

August 18, 2011



Clerk of the Board, Air Resources Board
1001 "I" Street
Sacramento, CA 9581

Re: Modified Tractor Trailer Greenhouse Gas Reduction Measure

The California Trucking Association (CTA) is pleased to have the opportunity to provide its comments on the recently released 15-Day amendments regarding the implementation of the Tractor Trailer Greenhouse Gas Reduction Measure. CTA is the second largest trucking trade association in the United States. In California, trucking provides 1 out of every 15 jobs.

CTA has no concerns regarding the proposed modifications to the rule. CTA does, however, wish to offer further input on the modifications ARB Staff has thus far failed to include in their amended language.

Short and Local Haul Exemptions Should Not Capture Regional Trucks and Trailers

The standards used in the Environmental Protection Agency/National Highway Traffic Safety Administration joint fuel efficiency rulemakings further demonstrate how CARB Staff has missed the mark in identifying regional haul trucks and trailers:

- “Truck tractors operating as regional-haul trucks **are tractor trailer combination vehicles used for routes less than 500 miles**, and tend to travel at lower average speeds than long-haul trucks.”
- “**Long-haul combination tractors typically travel at least 1,000 miles** along a trip route. Long-haul operation occurs primarily on highways and accounts for 60 to 70 percent of the fuel used by Class 7 and 8 combination tractors.”
- Class 8 long-haul combination tractors are typically sold after the first three to five years of ownership and operation by large fleets... These newest trucks travel between **150,000 – 200,000 miles per year**, and 50 percent of the trucks in this Class 8 segment use 80 percent of the fuel.”

Source: *Final Rulemaking to Establish Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicle, Joint EPA/NHTSA Rulemaking*

The table below compares the two rules.

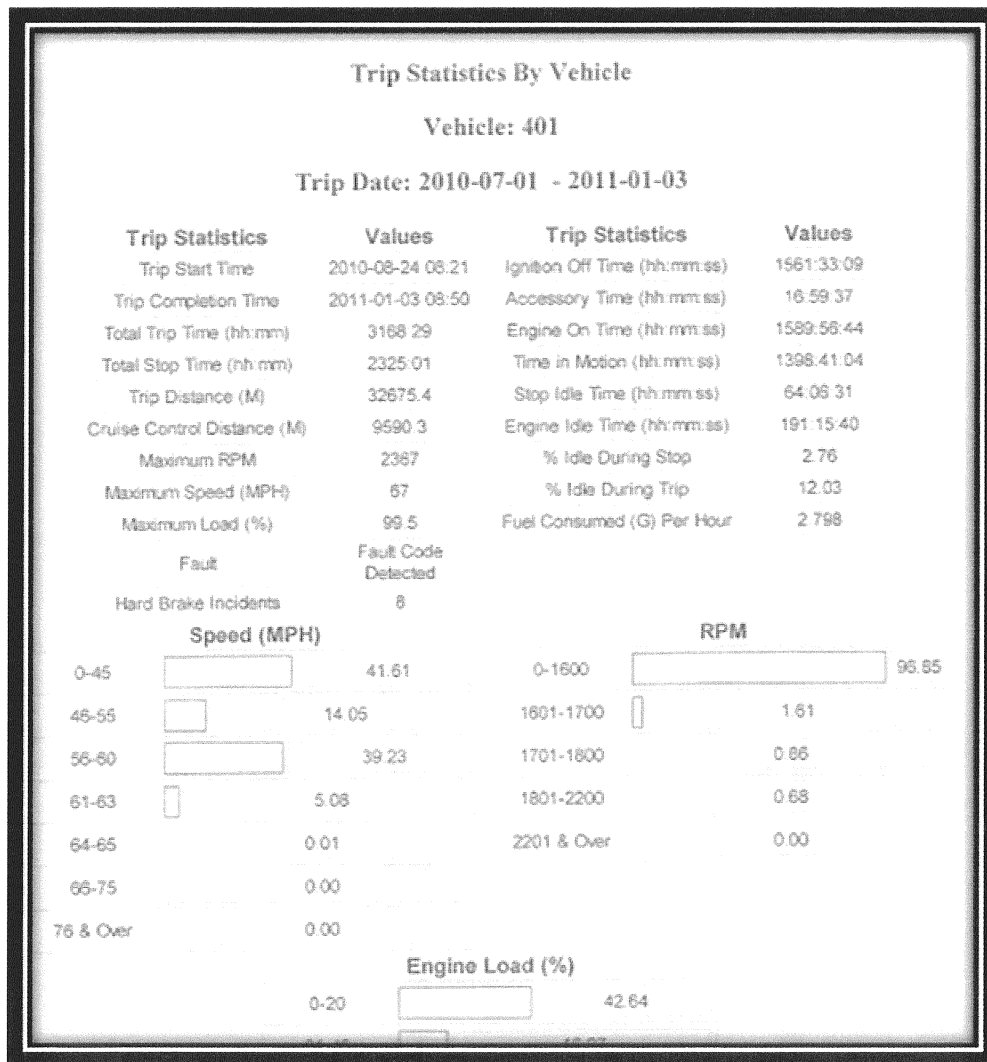
Comparison Between Rulemaking Regional/Long Haul Distinctions		
	EPA/NHTSA GHG	CARB GHG
Annual Miles	150,000-200,000	50,000
Distance Traveled	1000 miles per trip	Travels within 100 mile radius

Cost Effectiveness Estimates Should Reflect Reality or Rule Should Be Amended to Reflect Estimates

The original staff Economic Impact Analysis calculated average fuel savings resulting from this rule where “84 percent of the vehicle miles traveled at highway speed that benefit fully from the aerodynamic devices” and tractors travel 125,000 miles annually. We have forwarded two letters to Board which have highlighted the following:

- There is **no evidentiary support** for the estimate of 84 percent vehicle miles traveled (VMT) at highway speeds.
- Despite claims made by staff that “speed distribution data for the fleet that is impacted by the proposed regulation were not available”

(source: <http://www.arb.ca.gov/regact/2008/ghghdv08/ghgisor.pdf>), we have provided a source for this data to the Board and Staff.



- Inaccurate estimate of VMT done at highway speeds could swing cost of \$11.2 billion regulation by \$4-6 billion.

Recommendations

1. Modify regional haul exemptions to more closely reflect the vehicles envisioned by Staff's cost-effectiveness estimates; or
2. Revise cost-effectiveness estimates to more closely reflect population of trucks and trailers currently subject to this rule.

Either of the above suggestions would close the multi-billion dollar gap between your cost projections and the likely cost to the State and its business owners. This continues to be a massively flawed regulation which has not been improved substantially despite extensive, targeted stakeholder input. If you have any questions or concerns about our comments, please contact Chris Shimoda at (916)373-3504.

Sincerely,



Eric Sauer, Vice President of Policy Development
California Trucking Association
(916)373-3562