



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO:

5090

Ser N45JRR.rr/0175

May 19, 2006

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814-2828

RE: Proposed New Emission Standards, Fleet Requirements, and
Test Procedures for Forklifts and Other Industrial Equipment;
Large Spark Ignition (LSI) Engine Fleet Requirements

On behalf of the military services in California, attached are
comments to the proposed new emission standards, fleet
requirements and test procedures for forklifts and other
industrial equipment. Our specific issues are identified below.
Where appropriate, we have suggested language to address the
concern.

1. Amend definition of Fleet each time it appears in the
regulations i.e. "Large Fleet," "Medium Fleet," "non-forklift
Fleet," "Small Fleet": As currently written in the proposed
regulation, each definition of fleet aggregates an operator's
operations in California. This is problematic as written as is
could arguably aggregate all Department of Defense (DOD)
facilities as one fleet. As you are aware, each of the military
services are extremely unique with distinct chains of commands
as well as distinct mission requirements. As such, we suggest
CARB revise the fleet definition each time it appears in the
regulations as follows:

Fleet refers to an engine or group of engines that are
owned and managed by an individual operator such as a
business, business unit within a corporation, city, state
or military installation.

This proposed definition enables individual DOD installations
the ability to track individual fleets at the appropriate level
ensuring that each individual DOD installation can ensure
compliance with the regulation.

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2. Revise the Definition of Military Tactical Vehicles to add allies:

We appreciate ARB's continued recognition of uniqueness of Military Tactical Vehicles and the continued need for regulatory relief for this class of vehicles. As such we have a minor request that CARB add "allies" into this definition to cover the situation where we are involved in joint training or testing exercises.

Military tactical vehicles or equipment means vehicles or equipment owned by the U.S. Department of Defense and/or the U.S. military services, or its allies and used in combat, combat support, combat service support, tactical or relief operations, or training for such operations.

Thank you for the opportunity to provide comments on the subject proposed regulation. If you have any questions or concerns regarding these comments, my point of contact is Mr. Jose Casora. He can be reached at (619) 524-6502.

Sincerely,



RENE TREVINO
Executive Director