



June 23, 2009

Chairman Mary Nichols and board members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**Re: Support Enhanced Fleet Modernization Program Regulation  
With Proposed Amendments**

Dear Chairman Nichols and board members:

The undersigned public health and environmental organizations are writing to express our support for the proposed Enhanced Fleet Modernization Program (EFMP) regulation and to recommend strengthening the regulation by allowing vouchers to be used for either new vehicles or transit passes and by requiring that new vehicles purchased with the vouchers meet minimum efficiency standards. Given California's severe air pollution problems, accelerating the turnover of the existing fleet of vehicles on California's roads is an important strategy to reduce smog exposure and related public health emergencies.

By 2010, vehicles 15 years old and older will account for about 20 percent of the fleet, but will still be responsible for over 62 percent of the smog-forming emissions from cars. The proposed EFMP offers valuable incentives to consumers to retire older, higher polluting vehicles and replace them with cleaner models, and substantially boosts the number of cars that are being retired through existing state and local air district programs. The regulation will support the early retirement of up to 15,000 older, high-emitting vehicles from the road annually, nearly doubling the existing state program for vehicle retirement. The estimated retirements would provide daily reductions of 1.6 tons of smog-forming emissions along with particulate matter and greenhouse gas reduction benefits.

In order to increase air quality and public health benefits from this regulation, we also support two amendments to the regulation:

- 1) **Include public transit:** We support allowing vouchers to be used for purchase of public transit passes in addition to purchase of newer model vehicles. This amendment would further reduce air pollution and greenhouse gas emissions from passenger vehicles.
- 2) **Include efficiency criteria:** We support adding a mpg standard for newer model vehicles purchased with the vouchers to promote purchase of both cleaner and more efficient vehicles that assist with GHG reduction goals. We recommend a mpg standard of at least 35 mpg for cars and 27 mpg for larger vehicles (trucks, vans and SUVs).

We thank you for your leadership in improving air quality and health outcomes for all Californians and support approval of this important effort toward those goals.

Sincerely,

Bonnie Holmes-Gen  
American Lung Association in California

Tim Carmichael  
Coalition for Clean Air

Simon Mui  
Natural Resources Defense Council

Bill Magavern  
Sierra Club California

Patricia Monahan  
Union of Concerned Scientists