

July 23, 2018

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

RE: PROPOSED GUIDELINES FOR THE CLEAN CARS 4 ALL AND ENHANCED FLEET MODERNIZATION PROGRAMS

Dear Mr. Corey,

The California New Car Dealers Association (CNCDA) is a statewide trade association that represents the interests of about 1,200 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 provide customers with parts, service, and automotive repair. Our member dealers are actively involved in the communities they serve and are committed to supporting their customers, whether in new and used car sale and lease transactions, warranty repairs, service work, recall-related vehicle fixes, or other customer service activities.

Thank you for the opportunity to provide written comments on the California Air Resources Board (ARB) Clean Cars 4 All proposal. California's new car dealers are on the front lines of our state's commitment to invest in zero-emission vehicles, and our members are committed to growing these sales numbers year over year to support the state's goals.

According to a past ARB report to the Legislature, vehicles 15 years and older now account for at least 17 percent of the fleet but are responsible for about 60 percent of the smog-forming emissions from cars. Since about half of all cars on California's roads run for at least 15 years (and one-quarter for at least 20 years), it is vital for programs like EFMP to expand statewide and serve more Californians. Since the emission rate of a 20-year-old vehicle is roughly 30 times that of a new car, this means that every new car sold that replaces an older car means cleaner air and safer roads. ARB's proposal to limit replacement vehicles to eight model years or newer will provide a good balance of more environmental gains for the state's communities and a good selection of used vehicle inventory to choose from for consumers.

Our only request for this program is that you consider keeping the term "retire" instead of replacing the term with "scrap." Although we support the program's goals on the environmental side, a huge issue for dealers today is a lack of qualified vehicle technicians. One reason for this gap is a severe funding shortage for auto tech-related educational programs in both high schools and higher education. In the future, we would like to explore the possibility of directing some of the retired vehicles from Clean Cars 4 All into educational programs for students instead of sending the vehicles directly to be scrapped. The privilege of working with a vehicle hands-on is priceless, and so immediately scrapping older, retired vehicles means countless lost educational opportunities for California students interested in a career as a vehicle technician.

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We strongly support both expanding the program statewide and simplifying the vehicle replacement requirements, as this will help with program clarity for consumers and be easier for dealers to implement.

Thank you for your continued leadership and commitment to expanding this successful program. Please contact CNCDA's Director of Regulatory Affairs, Alisa Reinhardt, at (916) 441-2599 or <u>areinhardt@cncda.org</u> if you have any questions or would like to discuss these comments further.

Sincerely,

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Alisa Reinhardt CNCDA Director of Regulatory Affairs