

**Form Letter 1 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Rob  
Last Name: Goliti  
Email Address: robgoliti@earthlink.net  
Affiliation:

Subject: Port Drayage Rule  
Comment:

Please read attached letter  
Thank you

Attachment: [www.arb.ca.gov/lists/drayage07/13-arb\\_letter.doc](http://www.arb.ca.gov/lists/drayage07/13-arb_letter.doc)

Original File Name: ARB letter.doc

Date and Time Comment Was Submitted: 2007-11-27 10:38:26

## **Form Letter 2 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Dick

Last Name: Vogel

Email Address: commercetruck@earthlink.net

Affiliation: California Trucking Assoc

Subject: Proposed Port Drayage Regulations

Comment:

I am a local Sales Trucking co. operating in and around the ports and have been in business in Ca. for 15 years. I am a part of the California Trucking Assoc. which represents over 2,300 member companies who operate in and out of CA. As a business operating in CA we recognize the air quality issues facing all of us. I have concerns with the recently released regulatory proposal aimed at controlling the proposed regulations require all drayage trucks to be equipped with a 1994-2003 model year engine certified to CA of federal emissions standards and a level 3 VDECS for PM or 2004 or newer model year engines certified to CA and federal standards by December 31, 2009. Phase 2 creates even more burdensome requirements required trucks to meet or exceed 2007 model year engine standards by 12-31,2013. To date the CARB has yet to provide any information as to the overall potential cost associated with these changes, specially:

1. 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.
  2. The potential of excessive price increases levied on new model trucks.
  3. The impacts of forcing 2003 and older year model trucks out-what happens to the used truck market and those who purchase those trucks.
  4. 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.
- I am committed to working to find attainable and sustainable solutions to emissions reductions and ask you to take into consideration the potential effects on the overall industry before putting potentially damaging regulations in place.
- Sincerely, Dick Vogel Commerce Truck & Equip. Sales

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-11-27 12:46:12

## **Form Letter 3 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Anna  
Last Name: Cummins  
Email Address: cumminstransport@earthlink.net  
Affiliation:

Subject: New ARB rules and regulations  
Comment:

Cummins Transportation, Inc.  
7400 E. Slauson Ave.  
Commerce, CA 90040

November 27, 2007

RE: Proposed Port Drayage Truck Regulation

Dear ARB Board Member:

I am a local trucking company operating around the ports and have been in business in California for 31 years. Cummins Transportation 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 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.

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,

Anna M. Cummins  
CFO, Cummins Transportation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-11-27 13:25:58

**Form Letter 4 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Alain  
Last Name: Ambroziac  
Email Address: Alain@pcc.cc  
Affiliation:

Subject: ARB's Proposed Regulations on Port Trucks  
Comment:

Please see our attached letter re this proposed regulation.

Attachment: [www.arb.ca.gov/lists/drayage07/16-arb-alert-letter.doc](http://www.arb.ca.gov/lists/drayage07/16-arb-alert-letter.doc)

Original File Name: ARB-Alert-Letter.doc

Date and Time Comment Was Submitted: 2007-11-27 13:37:41

## **Form Letter 5 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: HECTOR

Last Name: CONTRERAS

Email Address: hectorc@contrerastrucking.com

Affiliation: California Trucking Association

Subject: RE: Proposed Port Drayage Truck Regulation

Comment:

November 20, 2007

RE: Proposed Port Drayage Truck Regulation

Dear ARB Board Member:

I am a local trucking company and have been in business in California for 9 years. Contreras Trucking Inc 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.

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- 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.

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,

Hector Contreras  
President, Contreras Trucking, Inc  
3055 Beyer Blvd. C-102, San Diego, CA. 92154  
hectorc@contrerastrucking.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-11-27 14:04:17

## **Form Letter 6 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Phil  
Last Name: Rankin  
Email Address: philr@mtnvly.com  
Affiliation:

Subject: Drayage 07  
Comment:

November 27, 2007

RE: Proposed Port Drayage Truck Regulation

Dear ARB Board Member:

I am a Manager at a local trucking company operating in and around the ports and have been in business in California for 30 years. Mountain Valley Express 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.

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- 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.

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,

Phil Rankin  
Northern Regional Manager  
1019 Bessemer Ave.  
Manteca, Ca. 95336

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-11-27 15:46:58

**Form Letter 7 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Mike

Last Name: Cook

Email Address: mcrmc@sbcglobal.net

Affiliation: CTA

Subject: ARB Proposal

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/drayage07/20-arb-alert-letter\\_11-26-08.doc](http://www.arb.ca.gov/lists/drayage07/20-arb-alert-letter_11-26-08.doc)

Original File Name: ARB-Alert-Letter 11-26-08.doc

Date and Time Comment Was Submitted: 2007-11-28 09:15:52

**Form Letter 8 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Randy  
Last Name: Caillier  
Email Address: rpcaillier@aol.com  
Affiliation: CTA

Subject: ARB Proposal  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/drayage07/21-arb-alert-letter-randy\\_11-28-07.doc](http://www.arb.ca.gov/lists/drayage07/21-arb-alert-letter-randy_11-28-07.doc)

Original File Name: ARB-Alert-Letter-Randy 11-28-07.doc

Date and Time Comment Was Submitted: 2007-11-28 09:18:03

**Form Letter 9 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Joseph  
Last Name: Caito  
Email Address: caitofsh@mcn.org  
Affiliation: Caito Fisheries Inc.

Subject: DRAYAGE07  
Comment:

letter attached

Attachment: [www.arb.ca.gov/lists/drayage07/22-arb-alert-letter.doc](http://www.arb.ca.gov/lists/drayage07/22-arb-alert-letter.doc)

Original File Name: ARB-Alert-Letter.doc

Date and Time Comment Was Submitted: 2007-11-28 09:27:34

**Form Letter 10 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Alan

Last Name: Osofsky

Email Address: Non-web submitted comment

Affiliation:

Subject: Rodgers Trucking Co.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/drayage07/23-07127com0001.pdf](http://www.arb.ca.gov/lists/drayage07/23-07127com0001.pdf)

Original File Name: 07127com0001.pdf

Date and Time Comment Was Submitted: 2007-11-28 14:33:54

## **Form Letter 11 for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

First Name: Robert  
Last Name: Alberti  
Email Address: RobertA@mtnvly.com  
Affiliation:

Subject: Port Trucks  
Comment:

November 20, 2007

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 31 years. Mountain Valley Express 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.

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- 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.

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,

Robert Alberti  
Dedicated Logistics Manager  
Mountain Valley Express  
Manteca, Ca

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-11-28 17:08:03

**Form Letter Log for Comment 6 for Drayage Port Trucks (drayage07) - 45 Day.**

There are 10 non-docket system comments associated with this item.