

TRUCK RULE TALKING POINTS

- Regulation is too costly as drafted. Changes are necessary to make rule flexible and reasonable, including low use exemptions, one-time replacements and incentives. **There is no one silver bullet, and ARB needs to take these suggestions as a whole.**
- Replacement of “low use” trucks is not cost effective and unreasonable. Solution: provide a stair-stepped, low use exemption as follows:

<i>Model Year-Engine</i>	<i>Mileage Exemption Threshold*</i>
Pre-1996	20,000
1996 – 2005	25,000
2005 and newer	30,000

- Don't require the trucks to be replaced “twice”. Solution: Use industry proposed timeline, which provides for later start, but same end date. Provides same reductions, but eliminates the double replacement.

<i>Engine Model-Years</i>	<i>Compliance Deadline, as of December 31</i>
Pre-1990	2011
1991-1994	2013
1995-1998	2015
1999-2004	2017
2005 and newer	2019

- Support “trade-down” concept. Let's pass down the high use later model trucks to replace the low use early model trucks. This is especially important when a later model truck is being replaced through the Carl Moyer Program and would otherwise have to be destroyed. This is not a fix-all, as this is not a viable option for some trucks, such as specialty-type trucks.
- Another alternative is a field and field to first point of processing exemption. Many specialized and low-use trucks would be covered by this approach, and make the regulation more reasonable.
- Support the use of incentives. Let's utilize the Carl Moyer Program, the Prop. 1B funds, etc. to help fund the replacements for trucks that wouldn't be replaced otherwise.
- ARB must consider the indirect costs, especially the costs to those who service our industry, who will be forced to pass along their cost to comply with this rule to us.