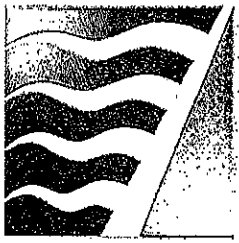


15-8-6  
Anthony Fournier



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

October 21, 2015

Mary Nichols, Chair  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Nichols:

We appreciate the opportunity to comment on the discussion draft of the Mobile Source Strategy being presented to the Board at your October 22, 2015 meeting. We appreciate the effort your agency has put into cutting mobile source emissions, both to date and into the future as proposed in the discussion draft. We share the goal of cutting emissions from mobile sources, for both air quality and climate reasons.

These comments are not on the Strategy in general, but instead are on potentially significant emission reductions we would like to see included under the second light duty measure proposed concepts. This concept, titled 'Lower In-Use Emission Performance Assessment', is focused on trying to ensure that the vehicles in-use in California operate at the cleanest levels possible. We support using the Smog Check database and results from the Bureau of Automotive Repair's Random Roadside Inspection Program to better understand and address potential problems with the Smog Check program.

But we note that some motorists deliberately avoid the Smog Check program by either failing to register their vehicles, registering their vehicles in other states, or through other fraudulent registration schemes. We believe that these vehicles tend to have emissions far higher than the average on-road vehicle, and are likely to be significantly underrepresented in the inventory. While California does not have comprehensive data on the extent of these behaviors, anecdotal and academic information we have been collecting suggests that such vehicles are higher in numbers than previously believed. For example, 6% of fatal accidents in California involve an unregistered vehicle. Academic studies in the states of Oklahoma, Nevada, and Arizona (where registration and insurance costs are lower than California) found unregistered vehicles comprised 4.2%, 3.8%, and 3.6% of on-road vehicles, respectively. These behaviors not only have significant air quality implications, they also have fiscal costs to the state and local governments, and increase insurance costs to law-abiding motorists.

We urge you to consider incorporating some efforts to better understand and address these issues. We would welcome the opportunity to discuss them in more depth with your staff.

Sincerely,

Jack P. Broadbent, Executive Officer/Air Pollution Control Officer

cc: Richard Corey, Executive Officer

- ALAMEDA COUNTY**  
Tom Bates  
Margaret Fujloka  
Scott Haggerty  
Nate Milley
- CONTRA COSTA COUNTY**  
John Giola  
David Hudson  
Mary Piepho  
Mark Ross
- MARIN COUNTY**  
Katie Rice
- NAPA COUNTY**  
Brad Wagenknecht
- SAN FRANCISCO COUNTY**  
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Eric Mar  
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- SAN MATEO COUNTY**  
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(Chair)
- SANTA CLARA COUNTY**  
Cindy Chavez  
Liz Kniss  
(Secretary)  
Jan Pepper  
Rod G. Sinks
- SOLANO COUNTY**  
James Spering
- SONOMA COUNTY**  
Teresa Barrett  
Shirlee Zane

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EXECUTIVE OFFICER/APCO