ASSOCIATED ROOFING CONTRACTORS OF THE BAY AREA COUNTIES, INC.

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November 24, 2008

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

Members of the Air Resources Board:

This Association represents professional roofing contractors in 14 metropolitan San Francisco Bay Area counties. All of our members are signatory to Working Agreements with Locals 40, 81 and/or 95 of the Roofers Union and most of them are small businesses, as well. **We are writing to you today to urge you to shelve your proposed in-use on-road diesel vehicle regulation and to adopt instead the alternative proposal developed by Driving Toward a Cleaner California (DTCC)**.

As you are well aware, the State and the Nation are facing an economic crisis of historic proportions. Falling home prices, escalating foreclosures and declining consumer confidence have hit the construction industry very hard. Backlogs have disappeared and future work prospects look bleak. Every week brings news of more construction projects delayed or cancelled. As a result, our roofing contractor members are struggling to stay afloat until the crisis passes.

Although we fully support the ARB's goal of significantly reducing PM and NOx emissions from diesel engines, the regulation you have proposed is simply too draconian. Many small businesses will be faced with a Hobson's choice between either disposing of older trucks well before the end of their useful lives (and at a considerable loss) or retrofitting or replacing their fleets while access to credit remains limited, at best. We fear that many small businesses will resolve the dilemma by closing their doors.

The alternative proposal put forward by DTCC is a reasonable compromise that serves the interests of both the ARB and the small business community. It promises virtually the same long-term emission reductions as the ARB proposal, while offering affected businesses the short-term relief they need to weather the current economic storm. We urge you to adopt it.

Thank you for your attention and consideration.

Sincerely,

William T. Callahan, Jr., Ph.D.
Executive Director