



Connecticut Construction Industries Association, Inc.

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To: Patricia Downes, and Tracy Babbidge, CT DEP
From: Faith Gavin Kuhn, Connecticut Construction Industries Association
Re: Comments on DEP's *Connecticut Clean Diesel Plan, Construction Equipment Report*
Date: December 12, 2005

The Connecticut Construction Industries Association (CCIA) appreciates the opportunity to comment on the *Connecticut Clean Diesel Plan, Construction Equipment Report*.

CCIA is an association of associations representing the many facets and disciplines of the construction industry. The membership includes general contractors, subcontractors, equipment and material suppliers, engineers, architect, consultants, and other professionals allied with the state's construction industry. CCIA is the largest statewide construction association in Connecticut, with nearly 500 members. It is the leading example in the country where all sectors of the industry are represented.

CCIA's eight stand alone divisions are: the Connecticut Road Builders Association, the Associated General Contractors of Connecticut, the Utility Contractors Association of Connecticut, Connecticut Ready-Mixed Concrete Association, Heavy and Highway Division, In-Plant Operators Association, the Equipment Dealers Division, and AGC/CCIA Building Contractors Labor Division of Connecticut, Inc. CCIA also administers the Connecticut Ironworkers Employers Association.

Specific Comments:

1. Implementation Options – Option 1 Expand and Enhance the CT Clean Air Construction Initiative

CCIA supports Option 1. In particular, the Association encourages the use of Contract Allowances to be set aside to cover the cost of retrofit equipment of the successful bidder. As the Contract Allowance option details, this option helps to level the playing field for smaller contractors since the funds for emission control equipment do not appear in the contract. CCIA also favors the provision to apply the Contract Allowance to subcontractors.

CCIA's support of Option 1 recognizes the expense to the construction industry, the contractor and subcontractor, and the project owner, when retrofit/emission control equipment is required. The grant programs in both California and Texas clearly indicate the astronomical costs associated with such diesel emissions reduction programs. In California, under the Carl Moyer program, funding was expected to increase in 2005 to \$140 million annually.



Texas, since 2001 more than \$120 million in grants for diesel retrofits, repowers, and equipment replacements have been awarded. The details of these two state grant programs, and the associated costs vs. benefits, are reviewed in depth in the ICF Report, dated May 2005, *Emission Reduction Incentives for Off-road Diesel Equipment Used in the Port and Construction Sectors*. This report was completed at the joint request of the US EPA and the Associated General Contractors of America; it was included in the CT Construction Subcommittee's diesel plan development submissions.

2. Implementation Options – Option 2 – Mandating Requirements for Emissions Control Technologies

CCIA opposes any mandatory requirements to retrofit (repower, replace) construction equipment. The costs associated with this option are prohibitive to the industry, and do not recognize that there is “no one-size fits all” solution to diesel emission reductions on construction equipment. The diversity of technologies and fuel requirements associated with diesel emission reductions is also detailed in the ICF Report, dated May 2005, *Emission Reduction Incentives for Off-road Diesel Equipment Used in the Port and Construction Sectors*. This report was completed at the joint request of the US EPA and the Associated General Contractors of America; it was included in the Construction Subcommittee's diesel plan development submissions.

3. Implementation Options – Option 3 Rental Equipment Retrofit/Replacement and Option 4 Voluntary Approaches

In an effort to reduce diesel emissions and recognize the substantial construction equipment rental market in Connecticut, CCIA supports DEP's Voluntary Approaches proposal for construction rental equipment. Options including waiving the property and sales taxes on rental construction equipment that has been retrofitted are attractive incentives. Incentive grants to cover retrofits (CARB/EPA verified) is also supported by CCIA. As option 4 points out, these financial incentives would assist fleet owners and encourage action by equipment rental companies that may not be easily reached through the contracting process.

Submitted by:
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