



October 21, 2024  
California Air Resources Board (CARB)  
1001 I Street,  
Sacramento, CA 95814

**Re: Comments Regarding Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines**

Dear CARB Staff,

AED is the trade association representing companies that sell, rent, and service construction, farm, mining, energy, forestry, material handling and industrial equipment. Our members, which are predominantly small to medium-sized, family-owned businesses, employ thousands of workers across California, providing well-paying jobs and serving as a positive force within communities throughout the Golden State. Below please find a list of AED member companies and locations in California.

**Chapter 4: On-Road Heavy-Duty Vehicles**

AED strongly supports the changes that CARB has proposed to increase the definition of “small fleet” from ten or fewer vehicles to twenty or fewer vehicles for purposes of determining increased funding amounts of up to 80% of vehicle cost. This expanded flexibility will serve to enable small fleets, that are often family-owned or small businesses, to participate in the Carl Moyer Program and accommodate the additional costs for a zero-emission vehicle that they were previously bearing directly. The Carl Moyer Program has been critical to the reduction of transportation emissions in California through the infrastructure projects it has funded. CARB’s proposed changes to the program enhance the flexibility and the impact of these funds, we thank you for the opportunity to comment on these important proposed revisions and look forward to ongoing collaboration with CARB to reduce carbon emissions.

Sincerely,

Jacob Asare  
State Government Affairs Manager

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