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BEKINS®

December 3, 2008

Agent

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Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95817

Dear Ms. Nichols,

I am writing on behalf of our family owned and operated moving company A and P Moving, Inc. regarding California Air Resources Board's proposed regulation to reduce in-use, on-road diesel trucks and buses. I would like to express some recommendations our industry, and the California Moving and Storage Association has concerning your proposal.

The proposal to adopt regulation to reduce emissions employs a regulatory strategy of requiring expeditious retrofit of backend control technology rather than attrition replacement with new low emission engines; as has always been done in the automobile industry. The approach ARB is proposing is quite vigorous in its application to small and short distance operators, whose potential emission reductions are such a small part of the total emissions sough to be reduced.

An unreasonably rigorous regulatory enactment that requires financial commitment that is especially difficult, or even disabling for small operators, can engender low rates of compliance with the attendant alienation of the regulated sector and the enforcement agencies. This reduces the effectiveness of the regulation. We believe the large bulk of the emission reductions planned for the proposed regulation can still be achieved with a moderation in the pace of implementation required of small and short distance operators.

I urge the California Air Resources Board to develop revisions to its proposed On-Road Diesel control measure that will moderate the implementation schedules for small and short distance operators of affected diesel equipment. It is feared that the regulation as proposed will reduce compliance rates and cause irreparable harm to operators whose emissions are a very small part of the pool of emissions the regulation seeks to reduce.

Respectfully,

Darcy Aman Quinn
A and P Moving, Inc.-Bekins

Copies: Clerk
Executive Officer
Chair