



# LUMBER ASSOCIATION

Of California & Nevada

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May 22, 2007

California Air Resources Board  
PO Box 2815  
Sacramento CA 95812

Re: Off-road diesel equipment regulations, final draft

Dear Members of the California Air Resources Board:

The Lumber Association of California and Nevada (LACN) wishes to be on record opposing the adoption of off-road diesel regulations that, if implemented as presently drafted, would have a substantial negative impact on the state's infrastructure rebuilding efforts, and affect the well-being of the state's business and industries that utilize off-road diesel equipment. LACVN is composed of more than 500 firms in the two states in the lumber and building materials retail business, as well as others in the wood products industries.

Lumber and building materials dealers and others in the wood products industries have substantial investments in off-road equipment, such as forklifts and other loading equipment. To require replacement or retrofitting of this equipment in a relatively short timeframe is unreasonable, especially considering that some equipment of this type has a lifespan of more than 20 years.

Additionally, the addition of regulation of NOx emissions to the proposed regulations requires equipment technology that is not general utilized today. Simply stated, there is currently no diesel engine that is capable of addressing both PM and NOx emissions.

Air quality and a clean environment is a major concern for the lumber and wood products industries. The lumber industry is at the forefront of recycling, renewable energy, "green" building and developing technology for sustainable practices. There is a balance between achieving California's air quality goals while keeping the economy moving forward. We as an industry are committed to that goal.

We urge that the Air Resources Board reconsider the timeframe for implementation as well as the issues of available technology.

Sincerely,

  
KEN DUNHAM  
Executive Director

Lumber Association of California and Nevada

**AN ASSOCIATION OF INDEPENDENT LUMBER DEALERS AND SUPPLIERS**

Affiliated with the National Lumber and Building Materials Dealers Association