

Charlie Peters

Clean Air Performance Professionals

21860 Main Street Ste A
Hayward, California 94541

Monday, May 14, 2012

Dr. Willie Armstrong
Dep. Secretary of the
State and Consumer Services Agency
915 Capitol Mall, Suite 200
Sacramento, California 95814
(916) 653-4090 / 653-3815 fax

RE: 1.43 million Apportioned Plated Vehicles within California

Dear Dr.,

Can you honor me by arranging a meeting with DCA Director Denise Brown.

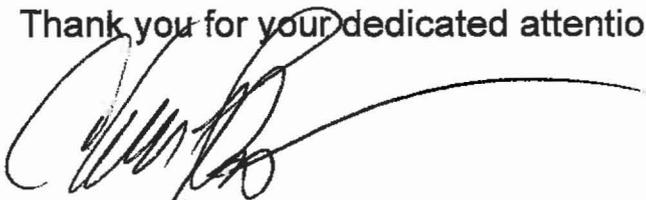
A Memorandum to Harold Mace dated August 28, 2003 evaluated issues that to me provided opportunities to improve quality of California Air and business profit performance.

Has any progress on this important issue become available for public review?

Small green business jobs and government regulator value has been expanding public interest over this past decade.

Is it time for expanded conversation?

Thank you for your dedicated attention to the details of an improved California.



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cc: interested parties

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Friday, May 4, 2012
Ms. Joyce Crandall
Assistant to the Director
Department of Consumer Affairs
(916) 574-8200 / 8613 fax
joyce.crandall@dca.ca.gov

RE: 1.43 million Apportioned Plated Vehicles within California

Dear Ms. Crandall,

Can you honor me by arranging a meeting with DCA Director Denise Brown.

A Memorandum to Harold Mace dated August 28, 2003 evaluated issues that to me provided opportunities to improve quality of California Air and business profit performance.

Has any progress on this important issue become available for public review?

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Clean Air Performance Professionals

21860 Main Street Ste A
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Monday, April 16, 2012

Mr. Tony Dickerson,
Air Resources Engineer
Field Inspection/Testing Section
California Environmental Protection Agency (CaEPA)
California Air Resources Board (CaRB)
9528 Telstar Avenue/P.O.Box 8001
El Monte, California 91731
(626) 459-4350 / 459-4310 fax
tdickers@arb.ca.gov

RE: 1.43 million Apportioned Plated Vehicles within California

Dear Mr. Dickerson,

Your Memorandum to Harold Mace dated August 28, 2003 evaluated issues that to me provided opportunities to improve quality of California Air and business profit performance.

Has any progress on this important issue become available for public review?

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MEMORANDUM

TO: Harold Mace, Manager
Field Inspection / Testing Section

FROM: Tony Dickerson, Air Resources Engineer
Field Inspection / Testing Section

DATE: August 28, 2003

SUBJECT: A FIELD REPORT REGARDING -
APPORTIONED PLATED VEHICLES WITHIN CALIFORNIA

In February 2003, during the course of our regular commercial fleet inspections Field Inspection Staff inspected various U-Haul, Ryder, and Penske rental facilities in the Los Angeles area. These inspections provided information detailing make, model, year, mileage, certification information, OBD information, and license plate number.

Of particular note was the license plate of these rental vehicles. Nearly every vehicle inspected was registered in another state, other than CA. Over 200 vehicles were inspected. The pattern seen was that U-Haul vehicles are registered to AZ, Ryder vehicles are registered to IN, and Penske are registered in OK. At the time of inspection, staff was not concerned with registry because it was thought that these vehicles would move on after a period of time

In August staff returned to inspect a local U-Haul rental site. Again, all vehicles on the lot were licensed in AZ. In fact, some of the same vehicles from the previous inspection were found on the same lot. Some of the rental vehicles registered in AZ had the phone number of the local U-Haul rental lot painted on them (Picture 1 and Picture 2). This seemed strange on a vehicle supposedly "just passing through."

Field Staff inquired with the rental site manager as to where these vehicles received maintenance. The manager reported that light maintenance was performed "on-site," and major repairs are performed at regional centralized station, in this case City of Industry. When asked if these vehicles ever receive a Smog Check the manager stated "NO."

A phone call was made to California DMV to inquire about registration details of these apportioned plated vehicles. Ms. Debbie Tarrant, Manager of the International Registration Plan (IRP) Section outlined the usage and requirements of these vehicles.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

According to DMV these vehicles are authorized to operate within CA on the condition that they make one trip outside the state per year. This out of state trip would keep them compliant with IRP rules. Ms. Tarrant stated there are 1.43 million apportioned plated vehicles operating within CA.

Field Staff's curiosity next led to contacting the Arizona Department of Environmental Quality. Chris, from the Technical Support for Government and Law Enforcement, researched the question, "Do any of these vehicles receive a Smog Check?" Her reply was "NO." She stated that though registered vehicles operating within certain Arizona communities are required to receive a Smog Check, it was too confusing to bring the U-Haul vehicles into the program. It was decided that Arizona would exempt these vehicles from their Smog Check requirements.

During the April 2003 ARB Board Meeting FITS staff heard comments from Mr. Charlie Peters regarding the fact that U-Haul vehicles operated within CA outside of the Smog Check. Upon follow-up to the inspections conducted in 2003 Mr. Peters stands correct. Yet it appears, this trend extends to more vehicles than U-Haul.

John, the Marketing Manager from U-Haul's Phoenix office was contacted and he stated their nation-wide fleet base of vehicles to be approximately 64,000 gasoline powered engines and an additional 28,000 diesel powered engines.

U-Haul vehicles inspected by staff ranged from a 1978 Ford F-350 with 37,153 miles to a 2002 Chevy Sonoma with 2,447 miles. The GVWRs of all the inspected vehicles ranged from 4,200 to 18,200 pounds. Of note was a 1990 Toyota 1-Ton Pickup (6,600 GVWR) with 205,257 miles. Though these vehicles do not violate any current Health and Safety Code, because they have in excess of 7,500 miles or are certified to California emission standards, they do not receive any Smog Check inspection.

It appears none of the 1.43 million apportioned plated gasoline or diesel powered commercial vehicles ever receive an annual or biennial Smog Check from any state, including California.

Select Committee on Air Quality in the Central Valley

Truck and Vehicle Air Emission

June 20, 2003

Kings County Board of Supervisors Chambers Hanford, California

SENATOR DEAN FLOREZ: --go ahead and get started. If you can't hear me, just let me know. Want to bring the Senate Select Committee on Air Quality in the Central Valley to order. As you know, this committee's been traveling throughout the Central Valley and in Sacramento since January, and of course, we're pleased to be here in Kings County to discuss the very critical issue of air quality, and particularly as it deals with truck and vehicle emissions.

(Snip)

MR. CHARLIE PETERS: Yes, hello, Senator. Very exciting to be allowed to be here today and to put some input into all of your hard work to trying to coordinate some efforts to improve air quality in the Central Valley.

It seems as though I must be confused, because I probably shouldn't be here today, 'cause I'm not here asking for any money. That seems to be the basis for this. Everybody seems to want some money for their jobs or their technology and so on. But, what I would like to do is provide for you an opinion or two that maybe we can do something that might significantly improve air quality in the Central Valley while improving the lives of the citizens in the Valley and not only by air quality, but improving their relationship with business and government and that sort of thing. I'm Charlie Peters, Clean Air Performance Professionals, and we're a coalition of motorists. Things that we support are, we support a smog check inspection and repair audit, a gasoline oxygen cap for the fuel for gasoline, and elimination of the

duel fuel café credit, and those items we believe would cut car impact 50 percent in one year.

The changes as far as the motorists are concerned that would decrease the amount of illusions or fraud or whatever you want to call it in the smog check program in half in one year, it could potentially cut the failure rate in smog check in half in one year, and it could cut the costs to the motorists in half in one year. And we believe that that could decrease the car impact 50 percent in one year.

Smog check could cut the toxic impact in half in a year, _____ waiver allowing flexibility on the fuel which virtually every stakeholder in the State of California has stated that they support would save a \$10 billion national refinery welfare program of 52 cents a gallon for the ethanol use. That's one small portion of the incentives for the ethanol use. Ethanol gets less gas mileage, produces more NOx, costs more money, plus the taxes in the incentives. And about a third of the total gasoline use

in the new vehicles is generated from a credit, a café credit which the car manufacturer can produce a car that can run as an example on E85 and gasoline and the credit for the café amounts to about a third of the fuel used in the current cars in California, the new car. So we believe that somehow or another if that credit was eliminated first of all, the cost of doing that's about \$900 per car is our understanding. _____ significantly reduce the price of the cars. And significantly improve the amount of fuel being used in the fleet.

I have in front of you, hopefully in have in front of you or can supply to you an article that was in the Daily Breeze indicating that a change in management of smog check from a adversarial complaint-based process which supports fraud and cheating, to a performance-based process that demands changes in behavior, that could significantly improve how the public's being treated.

One of the things that you've been supporting is a, to do some smoke testing of cars. The California Smog Check program does not allow any provider in the State of California to fail a car for smoking. I would suggest the possibility of incorporating the ability of a Smog Check provider to fail a car for smoking. And to fix it. That would get you 10 million smoke tests a year at no charge. You don't have to pay extra money to all the police in the state to go out and give people fines and give that money to the Bureau of Automotive Repair to create more welfare. All you got to do is allow the mechanic to do his job.

We have nice little cars running all over the State of California like U-Hauls. There

are tens of thousands of U-Hauls running all over the State of California. As far as I can find out, there's not a one of them that has a California plate. None of them are contributing to the California monies at DMV, and none of them ever get a smog check. I don't think that's fair, Senator. I think that should be addressed.

The people who are in the automotive repair trade have solvent that's supplied by Safety Clean. Supposed to be a clean air industry. All those vehicles are registered in Chicago and none of them ever get a smog check. They got California plates, but they never get a smog check.

There are huge opportunities to change how the public is being treated. The relationship between the government and business to better serve the public and significantly improve air quality. What I have said to you, Senator, is that the air quality in the Central Valley can be cleaned up to meet standards in one year at no cost. That's what I said. We had an approval to do this pilot study of improved management in 1993 to start within 45 days. We would petition you, sir, to give consideration to this possibility. This year we have met with Senator Robert Presley, the father of Smog Check. We have met with the Secretary of State and Consumer Services. We have met with Senator Torlakson's staff, with the Air Resources Board, the Department of Consumer Affairs, and the chief of the Bureau of Automotive Repair, heavily pushing for a possibility of demonstrating the effectiveness of an approved oversight of Smog Check. Thank you.

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Meeting of the California Inspection and Maintenance Review Committee (IMRC)

Northern California Court Reporters, February 26, 2003

Mr. Chairman (Victor Weiser), committee, I'm Charlie Peters, Clean Air Performance Professionals (CAPP), a coalition of motorists interested in automotive regulations...

... (IMRC member Dr.) Deakin brought to your attention something, (the National Academy "Evaluating Vehicle Emissions Inspection and Maintenance Programs") that you...should review. Well, I have a copy of it here. ... (Dr.) Elizabeth Deakin was a member of that committee for some time, I kind of feel that possibly this song and dance could be really cut to the chase real quickly by just reviewing what this says, and it basically says Smog Check increases emissions in California.

So for you to support the public to participate in Smog Check based upon what you're saying you want to review and follow, it probably would be best if you go over to the Governor's office as soon as you're done here and recommend that it be stopped immediately.

Do I agree with that? I absolutely do not agree with that, and I think it's appropriate to evaluate. As (Committee Member Dr.) ... Williams said, we've got to find out where we've been, where we're at and where we need to go, and I think that the committee has stated and I think what these reports that you

are suggesting to look at, ...the Fresno Bee basically suggests to immediately stop Smog Check, put remote sensors on the highway, crush the cars that you find and we'll have a great program.

I don't think that treats the public very well, I don't think that's appropriate policy and I don't think it's right. I think it's not true.

So ... (Dr.) Williams is indicating that we need to evaluate where we've been and where we're at, and that could be done very easily by creating an audit system that determines what is really going on in the marketplace, whether or not you determine what's broken on a car, determine whether or not it is getting fixed.

You can also determine whether or not you can change that, and I believe that that could generate 2,000 tons (per day) emissions reductions in the state of California that can create a great benefit, and also create a proud effective repair industry to supply ethical services to the public.

So if you want to just do what you've suggested here today, that's quite simple. Make it a point to go to the Governor and ask him to stop this. Or let's evaluate what's really going on and whether or not we can do something to benefit the public. Thank you.