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July 21, 2014

Clerk of the Board, Air Resources Board
1001 I Street
Sacramento, California 95814

SUBJECT: Comments Regarding the Proposed Modifications to the Carl Moyer Memorial Air Quality Standards Attainment Program On-Road Chapters.

To Whom It May Concern:

The California Air Pollution Control Officers Association (CAPCOA) appreciates the opportunity to submit comments on the proposed Modifications to the Carl Moyer Memorial Air Quality Standards Attainment Program (Moyer Program) On-Road Chapters.

Overall, CAPCOA is supportive of the proposed changes to the Moyer Program On-Road Chapters. However, CAPCOA has significant concerns regarding some of the proposed changes to limit funding eligibility to fleets with no more than three trucks.

BACKGROUND

During the April CARB Board meeting, CARB staff committed to look into additional ways to provide financial assistance to small fleets. During the meeting, many truck fleet owners came forward to provide comments on the proposed changes to the Truck and Bus Regulation language. A fair percentage of the truck owners that spoke seemed to be owners of fleets that can be considered small in size but may now fall into the large fleet category of the regulation (four or more trucks). For reference, the Voucher Incentive Program began as a program for truck fleets of 3 or fewer trucks but soon after implementation a change was made to allow fleets with up to 10 trucks to participate in the program which has allowed for a very successful program. This modification was done at the suggestion of truck fleet owners, dealers and industry leaders so that small business owners could access the incentive funds that were offered.

RECOMMENDATIONS

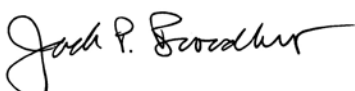
CAPCOA supports the proposed guideline changes to allow light heavy duty trucks with Gross Vehicle Weight Ratings of 14,001 to 19,500 pounds into the incentive programs and CAPCOA recommends that the Moyer Program definition of a small fleet remain at 10 trucks or less.

Reasons for enacting this recommendation include the following:

1. **Although Light Heavy Duty trucks as a class will now be eligible, fleets of 4 to 10 trucks will not be able to utilize any Moyer Program funds now that their GVWR class is eligible.** We would recommend that the Moyer Program definition of a small truck fleet remain as it is with truck fleets of 10 trucks or less being eligible for funding. It is important to note that these light heavy duty truck fleet categories have never had access to any incentive program and limiting the program access to only fleets of three trucks or fewer would trim this pool of potentially qualified candidates for incentive funds just as their truck weight classes are being included in incentive programs like VIP and Fleet Modernization. CAPCOA would like to acknowledge that the VIP is currently operating with considerable success with fleets of 10 trucks or less qualifying for funds and we recommend keeping the fleet size requirements as is. Some of these light heavy duty trucks will be subject to replacement with a truck with a 2010 model year or newer engine beginning next year in January and incentive program funds would greatly assist some of these smaller truck fleets with this transition. In addition, districts retain the ability to apply more stringent requirements within the Moyer program as applicable based on local air quality needs and priorities.
2. **Eligibility for larger, 4 – 10 truck fleets is already limited and will become increasingly restricted due to the existing provisions of the Truck & Bus Regulation.** Additional Moyer guideline restrictions are not necessary to ensure that small (1 – 3 truck) fleets receive the lion's share of the funding.
3. **Eliminating larger fleets would further reduce the pool of eligible applicants.** The existing Fleet Modernization Program has experienced difficulty finding qualified applicants who operate enough miles per year to ensure project viability. Continuing to allow funding for larger fleets will help realize more and earlier emission reductions than we would otherwise see, and is not likely to siphon large amounts of funds away from small fleets. This is especially true for trucks in 4 to 10 size fleets in NOx Exempt Area Districts. Under the regulation, these fleets are required to have filters on their trucks but have no further requirement to upgrade the engines to cleaner NOx standards. Thus, gradual replacement of these engines could provide significant additional ozone precursor emission reductions for many years to come.

CAPCOA appreciates the opportunity to comment on the proposed Moyer Program Guideline changes. We hope that our recommendations are considered, reviewed, and enacted by CARB staff. We feel the proposed recommendations will lead to successful implementation of future grant programs and allow access to incentive funds to smaller light duty fleets and heavy duty fleets. CAPCOA stands ready to assist in the implementation of the recommendations included above.

Sincerely,



Jack P. Broadbent
President