>
<tr>
<td>Jeanne Flaherty</td>
<td>Upland PA</td>
<td></td>
</tr>
<tr>
<td>Matthew Bower</td>
<td>Downingtown PA</td>
<td></td>
</tr>
<tr>
<td>Bridget Salantri</td>
<td>Doylestown PA</td>
<td></td>
</tr>
<tr>
<td>Cathy Weiss</td>
<td>Plymouth Meeting PA</td>
<td></td>
</tr>
<tr>
<td>Sara W. Funk</td>
<td>Malvern PA</td>
<td></td>
</tr>
<tr>
<td>Kate Shapero</td>
<td>Lafayette Hill PA</td>
<td></td>
</tr>
<tr>
<td>Stephanie O'Neill</td>
<td>McKenna Upper Darby PA</td>
<td></td>
</tr>
<tr>
<td>Alina Macneal</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Bunny Driban</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Michele Salsburg</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Chad Murren</td>
<td>York PA</td>
<td></td>
</tr>
<tr>
<td>Louis Cinquino</td>
<td>Bethlehem PA</td>
<td></td>
</tr>
<tr>
<td>Norman Carter</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
<tr>
<td>Craig Duncan</td>
<td>Audubon PA</td>
<td></td>
</tr>
<tr>
<td>Tim Pearce</td>
<td>Pittsburgh PA</td>
<td></td>
</tr>
<tr>
<td>Lisa Ganzer</td>
<td>Buckingham PA</td>
<td></td>
</tr>
<tr>
<td>Petra S.</td>
<td>Philadelphia PA</td>
<td></td>
</tr>
</tbody>
</table>
| 446. | Louis Holdstock  
West Chester PA | 474. | Daniel Sauder  
Wyomissing PA |
| 447. | Stephen Hopkins  
State College PA | 475. | Shelly Lukon  
Pittsburgh PA |
| 448. | Kelly Riley  
Hummelstown PA | 476. | Milton Shapiro  
Philadelphia PA |
| 449. | Fran Berge  
Philadelphia PA | 477. | Charles Grant  
Hatboro PA |
| 450. | Sandra Folzer  
Glenside PA | 478. | Chad Dougherty  
Pittsburgh PA |
| 451. | Benjamin Mudry  
West Chester PA | 479. | Jason Perkins  
Pittsburgh PA |
| 452. | Heather Scott  
West Chester PA | 480. | Kris Rust  
Swarthmore PA |
| 453. | Martha Straus  
State College PA | 481. | Blossom Backal  
Philadelphia PA |
| 454. | Ryan and Rebecca  
Holdstock  
West Chester PA | 482. | Cathy Block  
Furlong PA |
| 455. | Melissa Tesoroni  
East Stroudsburg PA | 483. | Mischa Gelman  
Pittsburgh PA |
| 456. | Timothy Westberg  
Philadelphia PA | 484. | Suzy Gerst  
PTA Legislative and Advocacy  
Chairman  
Philadelphia PA |
| 457. | Kenneth Janosko  
Pittsburgh PA | 485. | Michelle Boyle  
Pittsburgh PA |
| 458. | David and Kaethe  
Zeamch-Bersin  
Doylestown PA | 486. | Pei Ling Chen  
West Chester PA |
| 459. | Shirley Ellsworth  
Schnecksville PA | 487. | Roberta Bash  
Downingtown PA |
| 460. | Judith Roberts  
State College PA | 488. | Deb Wood  
Westtown PA |
| 461. | Ruth Finley  
Malvern PA | 489. | Kimberly Glovas  
Holland PA |
| 462. | Roanna Kong  
Philadelphia PA | 490. | Lydia Tackett  
Philadelphia PA |
| 463. | Shirley Trottle  
Waynesboro PA | 491. | Regina Dougherty  
Conshohocken PA |
| 464. | Sharon Buazard  
Rockford IL | 492. | Laura Lind  
Baltimore MD |
| 465. | Anne Tirachia  
Stroudsburg PA | 493. | Jennifer Hunsinger  
Catawissa PA |
| 466. | Kate Hall  
Philadelphia PA | 494. | Barbara Seiple  
Philadelphia PA |
| 467. | Rose Flood  
Fairless Hills PA | 495. | Elizabeth Scheer  
Oreland PA |
| 468. | John Neff  
Abington PA | 496. | Jeff Ayres  
North Huntingdon PA |
| 469. | Susan Taylor  
Lancaster PA | 497. | Julie Rizzo  
New Milford PA |
| 470. | Tennyson Wellman  
Philadelphia PA | 498. | Carol Hilton  
Irvine GA |
| 471. | Autumn Thomas  
Newtown PA | 499. | Sarah Alessio  
Pittsburgh PA |
| 472. | Claire Witmer  
Harrisburg PA | 500. | Robert O'Connor  
Pleasant Gap PA |
| 473. | Barbara Brigham  
Philadelphia PA | 501. | Suzanne Cresswell  
West Chester PA |
| 502. | Mary Ann Bentz  
Morrisville PA | 503. | Carla Stull  
Lititz PA |
| 504. | Sharon Bleiler  
Chalfont PA | 505. | J. Alex Cordaro  
Philadelphia PA |
| 506. | Lauri Peacock  
Hobbstown PA | 507. | Barbara Mistichelli  
Rutledge PA |
| 508. | Merrill C. Horine  
Lancaster PA | 509. | Robert Deming  
Villanova PA |
| 510. | Russ Savit  
Havertown PA | 511. | Frank Groll  
Pittsburgh PA |
| 512. | Karen Winey  
Philadelphia PA | 513. | Gail Schwartzberg  
Philadelphia PA |
| 514. | Tracy L. Markland  
Amler PA | 515. | Martin Jacobs  
Fort Washington PA |
| 516. | Ashley Meischeid  
Philadelphia PA | 517. | Anna Adamson  
Pottsville PA |
| 518. | Susanne Iannece  
Philadelphia PA | 519. | Gary Dukart  
Amler PA |
| 520. | Melissa Dyas  
Bloomburg PA | 521. | Wendy Osher  
Pittsburgh PA |
| 522. | Kevin Scoles  
Havertown PA | 523. | Kaaren Lobel  
Huntingdon Valley PA |
| 524. | Joan Schmitt  
Philadelphia PA | 525. | Thomas McKernan  
Philadelphia PA |
| 526. | Donald Sutton  
Royersford PA | 527. | Margaret Schiavo  
Collegeville PA |
| 528. | Rick Shiner  
Pocono Pines PA | 529. | Thomas Witholt  
Pittsburgh PA |
| 530. | Richard Grainer  
Bethel Park PA | 531. | Barbara McKenzie  
Philadelphia PA |
| 532. | David Benner  
New Hope PA | 533. | Richard Linsenberg  
Philadelphia PA |
| 534. | Patrick McElhone  
Pittsburgh PA | 535. | Peter Foltz  
Hershey PA |
| 536. | Sheila Weinhardt  
Wyncote PA | 537. | Mary Willis  
Huntingdon Valley PA |
| 538. | Toni McIntosh  
Lansdowne PA | 539. | Jarrett Slaughter  
Philadelphia PA |
| 540. | Anuj Gupta  
Philadelphia PA | 541. | Mary Maria  
Philadelphia PA |
| 542. | Sandra Gerhart  
Sinking Spring PA | 543. | Julie Graf  
Pittsburgh PA |
| 544. | Jennifer Shrewder  
Gettysburg PA | 545. | Steve Heitzenrater  
Harborcreek PA |
| 546. | Brett Taubman  
State College PA | 547. | Ron Edwards  
Fayetteville PA |
| 548. | Michael Baurer  
Jenkintown PA | 549. | Pamela Meade  
Dayton PA |
| 550. | Mitchell Price  
Saegertown PA | 551. | Kate Semmens  
Perkiomenville PA |
| 552. | Eric Palmer  
Pittsburgh PA | 553. | Jordan Offutt  
Pittsburgh PA |
| 554. | Kyle Gradinger  
Philadelphia PA | 555. | Allison Turner  
Springfield PA |
| 556. | Dawn Scheets  
Newtown PA | 557. | Carissa Shipman  
North Wales PA |
| 558. | Rhonda Saylor  
Philadelphia PA |
587. Michael Raftogianis
Elkins Park PA

588. Richard Shapero
Lafayette Hill PA

589. Robert DuPlessis
Philadelphia PA

590. Allie Baurer
Jenkintown PA

591. David Mertz
Sellersville PA

592. Marilyn Long
Pittsburgh PA

593. KC Carney
Pittsburgh PA

594. Jonathan Kleinman
Jenkintown OH

595. Catherine O'Rourke
West Chester PA

596. Anjuli Kronheim
King of Prussia PA

597. Mickey Bannon
Pittsburgh PA

598. Tina Shelton
Havertown PA

599. Barbara Bloom
Philadelphia PA

600. Donald Waltman
State College PA

601. Carol S. Huff
Pittsburgh PA

602. Levana Layendecker
Philadelphia PA

603. Phyllis Anastasio
Stackhouse

604. Steve Blum
Philadelphia PA

605. Donald Bristol
Reading PA

606. Kevin Ryan
Yardley PA

607. Ellen Smith
Havertown PA

608. Lisa Rosenkoetter
Carlisle PA

609. Lisa Simonetti
Toby PA

610. Adam Drake
Elkins Park PA

611. Elaine and Grant
Kalson

612. Kara Savastio
Downingtown PA

613. Keefe Keeley
Swarthmore PA

614. Judith Sanders
Pittsburgh PA

615. Henry Frank
Philadelphia PA

616. Sarah Coppinger
Philadelphia PA

617. Michelle Minyon
Pittsburgh PA

618. Alison Greifenstein
Havertown PA

619. Kara Popowich
Hellertown PA

620. Dennis Coffman
Harrisburg PA

621. Pamela Zimmerman
Philadelphia PA

622. Clare Mundell
Pittsburgh PA

623. William
Linkheimer III

624. Ed Barboni
Norristown PA

625. Joseph Biegel
Aubudon PA

626. Will Galiano
Lancaster PA

627. Charles & Audrey
Hois

628. Lisa Westerterp
Philadelphia PA

629. Lori Giagnacova
Harleysville PA

630. David Skellie
Erie PA

631. Jan Culton
Orrtanna PA

632. Chris Striegel
Philadelphia PA

633. Kevin Meehan
Newtown Square PA

634. Allyson Rogers
Glenside PA

635. Tracy Neilson
Havertown PA

636. Amanda Briggs
York PA

637. Lawrence Bloom
Elkins Park PA

638. Kevin Muller
Bath PA

639. Audrey Jaros
Philadelphia PA

640. Ann Foley
Glenside PA

641. Elsa Kerschner
Kunkletown PA

642. Virginia Arndt
Lancaster PA

643. Herbert Bawden
Southampton PA

644. Bud & Phyl Morello
Abingtonville PA

645. Brian Umstead
Whitehall PA

646. Karen Boujoukos
Wexford PA

647. Marie Gallagher
Wyncote PA

648. Noel Bednaz
Southwick MA

649. Winifred Shaw-Hope
Wayne PA

650. Carol Brown
Gettysburg PA

651. Nancy Bernstein
Pittsburgh PA

652. Luise Davis
Pittsburgh PA

653. H. P. Denenberg
Philadelphia PA

654. Nancy Vintilla
Mt. Lebanon PA

655. Sherrill Brown
Gettysburg PA

656. Brett & Cindy Snyder
Biglerville PA

657. Michelle Gasperine
Waterville PA

658. Sue Bumbaugh
Cashstown PA

659. Kristi Fox
Philadelphia PA

660. Mirjana Jelic
Hermitage PA

661. Claire & Lucia
Surmik

662. Lucia Schlossberg
Havertown PA

663. Rochelle Krowinski
McKean PA

664. Dianne Dillman
Merion Station PA

665. Bill Wood
Pittsburgh PA

666. Yvonne Appeltns
Philadelphia PA

667. Maureen Rose
Philadelphia PA

668. Tina Horowitz
Philadelphia PA

669. Carol Atwell
W. Sunbury PA

670. Helen Uhrig
Collingdale PA

671. Dieter Rolfinke
Carlisle PA
<table>
<thead>
<tr>
<th>Name</th>
<th>Email/Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jed Feffer</td>
<td><a href="mailto:hess.jen@gmail.com">hess.jen@gmail.com</a></td>
</tr>
<tr>
<td>Maggie Levinson</td>
<td>Glen Rock PA</td>
</tr>
<tr>
<td>Eric Damon</td>
<td>Glenwood PA</td>
</tr>
<tr>
<td>Richelle Luster</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ilene Greenstone</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ronald Wagner</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>David Simpson</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Joseph Tesoroni</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Joyce Remillard</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jonathan Aldrich</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Wendy &amp; Edward Augehe</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>William Daniels</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Shively</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Shannon Null</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Robert Kettell</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Selena Spry</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Rachsl Steffan</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Wilma Beacher</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Sharon Levin</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Paul Rosier</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Rosemary Colson</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Henry Rhoads</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Hazel Cope</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Anne Stullken</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Lisa Martinke</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Carl Kugel</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Betty C. Ruz</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jeremiah Blatz</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Holly Williams</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jennifer Hess</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Gregory Linn</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Karen Bernard</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Alida Spry</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Barbara Cicalese</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ted Sarisky</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Angela Gillem</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Kathleen Zunic</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Lloyd Curt Mangel III</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Stephanie Genovese</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Cecilia Sheehan</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Bonnie De Bold</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Janice Maulick</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Barbara Likens</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Chuck &amp; Erin</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Sandra DeSmiedt</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Grace Pasquarrello</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Marcia Angermann</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Peter Stone</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Anne Jackson</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Greg Pasquarrello</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Carol A. Little</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>David Forde, Jr.</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Brad Nahill</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Tony McIntosh</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Carol Bertrand</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jeff Landis</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jane L. Hutton</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Beryl Sternagle</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Robin Imhof</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Suzanne Seckinger</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>James Orcutt</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Trish Lea</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Khry Myrddin</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Anna Welsberg</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Mark Gillespie</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Amy Freeman</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Kevin Gallagher</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ellen Poist</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jason Kopanic</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Leslie Gall</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>David Gurule</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Margaret Harrison</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Adele Bon-Shannon</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Janet Jones</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Antoinette Munafo</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Linda Curry</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Alice Seidel</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Angela Ludovici</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Pat Boyle</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Margaret Duda</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Maureen Cotton</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Margaret Collins</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Paul Pasles</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Linda Roosa</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Joan Fabrega</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Donna Howarth</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ben Greenstone</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Taryn Toma</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Jerry Bianco</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ken Hull</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ronald Jones</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Joanne Stearns</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Amy Weigand</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ann Cohen</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Kathy Everett</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Eric Miller</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Brian Revak</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ed Harkins</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Kristin Dormuth</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Mary E. Corbett</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Amy Weigand</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Carl Denlinger</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Vince Pettinato</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Upper Moreland</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Advisory Board</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Mandy Gaydash</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Meghan Coyle</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Eileen M. Andrzejewski</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Ed Harkins</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Milton Alter MD PhD</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Patricia St. Georges</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Amanda Battisti</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>A. Brennan</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Deborah Myers</td>
<td>Plumsted PA</td>
</tr>
<tr>
<td>Carrie Wilson</td>
<td>Plumsted PA</td>
</tr>
</tbody>
</table>
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

902. Adam Kapp
West Chester PA

903. Edward Harkins
Philadelphia PA

904. John Redmon
Middletown PA

905. Clay Reed
Manville NJ

906. Steven Bielinski
Scranton PA

907. Nancy Grundman
Pittsburgh PA

908. Jake Witherell
Mars PA

909. Andrew Dorman
Bethlehem PA

910. Daryl Rice
Perkasie PA

911. William Mellon
Collingdale PA

912. Patience Sharp
Edinboro PA

913. Elaine Rubinstein
Pittsburgh PA

914. Martin Gromulat
Harrisburg PA

915. Michael Frailey
Lancaster PA

916. Mary Ann Baron
Philadelphia PA

917. Audrey Summa
Scranton PA

918. James M. Rogers
Indiana PA

919. Juliana Brafa
Winfield PA

920. Anne Stocker
Kutztown PA

921. Eileen McElhone
Pittsburgh PA

922. Dawn Gilliland
Bensalem PA

923. Brian Reed
Manville NJ

924. Kelly Riley
Hummelstown PA

925. Carol F. Hershey
Pittsburgh PA

926. William Willis
Mertersburg PA

927. Kyle Gracey
Johnstown PA

928. Patrick Joseph
Mahoney
Nicholson PA

929. Lindsay Chamberlain
Bound Brook NJ

930. Jeffrey Campbell
Pittsburgh PA

931. Alex McConaghy
Philadelphia PA

932. Harry and Esther
Buck
Chambersburg PA

933. Garry Garry
Williamsport PA

934. Mark Fiorini
Blandon PA

935. Brian Fink
Brooklyn NY

936. Hal Lehman
Philadelphia PA

937. Steve Lindsay
Havertown PA

938. Barbara Litt
Pittsburgh PA

939. Christopher
Luczkowiak
Wind Gap PA

940. Bob Flatley
Kempton PA

941. Renee Adam
Kutztown PA

942. Anna Haughwout
White Oak PA

943. James Mayer
Haverford PA

944. Phyl Morello
Albrightsville PA

945. Sharon & Tony
Capobianco
South Park PA

946. Ann Kiefer
Chalfont PA

947. Steven Patterson
Sunbury PA

948. Linda Sopp
Coal Township PA

949. Joe Shaw
Quakertown PA

950. Maria Evers
Pittston PA

951. William Sayenga
Fayetteville PA

952. Jacquelyne M.
Lapitsky
Camp Hill PA

953. John Fowler
Newtown PA

954. Terrence E. Fahy
Abington PA

955. Mary Mesaros
Allentown PA

956. Curtis Johnson
Fairless Hills PA

957. Richard Voldstad
Kennett Square PA

958. Atsuko Lin
Plymouth Meeting PA

959. James H. Fitch
Pittsburgh PA

960. Tim McDougall
Quakertown PA

961. Tim ifill
Philadelphia PA

962. Eileen Conner
Gillett PA

963. Rebecca Neborsky
Philadelphia PA

964. William Turner
Dillsburg PA

965. Aaron Warren
Scarsdale NY

966. Francis Mercier
Philadelphia PA

967. Anni Frick
Chambersburg PA

968. Jerry Tamburino
Hawley PA

969. Marianne
Amspacher
Glen Rock PA

970. Rebekah Goodwin
Harrisburg PA

971. Jacqueline Magness
State College PA

972. Carl Kugel
Pacific Palisades CA

973. Jennifer Layman
Pittsburgh PA

974. Melissa Tesoroni
East Stroudsburg PA

975. Ronald Freed
Carlisle PA

976. Jay Angert
State College PA

977. D. Deibler
Selinsgrove PA

978. Judy Serei
Merion Station PA

979. Meghan Mazick
Hershey PA

980. Joanne Feldman
State College PA

981. Kathleen Smith
Cheswick PA

982. Joanna Karraker
Philadelphia PA

983. Kelly Riley
Hummelstown PA

984. Lee Ann Draud
Philadelphia PA

985. Vaughan Boleky
Utica PA

986. Derek Markley
York PA

987. Meghan Mitzel
York PA

988. Ken Hull
Boalsburg PA

989. Stephen Baker
York PA

990. Diane Selvaggio
Gibsonia PA

991. Bryan Murphy
Souderton PA

992. Kim Eisen
Doyelstown PA

993. Lucy Horton
Allentown PA

994. Lisa Marie Kecht
Turtlepoint PA

995. Brian Henderson
Pittsburgh PA

996. Jeanine Petardi
Easton PA

997. Mollie Harms
Lewisburg PA

998. John G. Lentz
Orefield PA

999. Gregory Pais
Trout Run PA

1000. Brett Nordan
State College PA

1001. Melissa Dyas
Bloomburg PA

1002. Margaret S. Maurin
Bryn Mawr PA

1003. Jane Malyn
Ranor PA

1004. Richard Youell
Horsham PA

1005. Rosemary Reshetar
New Hope PA

1006. Lisa Snell
Carlisle PA

1007. Albert M Comly Jr.
Ambler PA

1008. Peter Black
Bellevue PA

1009. Shawn Radcliffe
Media PA

1010. Josh Whitcraft
Pittsburgh PA

1011. Anita Rinehart
New Freedom PA

1012. Jennifer Ray
Philadelphia PA

1013. Mary Lois B. Eberle
Gwynedd PA

1014. Michelle Gasperine
Waterville PA
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

1128. Brinton Culp
Lititz PA

1129. Gregory Hess
Wayne PA

1130. Rebecca Denison
Philadelphia PA

1131. Beth Daubert
Northampton PA

1132. Justin Corvino
Coopersburg PA

1133. Benita J. Campbell
Burgetstown PA

1134. John Dziak
State College PA

1135. Margaret Troha
Pittsburgh PA

1136. Suzanne Seppi
GASP

1137. Rachel Filippini
Export PA

1138. Heather Sage
Pittsburgh PA

1139. Rachel Martin
Pittsburgh PA

1140. Steve Karas
Pittsburgh PA

1141. Donald Gibbon
Pittsburgh PA

1142. Andrea Boykowycz
Pittsburgh PA

1143. Brian G. Ramsey
Pittsburgh PA

1144. Joseph Shirk
Pittsburgh PA

1145. Al Bennett
Castle Shannon PA

1146. Liz Hughes
Pittsburgh PA

1147. Laryn Finder
Pittsburgh PA

1148. Janice Hodge
Verona PA

1149. Nancy Bocchino
Haverford PA

1150. Thomas Ippolito
Chester Springs PA

1151. Norman Hanson
Edinboro PA

1152. James Butt
Cheltenham PA

1153. Barbara Mathers
Newtown Square PA

1154. Josh Roseboro
Bensalem PA

1155. Tom Butler
Chambersburg PA

1156. David Popkin
Yardley PA

1157. Emily Paulus
Tannersville PA

1158. Mary Kane
Chester Springs PA

1159. Jon Levin
Macungie PA

1160. Steven Patterson
Sunbury PA

1161. Dan Poresky
Allentown PA

1162. Hal Lehman
Philadelphia PA

1163. Adam Eyring
Philadelphia PA

1164. Janice Milburn
Ligonier PA

1165. Michael Mueller
Greenville PA

1166. Nathan Bronstein
Armdale PA

1167. Steve Karas
[kbh65@verizon.net]

1168. Julia Kalloz
Gettysburg PA

1169. Paul Davis
Pittsburgh PA

1170. Marcia Hole
Radnor PA

1171. Emma Jo Phipps
Upper Darby PA

1172. Catherine Zeldman
Pittsburgh PA

1173. Sharon Gross
Collegeville PA

1174. Vivek Stalam
Bryn Mawr PA

1175. Bradley Harris
Narberth PA

1176. Donna Kilgore
Lititz PA

1177. gkovacovsky@yahoo.com

1178. Charles Alan Yurek
Alan Yurek
[alan1234cy@yahoo.com]

1179. Alex Severance
Wayne PA

1180. Robert Drummond
Broomall PA

1181. Molly Cousins
Wallingford PA

1182. Emily White
Wayne PA

1183. Mike Reinert
State College PA

1184. Matthew Pilitch
Bryn Mawr PA

1185. Meghan Stevenson-Krausz

1186. Mary Beth Castillo
Steelton PA

1187. Alec Faggen
aleceff@aol.com

1188. Nicole Bloom
Houtzdale PA

1189. Mark Russo
Wayne PA

1190. Seth Holzman
Ardmore PA

1191. Alex Gamburg
Berwyn PA

1192. Tom Bruner
Berrysburg PA

1193. Tim Kelly
Philadelphia PA

1194. Carla Tayoun
Lansdowne PA

1195. Carissa Shipman
North Wales PA

1196. Sean Jacobs
Philadelphia PA

1197. David Mindel
Jenkintown PA

1198. Rajpal Malik
Philadelphia PA

1199. Christopher Linn
Philadelphia PA

1200. Charles Marshall
Paoli PA

1201. Julie Chadwick
Wilmington DE

1202. Leesa Portale
Wilmington DE

1203. Deane Rosen
Philadelphia PA

1204. Jesseca Davis
Philadelphia PA

1205. Donald Williams
Philadelphia PA

1206. Martin Gromulat
Harrisburg PA

1207. Maurine Devine
Narberth PA

1208. Bradley Layton
Havertown PA

1209. Nancy Shaw
Havertown PA

1210. Sara Steele
Philadelphia PA

1211. Evelyn Reitz
Lansdale PA

1212. Mara Natkins
Philadelphia PA

1213. Lynn Mather
Philadelphia PA

1214. Annette Ballard
Philadelphia PA

1215. Heather Ehrlitch
Penlyn PA

1216. Bruce Arkwright, Jr.
Erie PA

1217. Evelyn Hutchinson
Bryn Mawr PA

1218. Malcolm B. Seaholm
Pittsburgh PA

1219. Suzanne Flood
Pittsburgh PA

1220. Rose Evesovich
Pittsburgh PA

1221. Richard Wodzinski
Munhall PA

1222. Anne and Ken
Rawson

1223. Ellen Zaleta
Philadelphia PA

1224. Joel Hecker
Bala Cynwyd PA

1225. Lisa Corrado
Claymont DE

1226. Adam Eyring
Philadelphia PA

1227. Kevin Rayph
West Chester PA

1228. Carol Seeley
Brookhaven PA

1229. Judith Moffett
Swarthmore PA

1230. Emily Bittler
Easton PA

1231. Elise Annunziata
Philadelphia PA

1232. Lois Sellers
Springfield PA

1233. Eric Wagner
Media PA

1234. Meghan Ganser
Philadelphia PA

1235. Michael Burri
Bala Cynwyd PA

1236. John H. Barnes
Harrisburg PA

1237. Jim Kippen
Wyndmoor PA

1238. Eric Stone
Pittsburgh PA

1239. Sarah Kinner
York PA

1240. Kathy Welsh
Harrisburg PA

1241. Myra Vallianos
Philadelphia PA
1242. Clarence Burgher
Linden PA
1243. Paula Stackonis
Gilbertsville PA
1244. Victoria Ferguson
Philadelphia PA
1245. Mark Medinger
Allentown PA
1246. Chelsea Johnson
Philadelphia PA
1247. FaJoy@aol.com
1248. Gina Arasin
Paoli PA
1249. Libby Frank
Philadelphia PA
1250. B Solis
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
Erdentheim PA
1258. Vivian Schatz
Philadelphia PA
1259. Anna Mindel
Jenkintown PA
1260. Freyda Black
Cheltenham PA
1261. Nancy Parks
PA Sierra Club
1262. Rev. Sandra Strauss
Philadelphia PA
1263. Michael Fedor
PA League of Conservation Voters
1264. Kevin Stewart
American Lung Association of PA
1265. Greg Dana
Alliance of Automobile Manufacturers
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 Flierer
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. Tobias 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 Maselli
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 Tooile
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 Quinn
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
Philadelphia 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
Belleville PA
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joel Hecker</td>
<td>Doylestown PA</td>
</tr>
<tr>
<td>Gayle Shisler</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>Joe McLoughlin</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Jane Kronick</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Julie Staroschuck</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Phyllis Anastasio</td>
<td>Stockhouse PA</td>
</tr>
<tr>
<td>Ozzie Perez</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Sedia</td>
<td>Willow Grove PA</td>
</tr>
<tr>
<td>Mary Volpe</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>Daniel Volz</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Kimberly R. Empson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Betsy Ragan</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>Lisa Mayo</td>
<td>Churchville PA</td>
</tr>
<tr>
<td>Sherrill Brown</td>
<td>Gettysburg PA</td>
</tr>
<tr>
<td>Joe Friend III</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Heather Alt</td>
<td>State College PA</td>
</tr>
<tr>
<td>Ruth A. Rin</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>Christopher Clements</td>
<td>Media PA</td>
</tr>
<tr>
<td>Kelli Wilson</td>
<td>Port Matilda PA</td>
</tr>
<tr>
<td>Carol Brown</td>
<td>Gettysburg PA</td>
</tr>
<tr>
<td>Auden Thomas, Ph.D.</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Anne McCoy</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Douglas Martinez</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>William Goldsmith</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Alice Dubroff</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>Emily Schiller</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kelly Vresilovic</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Anne Riconosciuto</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Denise Gurz</td>
<td>Scranton PA</td>
</tr>
<tr>
<td>Brett &amp; Cindy Snyder</td>
<td>Biglerville PA</td>
</tr>
<tr>
<td>David Cope</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Linda Say</td>
<td>Polk PA</td>
</tr>
<tr>
<td>Walter Garvin</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>Wayne Laubscher</td>
<td>Lock Haven PA</td>
</tr>
<tr>
<td>Linda Shanahan</td>
<td>Doylestown PA</td>
</tr>
<tr>
<td>JoAnne Matty</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Matt Borden</td>
<td><a href="mailto:mborden583@aol.com">mborden583@aol.com</a></td>
</tr>
<tr>
<td>Andrea Karsh</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>David Shoemaker</td>
<td>Quakertown PA</td>
</tr>
<tr>
<td>Dan Herman</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Kathleen Vagnoni</td>
<td>Chalfont PA</td>
</tr>
<tr>
<td>Betsy and Elizabeth</td>
<td>Berwyn PA</td>
</tr>
<tr>
<td>Rita Hawrot</td>
<td>Bridgeville PA</td>
</tr>
<tr>
<td>Robin Stelly</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>Jon Brams</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Elizabeth Hancock</td>
<td>Elverson PA</td>
</tr>
<tr>
<td>Heather Hurlock</td>
<td>Pottstown PA</td>
</tr>
<tr>
<td>James Eadie</td>
<td>Greencastle PA</td>
</tr>
<tr>
<td>Jane Kauer</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sheila Erlbaum</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Harmon Zuckerman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Matthew Bower</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>David Rogers</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Helen Cleaver</td>
<td>Orangeville PA</td>
</tr>
<tr>
<td>David Fleece</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Richard Pearce</td>
<td>Jenkintown PA</td>
</tr>
<tr>
<td>Number</td>
<td>Name</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>1462</td>
<td>Candie Wilderman</td>
</tr>
<tr>
<td>1463</td>
<td>Alexandra Gruskos</td>
</tr>
<tr>
<td>1464</td>
<td>Karen Davish</td>
</tr>
<tr>
<td>1465</td>
<td>Cynthia Iberg</td>
</tr>
<tr>
<td>1466</td>
<td>Kelly Riley</td>
</tr>
<tr>
<td>1467</td>
<td>Grant Kalson</td>
</tr>
<tr>
<td>1468</td>
<td>Sherri Fried</td>
</tr>
<tr>
<td>1469</td>
<td>Myrna Newman</td>
</tr>
<tr>
<td>1470</td>
<td>Margaret Hynosky</td>
</tr>
<tr>
<td>1471</td>
<td>Ginny Altieri</td>
</tr>
<tr>
<td>1472</td>
<td>David Christiansen</td>
</tr>
<tr>
<td>1473</td>
<td>Christine Kennedy</td>
</tr>
<tr>
<td>1474</td>
<td>Rhona Candeloro</td>
</tr>
<tr>
<td>1475</td>
<td>Chris Meck</td>
</tr>
<tr>
<td>1476</td>
<td>Carol Levy</td>
</tr>
<tr>
<td>1477</td>
<td>Wayne Cluff</td>
</tr>
<tr>
<td>1478</td>
<td>Samantha Starr</td>
</tr>
<tr>
<td>1479</td>
<td>Toby Carlson</td>
</tr>
<tr>
<td>1480</td>
<td>Ian Thomas</td>
</tr>
<tr>
<td>1481</td>
<td>Jeanine Foster</td>
</tr>
<tr>
<td>1482</td>
<td>Pamela Tudor</td>
</tr>
<tr>
<td>1483</td>
<td>Jamie Cato</td>
</tr>
<tr>
<td>1484</td>
<td>Cameron Akins</td>
</tr>
<tr>
<td>1485</td>
<td>Danielle Wright</td>
</tr>
<tr>
<td>1486</td>
<td>Erik Chappelle</td>
</tr>
<tr>
<td>1487</td>
<td>Nancy Daniel</td>
</tr>
<tr>
<td>1488</td>
<td>Kira Chappelle</td>
</tr>
<tr>
<td>1489</td>
<td>Elizabeth Eccleston</td>
</tr>
<tr>
<td>1490</td>
<td>Emily Gilbert</td>
</tr>
<tr>
<td>1491</td>
<td>Amy Chalmers</td>
</tr>
<tr>
<td>1492</td>
<td>Tod L. Benedict</td>
</tr>
<tr>
<td>1493</td>
<td>Mickey Bannon</td>
</tr>
<tr>
<td>1494</td>
<td>Kathy Everett</td>
</tr>
<tr>
<td>1495</td>
<td>Daniel Kuestner</td>
</tr>
<tr>
<td>1496</td>
<td>Thais Kuestner</td>
</tr>
<tr>
<td>1497</td>
<td>Jim Higgins</td>
</tr>
<tr>
<td>1498</td>
<td>Lisa Rosenkoetter</td>
</tr>
<tr>
<td>1499</td>
<td>Andrea Finn</td>
</tr>
<tr>
<td>1500</td>
<td>Sister Kathleen Coll,</td>
</tr>
<tr>
<td>1501</td>
<td>Mary Durando</td>
</tr>
<tr>
<td>1502</td>
<td>Phyllis Chapell</td>
</tr>
<tr>
<td>1503</td>
<td>Myles Zuckerman</td>
</tr>
<tr>
<td>1504</td>
<td>Kate Hall</td>
</tr>
<tr>
<td>1505</td>
<td>Maurice Tierney</td>
</tr>
<tr>
<td>1506</td>
<td>Judith Wolf</td>
</tr>
<tr>
<td>1507</td>
<td>Ida Holman</td>
</tr>
<tr>
<td>1508</td>
<td>Clare Mundell</td>
</tr>
<tr>
<td>1509</td>
<td>Virginia O'Connell</td>
</tr>
<tr>
<td>1510</td>
<td>Sandra Ballard</td>
</tr>
<tr>
<td>1511</td>
<td>Bridget Miller</td>
</tr>
<tr>
<td>1512</td>
<td>Genevieve Becker</td>
</tr>
<tr>
<td>1513</td>
<td>Monica Baznik</td>
</tr>
<tr>
<td>1514</td>
<td>Al Lutz</td>
</tr>
<tr>
<td>1515</td>
<td>Sean V. Howard</td>
</tr>
<tr>
<td>1516</td>
<td>Ellen Somekawa</td>
</tr>
<tr>
<td>1517</td>
<td>Bill Turner</td>
</tr>
<tr>
<td>1518</td>
<td>Erica Strang</td>
</tr>
<tr>
<td>1519</td>
<td>Peter Commons</td>
</tr>
<tr>
<td>1520</td>
<td>Carol Morotti-Meeker</td>
</tr>
<tr>
<td>1521</td>
<td>Helyn Whitman</td>
</tr>
<tr>
<td>1522</td>
<td>Stacey Daman</td>
</tr>
<tr>
<td>1523</td>
<td>Kimberly Walker</td>
</tr>
<tr>
<td>1524</td>
<td>Niamh Gallagher</td>
</tr>
<tr>
<td>1525</td>
<td>Julie Delp</td>
</tr>
<tr>
<td>1526</td>
<td>Courtney Sexton</td>
</tr>
<tr>
<td>1527</td>
<td>Clare Bohn</td>
</tr>
<tr>
<td>1528</td>
<td>Karina Bongaarts</td>
</tr>
<tr>
<td>1529</td>
<td>Dorothy L. Klemas</td>
</tr>
<tr>
<td>1530</td>
<td>Keith Parsons</td>
</tr>
<tr>
<td>1531</td>
<td>Helen Pacchione</td>
</tr>
<tr>
<td>1532</td>
<td>Silvana Gross</td>
</tr>
<tr>
<td>1533</td>
<td>Jenny Ruckdeschel</td>
</tr>
<tr>
<td>1534</td>
<td>A. Moyer</td>
</tr>
<tr>
<td>1535</td>
<td>Donna Smith-Remick</td>
</tr>
<tr>
<td>1536</td>
<td>Barney Oursler</td>
</tr>
<tr>
<td>1537</td>
<td>De Yarrison</td>
</tr>
<tr>
<td>1538</td>
<td>Katherine Daley</td>
</tr>
<tr>
<td>1539</td>
<td>James Strick</td>
</tr>
<tr>
<td>1540</td>
<td>Rhea Hoch</td>
</tr>
<tr>
<td>1541</td>
<td>Lauren Braun</td>
</tr>
<tr>
<td>1542</td>
<td>Sidney Goldstein</td>
</tr>
<tr>
<td>1543</td>
<td>Sally Hess</td>
</tr>
<tr>
<td>1544</td>
<td>Anjuli Kronheim</td>
</tr>
<tr>
<td>1545</td>
<td>Eleanor Brownstein</td>
</tr>
<tr>
<td>1546</td>
<td>Rita Cubranich</td>
</tr>
<tr>
<td>1547</td>
<td>Barb Lupica</td>
</tr>
<tr>
<td>1548</td>
<td>Linde Fiore</td>
</tr>
<tr>
<td>1549</td>
<td>Todd Stevenson</td>
</tr>
<tr>
<td>1550</td>
<td>George Heid</td>
</tr>
<tr>
<td>1551</td>
<td>Michael Zuckerman</td>
</tr>
<tr>
<td>1552</td>
<td>Gordon F. Macklem</td>
</tr>
<tr>
<td>1553</td>
<td>Sherri Sternberg</td>
</tr>
<tr>
<td>1554</td>
<td>Mary Pietrusko</td>
</tr>
<tr>
<td>1555</td>
<td>Jesse Brenner</td>
</tr>
<tr>
<td>1556</td>
<td>Joseph Peter Bridy,</td>
</tr>
<tr>
<td>1557</td>
<td>Barbara Eklund</td>
</tr>
<tr>
<td>1558</td>
<td>Kristin Scali</td>
</tr>
<tr>
<td>1559</td>
<td>Joanne Feldman</td>
</tr>
<tr>
<td>1560</td>
<td>Bob Boleky</td>
</tr>
<tr>
<td>1561</td>
<td>Barbara Dively</td>
</tr>
<tr>
<td>1562</td>
<td>Jolynn Haney</td>
</tr>
<tr>
<td>1563</td>
<td>Gregory Pais</td>
</tr>
<tr>
<td>1564</td>
<td>Lawrence Horwitz</td>
</tr>
<tr>
<td>1565</td>
<td>Shanon Hunt</td>
</tr>
<tr>
<td>1566</td>
<td>Joyce Akins</td>
</tr>
<tr>
<td>1567</td>
<td>Mary Fineran</td>
</tr>
<tr>
<td>1568</td>
<td>Mary Willis</td>
</tr>
<tr>
<td>1569</td>
<td>Lizzy Berryman</td>
</tr>
<tr>
<td>1570</td>
<td>Mike Greenwald</td>
</tr>
<tr>
<td>1571</td>
<td>Walter Kaufman</td>
</tr>
<tr>
<td>1572</td>
<td>Brett Taubman</td>
</tr>
<tr>
<td>1573</td>
<td>James Madson</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>-----------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Sharon Aveni</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Mark Garvin</td>
<td>Cheltenham PA</td>
</tr>
<tr>
<td>Eric Nelson</td>
<td>Berwyn</td>
</tr>
<tr>
<td>Norma Brooks</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jay Tarler</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Donna Fabyonic</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Elizabeth Trainor</td>
<td>Canton PA</td>
</tr>
<tr>
<td>Darcy Trumpler</td>
<td>King of Prussia PA</td>
</tr>
<tr>
<td>Kenneth Marino</td>
<td>Warren NJ</td>
</tr>
<tr>
<td>Jackie Dearborn</td>
<td>Seegers Union 0470</td>
</tr>
<tr>
<td>Mary Jo Brinker</td>
<td>Ellwood City PA</td>
</tr>
<tr>
<td>Douglas Kupferman</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>Roy LaPlante</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>Etta Albright</td>
<td>Cresson PA</td>
</tr>
<tr>
<td>Judith Springer</td>
<td>Exton PA</td>
</tr>
<tr>
<td>George Bradley</td>
<td>Ambler PA</td>
</tr>
<tr>
<td>Richard Linnsenberg</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kate Galer</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Adrian Shanker</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>James Armour</td>
<td>Villanova PA</td>
</tr>
<tr>
<td>Robert Sims</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>Jeannette Ayoob-Urban</td>
<td>Aliquippa PA</td>
</tr>
<tr>
<td>Lauren Sweeney</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>F. David Marschka</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>1602. Fred Baurer</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>1603. Barbara Hyde</td>
<td>Conyngham PA</td>
</tr>
<tr>
<td>1604. Jean Barrell</td>
<td>New Hope PA</td>
</tr>
<tr>
<td>1605. Linda Murray</td>
<td>Mansfield PA</td>
</tr>
<tr>
<td>1606. Carissa Shipman</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>1607. Marion</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>1608. Harry and Esther</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>1609. Charles Grant</td>
<td>Hatboro PA</td>
</tr>
<tr>
<td>1610. Breen Masciotra</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>1611. Sandi Clark</td>
<td>Erie PA</td>
</tr>
<tr>
<td>1612. Nora Schumacher</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>1613. Jason Perkins</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>1614. Patricia Ludwig</td>
<td>Hellertown PA</td>
</tr>
<tr>
<td>1615. Randal Stroup</td>
<td>Kane PA</td>
</tr>
<tr>
<td>1616. Ina C. &amp; William D.</td>
<td>Elliot PA</td>
</tr>
<tr>
<td>1617. Rachel R. Noll</td>
<td>Lancaster PA</td>
</tr>
<tr>
<td>1618. Edward Waxman</td>
<td>Annville PA</td>
</tr>
<tr>
<td>1619. Lionel Ruberg</td>
<td>York PA</td>
</tr>
<tr>
<td>1620. Andy Summa</td>
<td>Scranton PA</td>
</tr>
<tr>
<td>1621. Audrey Summa</td>
<td>Scranton PA</td>
</tr>
<tr>
<td>1622. Christina Ward</td>
<td>Hawertown PA</td>
</tr>
<tr>
<td>1623. Christine Ernias</td>
<td>Wexford PA</td>
</tr>
<tr>
<td>1624. Jill Swensen</td>
<td>Oakmont PA</td>
</tr>
<tr>
<td>1625. Howard Gitter</td>
<td>Lords Valley PA</td>
</tr>
<tr>
<td>1626. David DiPaquale</td>
<td>Pipersville PA</td>
</tr>
<tr>
<td>1627. Amy Sockaci</td>
<td>Ellwood City PA</td>
</tr>
<tr>
<td>1628. Tina Horowitz</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>1629. Catherine O'Rourke</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>---------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Mark Hirschman</td>
<td>Gladwyne PA</td>
</tr>
<tr>
<td>Joseph Pryber</td>
<td>Norristown PA</td>
</tr>
<tr>
<td>Stephen L. Wood</td>
<td>Media PA</td>
</tr>
<tr>
<td>Colleen Kriebel</td>
<td>Hatboro PA</td>
</tr>
<tr>
<td>Richard Hoesch</td>
<td>Bethel Park PA</td>
</tr>
<tr>
<td>Mary Ellen Snyder</td>
<td>Zionsville PA</td>
</tr>
<tr>
<td>Addie Liddic</td>
<td>Clarks Summit PA</td>
</tr>
<tr>
<td>Lillian Cavanagh</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>Russ Savit</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>Ron Edwards</td>
<td>Fayetteville PA</td>
</tr>
<tr>
<td>Anthony Capobianco</td>
<td>South Park PA</td>
</tr>
<tr>
<td>Chad Murren</td>
<td>York PA</td>
</tr>
<tr>
<td>Kait McKenzie</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Ray Migneco</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Kay Garrity-Roth</td>
<td>Lititz PA</td>
</tr>
<tr>
<td>Cynthia Sinclair</td>
<td>Gladwyne PA</td>
</tr>
<tr>
<td>Jim Ewing</td>
<td>Bensalem PA</td>
</tr>
<tr>
<td>Agnes Keiser</td>
<td>Quakertown PA</td>
</tr>
<tr>
<td>Elizabeth Scheer</td>
<td>Oreland PA</td>
</tr>
<tr>
<td>Nancy Stevenson</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>Eric Palmer</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Scott Hagelin</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>Andrew Dorman</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>Kaitlyn Bendik</td>
<td>Shavertown PA</td>
</tr>
<tr>
<td>Jarrett Slaughter</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Susan Hollinsworth</td>
<td>Shermans Dale PA</td>
</tr>
<tr>
<td>Michael Mann</td>
<td>Harrisville PA</td>
</tr>
<tr>
<td>David Keefe</td>
<td>Audubon PA</td>
</tr>
<tr>
<td>Alisha Fowler</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>Lisa Peterman</td>
<td>Bensalem PA</td>
</tr>
<tr>
<td>Louis Incognito</td>
<td>Abington PA</td>
</tr>
<tr>
<td>Caroline DeClerque</td>
<td>Haverford PA</td>
</tr>
<tr>
<td>Renee Abrams</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Ruth Rogers</td>
<td>Levittown PA</td>
</tr>
<tr>
<td>Carol Wren</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Denise Kaufman</td>
<td>Glen Mills PA</td>
</tr>
<tr>
<td>Barbara Cicalese</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Paul Brogan</td>
<td>Thornton PA</td>
</tr>
<tr>
<td>Stephanie Thomas</td>
<td>Lemoyné PA</td>
</tr>
<tr>
<td>Joan Pelc</td>
<td>York PA</td>
</tr>
<tr>
<td>Stephen Rogness</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Julia Haines</td>
<td>State College PA</td>
</tr>
<tr>
<td>Kate Doms</td>
<td>Berwyn PA</td>
</tr>
<tr>
<td>Terry Hoodak</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>Doug Gonze</td>
<td>Holland PA</td>
</tr>
<tr>
<td>Jane Moffett</td>
<td>Honey Brook PA</td>
</tr>
<tr>
<td>Tina Ziff</td>
<td>Springfield PA</td>
</tr>
<tr>
<td>Donna Howarth</td>
<td>Newtown Square PA</td>
</tr>
<tr>
<td>Joseph Sweeney</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Christy Carty</td>
<td>Doylestown PA</td>
</tr>
<tr>
<td>Robin Anderson</td>
<td>State College PA</td>
</tr>
<tr>
<td>Burr McFarlane</td>
<td>Hershey PA</td>
</tr>
<tr>
<td>Patti Vargo</td>
<td>Murrysville PA</td>
</tr>
<tr>
<td>Grace Pasquarlelo</td>
<td>SSJ</td>
</tr>
<tr>
<td>Phelps KY</td>
<td>Bridgeville PA</td>
</tr>
<tr>
<td>Laura Wigtill</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Eric Sudano</td>
<td>Merion Station PA</td>
</tr>
<tr>
<td>Deborah Dunton</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Emily Paulus</td>
<td>Tannersville PA</td>
</tr>
<tr>
<td>April Esterly</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Andrew Oldham</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Sue Bumbaugh</td>
<td>Cashtown PA</td>
</tr>
<tr>
<td>Peggy Goldman</td>
<td>Jenkintown PA</td>
</tr>
<tr>
<td>Judy Grossman</td>
<td>Elkins Park PA</td>
</tr>
<tr>
<td>Vivek Stalam</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>Matthew Zipin</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michael Balsai</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jean Vogel</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>Mark Jewett</td>
<td>Media PA</td>
</tr>
<tr>
<td>Sherry George</td>
<td>Bethel Park PA</td>
</tr>
<tr>
<td>Hugh Watkins</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>William Dautremont-Smith</td>
<td>Orefield PA</td>
</tr>
<tr>
<td>Bunny Driban</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Eric Salsburg</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michele Salsburg</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Lauren Shetler</td>
<td>Robsonia PA</td>
</tr>
<tr>
<td>Daniel Klein</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Janet Saunders</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>Kyle Gracey</td>
<td>Johnstown PA</td>
</tr>
<tr>
<td>Justin Laplante</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>John Redmon</td>
<td>Middletown PA</td>
</tr>
<tr>
<td>Frank X. Kleshinski</td>
<td>Jeannette PA</td>
</tr>
<tr>
<td>Joan Schmitt</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>B. Soltis</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Gauker</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>Brian Raynor</td>
<td>Ottsville PA</td>
</tr>
<tr>
<td>Meghan Mitzel</td>
<td>York PA</td>
</tr>
<tr>
<td>Monika McDole-Russell</td>
<td>Elverson PA</td>
</tr>
<tr>
<td>Bill Waddington</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Trish Lea</td>
<td>Glen Rock PA</td>
</tr>
<tr>
<td>Merrill C. Horine</td>
<td>Newtown Square PA</td>
</tr>
<tr>
<td>Kathleen Kindig</td>
<td>Danville PA</td>
</tr>
<tr>
<td>Noel Bednaz</td>
<td>Southwick MA</td>
</tr>
<tr>
<td>Michael Babitch</td>
<td>Kimberton PA</td>
</tr>
<tr>
<td>Kay Cloud</td>
<td>Willow Street PA</td>
</tr>
<tr>
<td>Daryn Edwards</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Dennie Baker</td>
<td>Warrington PA</td>
</tr>
<tr>
<td>Ellen Smith</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>Harriet Taylor</td>
<td>Mendenhall PA</td>
</tr>
<tr>
<td>Z. B. Bornemann</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Clifton Wigtill</td>
<td>Bridgeville PA</td>
</tr>
<tr>
<td>Melissa Vanasek</td>
<td>Wyomissing PA</td>
</tr>
<tr>
<td>William Sharpe</td>
<td>Spring Mills PA</td>
</tr>
<tr>
<td>Penny Ordway</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Ronald Horiszny</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>Virginia Cassidy</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>Leah Akins</td>
<td>Strasburg PA</td>
</tr>
<tr>
<td>William Jones</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>Doris Loud</td>
<td>Millerton PA</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Michelle Gasperine</td>
<td>Waterville PA</td>
</tr>
<tr>
<td>Ronald Beck</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Ellen Creveling</td>
<td>Perkasie PA</td>
</tr>
<tr>
<td>Cheryl Bittner</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Keith Camilli</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Patricia Moore</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>Barbara Elliot</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Maggie Christy</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>Jennifer Pour</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>David Deardorff</td>
<td>Fairfield PA</td>
</tr>
<tr>
<td>Gerogi Anderson</td>
<td>Gardners PA</td>
</tr>
<tr>
<td>Cynthia Snyder</td>
<td>Biglerville PA</td>
</tr>
<tr>
<td>Beth Rockwell</td>
<td>Erie PA</td>
</tr>
<tr>
<td>Lorraine Poore</td>
<td>Muncy Valley PA</td>
</tr>
<tr>
<td>Michelle DiMeglio</td>
<td>Morton PA</td>
</tr>
<tr>
<td>Mary McMahon</td>
<td>Yardley PA</td>
</tr>
<tr>
<td>Jay Sweeney</td>
<td>Dalton PA</td>
</tr>
<tr>
<td>Robert Cannell</td>
<td>Norristown PA</td>
</tr>
<tr>
<td>Fairlie Gamble</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Emily Houseman</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>Clifford Hritz</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jean Weaver</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Jon Bjornson, MD</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Roger Lieux</td>
<td>Media PA</td>
</tr>
<tr>
<td>Claude Miros</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Betty Cruz</td>
<td>Erie PA</td>
</tr>
<tr>
<td>Peggy Miros</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>Cheryl Parsons</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>Kay Kunkel</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>Louise Fahnstock</td>
<td>Lansdale PA</td>
</tr>
<tr>
<td>Christy Bowersox</td>
<td>New Columbia PA</td>
</tr>
<tr>
<td>Mary Otto</td>
<td>State College PA</td>
</tr>
<tr>
<td>Bonnie Boylan</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>Jeff Alio</td>
<td>Cochranton PA</td>
</tr>
<tr>
<td>Dorothy Newcomer</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>Jean Pendze</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rebekah Baglin</td>
<td>Bryn Mawr College</td>
</tr>
<tr>
<td>Daniel P. McHugh</td>
<td>Newtown Square PA</td>
</tr>
<tr>
<td>Lourdes Fernandez</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Ruth Ann Purchase</td>
<td>Chadds Ford PA</td>
</tr>
<tr>
<td>Christopher W. James</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>Lynn McConville</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Ramona Caligiuri</td>
<td>Media PA</td>
</tr>
<tr>
<td>David Houch</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Traci Confer</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jennifer Rule</td>
<td>Folcroft PA</td>
</tr>
<tr>
<td>Margaret Devaney</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Mark DeVito</td>
<td>Milmont Park PA</td>
</tr>
<tr>
<td>Bradley Krueger</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>George E. Braun</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Mary Ciarcocchi</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Kate Galer</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>John J. Furth</td>
<td>Lansdowne PA</td>
</tr>
<tr>
<td>Cassie Goodrich</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Linda Doyle</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>James Baumann</td>
<td>Allentown PA</td>
</tr>
<tr>
<td>Gerri S. Test</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>William H. Seybold</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Stephen Natalie</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Antonio Zamudio</td>
<td>Boothwyn PA</td>
</tr>
<tr>
<td>Dorothy B. Bosley</td>
<td>Scranton PA</td>
</tr>
<tr>
<td>Christine Weigand</td>
<td>Beach Lake PA</td>
</tr>
<tr>
<td>Charles Sherrouse</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>My Somsanith</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Tina D. Shelton</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>Stefania Trovarelli</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jaclyn Rhoads</td>
<td>Folcroft PA</td>
</tr>
<tr>
<td>Victoria Schmidt</td>
<td>Media PA</td>
</tr>
<tr>
<td>Marcelle Baroby</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>Terry Heng</td>
<td>Folsom PA</td>
</tr>
<tr>
<td>Amelia L. Sass</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Candice D'Orazio</td>
<td>Boothwyn PA</td>
</tr>
<tr>
<td>Kelly Fielden</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>Sandra Retzloff</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Amarturshin Boatar</td>
<td>Bryn Mawr PA</td>
</tr>
<tr>
<td>Rebecca M. Lee</td>
<td>Media PA</td>
</tr>
<tr>
<td>Mariano Oropeza</td>
<td>Chester PA</td>
</tr>
<tr>
<td>Linda Nguyen</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>Joseph Dinn</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>Louis Govinden</td>
<td>Lansdowne PA</td>
</tr>
<tr>
<td>Lori Bilder</td>
<td>Media PA</td>
</tr>
<tr>
<td>Diep Nguyen</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>Deborah Reeder</td>
<td>Narberth PA</td>
</tr>
<tr>
<td>Robin Dailey</td>
<td>Aldan PA</td>
</tr>
<tr>
<td>Maureen Kelleher</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Mary L. Dougherty</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Sameer Jadhav</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Kate Hoch</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Marsha F. Miller</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Kerry McElhiney</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Marie Hines</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Gerald A. Olsyn</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Melissa Salach</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Trent Wells</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Richard Ruf</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Hbalcio Solon</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Alice Malick</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>E. H. Wolverson</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Shirli Offutt</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Helen Hutchison</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Martha M. Broad</td>
<td>Wynnewood PA</td>
</tr>
<tr>
<td>Susan M. Swider</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>Toni McIntosh</td>
<td>Lansdowne PA</td>
</tr>
<tr>
<td>George Hubbard</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Maureen Wade</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>John Haigis</td>
<td>Darby PA</td>
</tr>
<tr>
<td>Robert Williams</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Carly Vecchione</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>Rochelle Pierre</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>Jennifer Hastings</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>Brittany Hastings</td>
<td>Drexel Hill PA</td>
</tr>
<tr>
<td>Alexander Gillett</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Guy Gray</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>Andrew Lukurano</td>
<td>Aldan PA</td>
</tr>
<tr>
<td>Greta Browne</td>
<td>Bethlehem PA</td>
</tr>
</tbody>
</table>
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

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. Viscri  
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
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  
Landsdowne PA
2218. Kayly Newcomer  
Harrisburg PA
2219. John Engstrom  
Walton NY
2220. Charles McCrae  
Marysville PA
2221. Kevin Shober  
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  
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  
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
2252. Erika Martin
St. Davids PA
2253. Bill Seybold
West Chester PA
2254. Christine Knapp
Philadelphia PA
2255. Dr. Kenneth R. Brown
Philadelphia PA
2256. Kathy Sherman
Merion Station PA
2257. Annie Leary
Philadelphia PA
2258. Juliette Pryor
King of Prussia PA
2259. Arthur Stamoulis
Philadelphia PA
2260. Thurm Brendlinger
Swarthmore PA
2261. Jim Black
Cheltenham PA
2262. Brian Zeck
Philadelphia PA
2263. Anne M. Bellwoar Moscony
Media PA
2264. Diana Mizer
Devon PA
2265. Ed Larsen
Philadelphia PA
2266. Al Haynes
Conshohocken PA
2267. David Mindel
Jenkintown PA
2268. Matt Nicholas
Philadelphia PA
2269. Tim Kearney
Philadelphia PA
2270. Peter Bauer
PA Automotive Association
Philadelphia PA
2271. Rob Acheson
Philadelphia PA
2272. Henry Frank
Philadelphia PA
2273. Bernard McPherson
Philadelphia PA
2274. Dorothy Reichardt
Media PA
2275. Sam Gillin
Wayne PA
2276. Lorrie Preston
Mechanicsburg PA
2277. Alanna Cleary
Lansdale PA
2278. DavNuge4@aol.com
2279. Carol Matthews
Wayne PA
2280. Jean Dankosky
New Cumberland PA
2281. Karen Smiga
Trumbull CT
2282. Nicholas Sanders
Philadelphia PA
2283. Margaret Collins
Scranton PA
2284. Linda Harrison
Philadelphia PA
2285. Shannon Dunham
Philadelphia PA
2286. Eric Wagner
Royersford PA
2287. Margaret Clark
Havertown PA
2288. K. C. Carney
Pittsburgh PA
2289. Elizabeth Kury
Harrisburg PA
2290. Tamara Cobaugh
Narberth PA
2291. Lois Smith
Camp Hill PA
2292. Mel Brownstein
Shillington PA
2293. Rich Dixon
Apollo PA
2294. Virginia Maus
Camp Hill PA
2295. Donna Pope
Harrisburg PA
2296. JoAnne Fogelman
Tourtibville PA
2297. Mary Ellen Snyder
Zionsville PA
2298. Bonnie L. Balaban
Downingtown PA
2299. Rick Balaban
Downingtown PA
2300. Resident
Newtown Square PA
2301. Paula Cosden
King of Prussia PA
2302. William D. Foden
Havertown PA
2303. Craig Cosden
King of Prussia PA
2304. Gertrude McGranie
Drexel Hill PA
2305. Thomas Ganzelli
Drexel Hill PA
2306. Alan Huldswort
Bensalem PA
2307. Peggy Dougherty
Easton PA
2308. Resident
Erie PA
2309. Adrienne M. Bucci
Cheltenham PA
2310. Kathleen Lunn
Lafayette Hill PA
2311. Frances Ann Hall
Flourtown PA
2312. Dorothy Ruffin
Philadelphia PA
2313. Janice McGrane
Flourtown PA
2314. Tameka Calec
Philadelphia PA
2315. Eileen Sobel
Philadelphia PA
2316. Lamar Muriel James
Upper Darby PA
2317. Mary McGrath
Flourtown PA
2318. Sister Cordata Dunn
Philadelphia
2319. Sister Anne Roberta Ruckey
2320. Patricia Moscony
Glen Mills PA
2321. William Brinkhoff
Pittsburgh PA
2322. Audrey Fisher
East Petersburg PA
2323. Elizabeth C. Prugh
Edgeworth PA
2324. Ralph Thompson
Crane Bryn Mawr PA
2325. Jane Grant
Newtown Square PA
2326. Richard G. Mulvaney
Newtown Square PA
2327. Terri Murphy
East Norriton PA
2328. Jane C. Valdes-Dapena
Merion Station PA
2329. Catherine Verrier
Piersol Media PA
2330. Carla J. DeWald
Newtown Square PA
2331. Stephanie Gallagher
Aston PA
2332. Sharon M. Gallagher
Aston PA
2333. Elizabeth George
Aston PA
2334. Jennifer George
Aston PA
2335. Alan Kaufman
Philadelphia PA
2336. Thomas W. & Anne H. T. Moore
West Chester PA
2337. Susan Racobaldo
Kennett Square PA
2338. Terry Kramzar
Kennett Square PA
2339. B. Taylor Liska
Kennett Square PA
2340. Robyn Liska
Kennett Square PA
2341. Sandy Mayer
Chadds Ford PA
2342. Gary & Veronique Liska
Kennett Square PA
2343. J. B. & Karen D. Liska
Kennett Square PA
2344. Thomas Winkler
Springfield PA
2345. Gretchen Roth
Downingtown PA
2346. Marilyn Lee
Havertown PA
2347. Mollie Moscony
Media PA
2348. Charles E. Moscony
Media PA
2349. Katelyn Moscony
Media PA
2350. Cathy Drager
West Chester PA
2351. Mark R. Drager
West Chester PA
2352. Rev. Dr. Bruce T. Davis
Messiah Evangelical Lutheran Church Philadelphia PA
2353. Mark Hummer
Glenside PA
2354. Hallie Rozansky
Rydal PA
2355. Christina Brenner
Huntingdon Valley PA
2356. Anna Mindel
Jenkintown PA
2357. Sara Mindel
Jenkintown PA
2358. David Mindel
Jenkintown PA
2359. Silvia Bloise
Jenkintown PA
2360. Scott Simons
Rydal PA
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

2361. Lynda Simons
Rydal PA

2362. Dena Reese
Newtown Square PA

2363. Sidne Baglini
Newtown Square PA

2364. Lynn O. Schickling, Jr.
Media PA

2365. Susan R. Brastow
Brookmall PA

2366. Rochelle Solow
Brookmall PA

2367. Alan S. Kauffman
Brookmall PA

2368. William O’Grady
Plymouth Meeting PA

2369. Barbara Silbert
Wyndmoor PA

2370. Jeffrey T. Chappelle
St. Davids PA

2371. Lt. Col. Theodore C. Martin
Ambler PA

2372. William S. Aiken
Villanova PA

2373. Lois M. Shenk
Narberth PA

2374. Lesley A. Nicol
Newtown PA

2375. Bonita Hay
Wyncote PA

2376. Dorothy Wells
Berwyn PA

2377. Caroline Brubaker
West Chester PA

2378. Joanna Bau
West Chester PA

2379. Margaret A. Wood
Exton PA

2380. Michael D. Wood
Exton PA

2381. Barbara E. Drake
Havertown PA

2382. Nancy C. Moses
West Chester PA

2383. Owen D. Owens
West Chester PA

2384. Everett Marsh
West Chester PA

2385. Betty U. Green
West Chester PA

2386. Karen Slyman
Exton PA

2387. John Wright
Coatesville PA

2388. Mary Ella Fuquay
Exton PA

2389. Faith R. Sipe
West Chester PA

2390. Rona Obert
Downtown PA

2391. Sylvia W. Fuller
West Chester PA

2392. F. R. Struckmeyer
West Chester PA

2393. Olga Taylor
West Chester PA

2394. Thomas Tollesen
West Chester PA

2395. Kathy Parker
Exton PA

2396. Barry Lewis
West Chester PA

2397. Renate Haekler
West Chester PA

2398. Judith Wadsworth
West Chester PA

2399. Katherine J. Johnson
West Chester PA

2400. Sydney Rachall
Downtown PA

2401. Rev. Ruth H.
Wooden
West Chester PA

2402. Bev Hoehing
West Chester PA

2403. Sharon Thompson
West Chester PA

2404. Linda S. Seybold
West Chester PA

2405. William H. Seybold
West Chester PA

2406. Kathy Parker

2407. Jan Wilcox
Philadelphia PA

2408. Linda Smith
West Chester PA

2409. Jill Herman
Audubon PA

2410. Monique Lazard
Bryn Mawr PA

2411. Larry Hirshland
Devon PA

2412. Tom O’Neill
St. Davids PA

2413. Patricia Salvitti
Media PA

2414. Lynn Racey
Conshohocken PA

2415. Jim Nicol
Newtown PA

2416. Marc Silbert
Glen Side PA

2417. Bill Fantini
Bala Cynwyd PA

2418. Chuck Sherman
Merion Station PA

2419. L. F. Filipone
Wayne PA

2420. Mike Mostardi
Wayne PA

2421. Jesse Yanneill
Wayne PA

2422. Laura Caracini
Philadelphia PA

2423. Jess Knight
Philadelphia PA

2424. Meredith Carty
Philadelphia PA

2425. Jen Zimmerman
Philadelphia PA

2426. Joseph Matteo
Philadelphia PA

2427. Ona Hamilton
Haverford PA

2428. Robert Potter
Chester PA

2429. Meg Miller
Wynnewood PA

2430. JoAnne Wallen
Narberth PA

2431. Deborah McKnight
Narberth PA

2432. Elizabeth Drummond
Eagleville PA

2433. Carol Witzeman
Camp Hill PA

2434. Anne Harman-
Menke
Lancaster PA

2435. Emily Bittler
Easton PA

2436. Lisa Tomkosky
Johnstown PA

2437. Claudia Kirk
Paradise PA

2438. Stefan Ellis
Philadelphia PA

2439. Senator Roger
Madigan
Senate
Environmental
Resources and
Energy Committee
Philadelphia PA

2440. Senator Mary Jo
White
Senate
Environmental
Resources and
Energy Committee
Philadelphia PA

2441. Dana Dorman
Philadelphia PA

2442. Jenne Turner
Philadelphia PA

2443. Lizzy Berryman
Philadelphia PA

2444. Matthew Curtis
Philadelphia PA

2445. Cecily Anderson
Philadelphia PA

2446. Beth McConnell
Philadelphia PA

2447. Stephanie Haynes
Philadelphia PA

2448. Daniel Favre
Philadelphia PA

2449. Amy Fox
Harrisburg PA

2450. Garret Godfrey
Mechanicsburg PA

2451. John Kesich
Millerton PA

2452. Wade Wright
Stillwater PA

2453. Bruce Fink
McKees Rocks PA

2454. Karen Rudy
New Cumberland PA

2455. Brian Gelletly
Chambersburg PA

2456. Margaret Clark
Havertown PA

2457. Melissa Merdinger
Allentown PA

2458. Joseph Zairo
Allentown PA

2459. Jennifer Gladue
Media PA

2460. Maryann Wagner
Whitehall PA

2461. Jeff Brown
Bryn Athyn PA

2462. Barbara Field
Pittsburgh PA

2463. John Leisenring
Berwyn PA

2464. Christine E. Fiduccia
Pittsburgh PA

2465. Jim Miles
Philadelphia PA

2466. Dan Pohlig
Philadelphia PA

2467. Sabiha Basrai
Philadelphia PA

2468. Greta Kelz
Mohnton PA

2469. William Hance
Media PA

2470. Patricia Johnson
Blue Bell PA
<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amanda Esrey</td>
<td>Ridley Park PA</td>
</tr>
<tr>
<td>Trish Tchume</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>George Seman</td>
<td>Scranton PA</td>
</tr>
<tr>
<td>Carolyn Booz</td>
<td>Langhorne PA</td>
</tr>
<tr>
<td>Rebecca Farabaugh</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Donna Hutchinson</td>
<td>Furlong PA</td>
</tr>
<tr>
<td>Ilse Frank</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>JoEllen Exner</td>
<td>Langhorne PA</td>
</tr>
<tr>
<td>David Martin</td>
<td>Blue Bell PA</td>
</tr>
<tr>
<td>Janee Lamoureux</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Meghan Dinneen</td>
<td>Lewisburg PA</td>
</tr>
<tr>
<td>Mary Kinney</td>
<td>Mt. Pocono PA</td>
</tr>
<tr>
<td>Jean Weaver</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>John Fowler</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>Louis Harris</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Laurel Person</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Mary Lou Artim</td>
<td>Freeland PA</td>
</tr>
<tr>
<td>Bonnie Cline</td>
<td>Fair Oaks PA</td>
</tr>
<tr>
<td>R. Lange</td>
<td>Blanchard PA</td>
</tr>
<tr>
<td>Lauren Ivy Chiong</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>John Fowler</td>
<td>Newtown PA</td>
</tr>
<tr>
<td>Matthew Cleveland</td>
<td>Elizabethtown PA</td>
</tr>
<tr>
<td>Sally Zaino</td>
<td>Hummelstown PA</td>
</tr>
<tr>
<td>James Armour</td>
<td>Villanova PA</td>
</tr>
<tr>
<td>Stephen Bennett</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>Virginia Fitzpatrick</td>
<td>East Norriton PA</td>
</tr>
<tr>
<td>Sarah Batchelor</td>
<td>Springfield PA</td>
</tr>
<tr>
<td>Elizabeth Sterner</td>
<td>York PA</td>
</tr>
<tr>
<td>Lorin Snyder</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Nancy Ohm</td>
<td>Breinigsville PA</td>
</tr>
<tr>
<td>Marion</td>
<td>Constantinides, Pittsburgh PA</td>
</tr>
<tr>
<td>Laurie Plank</td>
<td>Hummelstown PA</td>
</tr>
<tr>
<td>Eric Jensen</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>Chad Murren</td>
<td>York PA</td>
</tr>
<tr>
<td>Thomas Graves</td>
<td>Holtwood PA</td>
</tr>
<tr>
<td>Evan Mull</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Cynthia Iberg</td>
<td>McAlisterville PA</td>
</tr>
<tr>
<td>Reed Dunn</td>
<td>York PA</td>
</tr>
<tr>
<td>Susan Wilmerding</td>
<td>Haverford PA</td>
</tr>
<tr>
<td>Anthony DiMenno</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Mike DellaPenna</td>
<td>Malvern PA</td>
</tr>
<tr>
<td>Carla Burkett</td>
<td>Mount Holly Springs PA</td>
</tr>
<tr>
<td>Harry and Esther Buck</td>
<td>Chambersburg PA</td>
</tr>
<tr>
<td>Rita Hawrot</td>
<td>Bridgeville PA</td>
</tr>
<tr>
<td>Christian Vise</td>
<td>Mt. Pleasant PA</td>
</tr>
<tr>
<td>Clare Shumway</td>
<td>Dillsburg PA</td>
</tr>
<tr>
<td>Richard Hess</td>
<td>Philipsburg PA</td>
</tr>
<tr>
<td>Anthony Capobianco</td>
<td>South Park PA</td>
</tr>
<tr>
<td>Carol McCullough</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Kathy Stewart</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Barbara Dahlgren</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Jill Gleeson</td>
<td>Philipsburg PA</td>
</tr>
<tr>
<td>Janet Tagg</td>
<td>Mechanicsburg PA</td>
</tr>
<tr>
<td>Coleen Kinlin</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Charles O'Brien</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Judith Springer</td>
<td>Exton PA</td>
</tr>
<tr>
<td>Julia Johns</td>
<td>McMurray PA</td>
</tr>
<tr>
<td>Jesse Brenner</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Wendy McClure</td>
<td>North Wales PA</td>
</tr>
<tr>
<td>Audrey Kent</td>
<td>Langhorne PA</td>
</tr>
<tr>
<td>Rosemary Frain</td>
<td>Holland PA</td>
</tr>
<tr>
<td>John Carricato</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>Otto Lehrbach</td>
<td>Alburdis PA</td>
</tr>
<tr>
<td>Averill Shepps</td>
<td>Mechanicsburg PA</td>
</tr>
<tr>
<td>Lynn Stauffer</td>
<td>Bath PA</td>
</tr>
<tr>
<td>Iona Conner</td>
<td>Shade Gap PA</td>
</tr>
<tr>
<td>Brian Gilin</td>
<td>Lafayette Hill PA</td>
</tr>
<tr>
<td>Jim Wurster</td>
<td>Springfield PA</td>
</tr>
<tr>
<td>John Willard</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Redmon</td>
<td>Middletown PA</td>
</tr>
<tr>
<td>Frank X. Kleshinski</td>
<td>Jeannette PA</td>
</tr>
<tr>
<td>Patty Phillips</td>
<td>Altoona PA</td>
</tr>
<tr>
<td>Nicole Cicalese</td>
<td>Finleyville PA</td>
</tr>
<tr>
<td>Mary Dawn Edwards</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>William Shaffner</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Darwin Hollinger</td>
<td>Mechanicsburg PA</td>
</tr>
<tr>
<td>Katherine Baker</td>
<td>Schwenksville PA</td>
</tr>
<tr>
<td>Camille Lore</td>
<td>Walnutport PA</td>
</tr>
<tr>
<td>Molly Duffy</td>
<td>Paoli PA</td>
</tr>
<tr>
<td>Emily Bragonier</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Brigitta Arden</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>Peg Thompson</td>
<td>Glenmore PA</td>
</tr>
<tr>
<td>Stephen Loughin</td>
<td>Bala Cynwyd PA</td>
</tr>
<tr>
<td>Ed McGovern</td>
<td>Mechanicsburg PA</td>
</tr>
<tr>
<td>Thomas P. Wolfe</td>
<td>Kennett Square PA</td>
</tr>
</tbody>
</table>

- 23 -
<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2586</td>
<td>Diane Hollinger</td>
<td>Mechanicsburg PA</td>
</tr>
<tr>
<td>2587</td>
<td>Sarah Gellerty</td>
<td>Chambersburg PA</td>
</tr>
<tr>
<td>2588</td>
<td>Audrey Fisher</td>
<td>East Petersburgh PA</td>
</tr>
<tr>
<td>2589</td>
<td>Cindi Varcoe</td>
<td>Doylestown PA</td>
</tr>
<tr>
<td>2590</td>
<td>Priscilla Mattison</td>
<td>Narberth PA</td>
</tr>
<tr>
<td>2591</td>
<td>Michael Arnold</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>2592</td>
<td>Aletheia Fkiaras</td>
<td>Southampton PA</td>
</tr>
<tr>
<td>2593</td>
<td>John Amadio</td>
<td>Bryn Maw PA</td>
</tr>
<tr>
<td>2594</td>
<td>Bryan Wienand</td>
<td>Pittsburg PA</td>
</tr>
<tr>
<td>2595</td>
<td>William Willis</td>
<td>Mercersburg PA</td>
</tr>
<tr>
<td>2596</td>
<td>Shannon Elliott</td>
<td>Bensalem PA</td>
</tr>
<tr>
<td>2597</td>
<td>Peter Stone</td>
<td>Bethlehem PA</td>
</tr>
<tr>
<td>2598</td>
<td>Alice Forner</td>
<td>Wynnwood PA</td>
</tr>
<tr>
<td>2599</td>
<td>Michael Helfrich</td>
<td>York PA</td>
</tr>
<tr>
<td>2600</td>
<td>Amy Howe</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>2601</td>
<td>Kathy Plavko</td>
<td>State College PA</td>
</tr>
<tr>
<td>2602</td>
<td>Teri Dignazio</td>
<td>Oxford PA</td>
</tr>
<tr>
<td>2603</td>
<td>Alse H. Sakheim</td>
<td>Gwynedd PA</td>
</tr>
<tr>
<td>2604</td>
<td>Frances Sonne</td>
<td>Catasauqua PA</td>
</tr>
<tr>
<td>2605</td>
<td>Kristen Budris</td>
<td>Aliquippa PA</td>
</tr>
<tr>
<td>2606</td>
<td>Henry &amp; Linda</td>
<td>Berkowitz Sabinsville PA</td>
</tr>
<tr>
<td>2607</td>
<td>Penny Ordway</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2608</td>
<td>Amy Lidle</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>2609</td>
<td>Hollister Knowton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2610</td>
<td>Kim LaBadie</td>
<td>Henryville PA</td>
</tr>
<tr>
<td>2611</td>
<td>Kathy Burkett</td>
<td>Mt Holly Springs PA</td>
</tr>
<tr>
<td>2612</td>
<td>Evalyn F. Segal</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2613</td>
<td>Edward Thornton</td>
<td>Swarthmore PA</td>
</tr>
<tr>
<td>2614</td>
<td>John S. Sloyer</td>
<td>Julian PA</td>
</tr>
<tr>
<td>2615</td>
<td>Jessica Krow</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2616</td>
<td>Bonnie Bristow</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>2617</td>
<td>Daniel Simotas</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>2618</td>
<td>Donald &amp; Barbara Brown</td>
<td>Media PA</td>
</tr>
<tr>
<td>2619</td>
<td>Roy LaPlante</td>
<td></td>
</tr>
<tr>
<td>2620</td>
<td>Cynthia Yewdall</td>
<td>Palmyra PA</td>
</tr>
<tr>
<td>2621</td>
<td>Estelle Wynn</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2622</td>
<td>Patricia P.</td>
<td>Reifsnnyder Gwynedd PA</td>
</tr>
<tr>
<td>2623</td>
<td>Robert E. &amp; Eva E. Gould</td>
<td>Gwynedd PA</td>
</tr>
<tr>
<td>2624</td>
<td>Ingrid A. Ruda</td>
<td>Coatesville PA</td>
</tr>
<tr>
<td>2625</td>
<td>Rosa T. Mallon</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>2626</td>
<td>Stephen Gilmour</td>
<td>Newtown Square PA</td>
</tr>
<tr>
<td>2627</td>
<td>William Hance</td>
<td>Media PA</td>
</tr>
<tr>
<td>2628</td>
<td>Carli Dale</td>
<td>Carlisle PA</td>
</tr>
<tr>
<td>2629</td>
<td>Richard Whiteford</td>
<td>Downingtown PA</td>
</tr>
<tr>
<td>2630</td>
<td>Jon Levin</td>
<td>Macungie PA</td>
</tr>
<tr>
<td>2631</td>
<td>Sal Ferraro</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>2632</td>
<td>Kayly Newcomer</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>2633</td>
<td>Angela Szesciorka</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>2634</td>
<td>Larry Burkett</td>
<td>Mount Holly Springs PA</td>
</tr>
<tr>
<td>2635</td>
<td>Robert Calhoun</td>
<td>Shohola PA</td>
</tr>
<tr>
<td>2636</td>
<td>Christopher Irwin</td>
<td>North Versailles PA</td>
</tr>
<tr>
<td>2637</td>
<td>Deborah Tracey</td>
<td>Albrightsville PA</td>
</tr>
<tr>
<td>2638</td>
<td>David Kenosian</td>
<td>Berwyn PA</td>
</tr>
<tr>
<td>2639</td>
<td>Barbara</td>
<td>Knickerbocker West Chester PA</td>
</tr>
<tr>
<td>2640</td>
<td>Lisa Cohen</td>
<td>Croton NY</td>
</tr>
<tr>
<td>2641</td>
<td>Anne Horvath</td>
<td>Honesdale PA</td>
</tr>
<tr>
<td>2642</td>
<td>Barbara Field</td>
<td>Pittsburgh PA</td>
</tr>
<tr>
<td>2643</td>
<td>Bill Dietrich</td>
<td>Indiana PA</td>
</tr>
<tr>
<td>2644</td>
<td>Tisha Walmer</td>
<td>Newmanstown PA</td>
</tr>
<tr>
<td>2645</td>
<td>Marian Freed</td>
<td>State College PA</td>
</tr>
<tr>
<td>2646</td>
<td>Mary Ellen Snyder</td>
<td>Zionsville PA</td>
</tr>
<tr>
<td>2647</td>
<td>Robert Nyce</td>
<td>Souderton PA</td>
</tr>
<tr>
<td>2648</td>
<td>Thomas and Justin Au</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>2649</td>
<td>William Marston</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2650</td>
<td>Nancy A. Berry</td>
<td>Chadds Ford PA</td>
</tr>
<tr>
<td>2651</td>
<td>The Honorable Charles T. McIlhinney, Jr.</td>
<td>Harrisburg PA</td>
</tr>
<tr>
<td>2652</td>
<td>Lazarus Saritsoglou</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2653</td>
<td>Rose Bove</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2654</td>
<td>Resident</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>2655</td>
<td>Resident</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2656</td>
<td>Patricia Foley</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2657</td>
<td>James Glotfelty</td>
<td>Havertown PA</td>
</tr>
<tr>
<td>2658</td>
<td>Deanne M. Kerrigan</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2659</td>
<td>Johanna Manning</td>
<td>Wallingford PA</td>
</tr>
<tr>
<td>2660</td>
<td>Jun Soetanto</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2661</td>
<td>Don Goodman</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2662</td>
<td>Robert Shillingford</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2663</td>
<td>Charles Brown</td>
<td>King of Prussia PA</td>
</tr>
<tr>
<td>2664</td>
<td>Kate Pietrowski</td>
<td>King of Prussia PA</td>
</tr>
<tr>
<td>2665</td>
<td>Resident</td>
<td>West Chester PA</td>
</tr>
<tr>
<td>2666</td>
<td>James R. Hedtke</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2667</td>
<td>Christine Semanyak</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2668</td>
<td>Joseph Shuster</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2669</td>
<td>Mr. &amp; Mrs. Ralph DiDonato</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2670</td>
<td>Resident</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2671</td>
<td>Shirley Law</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2672</td>
<td>Resident</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2673</td>
<td>Judi H. Hdtke</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2674</td>
<td>Thomas M. Burns</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2675</td>
<td>Jay Tarpey</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2676</td>
<td>Rich Pezick</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2677</td>
<td>Marie Rantz</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2678</td>
<td>James Morrison</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2679</td>
<td>T. F. McCullough</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2680</td>
<td>A. R. Subbiv</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2681</td>
<td>Lisa Plotts</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2682</td>
<td>Warren Fisher</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2683</td>
<td>Colleen O’Connor</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2684</td>
<td>Robert E. Drew</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2685</td>
<td>Eleanor McDonough</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2686</td>
<td>Christopher Ricciuti</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2687</td>
<td>Resident</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2688</td>
<td>Peg Drew</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2689</td>
<td>Cheryl Michielli</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2690</td>
<td>Victoria A.</td>
<td>Garstefeld</td>
</tr>
<tr>
<td>2691</td>
<td>Darrell Boyd</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2692</td>
<td>Resident</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2693</td>
<td>Valentina Sciulli</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2694</td>
<td>Joanne Lynch</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2695</td>
<td>Patricia Migliori</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>2696</td>
<td>Mary Kane</td>
<td>Broomall PA</td>
</tr>
</tbody>
</table>
2697. Al DeFruscio Jr.  Broomall PA
2698. Michael Losacco  Broomall PA
2699. K. Kloton  Broomall PA
2700. Resident  Broomall PA
2701. William J Hanlon  Broomall PA
2702. Robert Luke  Broomall PA
2703. Fred Beatty  Broomall PA
2704. Stephanie McCoy  Broomall PA
2705. Kimberly Wolferth  Broomall PA
2706. D. O'Mally  Broomall PA
2707. Andrew King  Ardmore PA
2708. William McCloskey  Broomall PA
2709. Rich Pfeffinger  Broomall PA
2710. Carl Medori  Broomall PA
2711. Jason McDonald  Collegeville PA
2712. Ari Topelidis  Broomall PA
2713. Chintal Shah  Broomall PA
2714. Mary K. Kazanjian  Broomall PA
2715. Rich Collins  Broomall PA
2716. Laura Mechan  Newtown Square PA
2717. Andy Dokmanian  Broomall PA
2718. Mike Glenn  Broomall PA
2719. Julia M. Wilson  Broomall PA
2720. M. Magnotta  Broomall PA
2721. Richard Terroni  Broomall PA
2722. Francesca Gentillo  Broomall PA
2723. Jon Garnet  Broomall PA
2724. Wafa Ayoub  Broomall PA
2725. Stella Varvarezis  Broomall PA
2726. Francis DeMarco  Broomall PA
2727. Joanne Gueriera  Broomall PA
2728. Al Dreyer  Broomall PA
2729. Bernadette McCaffrey  Broomall PA
2730. Tiffany Holdeman  Broomall PA
2731. Mary Riley  Broomall PA
2732. Betsy McFadden  Broomall PA
2733. Maryann Tallman  Broomall PA
2734. James Masterson  Broomall PA
2735. Mr. & Mrs. Joseph DiMarco  Broomall PA
2736. Emilia Solipaca  Broomall PA
2737. William McGlove  Broomall PA
2738. Paul R. Landman  Broomall PA
2739. Susan Conley  Broomall PA
2740. David S. Caviness  Broomall PA
2741. Lillian Jones  Broomall PA
2742. John Zoccola  Broomall PA
2743. Marie E. Neiburg  Broomall PA
2744. Peter Dolhancryk  Broomall PA
2745. Gary Baron  Broomall PA
2746. Liz Booth  Broomall PA
2747. Robert Handschu  Haverford PA
2748. Carmela Mraz  Broomall PA
2749. Jolene Petras  Broomall PA
2750. H. Granate  Broomall PA
2751. Fay E. Morgan  Broomall PA
2752. Marie Collas  Broomall PA
2753. William Collins  Broomall PA
2754. Leslie Grissom  Media PA
2755. William Poteau  Media PA
2756. Mary Elizabeth Clark  Philadelphia PA
2757. Maggie Allio  Philadelphia PA
2758. Margaret Bell  Broomall PA
2759. Frank Bellace  Broomall PA
2760. Anne Marie Trioic  Broomall PA
2761. Robert C. Leunis  Broomall PA
2762. Robert Hogg  Broomall PA
2763. Mary Woods  Broomall PA
2764. Susan Drake  Broomall PA
2765. W. Powell  Broomall PA
2766. Joseph N. Diendio  Broomall PA
2767. Mike Fierras  Broomall PA
2768. Frank Scarduzio  Broomall PA
2769. James & Julie Perri  Broomall PA
2770. John McGee  Broomall PA
2771. Michael Cella  Broomall PA
2772. Betty Wienchowski  Broomall PA
2773. Paul D. Scoa  Broomall PA
2774. Mary Lou Zimmerman  Broomall PA
2775. Hanh Nguyen  Broomall PA
2776. Shaun Hamilton  Broomall PA
2777. Fotios Michos  Broomall PA
2778. John K. Murphy  Broomall PA
2779. Jim Lanno  Broomall PA
2780. Carl Yost  Broomall PA
2781. L. Vanover  Broomall PA
2782. Catherine Langorotti  Broomall PA
2783. George Greenberg  Broomall PA
2784. Gail Morgan  Broomall PA
2785. Andy King  Media PA
2786. Frederick Gautsch  Broomall PA
2787. Brian McDonald  Broomall PA
2788. Tom Duffy  Broomall PA
2789. David Owen  Broomall PA
2790. Mary Mikus  Ardmore PA
2791. Lucy Charles  Broomall PA
2792. Mike Grassi  Broomall PA
2793. S. Garfield  Broomall PA
2794. Otto Vincen  Broomall PA
2795. Lauren Dobbins  Broomall PA
2796. Jerry Brown  Broomall PA
2797. Joseph Gentile  Broomall PA
2798. George Charles Sr.  Broomall PA
2799. Arlene Savarese  Broomall PA
2800. Marvin G. Collins  Broomall PA
2801. T. Capretti  Broomall PA
2802. Alan Moore  Broomall PA
2803. Egidio N Ricci  Broomall PA
2804. Colleen Smith  Broomall PA
2805. Derek Coren  Broomall PA
2806. T. Gekas  Broomall PA
2807. Garr E. Groff  Broomall PA
2808. Dan Funkhouser  Broomall PA
2809. Kevin Ryan  Broomall PA
2810. Joan B. Howe  Broomall PA
2811. Pete McGinnis  Broomall PA
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

2812. Helen R. Hurley
   Broomall PA

2813. Resident
   Broomall PA

2814. Ruth Besden
   Broomall PA

2815. The Gore Family
   Broomall PA

2816. Michael Lubragge
   Broomall PA

2817. Donna Palmerio
   Broomall PA

2818. Bernard Casey
   Broomall PA

2819. Stephen E. Pavlo
   Broomall PA

2820. M. A. Nocella
   Broomall PA

2821. Resident
   Gwynedd PA

2822. Kenneth Haughton
   Newtown Square PA

2823. Beth Rowe
   West Chester PA

2824. John Masek
   Downingtown PA

2825. Marshall D. Strode
   West Chester PA

2826. David Kelley
   Glenmore PA

2827. Penny K. Davis
   Exton PA

2828. Marilyn Brarton
   West Chester PA

2829. Christine N. Dionti
   Chester Springs PA

2830. Julie Spencer
   Downingtown PA

2831. Julius S. Heyman
   West Chester PA

2832. Carol Nevilis
   West Chester PA

2833. Marc Romishir
   West Chester PA

2834. Jamie Scott Brice
   West Chester PA

2835. Ted Anderson
   West Chester PA

2836. Cora Gemin
   West Chester PA

2837. Resident
   West Chester PA

2838. Johanna Manning
   Wallingford PA

2839. Victor G. Vely
   West Chester PA

2840. Mr. James E.
   O’Brien Jr.
   Upper Darby PA

2841. Ted Nawalinski
   Downingtown PA

2842. Barbara Seymour
   Media PA

2843. Charles Miller
   West Chester PA

2844. Resident
   Media PA

2845. Rosemarie Torres Zuppo
   Rutledge PA

2846. Neil R. Dreibelbis
   Exton PA

2847. David Eldredge
   Lansdowne PA

2848. Bernard Greenberg
   West Chester PA

2849. Roberta J. Roberts
   West Chester PA

2850. Jack Armstrong
   West Chester PA

2851. Mary Emmett
   Ardmore PA

2852. Janet Vokoun
   West Chester PA

2853. Michelle Ralph
   West Chester PA

2854. Paul Farkas
   West Chester PA

2855. Barbara Cossaboon
   West Chester PA

2856. Rose Buckwalter
   Moon Township PA

2857. Ted Leonard
   Pennsylvania AAA Federation

2858. Bryan Kemper
   Philadelphia PA

2859. Rob Steffes
   Alliquippa PA

2860. Neil J. Nitzberg
   Scranton PA

2861. Charlene Wittman
   Allentown PA

2862. Ruth Davis
   Waynesboro PA

2863. Rebecca Robertson
   Pittsburgh PA

2864. Jerome Glickstein
   Quakertown PA

2865. Jennifer Danner
   Nazareth PA

2866. Mary Armstrong
   Kennett Square PA

2867. Leslie Fenton
   Devon PA

2868. Julie Merrifield-Mull
   Philadelphia PA

2869. Beth Stauber
   Allison Park PA

2870. Meenal Raval
   Philadelphia PA

2871. Sanderson Caesar
   Media PA

2872. James Jones
   New Cumberland PA

2873. Daylin Leach
   DLeach@pahouse.net

2874. Ellen Creveling
   Perkasie PA

2875. Krista Iskra
   Langhorne PA

2876. Louis D Bettermann
   Seneca PA

2877. Randal Stroup
   Kane PA

2878. Scotty Stuart-Whistler
   Gwynedd PA

2879. Robert Reifsnyder
   Gwynedd PA

2880. Resident
   Philadelphia PA

2881. Ben Wagman
   Ambler PA

2882. Mary Lou
   Zimmerman

2883. Amber R. Wagman
   Broomall PA

2884. Ann E. Schilling
   Media PA

2885. M. Tracy Gallagher
   Erdenheim PA

2886. Nancy Nolde
   Wyndmoor PA

2887. Gordon F. Macklem, Jr.
   Wyndmoor PA

2888. Margaret Van Ummersen
   Philadelphia PA

2889. Beth Wolff
   Lansdale PA

2890. E. J. Trayes
   Wyncote PA

2891. Barbara Haig
   Ft. Washington PA

2892. David Bore
   Blue Bell PA

2893. Jane Benge
   Philadelphia PA

2894. Julia H. Haines
   Philadelphia PA

2895. Luther Van
   Ummersen

2896. Susan Cole
   Philadelphia PA

2897. Byron Woodman
   Wayne PA

2898. Michael L. Hoppus
   Media PA

2899. Lydia M. Erwine
   Abington PA

2900. Mary Washington
   Elkins Park PA

2901. Sally Weaver
   Hatboro PA

2902. Esther Wilson
   Hatboro PA

2903. Margery Reith
   Willow Grove PA

2904. Gwen S. Gutekunst
   Hatboro PA

2905. Gladys Parsons
   Willow Grove PA

2906. Patricia D. Levin
   Jenkintown PA

2907. Susan G. Farrell
   Willow Grove PA

2908. Lois G. Wilson
   Jenkintown PA

2909. Trudy Roman
   Wyndmoor PA

2910. Charlotte M.
    Goe-rich

2911. Nancy A. Weiss
    Ambler PA

2912. Sara L. Lang
    Glenside PA

2913. George J. Schefield
    III

2914. Hal Taussig
    Philadelphia PA

2915. Bronwyn Yocum
    Berwyn PA

2916. Amy Dwyer
    Havertown PA

2917. Elizabeth Killough
    Glenside PA

2918. Cathrine Baumbach
    Newtown Square PA

2919. Katehrine Duncan
    Philadelphia PA

2920. Hydalker Amaral
    Media PA

2921. Ellen Peters
    West Chester PA

2922. Peter A. Novick
    Philadelphia PA
<table>
<thead>
<tr>
<th>Name</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrea Szyper</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Resident</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Dee McConnell</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kim Pascher</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Francy Breon</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Gil Frost</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Elisabeth McGlynn</td>
<td>Merion PA</td>
</tr>
<tr>
<td>Margaret Vance</td>
<td>Merion PA</td>
</tr>
<tr>
<td>Judy Satofield</td>
<td>Roystonford PA</td>
</tr>
<tr>
<td>Wayne Ackes</td>
<td>Phoenixville PA</td>
</tr>
<tr>
<td>Sherrill Baugartner</td>
<td>Phoenixville PA</td>
</tr>
<tr>
<td>Jann Nielsen</td>
<td>Collegeville PA</td>
</tr>
<tr>
<td>Barbara E. Drake</td>
<td>Haverton PA</td>
</tr>
<tr>
<td>Robin M. Hynicka</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>James N. Sicks</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Elaine Dushoff</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Gerald D. Wright</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Richard Nourie</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Bill Levering</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Susan Beetle</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Dieter Littles</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Amy Gendall</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Barbara H. Waters</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Eric Wilden</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jim Ballengee</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Philip H. Jones</td>
<td>Abington PA</td>
</tr>
<tr>
<td>Jo Busser</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Judy Wenstein</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Willie D. Little</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Beth Fox</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Ann Croxson</td>
<td>Doylestown PA</td>
</tr>
<tr>
<td>Doug McClure</td>
<td>North Wales PA</td>
</tr>
<tr>
<td>Wendy A. McClure</td>
<td>North Wales PA</td>
</tr>
<tr>
<td>Sara McClure</td>
<td>North Wales PA</td>
</tr>
<tr>
<td>Patricia F. Klenk</td>
<td>Blue Bell PA</td>
</tr>
<tr>
<td>Susan Bond</td>
<td>Blue Bell PA</td>
</tr>
<tr>
<td>Deb DeVries</td>
<td>Oreland PA</td>
</tr>
<tr>
<td>Rosemary Burke</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>C. D. Buckley</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>L. H. Rector</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Deborah Doyle</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Karen Clemente</td>
<td>Pennsburg PA</td>
</tr>
<tr>
<td>Melinda, Tatum &amp; Jay Kaiser</td>
<td>Wyndmoor PA</td>
</tr>
<tr>
<td>Alicia &amp; Jess Lomba</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Mary Foster</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Daniel Guest</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kathryn Guest</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Guest</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Anthony J. Clemente</td>
<td>Pennsburg PA</td>
</tr>
<tr>
<td>Daniel Smith</td>
<td>Jenkintown PA</td>
</tr>
<tr>
<td>Eileen Gemmell</td>
<td>Jenkintown PA</td>
</tr>
<tr>
<td>Albert Bixler</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Beth &amp; Jim Logue</td>
<td>Blue Bell PA</td>
</tr>
<tr>
<td>Paul Gordon</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Jim &amp; Sue Wyatt</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Karen Smith</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Patricia Finley</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Kevin Cashman</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Isobel Cashman</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Carolyn Schotd</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Laura Melly</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Vivienne Hawkins</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>O. Cresson</td>
<td>Lumberton NJ</td>
</tr>
<tr>
<td>J. Harry Rothwell</td>
<td>Horsham PA</td>
</tr>
<tr>
<td>Molly Mahoney</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Joseph N. Newland</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Anne Julie White</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Amy A. Carter</td>
<td>Wyncote PA</td>
</tr>
<tr>
<td>Henry Elsner, Jr.</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Iris Marie Bloom</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Carol A. Fritz</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rachel Hubbs</td>
<td>Conshohocken PA</td>
</tr>
<tr>
<td>Bruce Bayue</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Susan Bloch</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Paul Haughton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>D. Edwards</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Katie Flanagan</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Bettina Herbert, M.D.</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Martha L. Kemper</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Maleka Fruean</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Resident</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Theresa Camerota</td>
<td>Wyncote PA</td>
</tr>
<tr>
<td>William J. Marston</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>W. Scott Anderson</td>
<td>Wrightstown PA</td>
</tr>
<tr>
<td>William L. Clovis</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Erin L. Schramm</td>
<td>Broomall PA</td>
</tr>
<tr>
<td>Vince Baker</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Amy Kietzman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Marita Roos</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Laura Lynds</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sharon J. Bender</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>William M. Brison</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Mary E. Berryman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Beatriz Garcia</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Robin MacArthur</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>James J. Menasoe</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Elizabeth Menasoe</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Dominic Maldonado</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>James Lilly</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sam N. Long</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jennifer Klapner</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Frank L. Chance</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Gretchen A. Hilyard</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Marianne Sellert</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kenneth Tromforde</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Harrison Prentice-Molt</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Paul Preston</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Robert Rosanic</td>
<td>Phoenixville PA</td>
</tr>
<tr>
<td>Viola Allen</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Maurice Earl</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Jamie Sims</td>
<td>Wayne PA</td>
</tr>
<tr>
<td>Leonora K. Carr</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Janine Marks</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Valerie Whaon</td>
<td>Ardmore PA</td>
</tr>
<tr>
<td>Elaine Freeman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Claire Baker</td>
<td>Springfield PA</td>
</tr>
</tbody>
</table>
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

3039. Cathleen Young
   Berwyn PA

3040. Edward Ronovas
   Sellersville PA

3041. Jennifer M. Wasnick
   Philadelphia PA

3042. Brian de Villa
   Plymouth Meeting PA

3043. Haniyyah Sharpe
   Philadelphia PA

3044. Michael Schafer
   Collingswood NJ

3045. Lindsay Hall
   Philadelphia PA

3046. Robert K. Rawlings IV
   Philadelphia PA

3047. Philip Chapalas
   Jenkintown PA

3048. Peters J. Stevens
   Philadelphia PA

3049. Olivia Gibb
   Philadelphia PA

3050. Resident
   Philadelphia PA

3051. Bruce Fairfield
   Upper Darby PA

3052. Erin M. Johnson
   Philadelphia PA

3053. Chris Kahn
   Philadelphia PA

3054. Karen Wargo
   Blue Bell PA

3055. Resident
   Mays Landing NJ

3056. Richard Wargo
   Blue Bell PA

3057. Marilyn Friedman
   Havertown PA

3058. Carrie Powell
   Philadelphia PA

3059. Oren Hechtman
   Philadelphia PA

3060. Kristine Montgomery
   Philadelphia PA

3061. Jason M. Stewart
   Philadelphia PA

3062. Susannah Carrole
   Philadelphia PA

3063. Scott Black
   Boothwyn PA

3064. Susan Sparkler
   Philadelphia PA

3065. Lawanna Handwerk
   Philadelphia PA

3066. Janice D. Poleon
   Philadelphia PA

3067. Roger Estes
   Philadelphia PA

3068. Amanda J. Heck
   Philadelphia PA

3069. Michelle Lavaller
   Philadelphia PA

3070. Michael Landers
   Philadelphia PA

3071. Paul Levering
   Philadelphia PA

3072. Resident
   Philadelphia PA

3073. Tim Daily
   Philadelphia PA

3074. Robert Klebanoff
   Wyncote PA

3075. Allison Styrd
   Wyncote PA

3076. Albert E. Weinhardt
   Wyncote PA

3077. Dominic Yanni
   Philadelphia PA

3078. Carol Ha
   Philadelphia PA

3079. Joe Black
   Philadelphia PA

3080. Cecelia Brooke
   Barnett

3081. Wendy Schwartz
   Philadelphia PA

3082. Theos McKinney
   Philadelphia PA

3083. Sarah Englander
   Philadelphia PA

3084. Paula McHarg
   Philadelphia PA

3085. Nancy Goldenberg
   Philadelphia PA

3086. Randi Thompson
   Philadelphia PA

3087. Robert G. Sanders
   Philadelphia PA

3088. Jordan Spivack
   Philadelphia PA

3089. Nancy A. Morrow
   Philadelphia PA

3090. Joshua J. Mills
   Philadelphia PA

3091. Resident
   Philadelphia PA

3092. Kathy Phillips
   Philadelphia PA

3093. Warren B.
   Cederholm, Jr.

3094. Lee Garner
   Philadelphia PA

3095. Edward J. Binns
   Philadelphia PA

3096. Pawel Machura
   Philadelphia PA

3097. George Lakey
   Philadelphia PA

3098. Teodoro Calabretta
   E. Norriton PA

3099. Bryan Howard
   Philadelphia PA

3100. Suzanne Minnis
   Philadelphia PA

3101. Paul Chhour
   Philadelphia PA

3102. Sylvia Elias
   Philadelphia PA

3103. Nicole Dolin
   Philadelphia PA

3104. Ken Yanovik
   Philadelphia PA

3105. Paul Fenske
   Philadelphia PA

3106. Joy L. Converse
   Philadelphia PA

3107. Joseph Kuna
   Philadelphia PA

3108. Alina Macneal
   Philadelphia PA

3109. Danielle Rousseau
   Philadelphia PA

3110. David Ford
   Philadelphia PA

3111. Robert Ranando
   Philadelphia PA

3112. Frank T. Inner
   Philadelphia PA

3113. Sheila Lechner
   Philadelphia PA

3114. Rebecca Kochman
   Philadelphia PA

3115. Tammy Doyle
   Philadelphia PA

3116. Joan E. Halbert
   Philadelphia PA

3117. Hetavi Naik
   Philadelphia PA

3118. Barbara Zanelli
   Philadelphia PA

3119. Gerhard Dietrich
   Conshohocken PA

3120. Tamra Dietrich
   Conshohocken PA

3121. David Stein
   Conshohocken PA

3122. Anthony Moral
   Conshohocken PA

3123. Howard Rosenthal
   Narberth PA

3124. Ellen Cutshall
   Narberth PA

3125. Pamela A. Cloud
   Narberth PA

3126. Jason Rash
   Narberth PA

3127. Jane Murray
   Narberth PA

3128. Patricia D’Antonio
   Narberth PA

3129. Nick Talbos
   Narberth PA

3130. Robert Schiatone
   Narberth PA

3131. Resident
   Narberth PA

3132. Richard McKnight
   Narberth PA

3133. Kristen Mayock
   Narberth PA

3134. Jim Semmler
   Narberth PA

3135. Marjorie Caplan
   Narberth PA

3136. Helen Walton
   Narberth PA

3137. Robert Desipio, Jr.
   Narberth PA

3138. Hiroko Matuskawa
   Narberth PA

3139. John Bryan
   Narberth PA

3140. Diane Tyler
   Narberth PA

3141. Charles Paige
   Narberth PA

3142. Resident
   Narberth PA

3143. Bernard G. Prusak
   Narberth PA

3144. Miriam Regan
   Narberth PA

3145. Resident
   Narberth PA

3146. Kim Lipetz
   Narberth PA

3147. Amy E. Slaton
   Narberth PA

3148. Allison Schadel
   Narberth PA

3149. Mary Jane Cobbs
   Narberth PA

3150. Mary F. Ivory
   Narberth PA

3151. Spencer Golden
   Narberth PA

3152. Marissa Golden
   Narberth PA
<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Name</th>
<th>Address</th>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3153. Kathy Bromley</td>
<td>Narberth PA</td>
<td>3181. Olga Dvornikova</td>
<td>Media PA</td>
<td>3204. Lowell Steinberg</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>3159. Mary Beth Alonzo</td>
<td>Narberth PA</td>
<td>3190. The Honorable Phyllis Mundy</td>
<td>Pennsylvania House of Representatives</td>
<td>3210. David A. Blythe</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3160. John E. Flynn</td>
<td>Narberth PA</td>
<td>3193. Michelle DiMeglio</td>
<td>Morton PA</td>
<td>3211. Dr. Janice Hollis</td>
<td>Wyndmoor PA</td>
</tr>
<tr>
<td>3166. Lawrence Greenspan</td>
<td>Narberth PA</td>
<td>3199. Eric V. Nielsen</td>
<td>Philadelphia PA</td>
<td>3217. Stephanie Than</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3171. Bruce Slemmer</td>
<td>Philadelphia PA</td>
<td>3204. Lowell Steinberg</td>
<td>Glenside PA</td>
<td>3222. Mr. Szacowny</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3181. Olga Dvornikova</td>
<td>Media PA</td>
<td>3214. Donald Scott Sr.</td>
<td>Elkins Park PA</td>
<td>3232. Auvel McLaughlin</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3209. Linda Blythe</td>
<td>Philadelphia PA</td>
<td>3226. M. Collins</td>
<td>Upper Darby PA</td>
<td>3244. Jeff Buckingham</td>
<td>Wyndmoor PA</td>
</tr>
<tr>
<td>3218. Elizabeth A. Durkee</td>
<td>Philadelphia PA</td>
<td>3235. Mike Corboy</td>
<td>Philadelphia PA</td>
<td>3253. Mike Corboy</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>3221. Thomas D. Elkinton</td>
<td>Philadelphia PA</td>
<td>3238. Mary McDonald</td>
<td>Philadelphia PA</td>
<td>3256. Elizabeth McDonald</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
<td>Name</td>
<td>Address</td>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>---------</td>
<td>-----------------------------</td>
<td>---------</td>
<td>-----------------------------</td>
<td>---------</td>
</tr>
<tr>
<td>Elizabeth A. Klein</td>
<td>Philadelphia PA</td>
<td>Paul Socolar</td>
<td>Philadelphia PA</td>
<td>Livingstone Parris</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Mary Ferguson</td>
<td>Philadelphia PA</td>
<td>Diane B. Gottlieb</td>
<td>Philadelphia PA</td>
<td>Keith Rolland</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kenneth P. Swartz</td>
<td>Philadelphia PA</td>
<td>Marc Stier</td>
<td>Philadelphia PA</td>
<td>Katelyn Allen</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Eric Mitchell</td>
<td>Philadelphia PA</td>
<td>Chris Kleckner</td>
<td>Glenside PA</td>
<td>Bimal Desai</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Christine D. Caputo</td>
<td>Philadelphia PA</td>
<td>Edward C. McAllister</td>
<td>Philadelphia PA</td>
<td>Naomi Balamuth</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Nicole Marks</td>
<td>Philadelphia PA</td>
<td>Brendan Gallagher</td>
<td>Philadelphia PA</td>
<td>Stephanie Weirich</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Maureen Chappelle</td>
<td>Philadelphia PA</td>
<td>William Grigsby</td>
<td>Newtown Square PA</td>
<td>D. Swingley</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>David Mitchell</td>
<td>Philadelphia PA</td>
<td>Aloicha Haynes</td>
<td>Conshohocken PA</td>
<td>Charlotte M. Elsner</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Carol Lorenz</td>
<td>Glenside PA</td>
<td>Matt Brown</td>
<td>Glenside PA</td>
<td>Valerie Knox</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jason Seggern</td>
<td>Glenside PA</td>
<td>Brian C. Ligi</td>
<td>Glenside PA</td>
<td>Stephanie L. Vroman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Stephanie Weitzman</td>
<td>Glenside PA</td>
<td>Jason Butsch</td>
<td>Philadelphia PA</td>
<td>Caroline Couser</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>R. C. Plumer</td>
<td>Glenside PA</td>
<td>Jennifer O’Donnell</td>
<td>Havertown PA</td>
<td>Leah Stradling</td>
<td>Telford PA</td>
</tr>
<tr>
<td>Susan Hoban-Dye</td>
<td>Glenside PA</td>
<td>Ryan Fitzgerald</td>
<td>Philadelphia PA</td>
<td>Monica Preston</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>James Stasik</td>
<td>Glenside PA</td>
<td>Lauren Berg</td>
<td>Philadelphia PA</td>
<td>Aaron Gannon</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Jeffers</td>
<td>Glenside PA</td>
<td>David Rosenblatt</td>
<td>Philadelphia PA</td>
<td>Dianna Beck</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>David Gallagher</td>
<td>Glenside PA</td>
<td>Ryan Budd</td>
<td>Philadelphia PA</td>
<td>Takeisha Allen</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Doris Chin</td>
<td>Glenside PA</td>
<td>Adam Dean</td>
<td>Philadelphia PA</td>
<td>Bernard P. Ryan</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Cliff Kirstein</td>
<td>Glenside PA</td>
<td>Eric Direnber</td>
<td>Philadelphia PA</td>
<td>Liz Moore</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Ellen D. Stoddard</td>
<td>Philadelphia PA</td>
<td>Patrick Sherlock</td>
<td>Philadelphia PA</td>
<td>Robert Scott Lee</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Lisa Brownstein</td>
<td>Philadelphia PA</td>
<td>Caroline Cyzkowski</td>
<td>Philadelphia PA</td>
<td>Diane L. Hamburg</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Steven Laden</td>
<td>Philadelphia PA</td>
<td>Kelly O’Laughlin</td>
<td>Philadelphia PA</td>
<td>Horace S. Furman</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Josepbine Taylor</td>
<td>Philadelphia PA</td>
<td>Sarah Eggleston</td>
<td>Philadelphia PA</td>
<td>Paul W. Gordon</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Mohamad Manar</td>
<td>Albari PA</td>
<td>Aaron J. Dinkin</td>
<td>Philadelphia PA</td>
<td>James Morrison</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Hazel H. Lee-Taylor</td>
<td>Philadelphia PA</td>
<td>Dana Tashjian</td>
<td>Philadelphia PA</td>
<td>Elizabeth L. Noll</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michael J. Goldberg</td>
<td>Philadelphia PA</td>
<td>Jeffrey Singer</td>
<td>Philadelphia PA</td>
<td>John Signature</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Nancy Day Gavin</td>
<td>Philadelphia PA</td>
<td>Tyson Mitman</td>
<td>Philadelphia PA</td>
<td>Theresa Wau</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>David C. Brown</td>
<td>Philadelphia PA</td>
<td>Gus David</td>
<td>Philadelphia PA</td>
<td>Erik Moe</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Tag: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

3482. John A. Harper
Pittsburgh PA

3483. Judith Brizek-
Oreskovic
Pittsburgh PA

3484. John Fetterman
Braddock PA

3485. Steve Karas
Pittsburgh PA

3486. Dianne Burnham
Pittsburgh PA

3487. Bennett C. Gould
Cheswick PA

3488. Laurie Plummer
Slippery Rock PA

3489. Renata G. Nelson
Pittsburgh PA

3490. Paul M. Brown
Pittsburgh PA

3491. Frank Kirkwood
Wexford PA

3492. Marilyn Skolnick
Monroeville PA

3493. Justin Rothshank
Pittsburgh PA

3494. Chad Martin
Pittsburgh PA

3495. Rachel Martin
Pittsburgh PA

3496. Christopher P.
Sandvig
Pittsburgh PA

3497. Jessica King
Pittsburgh PA

3498. Rachael E. Kelley
Pittsburgh PA

3499. Marijke Hecht
Pittsburgh PA

3500. Jonathan Robison
Pittsburgh PA

3501. Tom Wolper
Pittsburgh PA

3502. Lindsay Patross
Pittsburgh PA

3503. Dane Menger
Pittsburgh PA

3504. Jeff S. Maurin
Pittsburgh PA

3505. Kate H. Maurin
Pittsburgh PA

3506. Golan Levin
Pittsburgh PA

3507. Mike Isaac
Pittsburgh PA

3508. Thomas Hoffman
Pittsburgh PA

3509. Nathan Hart
Pittsburgh PA

3510. Daniel R. Dziubeh
Pittsburgh PA

3511. Mary V. Davidson
Pittsburgh PA

3512. Beverly L. Darvin
Pittsburgh PA

3513. April Clisura
Pittsburgh PA

3514. Katherine R.
Boykowycz
Pittsburgh PA

3515. Francis Bertonaschi
Pittsburgh PA

3516. K. Hawkins
Philadelphia PA

3517. Bennett H. Turner
Philadelphia PA

3518. Robert Behr
Philadelphia PA

3519. Nancy Juergens
Philadelphia PA

3520. David L. Miller
Philadelphia PA

3521. Jill Galloway
Philadelphia PA

3522. Angela Coghlan
Philadelphia PA

3523. Mark McGuine
Philadelphia PA

3524. Guenter Steguer
Philadelphia PA

3525. Stephen Donnelly
Philadelphia PA

3526. Patricia Warner
Philadelphia PA

3527. Timothy E. O’Meara
Philadelphia PA

3528. Patricia Isakowitz
Philadelphia PA

3529. Anne Kringle
Philadelphia PA

3530. Kathleen F. Ross
Philadelphia PA

3531. Robert Monk
Philadelphia PA

3532. Sharon McCullough
Philadelphia PA

3533. Ian B. Kimball
Philadelphia PA

3534. Carrie L. Kimball
Philadelphia PA

3535. Fred Coy
Philadelphia PA

3536. John E. Williams, Jr.
Philadelphia PA

3537. Dennis Richardson
Philadelphia PA

3538. Dawn C. Stewart
Philadelphia PA

3539. Janis W.
Schmahbach
Philadelphia PA

3540. Neil Acter
Philadelphia PA

3541. Paris L. Frazier III
Philadelphia PA

3542. Michele M. Johnson
c/o Weavers Way
Philadelphia PA

3543. James D. Peterson
Philadelphia PA

3544. Genie Ravital
Philadelphia PA

3545. Richard P. Bansen
Philadelphia PA

3546. Peter Davis
Philadelphia PA

3547. Joseph Sullivan
Philadelphia PA

3548. Amy Rose Kurland
Philadelphia PA

3549. William B. Bird
Philadelphia PA

3550. Alphonso Williamson
Philadelphia PA

3551. Claire E. Goldman
Philadelphia PA

3552. Ronald A. Little
Philadelphia PA

3553. Merri E. Baldus
Philadelphia PA

3554. Julie Perreault
Philadelphia PA

3555. Evan Seplow
Philadelphia PA

3556. Colette Kleitz
Philadelphia PA

3557. Petra Hoelchele
Philadelphia PA

3558. Carolyn Seplow
Philadelphia PA

3559. M. Diane Wood
Philadelphia PA

3560. F. C. Achenbach
Philadelphia PA

3561. Alexandra S. Bartlett,
MD
Philadelphia PA

3562. Natalie Ridel
Philadelphia PA

3563. Wadell J. Cazter
Philadelphia PA

3564. Charles Brenton
Philadelphia PA

3565. Susan L. Lytle
Philadelphia PA

3566. Andrew H. Hutchison
Philadelphia PA

3567. Jennifer Aiello
Philadelphia PA

3568. Walter G. Grissell
Philadelphia PA

3569. Gertrude M. Walters
Philadelphia PA

3570. Dina Pinsky
Philadelphia PA

3571. Sharon Browning
Philadelphia PA

3572. Russell Davenport
Philadelphia PA

3573. Coy Lay
Philadelphia PA

3574. John M. Evans
Philadelphia PA

3575. Carrie Askin
Philadelphia PA

3576. David Bennett
Philadelphia PA

3577. David Updike
Philadelphia PA

3578. Gregory Forna
Philadelphia PA

3579. D. Andre Dhondt
Philadelphia PA

3580. Jane Beckmann
Narberth PA

3581. Susan Gingerich
Narberth PA

3582. Joseph L. Zenobi
Narberth PA

3583. Kate Shackelford
Narberth PA

3584. Bobbi Cassidy
Narberth PA

3585. Valerie Coursan
Narberth PA

3586. Gail Estes
Narberth PA

3587. Robert DeNault
Narberth PA

3588 Ann Barolak
Narberth PA

3589. Timothy Corrigan
Narberth PA

3590. Michele Sokoloff
Narberth PA

3591. Robert Alexander
Narberth PA

3592. Ur Simonsohn
Narberth PA

3593. Beth Schuster
Narberth PA

3594. Richard Franco
Philadelphia PA

3595. Andris Peterson
Merion PA
<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>R. Wilson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Bruce Conover</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kenneth Allen</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Greg McMichael</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sharon Mullally</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Thomas F. Johnson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Barbara Breitman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Joel Nanni</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Russell Carter</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Stephanie Carter</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Macoretta</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Hector Badean</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kenneth Weiss</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michael R. Robinson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jeanine Vivona</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Alan Dawley</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rosalind Dutton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rachel Falkove</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Keith Knuckle</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Katherine Watson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Teja Sepinuck</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jane L. Abbott</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Marie-Jeanne Lambert</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>A. C. Smith</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Courtney Stoll</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michelle Kaczovitch</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Aiza Rodriguez</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rhonda Edwards</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Lisa Burns</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Lisa DiTocca</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jason Butsch</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Alfred DiTocca</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Eva Monheim</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Esther Ward</td>
<td>Thorefare NJ</td>
</tr>
<tr>
<td>Rachel Ward</td>
<td>Thorefare NJ</td>
</tr>
<tr>
<td>Jason Ward</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Darva Sommers</td>
<td>Glenside PA</td>
</tr>
<tr>
<td>Collin Robinson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kathryn Harrison</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Beth Scheraga</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Meenal Raval</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Janet Boys</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Betsy Tentson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Chloe Barton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Joy Lawrence</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sue Cochrane</td>
<td>Newton Square PA</td>
</tr>
<tr>
<td>Julia Braton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Ursula Reed</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Priscilla Molina</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Mike Ewall</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>David Hough</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Thomas Crowley</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Robert Lawendola</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Erika Ogkucak</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michael Thomas</td>
<td>Bensalem PA</td>
</tr>
<tr>
<td>Walter Beben</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sinae Pitts</td>
<td>Upper Darby PA</td>
</tr>
<tr>
<td>Brian Zeck</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jeanne June-Mayer</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Horace Sanders</td>
<td>Conshohocken PA</td>
</tr>
<tr>
<td>Donna McLean</td>
<td>Conshohocken PA</td>
</tr>
<tr>
<td>Peter Mayne</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Lindi Wilcor</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Evelyn Minick</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Edwina Nolan</td>
<td>Cheltenham PA</td>
</tr>
<tr>
<td>Jennifer Monanan</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Rita Berger-Morron</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Christian J. Rupertus</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Phebe B. Runyon</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Justina R. Calgiano</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Cindy DiLulimo</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Malachi Adens</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Marshall McDonald</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>George Heck</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John Barone</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Julie Feinberg</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jacque Anderson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michael Pavelsky</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kristen Mermagen</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jeffrey E. Sutton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Jayna Calgiano</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kathleen Wall</td>
<td>Elkins Park PA</td>
</tr>
<tr>
<td>Paul Chase</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Anna Ferguson</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Kathleen Bachus</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Ned Bachus</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Janet J. Elfant</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>John C. Keogh</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Judith Mealing</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Susan Embender</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Geo B. Luks</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Henry J. Sommers</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Bruce H. Sacks</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Amy D. Gross</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Augusta M. Lemon</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Lynn Riley</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Margaret S. Brunton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Teresa Glover</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Carolyn Placke</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Phyllis Levitt</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Michelle Broughton</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>C. Collings</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Isaac Stanford</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Maria Helena M. Baronheid</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Leigh Hopkins</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Thomas Mooters</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Chris Hart</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Sheryl Richman</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Bradley Crandall</td>
<td>Philadelphia PA</td>
</tr>
<tr>
<td>Marc Hatton</td>
<td>Philadelphia PA</td>
</tr>
</tbody>
</table>
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

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

4245. Shirley Radler
Leighton 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
Cogan Allentown PA

4257. Thomas E. McKee
York PA

4258. Pastor Judith A. McKee
York PA

4259. Paula L. Lubold
Pittsburgh PA

4260. Barbara YY.
DivelBliss Eighty Four PA

4261. Terry L. DivelBliss
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
<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rev. Catrina</td>
<td>Ciccone</td>
<td>Harrisburg</td>
<td>PA</td>
<td>17110</td>
</tr>
<tr>
<td>Lewisburg PA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>John Newman</td>
<td>Easter PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peggy L. Bohart</td>
<td>Cogan Station PA</td>
<td>Broomall PA</td>
<td>PA</td>
<td>19302</td>
</tr>
<tr>
<td>Serena S. Sellers</td>
<td>Quakertown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Diana H. Rooker</td>
<td>Williamsport PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Helen B. Henninger</td>
<td>Elizabethtown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lois Ann Griffiths</td>
<td>Harrisburg PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Linda Van Tie</td>
<td>Lititz PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jean D. Dickey</td>
<td>Cogan Station PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rev. Detlef Huckeflot</td>
<td>Cogan Station PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robert A. Massing</td>
<td>Greenville PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bernie Massing</td>
<td>Greenville PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ellen Doughty</td>
<td>York PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amy Fazio</td>
<td>Freedom PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eileen A. Lutz</td>
<td>Allentown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ruth R. Dex</td>
<td>Emmaus PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stephen A. Schresing</td>
<td>Williamsport PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>S. Christine</td>
<td>Mummert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joseph A. Serafin</td>
<td>Ringtown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dennis K. Orsen</td>
<td>Pittsburgh PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sandra T. Schrader</td>
<td>Washington PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mary E. Wolfe</td>
<td>Reading PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D. Michael Bennethum</td>
<td>Reading PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>William A. Hower</td>
<td>Moon Township PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peggy M. Wuentele</td>
<td>Allentown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elizabeth S. Gnazzo</td>
<td>Harrisburg PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gary L. Harke</td>
<td>Harrisburg PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arnold L. Tiemeyer</td>
<td>Blue Bell PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Donald Main</td>
<td>Sunbury PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>David R. Strobel</td>
<td>Bowers PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carol S. Hendrix</td>
<td>Dillsburg PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allen M. Flueore</td>
<td>Lewisburg PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Honorable Joshua D. Shapiro</td>
<td>Pennsylvania House of Representatives</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frances E. Harkins</td>
<td>Munhall PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Abby Block</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robert F. Markley</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>James Fahringer</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Herbert M. Meyers</td>
<td>Media PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M. J. Rossi</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cordelia Butler</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Giovanni Aremone</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>J. E. Maley</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marsha Upshaw</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dorothy M. Kapp</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kevin Carr</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>John K. Maus, Jr.</td>
<td>Gwynedd PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mary Jean Maus</td>
<td>Gwynedd PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Patricia L. Bourne</td>
<td>Gwynedd PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Richard Stiller</td>
<td>Gwynedd PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Karen Slossburg</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gerald Gabel</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bruce J. Rubin</td>
<td>Downingtown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shirley Aliferis</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Francine Marinar</td>
<td>Exton PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>T. Lee</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Anthony Ciarrocchi</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bill Brarnerd</td>
<td>Broomall PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resident</td>
<td>North East PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kate Ward</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>L. Sexton</td>
<td>Narberth PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resident</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Angelina Flores</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stew Morgan</td>
<td>State College PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brittany Baney</td>
<td>No City No State</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kingsley Macomber</td>
<td>Sierra Research</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ray Scheetz</td>
<td>Palmyra PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reginald Modlin</td>
<td>DaimlerChrysler Corporation</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gary Oshnock</td>
<td>DaimlerChrysler Corporation</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Donald Fonte</td>
<td>The Hertz Corporation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hannah Miller</td>
<td>DaimlerChrysler Corporation</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Josh Robeson</td>
<td>DaimlerChrysler Corporation</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kate Leshco</td>
<td>Langhorn PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gregory S. Charovock</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mac Caderlern</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mariel P. Weber</td>
<td>Philadelphia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nancy Charke</td>
<td>Wynnewood PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carolina Dominguez</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lydia and Janar Santana</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joan G. Roscoe</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joe Hernandez</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Juan Luis Flores</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. Ansley</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Karen Townsend</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carlos Yuste</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saletia</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>William Romeika</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mark DeWitte</td>
<td>Downingtown PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Harry C. Jamison, Jr.</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Claudia L. Henrie</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lee Woolf</td>
<td>West Chester PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dr. Neil Sloane</td>
<td>King of Prussia PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>David Voigtzberger</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Donald E. Cohen</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Anthony DiGregorio</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>J. Gordon</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colleen DeJohn</td>
<td>Drexel Hill PA</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4497. Andrew Kucher  
State College PA
4498. Dave Dayon  
Lewisburg PA
4499. Jesse Yonkovich  
State College PA
4500. Emily Mahon  
State College PA
4501. Peter C. Listino  
Media PA
4502. Pamelle Gagne  
State College PA
4503. Kyle Sewartertz  
Mertztown PA
4504. Lori A. Cook-Stabley  
S. Williamsport PA
4505. Betty J. Hicks  
Huntingdon PA
4506. Ernie McNeely  
West Chester PA
4507. Susan Gillespie  
West Chester PA
4508. C. G. Ruth  
West Chester PA
4509. Sarah Gruner  
West Chester PA
4510. Harold Ross  
West Chester PA
4511. John Gruner  
West Chester PA
4512. Brian Banson  
West Chester PA
4513. Thomas Kelmartin  
West Chester PA
4514. Nancy Lawville  
Drexel Hill PA
4515. Jane Richards  
West Chester PA
4516. Paul S. Foster  
West Chester PA
4517. Jess Abramson  
West Chester PA
4518. Carl Shafer  
West Chester PA
4519. Matt Brown  
West Chester PA
4520. Chris Lang  
West Chester PA
4521. Patricia D. Woodward  
West Chester PA
4522. Robin Howson  
Princeton NJ
4523. Caroline Grunwell  
Downingtown PA
4524. Dianne Horvath  
West Chester PA
4525. Sarah Grupp  
West Chester PA
4526. Alan Weverstad  
General Motors Corporation  
Philadelphia PA
4527. Kevin S. O’Connor  
Haverford PA
4528. Jim Esch  
West Chester PA
4529. Linda Capron  
West Chester PA
4530. Vincent Ciarrocchi  
West Chester PA
4531. Lynne and Blair Ives  
Newtown Square PA
4532. Kathryn S. Stone  
Narberth PA
4533. Elizabeth Kurtz  
Downtown PA
4534. Mariel P. Weber  
Philadelphia PA
4535. Jenny Best  
West Chester PA
4536. Joy Cypher  
West Chester PA
4537. Brenda Olson  
Exton PA
4538. Tim Lutz  
West Chester PA
4539. Clifford Wagner  
West Chester PA
4540. Angelo A. Durso  
Drexel Hill PA
4541. Leif Olson  
Exton PA
4542. Jeanne F. Ward  
West Chester PA
4543. Sarah Burke  
West Chester PA
4544. R. F. Bauer  
West Chester PA
4545. Joe Grillo  
West Chester PA
4546. Stephen DeLeo  
West Chester PA
4547. Lee Javens  
West Chester PA
4548. Richard B. Crable  
West Chester PA
4549. D. Felice  
West Chester PA
4550. Chris Bell  
West Chester PA
4551. Monica Keller  
West Chester PA
4552. Gary Hewitt  
West Chester PA
4553. Ray Ott  
West Chester PA
4554. Jeff Crater  
West Chester PA
4555. Carl Weir  
West Chester PA
4556. Margaret Twomey  
West Chester PA
4557. Courtney Davis  
West Chester PA
4558. W R Siebold  
West Chester PA
4559. H. Thomas Sutton  
West Chester PA
4560. Bridget Locke  
West Chester PA
4561. Emily Michaels  
West Chester PA
4562. Dan Moran  
West Chester PA
4563. Tom and Dianne Walsh  
West Chester PA
4564. James Majors  
West Chester PA
4565. Stephen Cleary  
Ledebach PA
4566. Bernie McCabe  
Philadelphia PA
4567. Bill Myers  
Morton PA
4568. Lauren Amos  
Philadelphia PA
4569. Bill Kephart  
Drexel Hill PA
4570. Richard Tabb  
Drexel Hill PA
4571. Terry Hirst-Hermans  
Drexel Hill PA
4572. Kathleen S. Caporizzo  
Drexel Hill PA
4573. John Kacala  
Upper Darby PA
4574. Pat Donohue  
Drexel Hill PA
4575. Helene Shovlin  
Drexel Hill PA
4576. Barbara Airasian  
Drexel Hill PA
4577. Ethel M. Hollaway  
Drexel Hill PA
4578. Mary Jo Miller  
Springfield PA
4579. John Simpson  
Drexel Hill PA
4580. Peter O’Neill  
Drexel Hill PA
4581. Susan O’Neill  
Drexel Hill PA
4582. Kathleen Vogelman  
Drexel Hill PA
4583. Syed Zaman  
Drexel Hill PA
4584. Nancy Bailine  
Leavertown PA
4585. Thomas Greenly  
Drexel Hill PA
4586. Willie Rupert  
Drexel Hill PA
4587. Celeste Rupert  
Drexel Hill PA
4588. Joe Nestor  
Drexel Hill PA
4589. Pamela Lunardi  
Drexel Hill PA
4590. Robert Ferreri  
Drexel Hill PA
4591. Joshua Richard  
Upper Darby PA
4592. Ciaran Bellwoar  
Drexel Hill PA
4593. Cathy Luongo  
Drexel Hill PA
4594. Florence Putnam  
Drexel Hill PA
4595. Laurie Zepka  
Drexel Hill PA
4596. Jeanne Squillacioti  
Philadelphia PA
4597. Christina Stallings  
West Chester PA
4598. Suzanne Kelmartin  
West Chester PA
4599. Greg Bauer  
West Chester PA
4600. Mike Startup  
West Chester PA
4601. Stephanie Andersen  
Newark DE
4602. Jennifer Johannsson  
Drexel Hill PA
4603. Pharms Auctustin  
West Chester PA
4604. Jack Nolte  
West Chester PA
4605. Sharon Lawson  
West Chester PA
4606. Greg Halvorsen  
West Chester PA
4607. Marie Potter  
West Chester PA
4608. Pat Cunningham  
West Chester PA
4609. Karen Wolf  
West Chester PA
4610. William F. Dolan  
West Chester PA
Re: Proposed Rulemaking: Pennsylvania Clean Vehicles Program - (7-398)

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