



CITY OF SACRAMENTO

CITY MANAGER'S OFFICE  
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MAR 26 1980

Marty Van Duhn

PLANNING DIRECTOR

March 26, 1980

CITY PLANNING DEPARTMENT

915 "I" STREET  
CITY HALL - ROOM 308

SACRAMENTO, CALIF. 95814  
TELEPHONE (916) 449-5604

City Council  
Sacramento, California

Honorable Members in Session:

SUBJECT: Resolution recommending adoption of Motor Vehicle Inspection and Maintenance Program, and Opposing any Weakening or elimination of State Vehicle Emission Standards (M-405)

At its March 20, 1980 meeting the Council Law and Legislation Committee approved the attached staff report, and recommended City Council approval of the attached resolution reaffirming the City's positions in the City Air Quality Plan adopted on December 27, 1978 (Resolution #78-924).

The attached resolution is recommended as the Federal Environmental Protection Agency has indicated that Federal Clean Water Act and transportation planning funds would be cut off unless State of California enacted a vehicle inspection program. In addition, a number of pending measures in the Legislature propose to abolish or reduce the authority of the State of California to enact more stringent new vehicle emission standards. The attached staff report provides additional detail regarding this matter. The Sacramento County Board of Supervisors (acting as the Board of the County Air Pollution Control District), has adopted a similar resolution.

Respectfully submitted,

*Tokuo Masuda*

Tokuo Masuda  
Principal Planner

FOR TRANSMITTAL TO CITY COUNCIL:

*Walter J. Slupe*  
Walter J. Slupe, City Manager

TM:bw

Attachment  
M-405

April 1, 1980  
All Districts

**APPROVED**  
BY THE CITY COUNCIL

APR 1 1980

OFFICE OF THE  
CITY CLERK



# CITY OF SACRAMENTO

## CITY PLANNING DEPARTMENT

915 "I" STREET

CITY HALL - ROOM 308

SACRAMENTO, CALIF. 95814

TELEPHONE (916) 449-5604

Marty Van Duyn

PLANNING DIRECTOR

March 13, 1980

Law and Legislation Committee  
Sacramento, California

Honorable Members in Session:

SUBJECT: Pending Legislation re. Motor Vehicle Inspection and  
Maintenance Program (SB 1293; SB 1294; SB 1302; AB 2176)

### SUMMARY

There are a number of bills currently pending in the Legislature regarding a State motor vehicle inspection and maintenance program (MVIMP). A MVIMP is required by EPA to obtain an extension of the air quality attainment date from 1982 to 1987. The City has previously requested that the State adopt and implement a MVIMP. As these bills are subject to amendment as additional data is developed, this report evaluates the basic content of the measures. The staff recommends that the Committee 1) reaffirm the City's position urging the State to adopt and implement a MVIMP; 2) urge the retention of State vehicles emission standards; and 3) indicate its preference for a centralized inspection system.

### BACKGROUND INFORMATION

The Federal Clean Air Act requires the attainment of clean air standards by 1982, or by 1987 if the Environmental Protection Agency (EPA) grants an extension. Adoption of an annual MVIMP is required to obtain this extension. The City Air Quality Plan adopted on December 27, 1978 included Resolution No. 78-924 requesting that the State develop and adopt a MVIMP as soon as possible.

The pending legislation involves two basic issues:

1. Establishing a MVIMP program and modifying or eliminating the State's vehicular emission standards: this would mitigate the impact of a new program (MVIMP) by modifying or eliminating an existing air quality improvement program.

However, the City and Regional Air Quality Plans are based upon implementation of both programs in order to attain air quality standards by 1987. If the effectiveness of the State's emission standards are reduced, additional air quality improvement programs will have to be implemented.

A preliminary SRAPC evaluation (Attachment A) indicates that a MVIMP would be less effective than the State's vehicular emission standards.

2. Location of testing stations - centralized or decentralized system: a major difference between the MVIMP proposals is whether the inspections would be performed at a smaller number of centralized stations which would only perform inspections, or at a larger number of stations which could perform both inspections and remedial measures, such as tune-ups.

The decentralized program has the advantage of greater accessibility and the ability to perform both the emission inspections and remedial measures, thus saving a trip to perform two separate functions. The centralized program has the advantage of improved inspection control, but has the disadvantage of requiring separate trips to perform remedial measures.

The Legislative Analyst is preparing a report to be released in April on the inspection program. However, various bills are currently proceeding through the legislative process, so it is believed that a City position should be adopted before all of the hearings are completed. Currently SB 84 (Foran) has been endorsed by the League of California Cities. As amended, this measure would provide for a centralized inspection program, and proposes modification of the adopted State vehicular emission standards. However, it is uncertain at this time whether these modifications would result in the same reductions of vehicular emissions. If technical data indicates that the latest amendments would result in the same emission reductions as the current State standards, the staff could recommend support of this measure.

#### FISCAL IMPACT

Adoption of a State inspection program would not result in any cost to the City. However, failure to adopt an inspection program could result in loss of Federal Clean Water Act and transportation funds (see Attachment B regarding effect upon State of Colorado). If an inspection program is adopted concurrently with a reduction in the effectiveness of the State's vehicular emission standards, additional local programs would have to be adopted to compensate for the increased emissions.

#### RECOMMENDATION

The staff believes that a specific bill cannot be recommended for City support at this time, as all of the necessary data is not available. It is therefore recommended that the City adopt the following position regarding pending air quality measures:

1. The City reaffirms its support of an annual State vehicular inspection program;

2. The City opposes any modification of the State vehicular emission standards which would result in a net increase in vehicular emissions;
3. The City favors a centralized inspection system as it would assure improved inspection controls, and eliminate potential conflict of having inspections and remedial repairs performed by the same party.

Respectfully submitted,

*Tokuo Masuda*

Tokuo Masuda  
Principal Planner

TM:bw

Attachment

ESTIMATED IMPACT OF REPEALING CALIFORNIA  
MOTOR VEHICLE EMISSION STANDARDS

The Air Resources Board has estimated the potential impact of repealing California's motor vehicle emission standards and replacing them with the federal standards. ARB estimates for the Sacramento area include the entire Sacramento Valley Air Basin (i.e., Sutter, Yuba, Butte, Colusa, Shasta, Glenn, Sacramento, Solano, Tehama, and Yolo Counties).

In an attempt to determine more specifically the potential impact on the Sacramento metropolitan area, the ARB estimates can be scaled down to apply to Sacramento, Yolo and Solano Counties. Listed below are the estimated motor vehicle emissions for the Sacramento metropolitan area, along with the estimated emission increases from a change in the motor vehicle emission standards from the California standards to the federal standards.

1976 - Motor Vehicle Emission Inventory  
(Sacramento, Yolo Portion of Solano Counties)

<u>HC</u>	<u>NO<sub>x</sub></u>	<u>CO</u>
130 tons/day	104	851

Estimated Motor Vehicle Emission Increase (1987)

<u>HC</u>	<u>NO<sub>x</sub></u>	<u>CO</u>
8.9 tons/day	22.3	51.5

Estimated Emission Reductions from MVIMP (1987)

<u>HC</u>	<u>NO<sub>x</sub></u>	<u>CO</u>
4.7 tons/day	7.8	49.5

## COMPARISON OF CENTRALIZED AND DECENTRALIZED MOTOR VEHICLE INSPECTION PROGRAMS

A motor vehicle inspection and maintenance program generally involves inspecting motor vehicles to determine if the vehicle emissions exceed emission standards, and if the standards are exceeded, enforcing the necessary maintenance work on the vehicle to ensure that the standards are not violated. The vehicle inspection procedure varies somewhat according to the type of program in operation, but it generally would include a measurement of the vehicle tailpipe emissions and an under the hood inspection to make sure all of the required emission devices are installed.

In a centralized vehicle inspection program, inspections are performed at a network of inspection facilities where only inspections are conducted. If a vehicle is emitting pollutants beyond the standards, then the inspection station notifies the motorist that the vehicle is violating the standards and indicates the type of repair work needed to meet standards. The motorist is then responsible for having the necessary repair work performed. (In most programs, limitations are placed on the cost of maintenance work that can be required. If repair costs exceed the limit, the vehicle is exempted from the repair requirement.) After repairs have been completed, the vehicle is re-inspected to ensure that it meets the emission standards. Once the vehicle is re-tested, a certificate is signed which authorizes the motorist to renew the vehicle registration.

A centralized inspection program may be operated by a public agency or a private contractor. In general, a centralized inspection process can result in lower inspection costs, greater quality control, and better data collection.

In a decentralized MVIMP, the inspection and maintenance of a vehicle are performed at the individual automotive service stations in an area. Therefore, before a motorist may renew their vehicle registration, they must take the vehicle into a certified emissions inspection garage to have the vehicle inspected and, if necessary, repaired. One of the chief advantages in the decentralized MVIMP is that it offers the greatest convenience to the public because both inspection and maintenance can be accomplished in one step. However, it should be noted that the consumer may not be as well protected from unnecessary repairs using this approach, since the inspection determines what maintenance work is required to meet emission standards.

It is worthwhile to also mention the two basic emission inspection methods that can be used in either a centralized or decentralized system. The most common testing method is the idle mode test. With this test, vehicle emissions are measured at different idle speeds while the vehicle is in neutral. The other test method is the loaded mode test. This method measures vehicle emissions while the vehicle is on a dynamometer which simulates actual road conditions, such as road drag or wind velocity. In general, the loaded mode test is more effective in measuring vehicle emissions under conditions most like those actually experienced on the road. However, the loaded test also requires a larger capital investment for the dynamometer equipment.

## SUMMARY OF PROGRAM COSTS

### Decentralized Inspection Program

Inspection Costs - \$18.00 (for all vehicles)  
Average Repair Costs - \$40.00 (for failed vehicles requiring repair work)  
Average Emission Reductions - Hydrocarbons - 7% (approx.)  
Carbon monoxide - 7% (approx.)  
Nitrous oxide - N. A.

### Centralized Inspection Program

Inspection Costs - \$11.00  
Average Repair Costs - \$32.00  
Average Emission Reductions - Hydrocarbons - 11%  
Carbon monoxide - 15%  
Nitrous oxide - 2%

The above cost figures listed for centralized and decentralized I & M programs provide a reasonable illustration of comparative costs. However, it is very important to not place too much emphasis on the differences between the costs of centralized and decentralized programs for several reasons. In the first place there are only two "decentralized" annual I & M programs operating in this country and the information from these programs is very sketchy. In addition, the cost figures listed above were obtained from reports prepared by ARB, which has frequently indicated their preference for centralized inspection programs.

The inspection costs for decentralized programs are based upon current charges made by garages for obtaining a certificate of compliance. It is very possible that an annual program will reduce these charges because of the increase in business. This inspection fee also includes minor tune-up work like carburetor adjustment. As a result, the estimated repair costs are probably high and are most likely the same or lower than centralized programs repair costs. The inspection costs for centralized programs is the cost being charged in the Hamilton Test Program in Southern California. There are plans to increase the inspection costs but if the program becomes annual it is very likely that the inspection costs will remain at approximately the current level.

The repair costs are the average costs for cars that fail the emission inspection test. ARB estimated that repair costs in a decentralized program would be approximately \$40.00. However, because the inspection often includes minor engine adjustments in a decentralized program, the figure for average repair cost is probably high and it is likely that repair costs for both programs are about the same.

The largest and most apparent difference between a centralized and a decentralized program is in pollution emission reductions. Again, it should be emphasized that any comparison of emission reductions is tenuous because there are so few decentralized programs operating in this country. However, it is generally accepted that it is more difficult to obtain significant emission reductions in a decentralized program.

#### Non-Monetary Considerations

Aside from the quantifiable differences between the basic I & M program types, it is important to briefly discuss the intangible differences. One of the primary criticisms of the centralized inspection procedure is that it is considerably more inconvenient for the motorist. Because a centralized program requires the motorist with a vehicle failing the emission inspection to make separate trips to have the vehicle inspected, repaired and retested it is apparent that a centralized program does cost the motorist more in terms of time and gasoline.

Another significant consideration in comparing the two programs is consumer fraud. In a decentralized program the inspections and repairs are generally conducted in the same facility. And, even with strict surveillance it is difficult to avoid problems with mechanics performing unnecessary repairs. The centralized program avoids this problem by separating inspections and repairs.

# Lack Of Pollution Controls May Cost Colorado US Funds

DENVER (AP) — The Environmental Protection Agency announced Saturday it plans to cut off up to \$301.5 million in federal funds to Colorado because the state has failed to come up with an auto pollution control program.

It is the first time the EPA has exercised its power to withhold federal

funds from a state violating federal clean air standards, said Roger Williams, EPA regional administrator in Denver.

Indiana, also in violation of the federal Clean Air Act, may soon find itself in similar straits for not passing legislation to combat air pollution, Williams said.

At issue in Colorado are federal funds for highway construction and sewer projects along the eastern slope of the Colorado Rockies. The areas include the cities of Denver, Fort Collins, Greeley and Colorado Springs.

Under the sanctions, to begin March 14, the federal government also could deny permits for construction of major industrial facilities that would emit carbon monoxide or hydrocarbons, Williams said.

The EPA decided to impose the sanctions after the state Legislature failed to meet a self-imposed March 1 deadline for enacting a plan to reduce air pollution from automobiles.

Lawmakers will be back at work Monday on a draft proposal that combines mandatory auto emissions tests and tune-ups. But Williams said Saturday the EPA could not wait any longer for the Legislature to emerge with an acceptable pollution control plan.

As a result, the federal government will refuse funding of projects on a case-by-case basis, Williams said.

To comply with federal health standards, Colorado will have to reduce carbon monoxide pollution by about 62 percent. Federal law and EPA regulations require that legislators develop a plan to reduce vehicle emissions by 25 percent by 1987.

The EPA agreed last fall to wait until March 1 for such a plan.

State Senate President Fred Anderson, R-Loveland, said Colorado legislators plan to ask the 10th U.S. Circuit Court of Appeals to issue a temporary restraining order to stop the EPA sanctions.

## Lagging air plan costs Colorado \$\$

DENVER (UPI) — The government Saturday ordered \$300 million in federal funds withheld from Colorado — the first time such action has been taken — because the state failed to meet a deadline for enacting a clean air plan.

Roger Williams, regional administrator of the Environmental Protection Agency, said the federal money would have gone for sewage systems and highways. Also stopped will be construction permits for building or modifying potentially polluting industries.

The restrictions are effective March 14, allowing the state two weeks to appeal.

Williams said the agency's order affects nearly 100 sewage and highway projects at a cost of \$301.5 million. Future funding will be made on a case-by-case basis.

"Colorado is No. 1. We are not using Colorado as an example, but it is turning out that way."

The order affects the six-county Denver metropolitan area, Fort Collins, Greeley and Colorado Springs.

Last year, state legislators agreed to enact an auto emissions control plan by March 1, 1980, as a token gesture of compliance with the Clean Air Act of 1970.

# EPA Issues New Warning To State: Approve Auto Inspection Plan By April Or Lose Funds

By Richard D. Hall  
Bee Washington Bureau

WASHINGTON — Unless the California Legislature next month approves a vehicle inspection program governing air pollutants, the head of the Environmental Protection Agency said Friday he will move to withhold hundreds of millions of dollars from the state in sewer and highway construction funds.

"I will invoke the sanctions," Douglas M. Costle, EPA administrator, said during a breakfast meeting with western states reporters.

Twenty-one of 29 states required to prepare such plans have done so, and not to move against those who don't comply would be breaking faith with those who do, he added.

In the first such case of its kind, the EPA this month announced it would withhold \$301.5 million in sewer and

highway monies from Colorado because that state missed its compliance deadline. However, a court has since granted the state additional time.

A spokeswoman at the EPA regional office in San Francisco said California's deadline is mid-April.

Costle noted that California is permitted to set more restrictive air pollution standards than the national standards. However, he indicated that if the state should lower vehicle pollution standards with the idea of further tightening industrial plant standards, he might not approve the trade-off.

A bill sponsored by state Sen. John Foran, D-San Francisco, would result in an estimated 25 percent increase in pollution, according to Bill Sessa, a spokesman for the state Air Resources Board.

Foran's bill passed the Senate and is pending in the Assembly.

Another bill, sponsored by Assemblyman Victor Calvo, D-Mountain View, would be along the lines favored by the Air Resources Board, Sessa said.

In the 1980 fiscal year, California is scheduled to receive \$250 million in sewer construction funds and \$600 million in highway construction funds.

In the 1981 fiscal year, which begins Oct. 1, those funds would increase to \$350 million for sewers and \$800 million to \$900 million for highways.

Costle told reporters his authority to withhold sewer and highway funds was discretionary.

He is required by federal law to deny non-complying states the ability to issue construction permits for projects that would aggravate air pollution. Costle took that step in California last August when the state failed to come up with a vehicle pollution control program by July 1.

It is believed no major construction project has been blocked, however, because companies flooded the state with permit applications before the July 1 cutoff.

On another matter, Costle praised the technological effectiveness of new coal-fired electrical generating plants. He gave a qualified "yes" when asked if such a plant could be built in an agricultural area such as the San Joaquin Valley without harming the variety of crops grown there.

"I think the answer probably would be yes," Costle said. "I would have to look at the data."

The data would include the terrain, climate and "what else would be contributing to sulfur (emissions)," he added.

The Brown administration has talked of building such a plant in the valley. Scientists at the University of California at Davis have cautioned that some crops might suffer.

RESOLUTION NO. 80-193

Adopted by The Sacramento City Council on date of

APRIL 1, 1980

REQUESTING MEMBERS OF SACRAMENTO COUNTY DELEGATION OF STATE LEGISLATURE SUPPORT ADOPTION OF A STATE MOTOR VEHICLE INSPECTION PROGRAM, AND OPPOSE WEAKENING OR ELIMINATION OF STATE'S AUTHORITY TO ESTABLISH MOTOR VEHICLE EMISSION STANDARDS. (M-405)

WHEREAS, the City of Sacramento has adopted an Air Quality Plan designed to meet national ambient air quality standards for oxidants and carbon monoxides by 1987 as required by the Clean Air Act Amendments approved by Congress in 1977; and

WHEREAS, California Air Resources Board (CARB) estimates motor vehicle emissions in the Sacramento Region of 130 tons/day of hydrocarbon, 104 tons/day of nitrogen oxides and 851 tons/day of carbon monoxides, based on the 1976 motor vehicle emission inventory; and

WHEREAS, the SRAPC plan requires at least 51 tons/day reduction of hydrocarbons by 1987 which includes very stringent controls on local industries and radical changes in land use and transportation; and

WHEREAS, CARB estimated emission increases of 8.9 tons/day of hydrocarbon, 22.3 tons/day of nitrogen oxides and 51.5 tons/day of carbon monoxide if the California motor vehicle emission standards are repealed; and

WHEREAS, the state's motor vehicle emissions control program plays a crucial role in numerous plans throughout the state in meeting federal clean air standards, so elimination of this program may invalidate many nonattainment plans, subjecting local governments to severe federal sanctions (these sanctions, including a ban on new construction, could remain in effect until local governments impose additional restrictions on industry in their regions to make up for the increased emissions from vehicles); and

WHEREAS, the weakening or repeal of California's authority to adopt vehicle emission standards that are more stringent than federal standards would require local governments to adopt severe measures to make up the emission reductions lost from such action and these severe measures would affect virtually every business and industry within the state; and

WHEREAS, these reductions would be in addition to the expensive controls many companies will be installing as part of the local nonattainment plans and such additional controls will undoubtedly be more expensive than the controls which would be given up on motor vehicles; and

WHEREAS, an additional consideration of extreme concern, especially to the recipient areas of transported pollution, such as Sacramento Region, is that the increase in oxides of nitrogen emissions which would accompany the weakening or loss of California's stringent vehicle pollution control program on nitrogen oxides will likely increase the amount of photochemical smog transported and generated downwind in receptor air basin; and

WHEREAS, the adopted City and Regional Air Quality Plans are based upon implementation of both the state emission standards and a Motor Vehicle Inspection and Maintenance Program.

APPROVED  
BY THE CITY COUNCIL

APR 1 1980

OFFICE OF THE  
CITY CLERK

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Sacramento strongly urges that:

1. you oppose legislation which would allow the weakening or loss of California's strong motor vehicle emission standards; and
2. adopt an effective motor vehicle inspection and maintenance program at the earliest possible date.

\_\_\_\_\_  
MAYOR

ATTEST:

\_\_\_\_\_  
CITY CLERK

M-405