



California New Car Dealers Association

July 18, 2016

Richard W. Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: PROPOSED 2016 STATE STRATEGY FOR THE STATE IMPLEMENTATION PLAN

Dear Mr. Corey,

The California New Car Dealers Association (CNCDA) is a statewide trade association that represents the interests of over 1,100 franchised new car and truck dealer members. CNCDA members are primarily engaged in the retail sale and lease of new and used motor vehicles, but also engage in automotive service, repair and part sales. Thank you for the opportunity to provide written comments on the California Air Resources Board (ARB) proposed 2016 state strategy for the State Implementation Plan.

According to the ARB State Implementation Plan, important ongoing innovations in vehicle technology have led today's new cars to pollute 99 percent less than cars sold in the 1980s and 1990s. California's new car dealers agree with ARB that in order to continue this trajectory and meet the state's ambitious goal of reducing emissions in the South Coast area by 80% by the year 2031, more than half a million of the oldest passenger cars and trucks on our roads will need to be replaced with new cars. Our dealers are the best in the country at selling clean-energy vehicles, and are committed to growing these sales numbers year over year to support the state's goals.

ARB's plan to expand and enhance existing zero-emission vehicle incentive programs such as the Clean Vehicle Rebate Project (CVRP) and the Enhanced Fleet Modernization Program (EFMP) is absolutely essential in order to reach targeted reduction levels. Older vehicles need to be replaced, and many of our state's families are still recovering from the recession and thus cannot afford to buy a brand new car on their own – although innovation is exciting, it often comes with a hefty price tag and excludes residents who need it the most. The state's clean vehicle incentive programs are crucial to ensure that cleaner, safer cars are available for everyone, not just California's top earners.

However, since emissions are not stationary, the expansion and enhancement of incentive programs in areas of our state other than just the South Coast would be ideal. Emissions are not stationary, and we believe that all California residents should have similar opportunities to trade in their old cars for newer models. Every car sold by a California new car dealer that replaces an older vehicle means cleaner air and safer roads – goals that all Californians can appreciate.

California's new car dealers also strongly support the state's infrastructure investment programs to ensure that people who make a big investment in cleaner air and safer roads are able to charge their vehicles while on the go. Increased numbers of charging stations and hydrogen fueling stations will undoubtedly help to assuage consumer concerns about charging and fueling capabilities while driving longer distances, which will push consumer demand up and help move more zero-emission vehicles off of dealer lots and onto our roads.

In summary, CNCDA supports ARB's proposed implementation plan, and we thank you for your continued leadership regarding the state's crucial ZEV incentive programs and infrastructure investments. Please contact CNCDA's Staff Counsel, Alisa Reinhardt, at (916) 441-2599 or areinhardt@cncda.org if you have any questions or would like to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Alisa Reinhardt". The signature is fluid and cursive, with a long horizontal flourish at the end.

Alisa Reinhardt
CNCDA Staff Counsel