

## **Clean Air Coalition Advisory Committee Comments on Locally Enforced Motor Vehicle Idling Limitations**

The Clean Air Coalition Advisory Committee is comprised of local government staff and other stakeholders representing organizations in the Austin area who are involved with planning and implementing emission reduction measures in support of the 8-Hour Ozone Flex Program (8-O3 Flex). One of the measures included in the 8-O3 Flex is a commitment to enforce the motor vehicle idling restrictions in TAC 114.512. We appreciate the opportunity offered by TCEQ staff members on April 27, 2010 for public discussion of TCEQ's consideration for changes to the Locally Enforced Motor Vehicle Idling Limitations.

The following are informal comments regarding possible changes to locally enforced motor vehicle idling limitations as detailed in TAC 114.510 – 114.517:

- CACAC supports changing the period of applicability from April 1 through October 31 to the whole year due to increased likelihood of ozone exceedences to occur outside the current ozone period, and to reduce emissions of toxic diesel particulate;
- CACAC supports adding an exemption to 114.517 which would allow the idling of vehicles being used as armored cars for pick-up and delivery of monetary assets at commercial businesses;
- CACAC is not in favor of adding back in to 114.517 the exemption for idling while a driver is using the vehicle's sleeper berth unless several conditions are included. The first condition is that, if added back in, it be set to expire one year from the effective date. Also language in the exemption should clearly encourage truck owners using their trucks in applicable areas to initiate every effort to equip their vehicles with APUs or other approved equipment to preclude the need to idle the main engine while using the sleeper berth. An additional condition should be that TCEQ makes sufficient TERP funding available for truck owners in applicable areas to be able to get financial assistance to purchase and install the necessary equipment prior to the exemption expiration. Also truck stops and other warehouse or pick-up and delivery locations should be encouraged to install shore-side units to provide the necessary services so trucks could shut down their main engines while parked. The exemption should include narrative noting that it is only a one-year grace period for allowing affected parties to become properly equipped, using TERP funding where appropriate, to be able to comply with the idling restrictions.
- CACAC encourages TCEQ to consider a broadened interpretation of TERP applicability to allow TERP funds to be used for the installation of idle reduction technology on trucks and at truck stops regardless of whether local jurisdictions in the applicable region have approved agreements with TCEQ for local enforcement of the idling restrictions.

Thank you for considering our comments in your deliberation on what changes to make to the idling restrictions rules. If you have any questions please let us know.