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CALIFORNIA TRUCKING ASSOCIATION

Due to uncertainties in ARB staff Initial Statement of Reason (ISOR), CTA requests that the Board consider specific recommendations and include language within the regulation in order to offset any unanticipated outcomes. The provisional recommendations outlined below will ensure that the regulation achieves its intended goals while simultaneously maintaining an efficient goods movement system in California.

Specifically, the Board should:

- **Direct ARB staff to reassess the rule's cost-effectiveness and feasibility in the context of the uncertainties regarding the key issues outlined below and report back to the Board one year after the regulation is adopted:**
 - ARB staff must schedule a review after consideration of Proposition 1B Public Financing Proposals to ensure public funds will be made available for all phases of this rule.
 - ARB staff needs to perform a used truck price forecast, taking demand factors into consideration, and assess the impact on MY 2007 or newer truck prices of the concurrent drayage and statewide private fleet rule.
 - Additionally, ARB staff needs to assess the impacts of the rule in the event that drayage operators are unable to pass through costs.
 - ARB staff must assess the impact of the rule to California exports in the global economy.
 - ARB staff needs to assess the potential impacts of the rule on the population of the drayage fleet and its ability to move cargo unhindered by the impact of the rule and specify exactly how it would monitor the sufficiency of the drayage fleet and timely ensure that drayage operations would not suffer.
 - Finally, ARB staff must present costs as they will be experienced by the small businesses affected by the rule including costs that are currently annualized and costs that are not currently included such as the costs to drayage operators of being forced out of the drayage businesses.

Should ARB staff determine that in addressing the issues above, further analysis indicates that the regulation exceeds cost effectiveness benchmarks or if other unanticipated issues arise; the Board should direct staff to reconsider the implementation timeline once the review has been completed.

CTA supports action by the Board to improve the air quality performance of trucks in drayage and throughout the state. With additional analysis and the possibility of timeline reconsideration if warranted, the Board can ensure that it has approved sound public policy that will serve to protect the interests of the people of California now and for years to come.