

# CALCIMA

California Construction and  
Industrial Materials Association

June 3, 2011

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: 15 day comments for On-road Diesel (Truck and Bus) Rule

Dear ARB:

The California Construction & Industrial Materials Association (CalcIMA) is the trade association for aggregate, ready mixed concrete, and industrial mineral producers in California. The association includes 100 member companies representing over 500 production facilities.


CalcIMA members have a variety of fleets subject to this regulation that are used in the production and delivery of materials. These include on-road fleets of mixer trucks that deliver concrete to project sites. They also include water, crane, lube, mechanics, and other vocational fleets that operate at material production plants. The materials industry continues to face many challenges in a down construction economy, so we appreciate the Board making changes to provide more options, allowances, credits, and extensions in the rule.

Since CalcIMA members operate both On and Off-road fleets, the “bubble concept” in Section 2025 (j)(2)(C) is one of the potentially helpful changes, since it will allow exchange of excess credits among the two rules. *Comment:* Since this is a two part provision—requiring completion of the 15 day changes to the Off-road rule as well—we encourage the Board to complete the Off-road changes as soon as possible, so members will know the credit exchange rate and be able to make decisions accordingly.

*Other comments:* Section 2025 (f) (3) may need to be clarified as to exactly what exemptions, delays, and extensions apply to the vehicles under 26,000 lbs.; for Section 2025 (j), it may help to have clarification or guidance as to which credits are one-for-one per vehicle and which are applied on a fleet percentage basis; and Section 2025 (p)(2)(G) appears to be a duplicate of Section 2025 (p)(2)(F).

In general, it will be helpful to have guidance and examples to assist in understanding how provisions such as downsizing, low-mileage construction truck, early addition of vehicles, and excess credit transfer work, particularly in conjunction with the different compliance paths.

Sincerely,



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