

**Comment 1 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 45 Day.**

First Name: Mark

Last Name: Carlock

Email Address: mcarlock@foundationccc.org

Affiliation: Foundation for Cal. Community Colleges

Subject: Requirement for ASM Testing

Comment:

It has been proposed that consumers wishing to participate in the EFMP submit to an ASM test to ascertain sufficient vehicle functionality. In the conduct of the EFMP pilot program in the South Coast Air Basin, requiring an ASM test, even though free to the potential participant, was seen as significant obstacle to participation. There is also no data correlating the ability to complete an ASM with either the remaining useful life of a vehicle or the mileage accrual rate. As you indicate on the chart provided in the ISOR, that the differential in the emissions of older vehicles compared to newer ones can be substantial and it would be counter to the stated objectives of the program to omit these older, higher-emitting vehicles due to uncertainty regarding usage.

It is respectfully suggested that the state consider using their official on-road emission inventory model(EMFAC) to establish an actuarial table predicting remaining useful life of a vehicle according to model year and odometer reading. Such an approach would be more consistent with Moyer Guidelines as well as the modeled effectiveness of programs like EFMP. Staff might consider limiting the ASM requirement to those vehicles that have a project life expectancy of less than 2 years - which would suggest that they would not survive until their next scheduled inspection. We believe that such a consideration will help improve upon the low participation rates achieved in the past as well as save funds that might be better spent on other aspects of the program.

Thanks for your consideration in this matter.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-05-29 14:40:40

No Duplicates.

**Comment 2 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 45 Day.**

First Name: Leon  
Last Name: Zhu  
Email Address: leonyzhu@hotmail.com  
Affiliation:

Subject: Enhanced Fleet Modernization Program (EFMP)  
Comment:

To whom it may concern,

The proposed revision of the Enhanced Fleet Modernization Program (EFMP) sets income limits on the eligibility of the participants. While I support that more subsidies should be allowed for low-income motorists, I believe to make the program exclusive for low-income and moderate income motorist hampers the original goal of the program, which is to improve the state air quality.

Notice that setting income limits naturally reduce the participation rate and effectiveness of the program to improve the state air quality. Such limitation can be especially harmful given the extremely low participation rate during the pilot period (for replacement program). Therefore, I believe that the revision should provide more subsidies for low-income motorists without setting the income limit on eligibility.

Thank you for your time.

Leon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-02 04:56:17

No Duplicates.

**Comment 3 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 45 Day.**

First Name: Seyed  
Last Name: Sadredin  
Email Address: Seyed.Sadredin@valleyair.org  
Affiliation: SJVAPCD

Subject: EFMP comments  
Comment:

Please see the attached comments regarding the proposed EFMP guidelines.

Attachment: [www.arb.ca.gov/lists/com-attach/4-carscrap14-VyRTPwN0BzUBd1U2.pdf](http://www.arb.ca.gov/lists/com-attach/4-carscrap14-VyRTPwN0BzUBd1U2.pdf)

Original File Name: SJVAPCD EFMP comment letter.pdf

Date and Time Comment Was Submitted: 2014-06-19 07:55:59

No Duplicates.

**Comment 4 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 45 Day.**

First Name: Max  
Last Name: Baumhefner  
Email Address: mrasey@nrdc.org  
Affiliation: Charge Ahead California/NRDC

Subject: COMMENTS OF THE CHARGE AHEAD CALIFORNIA CAMPAIGN ON  
PROPOSED AMENDMENTS TO THE EFMP

Comment:

Please see attached COMMENTS OF THE CHARGE AHEAD CALIFORNIA  
CAMPAIGN ON PROPOSED AMENDMENTS TO THE ENHANCED FLEET MODERNIZATION  
PROGRAM.

Attachment: [www.arb.ca.gov/lists/com-attach/5-carscrap14-VGUHNQc2B2IANgE4.pdf](http://www.arb.ca.gov/lists/com-attach/5-carscrap14-VGUHNQc2B2IANgE4.pdf)

Original File Name: 140609\_Charge Ahead Comments on EFMP ISOR (2).pdf

Date and Time Comment Was Submitted: 2014-06-19 09:17:50

No Duplicates.

**Comment 5 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 45 Day.**

First Name: Cole  
Last Name: Wheeler  
Email Address: cole.wheeler@thenextgeneration.org  
Affiliation: Next Generation

Subject: Next Generation comments on proposed amendments to the EFMP  
Comment:

Please see the attached letter from Next Generation.

Attachment: [www.arb.ca.gov/lists/com-attach/6-carscrap14-BWBQMFU5BCdXDgdk.pdf](http://www.arb.ca.gov/lists/com-attach/6-carscrap14-BWBQMFU5BCdXDgdk.pdf)

Original File Name: EFMP Comment FINAL2.pdf

Date and Time Comment Was Submitted: 2014-06-23 11:10:41

No Duplicates.

**Comment 1 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 2 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14). (At Hearing)**

First Name: Seyed  
Last Name: Sadredin  
Email Address: Non-web submitted comment  
Affiliation: SJVAPCD

Subject: SJVAPCD's comments on the EFMP  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/10-carscrap14-WilSP1wrBDZRJ1Q3.pdf](http://www.arb.ca.gov/lists/com-attach/10-carscrap14-WilSP1wrBDZRJ1Q3.pdf)

Original File Name: SJVAPCD comments on EFMP.pdf

Date and Time Comment Was Submitted: 2014-06-30 12:42:20

No Duplicates.

**Comment 3 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14). (At Hearing)**

First Name: Jan

Last Name: Daniels

Email Address: Non-web submitted comment

Affiliation: Pick-n-Pull

Subject: Pick-n-Pull's comments on the EFMP

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/11-carscrap14-AXFXOFIwBT0HLAdp.pdf](http://www.arb.ca.gov/lists/com-attach/11-carscrap14-AXFXOFIwBT0HLAdp.pdf)

Original File Name: Pick-n-Pull comments on EFMP.pdf

Date and Time Comment Was Submitted: 2014-06-30 12:42:20

No Duplicates.



**Comment 4 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14). (At Hearing)**

First Name: Rosemary

Last Name: Shahan

Email Address: Non-web submitted comment

Affiliation: Consumers for Auto Reliability & Safety

Subject: Comments on the EFMP

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/12-carscrap14-VjVROAFuWHgKeVA9.zip](http://www.arb.ca.gov/lists/com-attach/12-carscrap14-VjVROAFuWHgKeVA9.zip)

Original File Name: Consumers for Auto Reliability & Safety.zip

Date and Time Comment Was Submitted: 2014-06-30 12:42:20

No Duplicates.

**Comment 5 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14). (At Hearing)**

First Name: Tom

Last Name: Knox

Email Address: Non-web submitted comment

Affiliation: Valley Clean Air Now

Subject: Valley CAN's comments on the EFMP

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/13-carscrap14-BXNRNIE8WGcFZgN6.pdf](http://www.arb.ca.gov/lists/com-attach/13-carscrap14-BXNRNIE8WGcFZgN6.pdf)

Original File Name: Valley CAN Comments on EFMP.pdf

Date and Time Comment Was Submitted: 2014-06-30 13:05:02

No Duplicates.

**Comment 1 for Enhanced Fleet Modernization Program (Car Scrap)  
(carscrap14) - 15-1.**

First Name: Yolanda

Last Name: Chavez

Email Address: chavezjolanda6@gmail.com

Affiliation:

Subject: Amendments to the Enhanced Fleet Modernization Program

Comment:

This Fleet Modernization Program is only adding amendments for the older model vehicles, however, would it be able to include Diesel Truck Heavy Duty Equipment for scrapping?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-12-02 10:30:12

No Duplicates.