

07-12-7



December 3, 2007

Chairman Mary Nichols,  
CA Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

Re: Board Agenda Item # 07-12-7 "Public Hearing to Consider the Adoption of Proposed Regulation to Control Emissions from In-Use On-Road Diesel-Fueled Heavy Duty Drayage Trucks at Ports and Intermodal Rail Yard Facilities"

Dear Chairman Nichols:

We would like to comment on the California Air Resources Board (CARB) proposed Port Drayage Truck regulation. Our organization, the West State Alliance (WSA) is made of truck drivers, owner, and operations serving the Port of Oakland.

No one understands the need to improve air quality by reducing the emissions from the diesel trucks operating in and around the ports better than we do. After all we spend most of our working lives near these diesel emissions. We also understand the local community's concern about the air they must breathe and that solutions are needed.

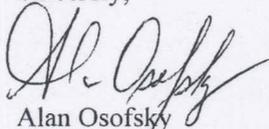
However, we must also point out that measures to clean up the air should be as practical and cost effective as possible, since it is our industry that must shoulder the cost of compliance with the regulations.

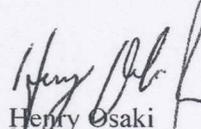
To that end, we urge CARB to consider providing additional options to comply with Phase 1 of the proposed regulation. Specifically, we ask you to amend the proposed regulation to allow 1988 through 1993 model year trucks to avoid being scrapped and allowed to continue to operate if a Level 3 VDECS is installed. By providing this option, the burden on the most economically vulnerable truck drivers will be lessened, while still achieving a reductions on par with any retrofitted 1994-2003 truck or any 2007 or newer truck.

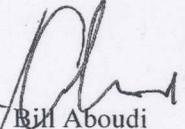
If left unchanged the current rule proposal will result in a "double scrap" which will severely impact the economics and viability of our industry. We ask CARB to carefully consider the consequences of this action, particularly with little air quality benefit to be gained.

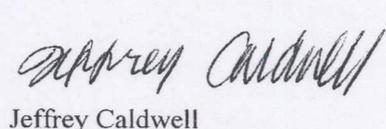
Thank you for considering the comments provided to you in this letter.

Sincerely,

  
Alan Osofsky  
Rodgers Trucking

  
Henry Osaki  
Mutual Express

  
Bill Aboudi  
AB Trucking

  
Jeffrey Caldwell  
Yolo Enterprises