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STATE OF CALIFORNIA
AIR RESOURCES BOARD
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FAX FROM THE OFFICE OF THE ASSISTANT
SECRETARY OF THE NAVY
(INSTALLATIONS AND ENVIRONMENT)

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1000 Navy Pentagon (rm 4A686)
Washington, D.C. 20350-1000
FAX # (703) 695-2573

December 13, 1995

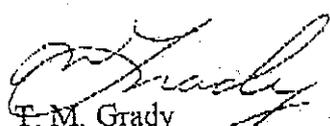
From: CDR Thomas M. Grady, Telephone # (703) 614-1313

To: Board Secretary
California Air Resources Board (CARB)
FAX # (916)322-4737

Subj: Department of Defense's Comments on Proposed adoption of Section 1905 Title 13,
California Code of Regulations

Attached are DoD's comments on subject proposal signed by Ms. Goodman, Deputy
Under Secretary of Defense for Environmental Security.

Very Resp,


T.M. Grady
CDR, SC, USN

ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON DC 20301-3000

17 3 DEC 1995

Mr. John D. Dunlap, III
Chairman
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Dunlap:

The purpose of this letter is to provide comments on behalf of the Department of Defense (DoD) regarding the California Air Resources Board (CARB) proposal to adopt a national security exemption for military tactical vehicles and equipment. We request that these comments be read into the record at the public hearing on December 14, 1995. Additionally, it is our intent to have the DoD's Regional Environmental Coordinator or his representative present at the public hearing.

DoD strongly supports CARB's proposed adoption of section 1905, and the amendment of sections 2400 and 2420 of Title 13, California Code of Regulations providing for a national security exemption for military tactical vehicles and equipment. We fully concur in the conclusions and recommendation contained in CARB's Staff Report. Without this national security exemption, California's new engine emissions standards will have a major impact on military operations in California and military readiness generally.

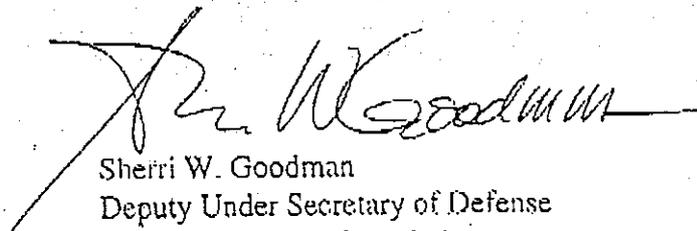
We want to emphasize our agreement with the conclusion in CARB's Staff Report that "this exemption is necessary for the military to maintain a uniform, combat-ready fleet worldwide." DoD's tactical vehicles and equipment are all integral parts of a carefully balanced fighting force, procured and maintained on a fleetwide basis. Tactical vehicles and equipment must be uniform throughout the world in order to facilitate the training of mechanics, the ready availability of parts and replacement engines, and repair on the battlefield. Moreover, the California National Guard and Reserve Components, as an integrated part of our nation's combat force, must train and fight with the same equipment used by Active-Duty forces worldwide. Consequently, designing and procuring a separate fleet of tactical vehicles and equipment for California would significantly impair military operational readiness.

With regard to the proposed annual reporting requirements, we understand that CARB intends to make technical amendments to subsections 1905(c), 2400(c)(3), and 2420(d)(3) to more accurately reflect CARB's intent that DoD furnish a list of the types of tactical vehicles and equipment subject to the exemption, as opposed to an individual listing of all exempted tactical vehicles and equipment in California. We fully concur in this amendment. The tracking and listing of thousands of tactical vehicles and equipment items in California would be extremely resource intensive and would not result in any substantial benefit to CARB.

We wish to express our appreciation to CARB for its timely and cooperative response to DoD's concern that California's new engine emissions standards would adversely affect military readiness. In particular, we would like to recognize two members of the CARB staff, Mr. Mike Terris and Ms. Veronika Pesinova, for their diligent and professional efforts in developing the proposed exemption.

Finally, I would like to take this opportunity to ask your assistance in quickly resolving another problem regarding our inventory of tactical equipment in California. Currently, our portable tactical equipment is subject to regulation by each air district in California as stationary sources. This patchwork of regulation is causing significant problems for the Military Services. AB 531, signed by Governor Wilson, provides a sensible framework for solving these problems through a statewide registration program. We have started working with your staff on the development of implementing regulations that will satisfactorily accommodate our military requirements, as intended under AB 531. We would like to work with you to complete these regulations as quickly as possible. In the interim, we hope that you will assist us in obtaining temporary relief from the problems that we are currently experiencing. Again, we appreciate your efforts in support of our national defense mission.

Very truly yours,



Sherri W. Goodman
Deputy Under Secretary of Defense
(Environmental Security)