CALIFORNIA TRUCKING ASSOCIATION

February 21, 2008

Chairman Mary D. Nichols
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Nichols,

The California Trucking Association, herein, offers its comments and recommendations on the Proposed Guidelines for Implementation of the Proposition 1B Goods Movement Emission Reduction Program (February 4, 2008).

- **Appendix A-3: Option (3), Trucks Serving Ports and Intermodal Rail Yards.**
  - Funding to replace repower or replace pre-1994 trucks serving ports and intermodal rail yards would not be available to non-single truck owners seeking to purchase a MY 2007 or newer vehicles. The requirement that a non-single truck owners' repower or replacement project be completed at least 3 years prior to a regulatory requirement cannot be met because the Drayage Rule required such actions to be completed by December 31, 2009. Under this provision as it currently stands, many of the oldest drayage trucks in the critical Port of Los Angeles/Long Beach area would be ineligible to receive funding for repowering or replacement. CTA recommends that the requirement for project completion be changed to 1.5 years for multiple truck operators and one year for single truck owner operators.[1]

- **Appendix B-1 through B-4: Other Heavy Duty Diesel Trucks, Options (1) through (4).**
  - The requirement that any retrofit, repowered or replacement trucks funded under the Other Heavy Duty Diesel Trucks Program may not be used for fleet averaging has no logical rationale. As long as the truck is retrofit, repowered or replaced in the required time frame, the operator adheres to all requirements for record keeping and all other requirements are met, the truck should be eligible to be used in fleet averaging.

- **Appendix B-4, Option (4), Three-Way Truck Transactions.**
  - The replacement truck (Truck A) should not be required to be equipped with a level 3 VDECS. Level 3 VDECS on 03-06 engines require plug in regeneration that requires 220 volt electrical service and cost upwards of $15,000 installed. Also, CTA recommends that the eligible model year for truck B be moved from pre-1990 to pre-1994.

[1] Owners of pre-1998 trucks to be covered under the pending Statewide Fleet Rule Proposal would also be ineligible for funding since their replacement deadline would be December 31, 2010.

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- **Requirement of 100% California operation**
  - Because of California's significant role in import goods movement, many California base-plated trucks haul loads to adjacent states. Yet even though the total mileage these trucks travel may be predominantly in California, the 100 % California requirement would make these trucks ineligible to receive funding. Because of the potential benefits to California air quality, CTA suggests that ARB consider adopting a more measured approach to funding eligibility. For example, California base-plated trucks receiving funding would have to meet some significant percentage threshold for miles traveled in California. Awards for such trucks would be reduced by the proportion of miles traveled in California. The actual percentage of mileage traveled in California for such fleets could be readily verified through IFTA records.

- **Public Information Issues**
  - ARB should become the public information clearinghouse for all the programs it approves. This should consist of more than requesting that local agencies provide information to be posted on the ARB website. ARB should provide monthly updates on progress in setting up the programs, program descriptions, eligibility requirements and contact information.

  - Both draft and signed Local Agency Grant agreements should be posted on the ARB website.

  - Overall program and local agency specific data on trucks replaced, converted or upgraded and their vocations should be posted monthly on ARB's website.

  - In view of the large proportion of Hispanic truck drivers in drayage service in Southern California (over 90%) local agencies should be required to provide all their program information in Spanish.

Sincerely,

Eric Sauer
Vice President Policy Development
California Trucking Association

cc: Douglas Ito, Manager Goods Movement Strategies Section ARB
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