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Clerk of the Board  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

Subject: Comments regarding proposed amendments to the Truck and Bus Rule

To Whom It May Concern:

Granite Construction is a large heavy civil contractor headquartered in Watsonville, California with operations throughout the State. In order to support its operations, Granite owns and operates a large equipment fleet that falls under the Truck and Bus Rule, the In-Use Offroad Rule, and a number of other CARB fleet rules.

Granite has actively participated in the development of the Truck and Bus Rule, and the company takes a proactive stance toward compliance with CARB and other agencies both inside of and outside of California.

Regarding the proposed amendments to the Truck and Bus Rule, Granite is largely in favor of the changes laid out in the 15-day language to allow more compliance flexibility for fleets. The simplification of the compliance path for trucks  $\leq 26,000$  lb GVW and the ability to exchange VDECS credit from the In-Use Offroad Rule are particularly helpful for large, diverse fleets such as Granite's.

While Granite supports the amendments, there is one detail that we feel has the potential to create competitive imbalance in the low-bid construction environment. The 10 truck per fleet limit in the low mileage construction truck exemption puts larger, proactive fleets at a potential disadvantage. Using a percent of fleet cap rather than a 10-truck fleet cap would maintain the desired limit to the exemption while maintaining bid parity for fleets in the ultra-competitive construction market.

Sincerely,



Nick Pfeifer

Equipment Department Project Manager  
Granite Construction Inc.