

Ken Dunham 19-12-4

WEST COAST LUMBER & BUILDING MATERIAL ASSOCIATION

177 Parkshore Drive Folsom, California 95630 Telephone 916/235-7490 Fax 916/235/7496 Toll-free 800/266-4344 www.lumberassociation.org

December 12, 2019

Subject: California Air Resources Board proposed advanced clean truck regulation – large entity and fleet reporting requirement

I am Ken Dunham, Executive Director of the West Coast Lumber & Building Material Association. This 103 year old organization has as members the independent retail lumber, hardware and building materials businesses in California and also has as members a wide range of product and services providers to this industry. Obviously, this is an industry that depends critically on trucking for various aspects of supply and service for building products.

We agree with the comments as collected and coordinated by the California Chamber of Commerce expressing concern on excessive reporting, vague enforcement and unclear goals.

I would add to these comments it is obvious that CARB did not solicit input or feedback from those business affected. A common criticism of regulatory agencies is that few, if any, understand how business is done and the challenges faced in compliance to such ill-prepared regulations.

We would urge that CARB reach out and ask for input and suggestions prior to simply developing regulations in an agency vacuum.