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**Comments on Proposed Rule: Fuel Requirements for Heavy Duty
Trade Waste Hauling Vehicles
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Clean Energy, the largest provider of natural gas for transportation in North America, supports this proposed rule change to add a new Chapter 51 to Title 15 of the Rules of the City of New York to require heavy duty trade waste hauling vehicles to operate using the best available retrofit technology (BART) per Local Law 38 of 2015. This change will do much to reduce the amount of particulate matter being emitted from heavy duty trade waste hauling vehicles.

That said, however, a further change is needed that will go a step further in not only reducing emissions, but also enhancing public safety and that is to place a ten-year eligibility cap on diesel trucks. Heavy duty trade waste hauling vehicles that have been in operation for over ten years should no longer be eligible for a BART upgrade. After ten years of wear and tear to a truck's brakes, tires, transmission, chassis, compaction body etc. it is no longer safe to be on the road; and no longer cost-efficient for an upgrade. An attempt to make vehicles ten years and older more energy efficient is a futile effort in energy efficiency and reducing carbon emissions. It should be mandated that once a diesel truck reaches this age, that it be replaced by a new truck already equipped with the cleanest available technology.

Thank you for the opportunity to comment on this proposed rule change.