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May 16, 2006

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Robert Sawyer, Ph.D., Chairman
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Dr. Sawyer:

Re: California Air Resources Board (CARB) Proposed Adoption of New Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and Other Industrial Equipment

This letter provides California Air Pollution Control Officers Association's (CAPCOA) comments regarding the proposed adoption of New Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and Other Industrial Equipment. CAPCOA recognizes the importance of this proposed regulation, especially in those regions of the state where every pound of emission reduction is needed for attainment of healthful ambient air quality standards. We understand that this matter has been a contentious issue among the agricultural industry and those dealerships serving the agricultural interest. Subject to the subsequent comment below, CAPCOA recommends CARB approval of the proposed regulations at this time.

CAPCOA believes it would be useful for CARB to provide annual implementation status reports to the Board with recommendations to further strengthen new and in-use emission requirements where feasible. For example, CARB staff's latest rulemaking proposal relaxes in-use fleet requirements as compared to staff's previous proposal, resulting in 50 percent less emission reductions in 2010 for this sector. As experience and information is generated in the early stages of rule implementation, CARB staff may conclude in the end that more stringent in-use fleet requirements may be economically viable and additional near term emission reductions are achievable.

CAPCOA appreciates the opportunity to provide these comments. If you have any questions regarding this matter, please call me at (707) 433-5911.

Sincerely,

Barbara A. Lee, President
CAPCOA

cc: Catherine Witherspoon, Executive Officer, CARB
CAPCOA Members

