



November 21, 2007

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RE: Proposed Port Drayage Truck Regulation

Dear ARB Board Member:

I am a local trucking company operating in and around the ports and have been in business in California for **40+** years. **Rodgers Trucking Company** is part of the California Trucking Association (CTA), which represents over 2,300 member companies who operate in and out of California, and who's Southern and Northern Intermodal Conferences make up the largest block of intermodal carriers nationwide.

As a business operating in California we recognize the air quality issues facing all of us. Many of our employees live and work in and around the port complexes and are currently working to assist in finding sustainable solutions that not only improve air quality but also help sustain a growing goods movement industry.

I have concerns with the recently released regulatory proposal aimed at controlling emissions for in-use on-road heavy duty drayage trucks within California Ports. Currently the proposed regulations require all drayage trucks to be equipped with a 1994-2003 model year engine certified to California or federal emissions standards and a level 3 VDECS for PM or 2004 or newer model year engines certified to California and federal standards by December 31, 2009. Phase 2 creates even more burdensome requirements requiring trucks to meet or exceed 2007 model year engine standards by December 31, 2013.

To date the California Air Resources Board (CARB) has yet to provide any information as to the overall potential cost associated with these changes, specifically:

- In order to fully evaluate the physical impact CARB would need to first take into account the availability of engines trucks and retrofit devices necessary to bring fleets into compliance.
- The potential of excessive price increases levied on newer model trucks.
- The impacts of forcing 2003 and older year model trucks out – what happens to the used truck market and those who purchase those trucks?
- The future impact of increasing initial costs for those entering the port trucking business will ultimately have economic consequences on the industry, as these regulations can and will lead to driver shortages as trucks will no longer be affordable.
- Consideration needs to be given to technology that exists for model engine years prior to 1994 that are being developed by a company named Cleaire Advanced Emission Controls www.cleaire.com.

We are committed to working to find attainable and sustainable solutions to emissions reductions and ask you take into consideration the potential effects on the overall industry before putting potentially damaging regulations in place. We hope to continue working towards a common goal.

Sincerely,

Alan Osofsky, Safety & Compliance Manager

ORIGINAL:
Copies:

Board Clerk
Executive Officer
Chair