



Driving Trucking's Success

American Trucking Associations  
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December 10, 2008

California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento CA 95812

**RE: Comments on Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles**

Dear Chairman Nichols and Members of the Board:

The American Trucking Associations, Inc. (ATA) respectfully submits the following comments on the California Air Resources Board (CARB) Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles.<sup>1</sup> ATA supports the goal of clean air and believes the most effective way to reduce the contribution heavy-duty trucks make toward air pollution is to set new engine emission standards in a manner that allows for, and encourages, improvements in productivity and fuel efficiency.

As a result of the more stringent engine and diesel fuel standards which have been established by both CARB and the U.S. Environmental Protection Agency, nationwide particulate matter and oxides of nitrogen emissions from heavy-duty trucks will be reduced by more than 40% by 2010 and by more than 70% by 2020 when compared to 2002 levels. Given California's unique air quality status which will require additional emission reductions from a variety of sources to meet federal standards, ATA recognizes the need to be part of the solution.

As a member of the diverse, broad-based coalition "Driving Toward A Cleaner California," ATA is committed to working with the Board to craft a sensible in-use, on-road diesel vehicle regulation that both cleans the air and keeps California's economy moving forward. At a time of unprecedented financial turmoil in the United States, the DTCC has developed a proposal that strikes the necessary balance of cleaning the air while ensuring the state's fragile economy is not negatively impacted in the process.

Given the multi-billion dollar cost of the truck and bus regulation – and the current volatile economic environment – the DTCC alternative proposal would give the affected industries and sectors the opportunity to comply in the most reasonable timeframe and flexible manner possible while still achieving aggressive emission reductions.

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<sup>1</sup> ATA is the national trade association of the trucking industry and is comprised of motor carriers, state trucking associations and national trucking conferences created to promote and protect the interests of the trucking industry. Its membership includes more than 2,000 trucking companies and industry suppliers of equipment and services. Directly and through its affiliated organizations, ATA represents more than 37,000 companies and every type and class of motor carrier operation in the U.S., effectively representing the nation's entire trucking industry.

The DTCC alternative proposal includes provisions which would:

- Require Best Available Control Technology (BACT) to be applied in sequential order, allowing trucking companies to retire or retrofit their oldest equipment first, as opposed to the proposed regulation which requires newer equipment to be addressed first.
- Encourage the early purchase of new, clean technologies by providing an additional two years of compliance under the BACT option.
- Require CARB to investigate and address potential operational and safety issues associated with retrofit technologies, such as transport of hazardous/flammable materials or sensitive cargo, and provide exemptions if these issues cannot be rectified.
- Provide more flexible mileage exemptions which would allow older model-year vehicles that meet certain mileage thresholds to use an alternative compliance schedule.

ATA believes the Board should adopt the DTCC alternative proposal. The DTCC proposal strikes an appropriate balance between the need to clean the air and the need for a robust economy that provides much needed jobs and tax revenues. Although the DTCC alternative proposal does not mitigate all of the environmental and economic concerns, we believe it strikes a reasonable balance between emission reductions, economic stability and fairness. We welcome continuing discussions between the Board and the coalition members to ensure the alternative proposal continues to address environmental and economic concerns in these times of financial turmoil.

Thank you for your consideration.

Sincerely,

Michael Tunnell  
Director, Environmental Affairs  
American Trucking Associations