



20 June 2008

Fort Collins City Council
City of Fort Collins
P.O. 580
Fort Collins, CO 80522

Subject: Vehicle inspection program for ozone air quality

We understand that the North Front Range MPO and the Regional Air Quality Council are seeking input on the possibility of a vehicle inspection and maintenance [IM] program for the North Front Range. The Fort Collins Air Quality Advisory Board is pleased to have this opportunity to comment.

In summary, the Board recommends that there should be some form of IM program in the Fort Collins area, and that the program should not be voluntary. The Board also prefers that testing dollars stay within the local community if possible, and that the testing program should reflect the rising cusp of technology as opposed to older, static technology.

The options that were presented to us include

1. IM-240
2. OBD – On Board Diagnostics
3. Two Speed Idle Test
4. Remote Sensing Technology

Although we would have preferred to prefer to comment based on an understanding of the detailed costs and benefits of each option, that information was not available to us. Our highest preference, however, would generally go to the option that produces the greatest emission reductions. In the event that the options are nearly equal, or equally uncertain as to outcome, we offer these further comments.

On-Board Diagnostics

- Pros:
 - Because it utilizes local automotive technicians, OBD enhances the direct relationships between motorists and the technicians who keep their emission

- control systems in good repair, while also recirculating testing dollars within the local community.
- OBD is attractive because it is supported by an enormous investment in emission control systems by the automotive manufacturers, and OBD is evolving to greater effectiveness and precision.
- Cons:
 - We are concerned about reports that OBD has a high rate of false passes with respect to high emitting vehicles, i.e., the 10% of vehicles that cause 50% of the emissions. It is hard to see how OBD could be effective if it missed a significant number of high-emitters.
 - Because OBD systems produce error codes at a very detailed level within the engine system, we are concerned that OBD would cause motorists and technicians to waste time and money on minutiae that do not contribute to emission reduction. Therefore, an OBD program should address only those error codes that have been shown to correlate to significant failure of the emission control system.

IM-240

- Pros:
 - Because IM-240 is already used in the Denver area, we like the idea that the IM program would be consistent for all communities along the Front Range.
 - IM-240 has a lengthy track record of success in Colorado, giving us the most confident and accurate pollution-reduction estimates.
- Cons:
 - Because IM-240 is centralized, and assuming that the IM-240 contractor is not a local company, testing dollars would leave the community rather than be recalculated here.
 - IM 240 is an older testing technology that is not expected to improve further. We think this, in part, because most states have adopted OBD, so there is insufficient customer base to support further improvement in IM-240 technology.

Thanks for the opportunity to comment. Please contact me if there is any question regarding this recommendation of the Air Quality Advisory Board.

Sincerely yours,

Eric Levine, Chair

CC:

Suzette Mellette, North Front Range MPO
Ken Lloyd, Regional Air Quality Council