

MR. MILLER: Thank you.

2 Clayton Miller with the Construction Industry Air  
3 Quality coalition.

4 Bill Davis' group, the Southern California  
5 Contractors' Association, is a founding member of CIAQC.  
6 I think Bill did a good job of sharing the extent to which  
7 the construction industry is I guess exposed or need to  
8 comply with CARB regulations just by the numbers of  
9 vehicles and number of contractors in the state.

10 And, you know, our concern moving forward is that  
11 with all these fleets, there's a lot that contractors need  
12 to comply with. You mentioned six. The off-road  
13 regulation, of course, is going to be something that is  
14 going to have a huge effect on contractors. It's already  
15 something that folks need to comply with now in terms of  
16 registering the fleets through the DOORS program. That's  
17 an on-line program to, for the first time ever, share with  
18 CARB the equipment the contractors own.

19 Idling limitations are in place. There's sales  
20 notifications that whenever somebody sells a piece of  
21 equipment 25-horsepower or greater, they need to let the  
22 buyer know that CARB has a regulation that affects that  
23 equipment.

24 There's the prohibition of adding equipment now  
25 to fleets that -- no longer can anybody in California buy

1 a Tier 0 piece of equipment. They add it to their fleet;  
2 and also identification numbers. Those are things that  
3 people are becoming familiar with now.

4           Next year, 2010, large fleets will have for the  
5 first time the fleet averages emission levels that they  
6 need to comply with. Medium fleets later and then small  
7 fleets.

8           But I guess the point I'm trying to make is there  
9 is a lot of places where -- a lot of things the  
10 contractors are going to need to do to comply. And we at  
11 CIAQC and our members want to make sure that the policies  
12 that CARB follows in this Enforcement Program and how  
13 these various penalties get determined it's a fair,  
14 transparent method. That's why we've joined and are  
15 working with CERT.

16           And we think the administrative hearing process  
17 is something that works well and would like to see that  
18 possibly expanded to include these things as moving  
19 forward.

20           Contractors also own on-road trucks. CARB  
21 estimated one-fifth of all the affected vehicles could be  
22 in construction. So that's pretty significant. There's  
23 the portable equipment air toxic control measure that  
24 contractors need to comply with as well. So there's just  
25 a whole host of things, and we want to just encourage



1 moving forward in a positive way that benefits both air  
2 quality and benefit to those in the regulated community.

3           Thanks.