

**Comment 1 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mike

Last Name: Patton

Email Address: mrpatton@capousd.org

Affiliation: 489-7365

Subject: rule 1191, 1196

Comment:

I understand you gave an extension to the private fleets for retrofits yet did not give the same consideration to public fleets. in an era of drastic revenue cuts the public fleets should be afforded the same consideration. I work for a Unified School district and the additional \$40,000 expense to achieve compliance is a burden.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-03 07:13:58

No Duplicates.

**Comment 2 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jim

Last Name: Bañuelos

Email Address: jimbanuelos@apcollc.com

Affiliation:

Subject: Comments to In-Use Heavy Duty Diesel Fueled Vehicles Regulation (truck and bus regulation)

Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/2-20101103\_signed\_truck\_and\_bus\_regulation\_form.pdf'

Original File Name: 20101103 Signed Truck and Bus Regulation form.pdf

Date and Time Comment Was Submitted: 2010-11-03 11:27:40

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 4 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Philip

Last Name: Blanthorne

Email Address: Philip\_Blanthorne@yahoo.com

Affiliation:

Subject: OFF-ROAD FLEET (AIRPLANES)

Comment:

Are commercial airlines included within the off-road fleet as many airlines dump excess fuel prior to landing and that fuel exist within the atmosphere? If California Air Resource Board is going to force compliance, it should be across all industries and affect all people equally as there should be no exceptions to the rules. The airline industry must be force to comply with the similar standards as other companies using gas powered equipment. Will CARB force the compliance even when it impacts politicians who will be required to pay additional monies along with excessive delays in traveling back and forth to Washington DC?

Thank you for your time. I would appreciate a response to my inquiry.

Regards,  
Philip Blanthorne

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-04 11:42:55

No Duplicates.

## **Comment 5 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Gary

Last Name: Williams

Email Address: gwilliams@cvwd.org

Affiliation: Caochella Valley Water District

Subject: Public Fleets

Comment:

The poor economy has affected Public Utilities in much the same way it has the private sector. We have had to slash our budgets, reduce our workforce, and raise rates just to keep operating and provide the necessary service to our customers. We don't have extra money laying around to retrofit or replace our diesel trucks and equipment. Any money spent on our fleet to comply with the emission regulations has to be passed on to our customers who are already feeling the affects of the down economy themselves. Public Fleets need to have the same considerations that the private sector is receiving in the regulation amendments. We need some breathing room as well. We have had to spend hundreds of thousands of dollars to date to remain compliant with the regulations and we still have much more to go with the current compliance schedule.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-08 07:40:38

No Duplicates.

**Comment 6 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Robert

Last Name: Kirschke

Email Address: bdkirschke@sbcglobal.net

Affiliation:

Subject: Inflated Carb data used in original model

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/6-kirschke.pdf'

Original File Name: Kirschke.pdf

Date and Time Comment Was Submitted: 2010-11-09 12:55:39

No Duplicates.

**Comment 7 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Tim

Last Name: Fortier

Email Address: Non-web submitted comment

Affiliation:

Subject: Policy Statement

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/7-cti.pdf'

Original File Name: CTI.pdf

Date and Time Comment Was Submitted: 2010-11-09 15:40:15

No Duplicates.

**Comment 8 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Clyde

Last Name: Stires

Email Address: cstires@ttruck.com

Affiliation:

Subject: Early PM Credits

Comment:

Message attached.

Thank you.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/8-early\_pm\_credit.doc'

Original File Name: Early PM credit.doc

Date and Time Comment Was Submitted: 2010-11-10 12:24:39

No Duplicates.

## **Comment 9 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: RICK

Last Name: TOMLINSON

Email Address: RTOMLINSON@CHEVRON.COM

Affiliation:

Subject: PM2.5

Comment:

My trust of CARB's ability to objectively present the facts regarding PM2.5 is waning rapidly.

Starting with cherry picking data to support loss of life due to PM2.5, it seems that upon being questioned about the data to support the mortality rate, the data changes. The answer depends on whether the subject is diesel PM2.5 or background PM2.5. CARB conveniently combines the data when it supports their desired end game. CARB has ignored studies that show PM2.5 has no effects on premature deaths.

So my suggestions:

1. Hire a 3rd party scientific consultant with verifiable credentials to review all existing PM2.5 data (within CA and other states) and make conclusions/recommendations. This person should be vetted through the public arena to ensure true objectiveness and competency.
2. Hire a economist similarly qualified as the 3rd party scientist above to give a true picture of the economic impact of PM2.5 regulations on the local/state economy should it be implemented.
3. CARB should openly and honestly answer questions regarding this legislation that is presented in local newspapers.

Currently the public's confidence in CARB's ability to objectively make decisions on its behalf regarding health issues is falling.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-15 09:00:41

No Duplicates.

## **Comment 10 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jeff

Last Name: Wood

Email Address: jwood@hawthornecat.com

Affiliation:

Subject: Early retrofit credits compliance efforts lost to light duty fleet

Comment:

Our organization made the mistake of trying to pay for compliance early. Our mistake was retrofitting early some of our important trucks that are below 26,001 GVWR. Then the rules were changed. We would like to ask the Staff to propose that a fleet be allowed to pair a heavy fleet truck over 26,000 GVWR with a early retrofitted light fleet truck below 26,001 GVWR for exemption until 2017 for at least the first year of BACT requirements in 2012 to allow relief so a fleet can benefit from its early compliance spending efforts. The economy is still very tough and this would help us and some other fleets through 2012.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-15 10:53:08

No Duplicates.

**Comment 11 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jeff

Last Name: Wood

Email Address: jwood@hawthornecat.com

Affiliation:

Subject: July 1 2011 early retrofit incentive

Comment:

Due to the uncertainty and constant changes of the diesel regulations many fleets are hesitant to spend money for early compliance. It would be a benefit to see the July 1st 2011 incentive be extended until the end of 2011 to help fleets determine whether or not the regulation will assume its current form. We have been penalized for our early efforts in the past. Please consider extending the July 1st 2011 early credit until the end of 2011 to help give fleets more time to decide whether or not to spend early retrofit \$.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-15 11:13:10

No Duplicates.

## **Comment 12 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltrucking.com

Affiliation: member, CDTOA, CTA

Subject: ON road rule modifications

Comment:

To the Board,

The proposed amendments are a valiant attempt to fix this broken rule. My company, as with many others, spent a great deal of capitol to upgrade our equipment knowing that the rule was coming into play. We would have continued to operate our older equipment if we knew that there would be more time to comply. Now we are being penalized for our early action. We will now have to add filters to our equipment that should be payed off and realizing some additional capitol recovery.

By giving the older equipment a longer period to comply CARB will be giving a competitive advantage to those people who did not do anything and continue to emit higher emissions. Where as the people ( me, us) who have taken early action, reduced emissions with cleaner equipment, have to suffer with lower rates that the non-compliant operators can survive on. These people have not spent any capitol, while the CARB makes their mind up on the rule.

I like many others did and are doing our part to clean the air. We would not have purchased equipment as the normal course of business. Especially now,then, in this horrible economic environment. We have struggled to make our payments, pay our payroll etc. We are the group who needs to be helped. We are the ones who risked our capitol/lively hood to bring cleaner air to the state.

I would like to see the rule stay the same as originally pasted by the board in 2009. This would keep the economics even for all involved.

Chris Torres  
F & L Farms Trucking Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-16 16:06:53

No Duplicates.

**Comment 13 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Katherine

Last Name: Fry

Email Address: kfry@sierrapine.com

Affiliation: SierraPine

Subject: LSI - Proposed Modifications - Comment

Comment:

I would like to propose the following change to the proposed LSI regulations. Make the definition of "Agricultural operations" consistent with that of the definition in the Off-Road Diesel Vehicles regulations by adding the following language to the definition:

"For forest operations, agricultural crop preparation services include milling, peeling, producing particleboard and medium density fiberboard, and producing woody landscape materials."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-18 14:32:37

No Duplicates.

**Comment 14 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jim

Last Name: Lyons

Email Address: jlyons@sierraresearch.com

Affiliation: Sierra Research

Subject: Comments on Truck and Bus Inventory

Comment:

Please find attached Sierra's Report "Review of CARB On-Road Heavy-Duty Diesel Emissions Inventory".

Attachment: 'www.arb.ca.gov/lists/on-offroad10/15-sierra\_report\_sr2010-11-01.pdf'

Original File Name: Sierra Report SR2010-11-01.pdf

Date and Time Comment Was Submitted: 2010-11-18 16:05:39

No Duplicates.

**Comment 15 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: John

Last Name: Yandell

Email Address: john@yandelltruckaway.com

Affiliation:

Subject: Re: GHG Regulation for December 16th hearing

Comment:

I would ask that the Board change the radius for 53' trailers and greater that is proposed in the GHG regulation. I would ask this change parallel the DOT standard that is a 150 mile radius and not as stated a 100 mile radius. Many carriers have excess trailing equipment meaning they have 3 trailers for 1 power unit. These "mobile" warehouse trailers sometimes move only two or three times a month. For a short haul/regional carrier, there is little or no payback on the aerodynamic devices. Please give this serious consideration. Thank you in advance for your help.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-19 10:46:54

No Duplicates.

## **Comment 16 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Henry

Last Name: Babich

Email Address: Babich@charter.net

Affiliation:

Subject: On Road Emission Amendments

Comment:

I dont think amendments should be made to the regulation at this point in time because companys that have already made the move to become compliant are the ones that will suffer the companys that have drug there feet will be rewarded by these amendments as far as the economy its already showing signs of inprovement and by the time these new amendments go into effect the economy will be well on its way to normal productivity so we need to keep the regulation in place as is. I believe if you amend the regulation you will only be hurting companys that have already moved to become compliant and at this point put them at a diadvantage to the companys that have not made a move to become compliant by allowing these noncompliant companys to run there junk at reduced operating cost due to fact they have minimal operating costs verses a company that has retrofited or replaced there units to become compliant and proactive, and by doing so increased there operating cost which they will need to recover in the form of higher rates making them less compeditive with there compeditors that are noncompliant and putting them at a disadvantage.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-23 21:43:43

No Duplicates.

## **Comment 17 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Brian

Last Name: Glidden

Email Address: bglidden@aesi-consulting.com

Affiliation:

Subject: Diesel Regulations - Personal Use As RV

Comment:

I own a 2003 Freightliner Speciality Vehicle that I purchased from an RV dealer for pulling my personal 5th Wheel RV trailer. It was sold as a 4 door heavy duty pickup with a single rear axle and GVWR of 31,000 lbs. This truck is labeled NOT FOR HIRE and is only used for personal use and not commercial use. My standard pickup truck was not able to safely haul my family and RV trailer so I upgraded to this truck 6+ years ago. I drive it 4 to 5,000 miles a year for RV purposes. It is like new with 32,000 miles. I have no other trucks and would be considered a single truck fleet by CARB as I understand it. To sell the truck or spend \$10,000 for DPF on seems extreme and very costly considering the economy and the fragilness of my job right now. Please reconsider the definition of personal use or a reasonable mileage exception, or RV use exception. The vehicle is built by Sportchassis Specialty Vehicles and is used to tow horses or heavy 5th wheel trailers. Thank you for your consideration. Brian Glidden

Attachment: 'www.arb.ca.gov/lists/on-offroad10/21-img\_2785.jpg'

Original File Name: IMG\_2785.JPG

Date and Time Comment Was Submitted: 2010-11-29 13:39:42

No Duplicates.

## **Comment 18 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Victoria

Last Name: Coots

Email Address: angandmon@comcast.net

Affiliation:

Subject: Disband CARB

Comment:

CARB's regulations which have so devastated the trucking industry were based on a discredited report by a "Dr." Hien Tran, a CARB researcher who mail ordered his PhD from a phony university. However, even when it was discovered that Hien Tran had falsified his qualifications, CARB refused to fire him and stood by his study - a study that now even CARB itself admits overestimated pollution by more than 300%. If you are waiting for CARB to apply its new proposed rule to itself, don't hold your breath.

THE GLOBAL WARMING AND AIR QUALITY CRUSADERS ARE A FRAUD, AND ARE KILLING OUR ECONOMY IN CALIFORNIA AND NATIONALLY. DISBAND CARB, AND RESTORE OUR ECONOMIC STABILITY.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-30 08:37:50

No Duplicates.

**Comment 19 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Bonnie

Last Name: Lowenthal

Email Address: Non-web submitted comment

Affiliation:

Subject: California Legislature

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/23-lowenthal.pdf'

Original File Name: Lowenthal.pdf

Date and Time Comment Was Submitted: 2010-12-02 11:54:01

No Duplicates.

**Comment 20 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: David

Last Name: Merk

Email Address: dmerk@portofsandiego.org

Affiliation:

Subject: Comments on Proposed Amendments to Diesel Truck Regulations

Comment:

Comments on Proposed Amendments to Diesel Truck Regulations

Attachment: 'www.arb.ca.gov/lists/on-offroad10/24-letter\_to\_arb\_from\_sdupd\_re\_comments\_on\_proposed\_amendments\_to\_diesel\_truck\_regulation.pdf'

Original File Name:

letter\_to\_ARB\_from\_SDUPD\_re\_comments\_on\_proposed\_amendments\_to\_diesel\_truck\_regulation.pdf

Date and Time Comment Was Submitted: 2010-12-02 14:02:38

No Duplicates.

**Comment 21 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mike

Last Name: Eng

Email Address: assemblymember.eng@assembly.ca.gov

Affiliation:

Subject: California Legislature

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/25-mikeeng.pdf'

Original File Name: MikeEng.pdf

Date and Time Comment Was Submitted: 2010-12-02 14:37:44

No Duplicates.

**Comment 22 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mel  
Last Name: Zeldin  
Email Address: melz@capcoa.org  
Affiliation: CAPCOA

Subject: CAPCOA Comments  
Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/26-12-3-10\_capcoa\_comment\_letter\_on\_diesel\_regs.pdf'

Original File Name: 12-3-10 CAPCOA Comment Letter on Diesel Regs.pdf

Date and Time Comment Was Submitted: 2010-12-03 09:08:08

No Duplicates.

## **Comment 23 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Anonymous  
Last Name: Anonymous  
Email Address: docket@arb.ca.gov  
Affiliation:

Subject: Truck/Bus  
Comment:

Hi, I received your email regarding the proposed changes to the drayage truck regulation. I am not in agreement with this new proposal. We spent many hours trying to figure out whether we should do a retrofit or if we should buy a newer truck and then it would be good until 2020. We ultimately ended up getting a newer truck and it is good until 2020. I think it's highly unfair to now change it after we have already made decisions and spent hours and hours trying figure out which would be the best decision to make. And now, somebody with a 2006 truck could possibly be driving it until 2020. No. You need to stick with what you said and everybody will be feeling a lot more secure with the decisions that they made. Otherwise you can reimburse the drivers for the extra money out of pocket they spent that was unnecessary, but I don't think you have the funding to do that. So, I disagree with the new proposal.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-03 15:41:46

No Duplicates.

**Comment 24 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Tim

Last Name: Pohle

Email Address: TPohle@airlines.org

Affiliation: Air Transport Association of America

Subject: ATA Comments on Proposed ORD Rule Changes

Comment:

Please see the attached comments from the Air Transport Association concerning ARB's proposed amendments to the Off-Road Diesel (ORD) Rule.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/28-2010-12-06\_ata\_comments\_re\_proposed\_ord\_rule\_changes.pdf'

Original File Name: 2010-12-06 ATA Comments re Proposed ORD Rule Changes.pdf

Date and Time Comment Was Submitted: 2010-12-06 15:08:58

No Duplicates.

**Comment 25 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Shaun

Last Name: Ryker

Email Address: sryker@primeinc.com

Affiliation:

Subject: Drayage Truck Regulation

Comment:

The current format for large companies to register there tractors in a group is through an XML upload. We looked at the cost to get an XML upload through our system and it was estimated between \$10,000 - \$14,000. We dont mind to register our tractors, but I would like to see a system that is easier for uploading. I suggest an Excel upload. Most large companies use excel to track their equipment and several states we do business with already use Excel for uploading. Thank you for your consideration. Please contact me if you have any further questions.  
Shaun 417-521-3140

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 08:40:27

No Duplicates.

## **Comment 26 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Dwayne

Last Name: Fosseen

Email Address: fosseen@mirenc.com

Affiliation: 800-423-9903

Subject: diesel combustion tuning

Comment:

We have found it is possible to maintain engine combustion over an entire engine life. This eliminates unwanted diesel fuel producing increasing emissions as an engine ages. We have found Caterpillar dealers learning how to measure combustion as a diagnostic tool and then tuning the diesel engine for maximum fuel savings. This results in vehicle owner savings and the Caterpillar professional service centers are taking the engine combustion responsibility same as a aircraft mechanic signing of an airworthy engine log. Check out the Whayne Supply CAT link for information about the Mirenc products and service through CAT Dealers. I would encourage you to check is the large "Mirenc" tile in the center of the Whaye Supply home page ([www.whayne.com](http://www.whayne.com)). It will explain much of the Mirenc process

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 15:21:49

No Duplicates.

**Comment 27 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Wayne

Last Name: Bengston

Email Address: waynebengston@hotmail.com

Affiliation:

Subject: Against more regulation

Comment:

To whom it may concern,

I am against any further pollution regulation at this time. As long as businesses are leaving in droves and unemployment is so high, we need to stop increasing costs on businesses.

Best regards,  
Wayne Bengston  
Cordelia, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 15:38:11

No Duplicates.

**Comment 28 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: James

Last Name: Thomas

Email Address: james.thomas@nabors.com

Affiliation: Nabors Well Services Co

Subject: Proposed Amendments to the Truck and Bus Regulation

Comment:

Please see attached comment letter regarding Proposed Amendments to the Truck and Bus Regulation.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/32-on-road\_reg\_comments.pdf'

Original File Name: On-Road Reg Comments.pdf

Date and Time Comment Was Submitted: 2010-12-08 13:40:21

No Duplicates.

**Comment 29 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Tina

Last Name: Olivari

Email Address: tolivari@netzero.com

Affiliation:

Subject: Public Hearing for Proposed Amendments to the 1) Truck & Bus, Drayage Truck, and Tractor-T

Comment:

Please amend this regulation so that it does not effect any vehicles purchased before the law was put into place. I own a small landscaping business with one truck bought new in 2006 and because of the economy I can't afford the retro fit nor can I purchase another vehicles that meets the current standard. I feel like I am being penalized for something that I have no control over.

Kindest regards,

Tina Olivari

Luna Custom Landscaping

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-08 13:32:27

No Duplicates.

**Comment 30 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: James

Last Name: Thomas

Email Address: james.thomas@nabors.com

Affiliation: Nabors Well Services Co

Subject: Proposed Amendments to the In-Use Off-Road Regulations

Comment:

Please see the attached comment letter regarding the Proposed Amendments to the In-Use Off-Road Diesel-Fueled Regulation

Attachment: 'www.arb.ca.gov/lists/on-offroad10/34-off-road\_amendments.pdf'

Original File Name: Off-Road Amendments.pdf

Date and Time Comment Was Submitted: 2010-12-08 13:50:28

No Duplicates.

**Comment 31 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: David

Last Name: Williamson

Email Address: drwtrk2004@yahoo.com

Affiliation:

Subject: Particulate Matter

Comment:

I am astonished that nobody @ your board or scaqmd is able to figure out and convey to the public that the reason the inland empire has poor air quality and high amounts of particulate matter is because of the hydrologic cycle, you need to explain this to the public. They are under the impression that they have more trucks than south bay and the los angeles area and thats why the poorer air quality. if you need more detail about this please write back

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-08 18:46:41

No Duplicates.

**Comment 32 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jacque

Last Name: Holub

Email Address: holub1@msn.com

Affiliation:

Subject: diesel regulations

Comment:

I do not understand how a government for the people could impose job killing regulations on their own public based on phony statistics by a phony scientist. This agency is part of what has made California a laughing stock to the rest of the States.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-08 23:35:53

No Duplicates.

## **Comment 33 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Erik

Last Name: K

Email Address: sonicescape@gmail.com

Affiliation:

Subject: Diesel Regulations Killing Jobs

Comment:

Just another Californian against the restrictive regulations you are trying to push through, which will force small trucking companies out of business and also drive up the costs of ALL goods statewide. Please take a moment to remember logic, and your responsibility to VOTERS like me to keep California a place where people will want to live, not where they will continue to flee from due to government regulation.

AB32 needs to be repealed - at least until our state can get on its economic feet again. Until then, diesel regulations like the ones you're trying to force on California will continue to drive business elsewhere and will keep our state under the water. Thanks for listening. Please also consider doing.

-Erik

Martinez, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-08 23:59:30

No Duplicates.

**Comment 34 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kay

Last Name: Graves

Email Address: kgraves@com-pair.net

Affiliation: American

Subject: STOP Cap and Trade and Diesel Proposal!!!

Comment:

YOU ARE KILLING CALIFORNIA!

Unless killing off what little economy left in California is your intention; Stop Cap and Trade and stop your diesel proposal.

Look at who is leaving California: businesses, the tax base providers, the people that manage to sell their homes and leave. Look at who is coming to California: illegal aliens and the welfare class.

Good luck draining every last penny from the people who cannot escape.

From a fourth generation Californian that is going to leave this state the first chance they get.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 08:57:51

No Duplicates.

**Comment 35 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Alan

Last Name: Kellogg

Email Address: alankellogg@cox.net

Affiliation:

Subject: New Diesel regulation

Comment:

I am against any new regulations on the diesel transportation industry. In this time of economic crisis, any new regulations are just not warranted. Additionally, Your studies appear to be flawed. Please do not pass any new laws.

Alan Kellogg

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 09:16:50

No Duplicates.

**Comment 36 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Donald

Last Name: Jerome

Email Address: don\_and\_shon@hotmail.com

Affiliation: American Patriot

Subject: Al Gore sychophants are hard at work...

Comment:

Given the hugely overstated estimates regarding CA & global polutions data only a moron or a self serving piece of crap would support AB32. OBVIOUSLY, as the shipping cost of virtually everything we touch,wear, and eat goes up our cost of living goes up and more middle and lower class peoples will suffer greater poverty.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 09:20:20

No Duplicates.

## **Comment 37 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ken

Last Name: Travers

Email Address: kendtravers@aol.com

Affiliation:

Subject: NO to the Fraudulent Job-Killing

Comment:

The unelected and unaccountable bureaucrats at the California Air Resources Board have announced their intentions to consider backing away from economically devastating diesel regulations that were based on the flawed findings of a researcher with a phony PhD. If the diesel regulations are implemented as currently designed, small trucking companies will go out of business because they cannot afford to make costly retrofits that could sock them with tens of thousands or even hundreds of thousands in new costs. The diesel regulations are aimed at truckers and operators of heavy machinery but their costs will hit all of us with more expensive prices on everything brought to us in a truck - that is to say, nearly everything. Housing prices furthermore will be affected as construction will become more costly. All of this from a regulation based on fraud: "Dr." Hien Tran, the researcher with the phony PhD, was not fired and CARB did not abandon his study until now as the study has been exposed for overestimating pollution by a whopping 300%.

After negative publicity attached to killing jobs and raising the price of consumer goods based on a bogus study, CARB is considering taking a step in the right direction and not moving forward with this particular regulation right now. Radical environmentalists are planning to show up in force to demand CARB implement the draconian diesel regulation regardless of their lack of scientific credibility and staggering costs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 09:33:32

No Duplicates.

**Comment 38 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: rudy

Last Name: marin

Email Address: wildcatmarin@hotmail.com

Affiliation:

Subject: diesel engines requirements

Comment:

I'm a one truck owner operator that the new regulations could probably put me out of business,so I'm hoping for a change or postponement on the rules, and like me there's thousands of small fleets owner operators that will be out of business

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 10:01:10

No Duplicates.

**Comment 39 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Scott

Last Name: Chatten

Email Address: schatten1@verizon.net

Affiliation:

Subject: CARB regulations

Comment:

I work in the trucking industry and our industry has been making great strides. The new regulations that are based on bogus information are putting small trucking companies out of business in droves. There needs to be resolution and these people back to work. The transportation industry is one of the leading industries in this state. These people that are appointed to this board need to be let go. What these people did is no different than those thieves in Bell. You need to stand up, be a man, and do the right thing

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 10:43:52

No Duplicates.

## **Comment 40 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kevin

Last Name: Brunnemer

Email Address: FoothillRM@aol.com

Affiliation:

Subject: Diesel Trucks

Comment:

We are a small Ready Mix Concrete firm (11 trucks) in the Northern Sacramento Valley. Because of the nature of our business, the nature of people in Construction and the weather, we need a lot of trucks for a short period of time each day.

In the Heat of the Summer, people want to pour concrete in the 6am-10am range. Ambient air temperature is detrimental to placing and finishing of concrete. It also adversely affects the people who do the work. Likewise in Winter, with cold temperatures and slower set times, concrete must be poured early in order to prevent concrete people from working into the night on overtime. While we have 10 mixer trucks, it is generally safe to say that 70% of them are parked after about 4 hours use per day. In this current economy, it is rare that all 10 are used at all on any given day. Since they are seldom used, they are older trucks. A new Mixer Truck costs approximately \$130,000, you simply can't run newer equipment with such little use, it's a financial no-brainer.

Over the past 3 years, our Diesel purchases have dropped from approximately 36,000 gallons in 2006 to 33,283 in 2008 and 31,805 in 2009. The Construction Industry meltdown has already achieved the goals set by AB 32.

Also, given the Housing Industry collapse and the Banking meltdown, I have no idea how we can comply with your regulations. I have no idea how we can borrow the money necessary to upgrade our fleet, who we could borrow it from or how we would be able to pay the money back. There are grants (none available) guaranteed loans but only for Interstate freeway corridors that we do not use.

I respectfully urge CARB to re-think their actions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 10:43:47

No Duplicates.

**Comment 41 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: john

Last Name: ballesteros

Email Address: john.ballesteros@sbcglobal.net

Affiliation:

Subject: AB 32

Comment:

I respectfully request the the Board to REJECT any amendment that jeopardizes the ability to retain transportation jobs in within the state.

While I understand the intent of the environmental special interest groups, I believe their tenets are extreme and not business nor job friendly thus reducing the number of potential employers to other states and thereby losing potential tax revenues to the general fund.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 11:19:32

No Duplicates.

**Comment 42 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jim

Last Name: Griffith

Email Address: jimgriffith@suddenlinkmail.com

Affiliation:

Subject: AB 32

Comment:

Abolish the CARB. Everything they have done is wrong. And it appears everything they will do in the future will be wrong. Before the destroy countless jobs, and price us out of existence. Abolish the CARB before it is too late.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 12:15:29

No Duplicates.

**Comment 43 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Brian

Last Name: Hulz

Email Address: bigbrithecarguy@aol.com

Affiliation:

Subject: ease of diesel restrictions

Comment:

Based on the improperly done study by Dr. Tran, I believe it is truly in your best interest to back off the restrictions until a new study can be conducted and affirmed by a seperate (non CARB) affiliated source.

Your policies are going to cost CA dearly and I would hope that you take a closer look at what our trying to do. Why I fundementally agree with the green concept, I truly believe that slowing the implementation to rate that is more in line with the rest of the United States we benifit all Californians.

If you push ahead with all the plans you have, you could see the whole fail because CARB acted too quickly. You don't want to cut off your nose to spite yur face do you?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 12:37:01

No Duplicates.

**Comment 44 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Gary

Last Name: Pay

Email Address: barkerranch@vcweb.org

Affiliation:

Subject: Please stop

Comment:

You are working off of information provided by a bogus "expert"  
Please just stop. You are killing California.  
Gary Pay

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 13:18:18

No Duplicates.

## **Comment 45 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kay

Last Name: Durkee

Email Address: kateea@bigfoot.com

Affiliation:

Subject: Diesel Fuel legislation

Comment:

Once again, the extreme environmentalists are trying to control our lives. Not only do they frequently lie, they misuse statistics by respectable scientists or else ignore some statistics, altogether. Increasing the tax and/or limiting the use of diesel fuel for truckers and other transportation methods will be a hardship for farmers, truckers, and us, the common citizen. We will be forced to pay more for farm products and trucking of food and other materials. The consumer will be forced to pay higher prices for a more limited supply of food and other products.

I am tired of our lives and livelihoods being controlled by the extreme environmental folks. such limitations are based upon faulty and misinterpreted statistics. Governments support this nonsense from unqualified non-scientists in order to tax and fine citizens - make more money at citizens expense.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 14:11:38

No Duplicates.

**Comment 46 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: George

Last Name: Fleming

Email Address: gtfjr@ranchomurieta.org

Affiliation:

Subject: job killing regulations

Comment:

DUMP THE JOB KILLING DIESEL REGULATIONS NOW!!!!!! I SAY AGAIN, VOTE  
NO ON THE DIESEL REGS,!!!! G.T.Fleming, Rancho Murieta Ca,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 15:09:33

No Duplicates.

**Comment 47 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Richard

Last Name: Coyle

Email Address: rcoyle@devineintermodal.com

Affiliation: Trucking Company

Subject: Pls do NOT modify all components of drayage trk regulation!!

Comment:

Please read in advance of next week's board meeting. We do not support modifying all aspects of the drayage truck rule, letter attached.

We support closing the "dray off" and Class 7 loopholes, but do not wish to see any modification to the reg mandating 2007 engines by 2014.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/54-carb\_letter.docx'

Original File Name: CARB Letter.docx

Date and Time Comment Was Submitted: 2010-12-09 15:27:51

No Duplicates.

**Comment 48 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Carl

Last Name: Dolk

Email Address: cdolk@devineintermodal.com

Affiliation: Devine Intermodal

Subject: Amendments to Drayage Truck Regulation

Comment:

Please see attached letter for the Board meeting scheduled for December 16-17, 2010

Attachment: 'www.arb.ca.gov/lists/on-offroad10/55-arb\_letter.pdf'

Original File Name: ARB Letter.pdf

Date and Time Comment Was Submitted: 2010-12-09 15:26:56

No Duplicates.

**Comment 49 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Barbara  
Last Name: Samardich  
Email Address: asbs@sierraemail.com  
Affiliation:

Subject: AB32  
Comment:

If this is enacted with all of the new regulations regarding diesel fueled farm equipment and trucks, will the last person leaving this state please turn out the lights. Good God! Where has common sense gone?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 16:28:50

No Duplicates.

## **Comment 50 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ann

Last Name: Laman

Email Address: aelaman@aol.com

Affiliation:

Subject: New Regulations on emissions

Comment:

California is in decline because it is over taxed and over regulated. Businesses are fleeing the state so they can do business without all of this. Putting more stringent fuel standards on Trucks, Buses, etc. will just cause all products we depend on to rise in cost and some will not be available. It is time to eliminate the ethanol in gas that decreases gas mileage and hurts the cost of food because of all the corn it takes to produce it. It takes more energy to produce ethanol than it saves and does nothing to clean the air but makes the gas mileage decrease. There have been too many of these quick fixes that do not accomplish what they were intended but have far too many unintended consequences. What may sound like a good idea needs to be given far more attention than passing another "feel good" rule that becomes a bad one once it is realized what it causes.

In this financial climate - STOP!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 16:53:21

No Duplicates.

**Comment 51 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Heidi

Last Name: Napier

Email Address: heidi.napier@gmail.com

Affiliation:

Subject: Diesel engine regulations

Comment:

Stop your plans to impose further regulations on diesel engines. These new regs will cost us all money and devastate the trucking and ag industries. They are based on phony research by phony Hien Tran, and you all know it.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 17:03:24

No Duplicates.

## **Comment 52 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Pam

Last Name: Pinkston

Email Address: pampink@pacbell.net

Affiliation: Concerned Citizen

Subject: Diesel Regulations

Comment:

The original report upon which you base your proposed regulations was later exposed to be written by a total fraud who received his PhD by mail order. Isn't that enough reason to completely throw out his recommendations? These draconian regulations are killing the farmers and truckers---the backbone of our economy. Where will you go for the eggs once you've killed the Golden Goose? This is insanity! DO NOT GIVE IN TO THE ENVIRONMENTAL EXTREMISTS---CALIFORNIA'S ECONOMY ISN'T EVEN ON THEIR LIST OF CONCERNS! YOU MUST STAND AGAINST THEM ON BEHALF OF THE PEOPLE OF THE STATE OF CALIFORNIA, I IMPORE YOU!!!!!!!!!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 17:12:54

No Duplicates.

**Comment 53 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: kc

Last Name: earnshaw

Email Address: kcrockz@aol.com

Affiliation:

Subject: new diesel laws

Comment:

My entire lifes monetary worth are tied up in my trucks and business. If the new laws take effect it would litterally shut are small business. I'm a law abiding, tax paying and even drive a Prius. Please reconsider the small businesses and are struggle to survive in this miserable economy. My trucks are smoke tested and they pass with flying colors. However their age make them vulnerable under the new proposed regulations. We certainly care about the air quality. Please have heart and keep this little guy in mind. KC Earnshaw

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 17:55:09

No Duplicates.

**Comment 54 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Myrtle  
Last Name: Findley  
Email Address: mbfrwf@aol.com  
Affiliation:

Subject: carb  
Comment:

Please dump the strict regulations, they will kill my small business!!!!!!!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 20:06:06

No Duplicates.

**Comment 55 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Robert  
Last Name: Dietrich  
Email Address: robertdietrich2000@earthlink.net  
Affiliation:

Subject: Diesel regs  
Comment:

These are unnecessary and job killers!!! VOTE NO!!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 21:12:51

No Duplicates.

**Comment 56 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Sandra

Last Name: Finch

Email Address: Sandra@sandrafinch.com

Affiliation:

Subject: Deisel Regulations

Comment:

I can't believe you would even consider new regulations on diesel fuel that will put independent Truckers and Small Trucking Companies out of business. How can you justify an action of this magnitude that will create a domino effect on commodities, cost of goods and freight. I understand that you are basing your actions on fraudulent data from a bogus reseacher who purchased a false degree documenting him as a PHD.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 06:37:16

No Duplicates.

**Comment 57 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Susan  
Last Name: Stalzer, MD  
Email Address: smaries@cox.net  
Affiliation: none

Subject: diesel fuel rules  
Comment:

I happen to have an MD from an Ivy League school, namely Cornell University. As someone with a REAL education, I can't believe you guys are going to help further destroy the states economy by giving credence to a bogus "study" by a fake PhD. People are hurting in this state. We don't need the prices of everything to go up due to your destruction of the trucking industry. Your stupid regulations will put mom and pop type truckers out of business, leaving us to deal with the big companies only. How will that help California? Please do the right thing and leave the trucking industry alone.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 08:20:26

No Duplicates.

**Comment 58 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: David

Last Name: Vonasek

Email Address: [dvonasek@foothill.net](mailto:dvonasek@foothill.net)

Affiliation:

Subject: Diesel Regulations

Comment:

While we all want clean air, destroying our already unsound economy based upon faulty data is ludicrous.

Basing decisions upon the rantings of "Dr." Hien Tran who mail ordered his PhD and overestimated pollution by 300% is so absurd that even the far-left San Francisco Chronicle disagrees.

Please stop this madness and give California a chance to once again be the economic land of golden opportunity it once was before it's too late.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 10:09:30

No Duplicates.

## **Comment 59 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Dan

Last Name: Scanlan

Email Address: dscanlan@autoreturn.com

Affiliation: AutoReturn-SF Municipal Tow co.

Subject: diesel truck emissions regulations

Comment:

I would like to weigh in on this topic as my position and experience in the towing and automotive industry provides perspective on the prior, current, and future ramifications of the proposed regulations. As one of the founders of AutoReturn, the current contract holder for all of the municipal towing in San Francisco I am aware of the (additional) costs the proposed regulations will have. However I grew up in the towing and automotive repair business (in SF CA), and witnessed first hand the effects of similar regulations as they were applied to passenger cars. Back in the 60's and 70's I was strongly against the emission regulations. Their initial affect hurt performance and economy, and raised the cost of purchase, maintenance and repair of cars. However it did not appear to be a battle that could be won, and I became an automotive technician, and obtained a license to perform smog checks. During the 80s and especially the 90s, things changed. With the technology that was developed, cars regained lost performance and fuel economy. While many older cars are remembered fondly for their style, anyone with automotive knowledge will agree that modern automobiles perform far better in every respect, while emitting a small fraction of what pre 70s cars did. For those in the know the hot tip is to put modern drivelines in vintage cars for the best of both worlds.

I am still no fan on CARB; it is an inefficient organization that can be inflexible to creative solutions that are not vetted by their approved processes. However I do support the proposed truck and diesel engine emissions regulations. Unfortunately I am in the minority with my opinion within my industry. Yes there will be some increased costs initially, but if history repeats itself as so often is the case; the long term benefits will show that these regulations like those imposed decades ago for passenger cars were the driving force for the needed change. My mind was changed witnessing the improvements to automobiles through the years.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 10:39:35

No Duplicates.



**Comment 60 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Cindy

Last Name: Stratton

Email Address: world.trek@hotmail.com

Affiliation:

Subject: proposed diesel amendments

Comment:

Please do not cave in to the environmental extremists and vote NO on proposed amendments regarding diesel fuel. Harm has been grossly exaggerated, and businesses with the jobs they create are more important.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 13:45:06

No Duplicates.

**Comment 61 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ed

Last Name: Bruno

Email Address: ed@ednictowing.com

Affiliation: Manager

Subject: On Road Truck & Bus amendments

Comment:

With the economy the way it is, I hope considerations can take place for extensions and revisions. I have children and would never want to jeopardize their health and well being. But with the additional expense of new emission equipped diesel trucks and the fact that it must be purchased relatively new with this equipment has just made it impossible under our current business environment. I only hope that ARB realizes what this is doing to small business owners. I am in favor of all amendments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 14:27:22

No Duplicates.

## **Comment 62 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ralph

Last Name: Bishop

Email Address: westlime@bak.rr.com

Affiliation: Western Lime, Inc.

Subject: VIP Program Regulation about Purchased Truck

Comment:

My company participated in the VIP program and received funds for turning in a 1993 truck towards the purchase of a 2009 truck. We would like CARB to review the requirement that the purchased truck cannot enter the ports in California for 3 years from date of purchase. This rule (requirement) does not seem appropriate for the cause. Afterall, what was accomplished is that an old truck was removed from the California Highways, which contributes to cleaner air in California. We were only made aware of this requirement when the deal was 99% completed and we were signing the final paperwork. We are not a large company. We only have 4 trucks (now). We occasionally go into the port of Stockton, and we need the flexibility of all of our trucks to be able to go into the port of Stockton to get our back haul on occasions. We ended up having to buy 2 2009 trucks so that we could still have 3 trucks on the road that can enter the port of Stockton. The VIP truck (as we call it) has been sitting in our yard since late January of this year when we purchased it through the VIP program. There should be at a minimum exceptions to this rule in a case like ours where this created a financial hardship in that we have a truck in our small fleet that cannot participate in our main route which is from Bakersfield to Stockton and back to Bakersfield.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 18:09:01

No Duplicates.

**Comment 63 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Cheryl

Last Name: Ritchie

Email Address: midwife@frontiernet.net

Affiliation:

Subject: Poposed Amendments

Comment:

RE: Proposed amendments 1) Truck & Bus, Drayage Truck, and Tractor-Trailor GHG and 2) Off-Road Diesel Fueled Fleets and Large Spark Ignition Engine Fleet Requirements

Please do not enact further restrictions on the diesel fuel. The enforcement of these new proposals will affect the weak job sector, and we cannot afford any more taxes.

It has been discussed that their is faulty data used in making the proposals. Please review all references before you make a decision. Please decline both amendments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-11 10:03:33

No Duplicates.

**Comment 64 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Warren

Last Name: Skinner

Email Address: fatherbill@sbcglobal.net

Affiliation:

Subject: proposed changes in diesel fuels usage.

Comment:

During the last energy crisis you put many independant truckers out of buisness--now you want to destroy: jobs, the trucking industry, the farm industry, highway construction firms.

Back off we cannot do this until our economy is back to normal.

Warren W. Skinner.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-11 11:01:00

No Duplicates.

**Comment 65 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 66 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Patricia

Last Name: McDonald

Email Address: [pjm47@sbcglobal.net](mailto:pjm47@sbcglobal.net)

Affiliation:

Subject: Construction trucking and retrofits

Comment:

As a small business owner, I want to protest the onerous regulations that are being proposed for trucks in the construction industry.

Our industry in particular is such that we stay fairly close to home - usually within a 50 or 100 mile radius. We contribute very little to any supposed "negative diesel" particulate effect.

Our industry is so suppressed now, due to the economic recession we are experiencing, that I am barely able to draw a paycheck, let alone have the funds to either retrofit my not-very new (1998) truck OR to buy a newer one. To do either of those things requires capital that can be recouped by working. There is little to no work, and the rates because of it are absolutely pathetic.

Unless there is a huge change in our economy, the enforcement of the regulations I have heard are proposed will put me out of business - I become just another statistic.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-12 13:53:22

No Duplicates.

## **Comment 67 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ruben

Last Name: Ayala

Email Address: tippystow@sbcglobal.net

Affiliation:

Subject: Requirements for Diesel engines

Comment:

First of all, let me say that the workers from the transportation industry are not evil. Contrary to popular belief, we do not want to destroy the planet. If you can find a way to gradually phase in new standards that would not force us out of business, we would be willing to comply.

You may think that the current proposed requirements are just that, but they are not. How can they be, when the findings you presented were based on a false study. Why don't we start by conducting a real study with real numbers, in our area.

I think that changes in the design and performance of diesel engines should be incorporated at the manufacturing level. I, as a business man, understand that as technology changes and new products become available, I may have to pay a little extra when purchasing something new.

What you guys want to do is change the standards, making our current fleet non compliant. This forces us to spend money on our existing fleet to comply, or buy new equipment to replace a unit that is a productive part of our business. I do not have to explain that these are tough economic times, and these standards will force people out of business. Any good business owner will upgrade their fleet, over time, when it is necessary. We would voluntarily upgrade our fleet to current standards as we gradually phase out the older units. All of the units we purchased in the past, met the guidelines and standards set during the time of purchase.

I always thought that my biggest competition in business would come from other companies in my industry. I never thought that my government would be my biggest competitor, killing me with taxes, standards and requirements.

Thank you for your time.

Ruben Ayala

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-13 08:36:58

No Duplicates.



**Comment 68 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: glenn

Last Name: tucker

Email Address: movaltow@aol.com

Affiliation: ctt

Subject: deisel smog

Comment:

how can we be made to install smog equipment the the manafecure was not required to install??? just like our cars we should be required to maintain them to the stanard for the year they were produced. smog test are ok. i have talked to 3 major companys that will be leaving ca. if this laws pass. we will be puting more companys out of bussines and people out of work!!!!!!!!!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-13 09:57:22

No Duplicates.

**Comment 69 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 70 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Andy

Last Name: Recalde

Email Address: arecalde@donchapin.com

Affiliation: Don Chapin Co. Inc.

Subject: Low mileage vocational trucks

Comment:

I ask that you seriously take into consideration the fact that not all trucks are created equal.

Our diverse fleet of construction (Vocational) trucks experience very low use compared to those drive all day long or even around the clock. The vocational trucks I am referring to usually drive from our office/yard to job sites within a 50 mile radius and are parked on the job all day with the engine off. These specialized trucks are essential to our operation and can last more than 20 years due to the low mileage they are driven. Many of these specialized trucks are equipped with bodies or attachments that are very expensive to transfer to a new replacement chassis which adds to the total replacement cost that your staff does not understand. Trucks that are equipped with just a fifth wheel hitch are very economical to replace, unfortunately we only have one of these trucks.

We simply can not afford to replace or even retrofit our trucks unless business improves drastically before we are faced with compliance deadline.

Please call if you have any questions.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/80-mechanics\_truck.jpg'

Original File Name: mechanics truck.JPG

Date and Time Comment Was Submitted: 2010-12-13 13:20:39

No Duplicates.

**Comment 71 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Anthony  
Last Name: Fournier  
Email Address: afournier@baaqmd.gov  
Affiliation: BAAQMD

Subject: BAAQMD Comments on the proposed amendments to the on-road and off-road regulations

Comment:

See the attached comment letter

Attachment: 'www.arb.ca.gov/lists/on-offroad10/81-baaqmd\_letter\_to\_carb\_on\_offroad.pdf'

Original File Name: BAAQMD Letter to CARB\_On&OffRoad.pdf

Date and Time Comment Was Submitted: 2010-12-13 14:44:03

No Duplicates.

**Comment 72 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Huber

Email Address: michael.huber@navy.mil

Affiliation: U.S. Department of Defense

Subject: DoD Comments on In-Use Off-Road Diesel Rule 13Dec10

Comment:

Attached are DoD's comments on the In-Use Off-Road Diesel Rule

Attachment: 'www.arb.ca.gov/lists/on-offroad10/82-037\_dod\_in-use\_off-road\_diesel\_ltr\_13dec10.pdf'

Original File Name: 037 DoD In-Use Off-Road Diesel ltr 13Dec10.PDF

Date and Time Comment Was Submitted: 2010-12-13 16:35:10

No Duplicates.

**Comment 73 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Charles

Last Name: Rea

Email Address: crea@calcima.org

Affiliation: CalCIMA

Subject: Truck & Bus

Comment:

Attached are CalcIMA's comments re proposed amendments to the Truck & Bus (On-road) diesel regulation.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/83-calcima.onroadltr.pdf'

Original File Name: CalCIMA.OnRoadLtr.pdf

Date and Time Comment Was Submitted: 2010-12-13 16:38:34

No Duplicates.

**Comment 74 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Leslie

Last Name: Chayo

Email Address: chayolaw@aol.com

Affiliation: 310-277-6337

Subject: Law Offices of Leslie E. Chayo

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/84-leslieechayo.pdf'

Original File Name: LeslieEChayo.pdf

Date and Time Comment Was Submitted: 2010-12-13 16:49:47

No Duplicates.

## **Comment 75 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Myles

Last Name: Anderson

Email Address: myles@andersonlogging.com

Affiliation:

Subject: On Road Rule Ammendments

Comment:

12/13/10

California Air Resources Board P.O. Box 2815 Sacramento, CA  
95812-2815

RE: Proposed Amendments to the Truck and Bus Rule

I would like to thank the Staff of CARB for working hard for some very helpful amendments to the rule, they will greatly help rural operations and Log Truck Companies achieve compliance. Even with the proposed amendments this rule will dramatically impact employment in rural California. There simply is not the money available for the updates even with the amendments in this rule, for rural operations to continue with seasonal constraints as they have for multiple generations. These companies have provided jobs in rural California for generations and today these same areas are listed in the top ten cleanest air districts in the Country.

Even though these districts are ranked high nationally for clean air, businesses within them will suffer greater impacts and higher costs to comply when compared with companies operating in San Joaquin and South Coast air basins. The inequity in this regulation is due to seasonality of operation and access to public funding. A majority of the trucks operating in rural California are pre 1994 mechanical engines; no current filter will bring them into compliance. These trucks are still being utilized because seasonal operations take decades to exhaust the useful life of a truck, not to mention the cost to purchase a replacement truck or engine using a rural business model, State agencies have no concept of the burden this puts on small business in the current financial situation.

There is no public funding for truck/engine replacement in rural California, Mendocino County has turned down Carl Moyer funding the last 3 years because they have no matching funds. There are no other direct funding opportunities in our County as with most of rural California. Even with the matching funds no more than 3 trucks would be replaced assuming the county did not use the funds to replace their own engines first. Industry only receives funds once municipalities have turned it down, and seldom is there any funding left. Mendocino County with its clean air is still going to face significant job losses due to their employer's inability to replace trucks in compliance with the amended rule. This scenario will play out in multiple rural counties facing the exact same

problem.

Replacing a pre 1994 mechanical engine with a post 1994 electric engine is something that can be done at a reasonable cost or hopefully no more than the fair market value of the original truck itself. In NOx compliant rural California the result of taking mechanical engines out of service and replacing them with electronic versions would have an astronomical impact on the reduction of Particulate Matter. Replacing mechanical engines with electric engines and no further requirements could save jobs in rural clean air districts while providing significant PM reduction. Instead the PM reduction will come from business's closing their doors and eliminating jobs because of the cost of this rule. Everyone would like to have a new truck however spending money that the business does not have makes no sense. Requiring local trucking firms to run the cleanest diesel technology in the low use areas of the state that currently have the cleanest air in the nation makes little sense either. Only Government agencies with no practical experience of living within their means would come up with an idea like this and make it law.

The NOx exempt boundaries leave a lot to be desired, boundaries should coincide with impaired air districts not county lines. A perfect example is the Northern Sonoma air quality district where the air is not impaired, however NE trucks cannot operate there because of a line on a Map. Southern Sonoma air district is the impaired district where the air quality problem exists and that is where the exclusion to NE trucks should take place. If lines are to be drawn restricting access it should be done by actual air quality conditions not abstract boundaries set up over 100 years ago for a different purpose. In order to minimize the impact on jobs in rural California this rule must be as flexible as possible; otherwise it is an all out recipe for disaster.

Sincerely,

Myles Anderson  
Anderson Logging, Inc.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/85-carb\_ltr.pdf'

Original File Name: CARB Ltr.pdf

Date and Time Comment Was Submitted: 2010-12-13 16:54:45

No Duplicates.

## **Comment 76 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Paulette

Last Name: Cary

Email Address: weeter886@aol.com

Affiliation:

Subject: Personal Use exemption for trucks under 19,500# GVWR needs to be redone

Comment:

Dear ARB:

We would like to comment on the forthcoming On-Road Diesel Truck Regulations and the exemptions to them as listed on your website.

We have a Ford F550 Diesel truck with a 17,500# GVWR that is used for personal use but because this truck has a flat bed, not a pickup bed, we are subject to these new regulations even though it is used for personal use. We use this truck for our hobby, taking our large model steam engine and cars to local model railroad clubs.

We are very confused by the ARB's logic that makes us subject to these new regulations. The engine in our Ford F550 flat bed truck is the same engine that Ford uses to put the pickup bed on to make their heavy duty pickup trucks that this exemption talks about. This is also the same Ford power stroke engine Ford uses in their F150, F250 and F350 pickup trucks that are exempt from these regulations. Why is there some sort of difference perceived by the ARB because it has a flat bed on it? Because it is a personal use vehicle under 19,500# GVWR, it should be exempt under Section 2025, C exemptions, number 13 regardless of the bed type.

We just wanted to comment on this and bring this to the ARB's attention. The exemptions for personal use vehicles under 19,500# GVWR need to be redone to allow the same exemption for our personal use flat bed truck that you allow for the oversize pick up trucks that are under 19,500# GVWR.

Thank you for letting me comment and we hope the ARB will follow through on our request.

Paulette Cary  
11835 N. Old Stage Rd  
Weed, CA 96094

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-13 18:30:13

No Duplicates.

## **Comment 77 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Torrez

Email Address: Michael.Torrez@bp.com

Affiliation: BP

Subject: Low-use vehicle definition

Comment:

As BP has previously submitted, low-use is defined on a vehicle basis rather than an engine basis 13 CCR2449(c)(32) - see definition below. In the case of a two engine vehicle, BP believes that the definition should be clarified that each engine can be separately evaluated and categorized as low-use. BP believes that this definition based on the vehicle was not originally constructed with two-engine vehicles in mind.

For example, a crane at the Carson refinery with two engines has one that would qualify as low-use and the other that would not. The pony engine is used frequently and would not qualify for low-use. However, it was retrofit with a tier 2 engine in the 2005-2006 timeframe. On the other hand, the drive engine only operates about 36 hours per year and should not be subjected to retrofit or repower based on the utilization of the pony engine. The vehicle replacement cost is prohibitively high, and even the retrofit or repower costs would not be justified by the low emission reduction at this usage rate.

BP believes this low-use vehicle definition clarification would provide flexibility and ensure that regulatory investment is made cost-effectively by targeting the best emission reduction opportunities. BP also believes that this change is responsive to broader stakeholder concerns and the board direction on April 22nd regarding flexibility and adopting regulations that are most cost-effective - particularly under these difficult economic circumstances.

To that end BP has attached a rough cost analysis comparing the costs and emission reductions comparing the cost of replacing the two engine crane (low use drive T0 engine and normal use T2 lift engine) versus a similar cost of replacing a front end loader (single engine T1 normal use). The analysis based on typical costs, average annual hours of the equipment and vendor quotes, show that replacing the normal use T1 equipment reduces diesel PM emissions reduces approximately ten times as much diesel PM then replacing the crane with a low use T0 engine. Additionally the cost per lb of diesel PM reduced for replacing the crane compared to the front end loader is a little over 13 times more expensive.

Thank you for considering our comment. Please contact me with any questions you have.

Pertinent definition

"(32) "Low-use vehicle" means a vehicle that operated in California less than 100 hours during the preceding 12-month period running from March 1 to end of February. For example, when reporting in 2009, the hours of use between March 1, 2008 and February 28, 2009 would be used to determine low-use status. To be considered a low-use vehicle, the fleet owner must submit engine operation data from a functioning non-resettable hour meter..."

Attachment: 'www.arb.ca.gov/lists/on-offroad10/87-rough\_crane\_drive\_engine\_cost\_analysis.xls'

Original File Name: Rough Crane Drive Engine Cost Analysis.xls

Date and Time Comment Was Submitted: 2010-12-13 18:30:56

No Duplicates.

**Comment 78 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mike

Last Name: Cook

Email Address: mcrmc@sbcglobal.net

Affiliation: A&A Ready Mixed Concrete Inc.

Subject: Comment to CARB about proposed regulations

Comment:

See Attachment

Attachment: 'www.arb.ca.gov/lists/on-offroad10/88-letter\_to\_carb\_12-14-10.doc'

Original File Name: Letter to CARB 12-14-10.doc

Date and Time Comment Was Submitted: 2010-12-14 06:28:18

No Duplicates.

**Comment 79 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Greg

Last Name: Menna

Email Address: gregstrucking@sbcglobal.net

Affiliation:

Subject: Carb

Comment:

This law is false and inconclusive. This is the worst possible time to submit these regulations on trucks because we are bordering a full blown depression in the construction industry. I am all for clean air, and the environment, but implement this over the next ten to fifteen years, not within the next couple of years. As new automobiles come out with new standards the same should apply to the trucks, so as we buy new trucks the emissions standards will meet the new requirements. We need more time. Otherwise there will be caos and devastation to this industry. Thank you.

Yours truly,

Greg C. Menna

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 08:25:09

No Duplicates.

**Comment 80 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Rasto  
Last Name: Brezny  
Email Address: rbrezny@meca.org  
Affiliation: MECA

Subject: MECA's Comments to Fleet Regulation Changes  
Comment:

Please find attached our comments and recommendations to the proposed amendments to the truck and bus, drayage and off-road diesel fueled fleet regulations.

Regards,

Rasto Brezny  
Deputy Director  
Manufacturers of Emission Controls Association

Attachment: 'www.arb.ca.gov/lists/on-offroad10/90-meca\_fleet\_amend\_12-17-2010\_final.pdf'

Original File Name: MECA Fleet Amend 12-17-2010 Final.pdf

Date and Time Comment Was Submitted: 2010-12-14 08:48:36

No Duplicates.

**Comment 81 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 82 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Gary

Last Name: Hill

Email Address: garyjil@prodigy.net

Affiliation:

Subject: Diesel Regulations

Comment:

EVERYTHING that you can see, hear, feel, touch, taste or smell came here by truck. If you impact the cost of trucking, you will impact the cost of EVERYTHING!!!! When it comes to payload, there is not a "known" fuel that has the efficiency of diesel. Today's engines and diesel fuel are very clean compared to a few years ago. Right now, California needs JOBS more than a little cleaner air.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 09:41:56

No Duplicates.

**Comment 83 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 84 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Stephen

Last Name: Nieto

Email Address: mtnkart@verizon.net

Affiliation:

Subject: CAN NOT SUPPORT MY FAMILY ANY LONGER IN CA

Comment:

To all Concerned,

I am writing this to you as a seventh generation Californian. I have had to make a hard decision. I am leaving California.

I have supported my family by the sales of Heavy Diesel Trucks for the past 15 years. The last two years have been tough. We are in the middle of the biggest sale slump in 25 years. You would think Heavy truck dealers would be having a field day selling new Trucks and retrofitting older trucks with the soon to be CARB mandated particulate traps. After all, The California government is requiring are customers to retrofit or buy new trucks. No chance, as every time government gets in the way of natural market forces it has crippled an already struggling industry. The Federal EPA in the middle of a 15-year plan to reduce diesel emissions. Our industry has responded by meeting all the federal requirements. The engineers should be commended. All of the engine manufactures have complied or gotten out of the business of manufacturing diesel motors. (A whole other topic).

If you buy a new truck today it will meet the new standards. This goes for 50 states. Somewhere in there infinite wisdom, CARB is trying to force Company's and individuals to replace or retrofit by 2014. They have amended there plan several times a recent as 1/20/10. But that is still the bottom line. What do you think that has done to the value of used diesel trucks in California? Industry estimates 40-80% devaluation. So the fleets that run the most miles that normally would replace trucks in say 5 years. Now they cannot afford to. There fleet has no equity. Thus not allowing the largest fleets to replace there older trucks with the new non-polluting trucks. The typical use for the trade-ins would be to sale them lower mile applications, local delivery, construction ect ect. The used trucks are converted to other types of trucks. A lot of people make a buck off of this transaction. It used to be a win win for everyone and the environment. Now there thousands upon thousands trucks rotting. Trucks that where once recycled and reused. The arrogant self-absorbed politicians got their nose in the middle of our industry. Now the big fleets that run the most miles can't afford to upgrade to the new less polluting trucks that are available NOW.

You have gotten your wish. I will take my business to the State of Oregon. Along with almost 500,000.00 in tax revenue I have generate anually for the State of California.This is direct revenue. I won't even get into the revenue lost from the trickle down effect.

I do not have a phoney PHD to back my facts. This is just the truth about one Californian Family.

Steve Nieto

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 09:48:03

No Duplicates.

**Comment 85 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Dave

Last Name: Sbaffi

Email Address: Dave.Sbaffi@gcinc.com

Affiliation:

Subject: CARB Offroad/Onroad Comments

Comment:

Please see attached

Attachment: 'www.arb.ca.gov/lists/on-offroad10/95-granite\_comment\_letter\_dec\_2010.pdf'

Original File Name: Granite Comment Letter\_Dec 2010.pdf

Date and Time Comment Was Submitted: 2010-12-14 10:43:01

No Duplicates.

## **Comment 86 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: George  
Last Name: Smith  
Email Address: gsmith@hollidayrock.com  
Affiliation:

Subject: On-Road 10  
Comment:

December 13, 2010

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Truck & Bus (On-road) Diesel Rule Amendments

Dear Air Resources Board:

Our company is a member of the California Construction & Industrial Materials Association, has reviewed the Oct. 30, 2010 proposed amendments to the On-road diesel rule, and provides these comments.

### Company Information

We are producers of aggregates, industrial minerals, and ready mixed concrete. We supply the materials to build California's roads, bridges, hospitals, schools, and water systems.

Our fleets are primarily local use vocational trucks. These include concrete mixer fleets that deliver within a 15 mile radius, drive less than 14,000 miles in a year, and operate about 1,400 hours per year (national averages). They also include water, fuel/lube, and mechanics trucks that operate primarily at a plant or construction site.

These trucks are used for local supply of materials and support local business and construction. They typically have longer service lives than over-the-road long haul trucks, can be difficult to retrofit, and don't have the engine revolutions to make retrofits effective.

### Construction Materials & the Economy

The construction materials industry has been hit hard by the economic downturn. California aggregate and ready mixed concrete production is off 50% and 60% respectively from 2005 to 2009. For 2010, production continues to be flat or slightly below 2009 levels. Most forecasts, including one by the Legislative Analyst

Office's, do not foresee any significant up-turn in the construction sector prior to 2015. In fact, the LAO states, "The construction industry remains flat on its back—with few immediate prospects—due to the massive fall in residential and commercial real estate markets." (LAO, California's Fiscal Outlook, Nov. 2010).

#### ARB's Proposed Changes

We appreciate the effort ARB has put into reviewing emissions estimates resulting from the downturn in the economy; and, consequently, the proposed rule changes based on these realities. We encourage ARB to continue assessing emissions and the impact of the economy.

Generally, the proposed changes help by simplifying the rule, delaying initial compliance, spreading out compliance dates, and providing options to phase-in and account for reduced fleet size or use.

In particular, there are a number of beneficial provisions:

- Vehicles don't have to be replaced before the end of their 20 year service life.
- A less aggressive compliance path for vehicles under 26,000 lbs. This will assist with a number of low-use local vehicles, particularly those that operate primarily off-road and outside population areas.
- For vehicles over 26,000 lbs., the optional phase-in/reduced use compliance path provides credit for vehicles no longer in the fleet or not currently operating. This is likely to be the most commonly utilized compliance path.
- Changing the baseline from 2008 to 2006 provides a starting point more reflective of common fleet size.
- The addition of a provision for low-use vehicles that considers the operating requirements of fleets that deliver a product. Though helpful in concept, the 1,000 mile threshold is very limiting and prevents this provision from providing substantive relief.
- Extends the useful life of credits for early-retrofit of vehicles (or use of hybrid or alternative fuel vehicles) from 2014 to 2017. Also, allows this credit to be used in combination with the phase-in/reduced use option.

#### Challenges & Solutions

Although the proposed changes help, there still are three ways the rule will present challenges and hardship, particularly given the reduced capital available and dim forecasts for future growth in the construction sector.

1. Bunching of PM Requirements Prior to 2014. The biggest difficulty for most fleets is the bunching of PM filter requirements between 2012 and 2014. Essentially, this is one area where the rule has not changed. It still presents a huge cost burden within a relatively short time, particularly given that it

impacts all vehicles in a fleet.

#### Proposed Solutions

- Additional delay or expanded low-use mileage exemption for vocational trucks in the construction and construction supply industries. These include concrete mixer trucks that deliver a product, and water, fuel/lube, and mechanics trucks that serve plant and construction sites. These are vehicles that travel 15,000-20,000 miles or less in a year. The cost of compliance is far greater relative to the PM impact of these low-mileage trucks.
- Increase the threshold for the lower weight class to 33,000 lbs.
- Provide an early retirement credit in the regular BACT compliance path.
- Spread out the initial PM filter compliance dates to 2017.

2. Lack of Credit Transfer Between Off and On Road Rules. Many companies with Off and On-road fleets had taken early action to comply with the Off-road rule and received credit for doing so. However, due to the changes proposed in the Off-road rule, they will be unable to utilize those credits. At the same time, the lack of current revenue greatly reduces their financial ability to address the On-road rule. In recognition of their efforts to assist with diesel emissions reduction and by placing filters on and modernizing their Off-road fleets, they should be granted opportunity to transfer credits among the two rules.

Proposed Solution. Develop a retrofit credit transfer program based on a ratio of Off-road to On-road credits. We are encouraged that ARB's notice for the rule indicates this is under consideration.

3. Lack of Early Replacement Credit. Some companies purchased new model on-road vehicles and engines based upon or in advance of the requirements of the current law. This means they purchased either 2007 or 2010 model year engines. These purchases have come at a time of great financial stress for the companies, but were done to spread out compliance costs over the long-term. These purchases have often required lead times of 8 to 9 months, due to the lack of a developed market. Finally, these purchases are very important in developing a market for these newer engines as well as a market for used equipment in years to come. However, this proposal gives no credit for early replacement of vehicles, even though there is provision for early retrofits.

Proposed Solution. We are encouraged that the ARB notice indicates a provision will be added in this regard.

#### Conclusion

Again, we appreciate the consideration ARB has given to more accurately assessing emissions and studying the impact of the economy on business sectors. We appreciate your consideration of our proposals.

Sincerely,

George Smith  
Environmental Coordinator  
Holliday Rock Co., Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 10:41:53

No Duplicates.

**Comment 87 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kelly

Last Name: Browne

Email Address: mbandkb@gmail.com

Affiliation:

Subject: Proposed diesel regulations

Comment:

I believe the legislators in California have gone mad. The majority of people out here are barely making it and you would enforce insane regulations that are only going to burden the poor and middle class! The people are going to be outraged when the effects of this measure take hold and prices rise even further. You are forcing the working people and businesses out of this state. What will you do then? I have lived here my entire life but we are in the process of trying to get out of this insane state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 10:42:49

No Duplicates.

## **Comment 88 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Alan

Last Name: Osofsky

Email Address: alano@rodgerstrucking.com

Affiliation: Rodgers Trucking Co

Subject: Comments on Proposed Changes to Truck and Bus, Drayage Regulation

Comment:

Dear CARB,

In my evaluation of the proposed changes to the Truck & Bus, and Drayage Regulations, I have determined that the proposed changes would have a positive affect on our fleet of 71 diesel powered vehicles. Hopefully I am interpreting the changes properly. Assuming that I am, the changes will spread out the time for replacement or retrofitting from a 4 year window to a 10 year window. For this we are grateful. Hopefully we can complete the transition in less than 10 years. We appreciate the work staff has done after listening to hours of testimony from various industry members. We appreciate the necessity for addressing our environmental issues. It is a complicated matter. We appreciate that staff has taken into account the plight of many in these difficult economic times. We are hopeful that with the extra time proposed for meeting the requirements, that the economic future will become brighter. We realize that some companies stepped up to the plate early and invested in newer technologies. For this they must be commended. Although we were not able to invest as they did, we feel it is only fair that they be rewarded for their efforts. Perhaps some State tax benefits can be offered to them to help even out the competitive playing field over the next 10 years. We realize that these changes allow many of us to continue to use older technology for a while longer, and that may or may not give us a competitive advantage. We know that advantage is only temporary and at some point we will need to step up to the plate and invest in newer more cleaner emission technology. Please consider some advantage to those carriers that complied ahead of schedule.

Thank you again to Staff and the Board for listening to industry and helping us meet your goals in a manner that we can afford.

Sincerely,

Alan Osofsky Rodgers Trucking Co San Leandro, CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 10:35:12

No Duplicates.

**Comment 89 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: larry

Last Name: eckman

Email Address: clenterprise@sbcglobal.net

Affiliation:

Subject: truck regulations

Comment:

before we get crazy on truck/bus emmissions we should look at what vehicles are not required to meet any standards---government(stae and local)/utilities/emergency vehicles/transit vehicles /solid waste haulers/ect are all exempt from diesel regs@ this time---if california wamnts to be green it should start @ the top and include all these vehicles too

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 10:16:29

No Duplicates.

**Comment 90 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Todd

Last Name: Gildersleeve

Email Address: tgildersleeve2004@yahoo.com

Affiliation:

Subject: diesel regulations

Comment:

These draconian regulations are based on false information that over estimated diesel pollution by 300%. Stop the over regulation of commerce in this State so we can go about the business of bringing a vital economy back to California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 10:52:08

No Duplicates.

**Comment 91 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast AQMD

Subject: Joint SJV / South Coast Comments

Comment:

Please see the attached joint comment letter submitted by San Joaquin Valley APCD and South Coast AQMD. Thank you.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/101-carb\_sjv-sc\_aqmd\_re\_on-road\_diesel-fueled\_vehs\_and\_off-road\_diesel-fueled\_fleets\_12-14-2010.pdf'

Original File Name: CARB SJV-SC AQMD re On-Road Diesel-Fueled Vehs and Off-Road Diesel-Fueled Fleets 12-14-2010.pdf

Date and Time Comment Was Submitted: 2010-12-14 10:55:36

No Duplicates.

## **Comment 92 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Donald

Last Name: Debelak

Email Address: debelakd@liqtechna.com

Affiliation: Liqtech NA

Subject: ARBs actions impact on Clean Diesel Manufacuter

Comment:

We are a manufacturer of silicon carbide diesel filters that supplies a number of manufacturers of verified Tier 3 systems in California.

This year we invested over \$1 million in equipment to provide additional filters at the request of our customers to serve a rapidly increasing market. Over the last few weeks we have seen a dramatic drop in business and have had to reduce our staff. We have been told the drop is due to the ARB changing and delaying its diesel rules and not having any new rules, or funding in place.

The result to us is that we have invested in a market that is very uncertain now and we have no way of knowing when the market will turn around.

We have heavily invested in the diesel retrofit market, primarily based on rules set forth by ARB, rules that have been delayed before but now are in flux. Potential buyers apparently are waiting to see if they need to do anything at all and I expect they will continue to wait till rules are in place or till funding guidelines are clear. Until that happens we expect to be scrambling. I realize ARB has many stakeholders to satisfy but I can't help feel that our industry is the only one being left out on a limb to fend for itself.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 12:42:39

No Duplicates.

## **Comment 93 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Justin

Last Name: Young

Email Address: JustinDaleYoung@hotmail.com

Affiliation:

Subject: Diesel PM 2.5 Regulations

Comment:

Dear Sir or Madam:

CARB has implemented a voluntary survey to establish an inventory of diesel emissions. CARB knows that this survey is inaccurate and has used a 28% estimate of under-reporting. The data obtained by voluntary surveys is not accurate, and it is impossible to estimate accurately what the "real" numbers are. CARB is using an arbitrary percentage (28%) to estimate what the actual data should be. This is not a scientific use of statistics; one cannot determine any voluntary survey to be an accurate sample of the population. It is unethical to use this data to implement any kind of regulation. We demand that CARB suspend the implementation, and rule-making processes of all PM2.5 regulations until an accurate emissions inventory number can be obtained from the Franchise Tax Board, which maintains data for every diesel sale in California.

Hien Thanh Tran was the lead scientist on the study of "Premature Mortalities from the exposure of PM2.5", which is the basis for the PM2.5 regulations. He claimed to have a PhD from UC Davis, when in fact, he had a mail-order, fraudulent PhD from a fake university that lists a UPS store as its address. We demand that CARB suspend the implementation and rule-making processes of all PM2.5 regulations until a new study can be completed, peer-reviewed, and is made available for public comment.

Furthermore, there is discussion within the scientific community regarding whether or not diesel is the largest emitter of PM2.5. Frederick W. Lipfert, in the Symposium on PM2.5 and Mortality presented on the 26th of February 2010 that no single source emits PM2.5, but rather PM2.5 particles come from many sources, which cannot be identified directly. In the same presentation, Lipfert also held the conclusion that national studies cannot be applied to California where pollutants and populations differ from states in the nation.

CARB does not have accurate data regarding how much PM2.5 is emitted in California. CARB does not have any conclusive study linking health risks to exposure of PM2.5. CARB does not have any conclusive study that suggests diesel emissions are responsible for the majority of PM2.5 pollution.

CARB has misused public money during the course of its writing and implementation of diesel PM2.5 regulations through fraudulent actions of its employees and possibly some board members. CARB has misused tax-payer money by creating regulations before it has

obtained accurate data. Especially in the current state of the California budget, CARB must utilize public funds in a more responsible manner. Furthermore, CARB must recognize that California businesses are in a time of extreme hardship because of the recession. Though the members and employees of CARB have not received any pay-cuts, the private industries in California have. California cannot afford to lose jobs and businesses because of unnecessary regulations. We demand that CARB suspend all rule-making processes and implementation of PM2.5 regulations until all the data has been collected and the studies have been completed, peer-reviewed and commented upon by the stakeholders.

Sincerely,

Justin D. Young

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 13:50:16

No Duplicates.

**Comment 94 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jeff

Last Name: Hunter

Email Address: jhunter@ctta.com

Affiliation: California Tow Truck Association

Subject: CTTA's Comments on the Truck and Bus Regulation

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/104-ctta.arb.writtencomment.12-14-10.pdf'

Original File Name: CTTA.ARB.WrittenComment.12-14-10.pdf

Date and Time Comment Was Submitted: 2010-12-14 13:42:35

No Duplicates.

**Comment 95 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Martin J. (Kelly)

Last Name: McTigue

Email Address: kmctigue@omm.com

Affiliation:

Subject: Comments on Amended Regulation

Comment:

Please see attached (comments on the regulation are shown in red, bold, italic font).

Attachment: 'www.arb.ca.gov/lists/on-offroad10/105-letter\_to\_carb\_re\_amended\_regulations\_xtra\_lease\_llc.pdf'

Original File Name: Letter to CARB re Amended Regulations\_XTRA Lease LLC.pdf

Date and Time Comment Was Submitted: 2010-12-14 14:06:32

No Duplicates.

**Comment 96 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Tom

Last Name: Carroll

Email Address: tcarroll@suhds.net

Affiliation: Public School District

Subject: Agenda Item 10-11-3 School Bus Regulations

Comment:

Attachment: 'www.arb.ca.gov/lists/on-offroad10/106-12-14-10\_arb\_letter.doc'

Original File Name: 12-14-10 ARB letter.doc

Date and Time Comment Was Submitted: 2010-12-14 14:24:31

No Duplicates.

**Comment 97 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: susan

Last Name: jones

Email Address: suzi\_jane1@pacbell.net

Affiliation: CDTOA

Subject: on road diesel regs

Comment:

The dump truck industry is dying with this depressive economy. We cannot afford to pay our bills much less try to upgrade, retrofit, or repower our trucks. We need more time for the economy to come around before we can do any of this. We all want clean air, but not at the cost of our businesses, families, health and our own lives due to the stress of no work.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 14:37:36

No Duplicates.

**Comment 98 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael  
Last Name: Graboski  
Email Address: msgraboski@speedtrail.net  
Affiliation: American Rental Association

Subject: On Off Road Comments  
Comment:

three comments attached

Attachment: 'www.arb.ca.gov/lists/on-offroad10/108-carb-comments-12-16-2010.zip'

Original File Name: CARB-comments-12-16-2010.zip

Date and Time Comment Was Submitted: 2010-12-14 15:01:44

No Duplicates.

**Comment 99 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Dyan

Last Name: Lorenzen

Email Address: dyankane@cox.net

Affiliation:

Subject: Proposed amendments

Comment:

Our company has been greatly hurt by the recession in construction. We are a small company trying to survive. The changes to the on-road and off-road diesel emission regulations are the minimum needed to keep us in business.

We hope for more help in construction for On-Road Diesel. We need you to increase the low-use mileage exemption for construction to 15,000 miles per year. Our on road vehicles have either been parked in great numbers due to the recession, or spend most of their time on jobsites, so they are a very small part of diesel emissions

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 15:08:11

No Duplicates.

**Comment 100 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Fred

Last Name: Martin

Email Address: fred@martinroofing.net

Affiliation:

Subject: off road diesel reg.

Comment:

Please keep the new regulations to the off road diesel vehicles in place, or soon to be in place. I am a small business man with 30 employees, down from 100 just a few years ago, any additional regulation at this time could send me over the top and out of business.

Thank you,  
Fred Martin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 15:28:15

No Duplicates.

## **Comment 101 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Bill

Last Name: Young

Email Address: billy@benchmarklandscape.com

Affiliation:

Subject: Off-road & On-road Diesel Emissions Changes

Comment:

Our company has been impacted profoundly by the recession in construction. We have gone from approximately 330 employees to around 200 employees. These changes being considered to the on-road and off-road diesel emission laws would be a small step towards helping to keep us in business.

We hope for more far reaching measures in construction for On-Road Diesel. If you were to increase the low-use mileage exemption for construction to 15,000 miles per year, this would be another step in the right direction. Our on road vehicles have been used far less than they used to be due to the recession, and when they are used they are on jobsites for the most part, so they are a very small part of diesel emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 15:42:25

No Duplicates.

**Comment 102 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mary

Last Name: Pitto

Email Address: mpitto@rcrcnet.org

Affiliation: Regional Council of Rural Counties

Subject: Proposed Amendments to In-Use Diesel Rules

Comment:

Please see the attached comment letter regarding the Proposed Amendments to the In-Use Off-Road Diesel-Fueled Regulation from the Regional Council of Rural Counties.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/112-mp.121410.ltr.arb.doc'

Original File Name: mp.121410.ltr.arb.doc

Date and Time Comment Was Submitted: 2010-12-14 16:09:16

No Duplicates.

**Comment 103 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Eric

Last Name: Carleson

Email Address: ecarleson@calog.com

Affiliation: Associated California Loggers

Subject: In-Use Diesel On-Road Amendments

Comment:

Please see attached letter from the Associated California Loggers.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/113-lettercommentcarbdieseltruck1210.docx'

Original File Name: lettercommentcarbdieseltruck1210.docx

Date and Time Comment Was Submitted: 2010-12-14 16:33:57

No Duplicates.

**Comment 104 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mark

Last Name: Cooper

Email Address: mark@hdelectric.com

Affiliation:

Subject: Off-Road and On-Road Diesel Emission legislation

Comment:

The recession in construction has taken a severe toll on our company. Since this recession began, we have gone from 390 employees to 24 employees. The changes to the on-road and off-road diesel emission regulations will be a step in the right direction towards recovery in construction.

It is our hope to secure more help in construction for On-Road Diesel. It is imperative that you increase the low-use mileage exemption for construction to 15,000 miles per year. With the onset of the recession and the decline in work, many of our on road vehicles have remained in our yard and many more are often stationary at the job sites, so they are a very small part of diesel emissions

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 16:59:01

No Duplicates.

## **Comment 105 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Rex

Last Name: Roden

Email Address: rexroden@zetabb.com

Affiliation:

Subject: Off-Road Diesel Fueled Fleets and Large Spark Ignition Engine Fleet Requirements

Comment:

It is absolutely unbelievable that you folks are making regulations based on not only phony science but also on phony people with phony degrees.

I can't even venture a guess of how many people you have hurt financially and emotionally. Many of my friends have begun to move their businesses and families out of California looking for a more friendly business climate.

When will all this phony science end; when will you folks realize what damage you are doing to the once greatest state in the union? I just hope that for California's sake you people stop trying to justify your existence with phony science and phony regs. Please listen to people who care about California, care about jobs, and care about business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 17:29:10

No Duplicates.

## **Comment 106 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Madelaine  
Last Name: Shenkel  
Email Address: mshenkel@aol.com  
Affiliation:

Subject: DUMP TRUCKS.. 32 years in business  
Comment:

Truck, truckers, lets stop the trucks for a day, week month and see how CARB effects on the State of Ca. EVERYTHING IS TRUCKED. The articles about the fuel causing death.. SHAME ON MARY NICHOLS AND HER SIDEKICK ARNOLD. They both get the STUPID award EVERYTHING IS TRUCKED. CALIFORNIANS SHAME ON YOU FOR ALLOWING THIS TO HAPPEN. Lies about the fuel, lies about the truckers Whos going to help build the freeways, streets, all the buildings 32 years in the dump truck business, hundreds of owner operators have been put out of business because the way Arnold and his group has handled his "GREEN" state. My children are grown and I'm having grandchidren are they going to LOVE California like I did??? YOU NEED THE TRUCKS, YOU WANT THE TRUCKS, YOU CANNOT DO WITHOUT THE TRUCKS... MADELAINE SHENKEL, Pres ofShenkel Tkg Ignorance of the business is not excuse for lawmakers..

EVERYTHING IS TRUCKED....PLEASE REMEMBER THIS

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:31:47

No Duplicates.

**Comment 107 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Robert  
Last Name: Dietrich  
Email Address: robertdietrich2000@earthlink.net  
Affiliation:

Subject: Diesel regs  
Comment:

Dump the diesel regs! They do nothing except destroy business!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:42:04

No Duplicates.

## **Comment 108 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Steve

Last Name: Lynes

Email Address: bankpool@ix.netcom.com

Affiliation:

Subject: AB 32

Comment:

I am a small business owner and have lived in California for 49 years. My business has gone from 42 employee to 9, as the current economic conditions have affected business. Our business requires equipment such as trucks, driven locally. I have not made a profit in 3 years. The only reason I am still in business is that I am using my savings from more prosperous years (the greedy rich). I keep my trucks in fine running condition. I can not afford to replace them. The letter you sent us about this law is a joke. It said simply "Pass the cost on to your customers". I don't have enough customers to make this happen. There is a reason residents are headed to Texas and Arizona. Please help this state recover. Stop over regulating. No one wants to destroy our home, we will be responsible without AB32. California cannot afford this. You are driving productive people into places where they can be successful. Be smart - stop the madness.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:39:21

No Duplicates.

**Comment 109 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: John  
Last Name: Quilter  
Email Address: jqulter@peoplepc.com  
Affiliation: ACCC

Subject: Proposed Diesel Regulations  
Comment:

Your overbearing proposed regulations on diesel engines will drive consumer costs up and up and drive viable businesses from the state little by little. It is time to back off and allow existing federal air quality rules to achieve their goals.

John F. Quilter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:43:29

No Duplicates.

**Comment 110 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Eddie

Last Name: Barbosa

Email Address: hvspeed@verizon.net

Affiliation:

Subject: Diesel Regulations Fraud

Comment:

I am writing in regards to the (now widely known) fraudulent study on diesel emissions. How can a government agency act so irresponsibly? You can't enact regulations that will potentially destroy the entire economy of California, based on junk science. The only chance you have to regain credibility with the public, is to admit your mistakes, and retract these ridiculous studies.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:38:33

No Duplicates.

**Comment 111 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Stephen

Last Name: Rhoads

Email Address: SRhoads@strategicadvocates.com

Affiliation: School Transportation Coalition

Subject: School Bus Regulations

Comment:

The attachment is our testimony. Thank you.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/121-stc\_arb\_letter\_ktb.doc'

Original File Name: STC ARB Letter KTB.doc

Date and Time Comment Was Submitted: 2010-12-14 18:54:47

No Duplicates.

**Comment 112 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Mark

Last Name: Morton

Email Address: markalla@pacbell.net

Affiliation:

Subject: CARB and deisel

Comment:

CARB should temper zealous and punitive actions against industry and business.

It's of course more complex than this but CARB is apparently driven by more than unreasonable clean air goals.

Quiet citizens like me will soon be driven to unite and strive to reveal the real motivations of the (largely unelected) officials and gov't employees.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 19:40:53

No Duplicates.

## **Comment 113 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael  
Last Name: Rea  
Email Address: mikerea-wcta@juno.com  
Affiliation: CASTO

Subject: Oppose School Bus amendemnts to Truck and Bus Rules  
Comment:

California Association of School Transportation Officials

December 14, 2010

Mary D. Nichols, Chair  
California Air Resources Board  
1001 "I" Street  
Sacramento, Ca 95812

RE: Agenda Item 10-11-3 School Bus Regulations

Dear Chairperson Nichols,

CASTO opposes the proposed amendments to the school bus regulations. We respectfully request that these regulations are suspended until adequate resources to fund them are attained. California's funding for school transportation prior to the recent economic downturn only covered 45% of our costs, and in the past two years our funding has been cut an additional 20%. School districts throughout California are reducing school transportation, and in some cases completely eliminating this service.

Your mandates would have the unintended consequence of decreasing safety and increasing congestion and thereby increasing air pollution. Parents and children from affluent areas will be able to drive their children to school. It will be the less affluent that will be hurt the most. School transportation is 172 times safer than riding in the family automobile. It will harm our most disadvantaged children because they will have to walk longer distances to school or simply not go.

We are in agreement with you that we need to update our school bus fleet with new modern buses. Our parents want their children to ride in school buses that have seat belts. However, this is the worst time to impose new mandates on school districts without additional funds.

We were very appreciative of the Proposition 1B funds, but those funds are no longer available to us. We would urge you to wait. We know of no other state program that has been cut as much as education. We cannot afford to take additional funds out of the classroom or to eliminate or reduce school transportation any more.

Please work with us to get additional funds for school transportation. We sincerely appreciate our on-going relationship to enhance air quality in and around our school buses.

Sincerely,

Michael G. Rea  
Governmental Relations Chairperson  
707-206-9988 x11

Attachment: 'www.arb.ca.gov/lists/on-offroad10/123-casto\_carb\_opposition\_letter\_\_12-14-10.doc'

Original File Name: Casto CARB Opposition Letter 12-14-10.doc

Date and Time Comment Was Submitted: 2010-12-14 22:17:19

2 Duplicates.

## **Comment 114 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Eric

Last Name: Eisenhammer

Email Address: Eric@SuspendAB32.org

Affiliation: Coalition of Energy Users

Subject: Please ease the diesel regs

Comment:

Chairman Nichols and Members of the Board:

Thank you for considering an easing of the devastating diesel regulations. I often communicate with individuals who share horror stories with me of being forced to purchase retrofits of their trucks that cost in the tens of thousands or even hundreds of thousands of dollars.

These are real human beings, and they are already struggling to get by. If not offered relief, many will go out of business or leave the state, costing our state even more jobs and hurting our already fragile economy.

Aside from the very serious impact diesel regulations will have on our jobs and economy, they are based on a study by a researcher who both falsified his credentials and overestimated pollution by up to 300%. This is not a sound basis for policies which harm the livelihoods of California citizens.

Beyond the questionability of the study upon which the regulations were based, please also consider the role of economics on public health. Nations with the highest poverty rates also have the highest infant mortality rates and lowest life expectancies. A conversation on public health is not complete without considering how harmful economic impacts also detract from citizens ability to pay for quality medical care.

With even the San Francisco Chronicle reporting on the pollution overestimates, now is an ideal time for the Board to revise its diesel policy to take into account the needs of affected citizens, taxpayers and business owners.

Respectfully submitted,

Eric Eisenhammer

Founder

Coalition of Energy Users

Attachment: 'www.arb.ca.gov/lists/on-offroad10/124-dieselregs121510.pdf'

Original File Name: DieselRegs121510.pdf

Date and Time Comment Was Submitted: 2010-12-14 23:24:16

No Duplicates.

## **Comment 115 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Garry

Last Name: Gifford

Email Address: giffy@joncethomas.com

Affiliation:

Subject: On road diesel regulations

Comment:

Our company has been greatly hurt by the recession in construction. We have gone from 100 employees to 7 employees. The changes to the on-road and off-road diesel emission regulations are the minimum needed to keep us in business.

We hope for more help in construction for On-Road Diesel. We need you to increase the low-use mileage exemption for construction to 15,000 miles per year. Our on road vehicles have either been parked in great numbers due to the recession, or spend most of their time on jobsites, so they are a very small part of diesel emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 05:16:30

No Duplicates.

## **Comment 116 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: mike

Last Name: murry

Email Address: mikeboy41@comcast.net

Affiliation:

Subject: on road truck rule

Comment:

I have been in business for ten years. I have 3 ten wheel dump trucks, 2 of which i am still making payments on and will do so for two more years.( if im lucky).The newest one being a 1999 year model motor with 240,000 original miles. junk according to you guys! you want me to replace it! hell i have not even finished paying for it yet. prior to 2008 i averaged about 20,000 miles a year per truck. last year 2009 i went 6000, 9000, and 11,000 per truck and my revenue has declined from being a small profit business to being a no profit business. i am only hanging on because i had a small savings account, available credit, health insurance, and now that those are all gone I just hope and pray everyday that i will have a job for tomorrow and nothing breaks on any of my trucks if i am lucky enough to work. so having said all that, please delay or scrap the on road rule until things get better in this state of ours. thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 05:28:24

No Duplicates.

## **Comment 117 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Rea

Email Address: mikerea-wcta@juno.com

Affiliation: West County Transportation Agency

Subject: Oppose school transportation amendments to Truck and Bus Rules

Comment:

West County Transportation Agency

December 14, 2010

Mary D. Nichols, Chair  
California Air Resources Board  
1001 "I" Street  
Sacramento, Ca 95812

RE: Agenda Item 10-11-3 School Bus Regulations

Dear Chairperson Nichols,

West County Transportation Agency opposes these amendments to the school bus rules for the Truck and Bus Regulations. We respectfully request that these regulations are suspended until adequate resources to fund them are attained. California's funding for school transportation prior to the recent economic downturn only covered 45% of our costs, and in the past two years our funding has been cut an additional 20%. West County Transportation Agency is a Joint Powers Agreement of sixteen school districts in Sonoma County. Due to ongoing funding cuts, our school districts have reduced over thirty school bus routes over the years. Two of our members have completely eliminated home to school transportation.

Your mandates would have the unintended consequence of decreasing safety and increasing congestion and thereby increasing air pollution. Parents and children from affluent areas will be able to drive their children to school. It will be the less affluent that will be hurt the most. School transportation is 172 times safer than riding in the family automobile. It will harm our most disadvantaged children because they will have to walk longer distances to school or simply not go.

We are in agreement with you that we need to update our school bus fleet with new modern buses. Our parents want their children to ride in school buses that have seat belts. However, this is the worst time to impose new mandates on school districts without additional funds.

We were very appreciative of the Proposition 1B funds, but those funds are no longer available to us. We would urge you to wait. We know of no other state program that has been cut as much as education. We cannot afford to take additional funds out of the

classroom or to eliminate or reduce school transportation any more.

Please work with us to get additional funds for school transportation. We sincerely appreciate our on-going relationship to enhance air quality in and around our school buses.

Sincerely,

Michael G. Rea  
Executive Director  
707-206-9988 x11

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 06:31:50

No Duplicates.

**Comment 118 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Christy

Last Name: Randall

Email Address: crandall@digitalpath.net

Affiliation:

Subject: New Diesel Regulations

Comment:

Please do not impose the new diesel regulations!! Our state economy needs help, not another increase in the cost of doing business and, therefore, living here. And honestly, if it keeps getting more and more expensive to live in the state, we will have to leave. We have a lot of family - I'm a fifth-generation Californian - so the last the thing I want to do is move, but when the money runs out, something has to give.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 06:35:34

No Duplicates.

**Comment 119 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Claire

Last Name: Shapiro

Email Address: [claire@eisen-shapiro.com](mailto:claire@eisen-shapiro.com)

Affiliation: Eisen & Shapiro

Subject: Truck and Bus Regulation

Comment:

Attached please find the comments of the Owner-Operator Independent Drivers Association on the proposed amendments to the Truck and Bus Regulation.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/129-truck.bus.comments.final.cls.pdf](http://www.arb.ca.gov/lists/on-offroad10/129-truck.bus.comments.final.cls.pdf)'

Original File Name: Truck.Bus.comments.final.cls.pdf

Date and Time Comment Was Submitted: 2010-12-15 07:41:24

No Duplicates.

**Comment 120 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Neysa

Last Name: McLoughlin

Email Address: Neysa@West-Calconcrete.com

Affiliation:

Subject: Off-Road Regulations

Comment:

The President of our company, Franklin Isaac, has asked me to contact you this morning regarding the changes to the off-road diesel emission. Due to the recession in the construction industries, we have had to park almost half of our fleet. We have gone from over 225 employees as of 2 years years ago to 65 employees currently. The changes to the off road diesel emission regulations are the minimum needed to keep us in business. We need to have you to increase the low-use mileage exemption for construction to at least 15,000 miles per year. Our on-road and off-road vehicles & equipment spend majority of thier time sitting at a job site or in our yard. We hope you can help to the construction industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 07:37:14

No Duplicates.

**Comment 121 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Paul  
Last Name: DiGuseppi  
Email Address: myrna@westcoastdrywallinc.com  
Affiliation:

Subject: On-Road Diesel  
Comment:

The recession in the construction industry has greatly hurt our company. We have seen our payroll dwindle from over 150 employees to fewer than 50 employees. The changes to the on-road and off-road diesel emission regulations are a big step needed to keep us in business, but they are not enough.

I urge you to increase the low-use mileage exemption for construction to 15,000 miles per year. Many on-road vehicles have either been parked in great numbers due to the recession, or spend most of their time on jobsites, so they are a very small part of diesel emissions.

Thank you for your consideration on this critical matter.

Sincerely,

Paul DiGuseppi, President  
West Coast Drywall, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 07:40:15

No Duplicates.

**Comment 122 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Martin

Last Name: Ward

Email Address: mward@midplacer.k12.ca.us

Affiliation: Mid-Placer Public Schools

Subject: CARB 2025 Regulation and Proposed Changes

Comment:

Please accept the attached letter.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/132-m\_nichols\_-\_carb.doc'

Original File Name: M Nichols - CARB.doc

Date and Time Comment Was Submitted: 2010-12-15 08:13:14

No Duplicates.

**Comment 123 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: tracey

Last Name: wright

Email Address: traceywright2@gmail.com

Affiliation:

Subject: on-offroad10

Comment:

No more regulations!! Let's enforce the laws and regs we already have on the books. Unless you want this state to fail, don't regulate jobs away!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 08:13:08

No Duplicates.

**Comment 124 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Steve

Last Name: Stansberry

Email Address: steve.stansberry@yahoo.com

Affiliation:

Subject: CARB diesel regulations

Comment:

I think it high time for CARB to get over themselves! Your infringement in all areas of the automotive world is far to wide. I would like to see every board member come up with a way to filter, ignite, vacuum, or just self inject themselves with MIND YOUR OWN BUSINESS and stop inflicting your stupidity on US! You have manage not to improve but to inflate the cost of vehicles only so you can beat your chest like a 400lb gorilla

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 08:24:52

No Duplicates.

**Comment 125 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: William

Last Name: Ebbeling, MD

Email Address: [airquality@fmms.org](mailto:airquality@fmms.org)

Affiliation:

Subject: Truck and Bus Rule Ammendments

Comment:

The attached are comments from the Air Quality Sub-Committee of the Fresno-Madera Medical Society re: the Truck and Bus Rule Amendments. Thank you.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/135-diesel\\_ltr\\_for\\_arb\\_dec\\_16\\_2010.docx](http://www.arb.ca.gov/lists/on-offroad10/135-diesel_ltr_for_arb_dec_16_2010.docx)'

Original File Name: Diesel ltr for ARB Dec 16 2010.docx

Date and Time Comment Was Submitted: 2010-12-15 08:52:45

No Duplicates.

## **Comment 126 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: steve

Last Name: hall

Email Address: shall@usamedia.tv

Affiliation:

Subject: regulations

Comment:

Why make more regulations to choke business and by direct relation cost jobs ??

It is not governments place to instruct us how to live our lives.

Government needs to relearn it's place in America and quit telling us what cars to drive, what food to eat, what toilet paper to use, etc, etc, etc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 09:03:17

No Duplicates.

**Comment 127 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Claire

Last Name: Shapiro

Email Address: [claire@eisen-shapiro.com](mailto:claire@eisen-shapiro.com)

Affiliation: Eisen & Shapiro

Subject: Tractor-Trailer GHG Regulation

Comment:

Please see attached the comments of the Owner-Operator Independent Drivers Association (OOIDA) on the proposed amendments to CARB's GHG Regulation.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/137-ghg.comments.final.cls.pdf](http://www.arb.ca.gov/lists/on-offroad10/137-ghg.comments.final.cls.pdf)'

Original File Name: GHG.comments.final.cls.pdf

Date and Time Comment Was Submitted: 2010-12-15 09:38:37

No Duplicates.

**Comment 128 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: helena

Last Name: chung

Email Address: island.gr@hotmail.com

Affiliation:

Subject: proposed amendments to 2 requirements re: trucks, et cet.

Comment:

I am concerned that the proposed modifications do not maintain the short and long-term health benefits of the original rule. They also go too far and can impact the public's health adversely. The health of businesses should not become a priority when the public's health can suffer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 09:41:01

No Duplicates.

**Comment 129 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Eric

Last Name: Carleson

Email Address: ecarleson@calog.com

Affiliation: Associated California Loggers

Subject: pdf In-Use On Road Rule

Comment:

See attached letter, new version to open.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/140-lettercommentcarbodieseltruck1210.pdf'

Original File Name: lettercommentcarbodieseltruck1210.pdf

Date and Time Comment Was Submitted: 2010-12-15 09:49:47

No Duplicates.

**Comment 130 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: JOHN

Last Name: SERRES

Email Address: JPSRANCH@GMAIL.COM

Affiliation:

Subject: STOP AB32

Comment:

MY FAMILY HAS BEEN IN HEAVY CONSTRUCTION IN CA. SINCE 1929 FOR 3 GENERATIONS WE HAVE GONE FROM 45 EMPLOYEES TO 3 THAT ARE LAID OFF FOR THE WINTER AB32 WILL BE THE FINAL NAIL IN THE COFFIN FOR OUR FAMILYBUSINESS

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 09:42:36

No Duplicates.

**Comment 131 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Camille

Last Name: Kustin

Email Address: camille@betterworldgroup.com

Affiliation:

Subject: Recommendations from coalition of environmental and health groups

Comment:

See attached

Attachment: 'www.arb.ca.gov/lists/on-offroad10/142-final\_diesel\_comments\_12-15-10\_with\_maps.pdf'

Original File Name: Final Diesel Comments 12-15-10\_with maps.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:04:05

No Duplicates.

**Comment 132 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation: American Trucking Associations

Subject: Proposed Amendments to Truck & Bus, Drayage Truck, and Tractor-Trailer GHG Regulations

Comment:

Comments Attached

Attachment: 'www.arb.ca.gov/lists/on-offroad10/143-2010.ata\_comments\_on\_carb\_on-road\_amendments.pdf'

Original File Name: 2010.ATA Comments on CARB On-Road Amendments.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:14:57

No Duplicates.

**Comment 133 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Alex

Last Name: Cherin

Email Address: alex@cheringroup.com

Affiliation: Harbor Trucking Association

Subject: Harbor Trucking Association Comments on Item 10-11-3

Comment:

The following are published comments by the Harbor Trucking Association in conjunction with CARB deliberation on Class 7 Truck regulations and Dray-Off issues heard as part of Agenda Item 10-11-3 for 12/17/10.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/144-htacarbcomments121710.docx'

Original File Name: HTACARBCOMMENTS121710.docx

Date and Time Comment Was Submitted: 2010-12-15 10:18:26

No Duplicates.

**Comment 134 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kevin

Last Name: Campbell

Email Address: [kcampbell@cleanairpower.com](mailto:kcampbell@cleanairpower.com)

Affiliation: Clean Air Power

Subject: Removal Of Dual Fuel Exclusion from Credit Provisions

Comment:

Attached are detailed arguments supporting Clean Air Power's request that the proposed on-road rule changes remove the exclusion of dual-fuel technologies from the type of vehicles eligible for credits under the on-road regulation. We welcome dialogue with staff and Board members in order to have this critical revision accepted as part of the Board's decision.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/145-carb\\_rule\\_response.pdf](http://www.arb.ca.gov/lists/on-offroad10/145-carb_rule_response.pdf)'

Original File Name: CARB Rule response.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:15:47

No Duplicates.

**Comment 135 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kelly

Last Name: McKechnie

Email Address: kmckechnie@wga.com

Affiliation:

Subject: Comments on Proposed Truck Rule Amendments

Comment:

Please see attached Western Growers comments concerning proposed amendments to the On-Road Truck and Bus Rule.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/146-western\_growers\_2010\_truck\_rule\_comments.pdf'

Original File Name: Western Growers 2010 Truck Rule Comments.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:23:25

No Duplicates.

## **Comment 136 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Anthony  
Last Name: Wegrecki  
Email Address: wegrecki2@llnl.gov  
Affiliation: Lawrence Livermore National Laboratory

Subject: In-Use On-Road Heavy Duty Diesel Vehicle Regulation (Truck and Bus Regulation)  
Comment:

Lawrence Livermore National Laboratory (LLNL) appreciates the opportunity to offer comments on the proposed amendments to the In-Use On-Road Heavy Duty Diesel Vehicle Regulation (Truck and Bus Regulation) being considered for adoption on December 16 and 17, 2010. The comments are as follows:

1. Section 2025(d)(40), Definition of Low Use Vehicle. LLNL recommends that the hour use limit for vehicles with power take-off be increased from 100 hours per year to 200 hours per year. This would harmonize the low use definition in this regulation with the proposed low use definitions in CARB's other vehicle regulations such as the Large Spark Ignition Engine Regulation and the In-Use Off-Road Diesel Vehicle Regulation.
2. Section 2025(n)(2), Requirements for Two-Engine Sweepers. LLNL recommends that Tier 0 auxiliary engines (greater than 50 horsepower) on two engine sweepers be allowed to operate up to 200 hours per year after January 1, 2014. This limit would be consistent with the low use limits for engines covered in the Large Spark Ignition Engine Regulation and in the In-Use Off-Road Diesel Vehicle Regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 10:20:40

No Duplicates.

## **Comment 137 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Anthony  
Last Name: Wegrecki  
Email Address: wegrecki2@llnl.gov  
Affiliation: Lawrence Livermore National Laboratory

Subject: In-Use Off-Road Diesel Vehicle Regulation  
Comment:

Lawrence Livermore National Laboratory (LLNL) appreciates the opportunity to offer comments on the proposed amendments to the In-Use Off-Road Diesel Vehicle Regulation being considered for adoption on December 16 and 17, 2010. The comments are as follows:

1. Section 2449(f)(2)(E), Affixing EIN Label to Left Side of Vehicle. LLNL recommends that this proposed requirement be removed. Section 2449(f)(2)(B) already requires an EIN label be affixed to the right side of vehicles covered by the regulation. This proposed requirement would be redundant and add additional cost and time burden to fleet operators with little additional benefit.
2. Section 2449.1(a)(2)(A)(2).a.iv, Credit for Early Retirement. LLNL recommends that the early retirement credit earned by fleets for reducing overall horsepower from March 1, 2006 to March 1, 2010 continue to be equal to its full value and continue to be available for meeting the BACT requirement in any compliance year (and furthermore, continue to never expire). Under the proposed amendments, the early retirement credit earned would be reduced to one half its original value, and for large fleets, the early retirement credit may not be used for meeting the BACT requirement for year ending January 1, 2014. The early retirement credit was part of a California budget agreement (Assembly Bill 8 2X) to provide economic relief to off-road diesel fleets severely impacted by the recession and who reduced their fleet size during that period. Fleets are relying on and have been planning their future compliance strategies (including year ending January 1, 2014) based on being able use their earned early retirement credits in full. Implementing the proposed requirement would reduce the economic relief that Assembly Bill 2X set out to provide.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 10:40:38

No Duplicates.

**Comment 138 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Kevin

Last Name: Brown

Email Address: kfb@enginecontrolsystems.com

Affiliation: ECS / CDTI

Subject: Clean Diesel Technologies Comments

Comment:

I am the regulatory affairs manager for Engine Control Systems- a division of Clean Diesel Technologies of Ventura, California.

Attached is our company's comment to the proposed rule changes.

Thank you

Attachment: 'www.arb.ca.gov/lists/on-offroad10/149-cdti\_comment\_to\_board\_dec\_15\_2010.pdf'

Original File Name: CDTI comment to board Dec 15 2010.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:45:10

No Duplicates.

**Comment 139 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Adam

Last Name: Harper

Email Address: aharper@calcima.org

Affiliation: CalCIMA

Subject: CalCIMA Off Road Diesel Regulations Comments

Comment:

Attached please find CalCIMA's Comments on the proposed modifications to the Off Road Diesel Rule.

Adam Harper

Attachment: 'www.arb.ca.gov/lists/on-offroad10/151-2010\_off\_road\_comments\_with\_cites.pdf'

Original File Name: 2010 Off Road Comments with cites.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:52:08

No Duplicates.

**Comment 140 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Christine

Last Name: Jones

Email Address: christinem.jones@cemex.com

Affiliation:

Subject: On-Road Diesel Rule Comments

Comment:

Please see attached letter. Thank you.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/153-on-road\_rule\_comments.cemex.12.15.2010.pdf'

Original File Name: On-Road Rule Comments.CEMEX.12.15.2010.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:00:24

No Duplicates.

**Comment 141 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: David

Last Name: Gibbs

Email Address: dgibbs@gibbsfirm.com

Affiliation:

Subject: In-Use On-Road Diesel-Fueled Vehicles Regulations

Comment:

Please refer to attachment.

Thank you.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/155-attachment\_to\_public\_comment\_121510.pdf'

Original File Name: Attachment to Public Comment 121510.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:17:09

No Duplicates.

**Comment 142 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Equipment Manager

Subject: On and Off Road Diesel Emissions

Comment:

I'm asking the Board to please consider raising the low miles exemption for both P.M. and NOx for trucks to at least 15,000 miles per year. A truck that operates less than 15,000 miles annually not only emits less emissions but also uses less fuel, oil, tires, brakes, and filters. That contributes to less emissions not only in the manufacturing but also in the transportation and delivery of those products to the supply house. Raising the low miles use to 15,000 annually would help our company, especially during these tough economic times in the construction industry.

Thank You For Your Time.

Ron

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 10:59:20

No Duplicates.

**Comment 143 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coal.

Subject: In-Use Off-Road Diesel-Fueled Fleets

Comment:

Attached are the comments submitted by the Construction Industry Air Quality Coalition (CIAQC) on the proposed amendments to the In-Use Off-Road Diesel-Fueled Fleets regulation.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/157-off\_road\_reg\_ciaqc\_comments\_-\_december\_2010.pdf'

Original File Name: Off Road Reg CIAQC Comments - December 2010.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:27:55

No Duplicates.

**Comment 144 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Lee

Last Name: Brown

Email Address: leebrown@cdtoa.org

Affiliation: California Dump Truck Owners Association

Subject: CDTOA's Comments on Truck and Bus Rule

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/158-cdtoa\_comments\_to\_carb.12.-15-10.pdf'

Original File Name: CDTOA Comments to CARB.12.-15-10.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:34:24

No Duplicates.

**Comment 145 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Brad

Last Name: Edgar

Email Address: brad.edgar@cleaire.com

Affiliation: Cleaire Advanced Emission Controls

Subject: Cleaire comments on ARB agenda item 10-11-3

Comment:

Comment letter attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/159-cleaire\_comments\_for\_arb\_agenda\_item\_10-11-3.pdf'

Original File Name: Cleaire comments for ARB agenda item 10-11-3.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:39:04

No Duplicates.

**Comment 146 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: James

Last Name: Enstrom

Email Address: [jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)

Affiliation: University of California, Los Angeles

Subject: Relationship Between PM2.5 & Total Mortality in California

Comment:

The attached table on the relationship between PM2.5 and total mortality in California is directly related to the calculation of premature deaths associated with diesel particulate matter in California. These premature deaths provide the primary public health justification for the CARB on-road and off-road diesel regulations.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/160-ca\\_relationship\\_pm2.5\\_\\_\\_mortality\\_table\\_121510.pdf](http://www.arb.ca.gov/lists/on-offroad10/160-ca_relationship_pm2.5___mortality_table_121510.pdf)'

Original File Name: CA Relationship PM2.5 & Mortality Table 121510.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:33:02

No Duplicates.

**Comment 147 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jenny

Last Name: Bard

Email Address: [jbard@alac.org](mailto:jbard@alac.org)

Affiliation:

Subject: Health Network Support for Strong Regulations

Comment:

Dear CARB,

Attached please find a letter from the Health Network for Clean Air in support of the strongest possible on road and off road diesel regulations to provide commensurate health protections to the original rules.

Thank you for your consideration.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/161-hnca\\_support\\_for\\_carb\\_diesel\\_regs\\_dec\\_\\_2010.pdf](http://www.arb.ca.gov/lists/on-offroad10/161-hnca_support_for_carb_diesel_regs_dec__2010.pdf)'

Original File Name: HNCA Support for CARB Diesel Regs Dec 2010.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:42:34

No Duplicates.

## **Comment 148 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Julian

Last Name: Imes

Email Address: julian.imes@donaldson.com

Affiliation:

Subject: Donaldson Comments

Comment:

Donaldson Company, Inc.  
1400 West 94th Street  
Bloomington, MN 55431 USA  
Mailing Address  
PO Box 1299  
Minneapolis, MN 55440 USA

STATEMENT FROM DONALDSON COMPANY, INC.  
ON THE AIR RESOURCES BOARD'S  
PROPOSED AMENDMENTS TO THE  
REGULATIONS FOR IN-USE OFF-ROAD  
AND IN-USE ON-ROAD DIESEL-FUELED  
FLEET REGULATIONS

December 17, 2010

Donaldson Company, Inc. is pleased to provide comments on the ARB's proposed amendments to the regulations covering in-use on-road and off-road vehicles. Donaldson understands the need for industry economic relief that is driving the proposed changes. We support the Manufacturers of Emission Control Association (MECA) recommended changes to the proposal in an effort to identify additional opportunities for emission reductions.

Donaldson is headquartered in Minneapolis, Minnesota, and is a leading worldwide provider of filtration systems and replacement parts. The company serves customers in the industrial and engine markets with a product mix which includes air and liquid filters and exhaust and emission control markets.

Donaldson is also a member of the Manufacturers of Emission Control Association (MECA) and has been actively working with EPA and California ARB Diesel Risk Reduction Plan (DRRP) and EPA's Voluntary Diesel Retrofit Program (VDRP). Donaldson presently has Verified retrofit technologies and is a leading supplier for both ARB's DRRP program and for EPA's VDRP. Specific reference and background to Donaldson's emission control technologies may be accessed from our corporate web site at [www.donaldson.com/emissions](http://www.donaldson.com/emissions).

In addition to support of MECA's overall comments or positions regarding ARB's proposed amendments, Donaldson also wishes to provide specific comments concerning certain aspects of ARB's staff proposal. ARB consideration of a few key modifications to the proposal that would achieve further emission reductions while providing additional opportunities for verified retrofit technologies.

For the On-Road rule, key requested modifications include:

- Add mandatory PM retrofits for 1994 - 1997 trucks over 26,000 pounds with extended life before turnover is required to achieve additional early PM reductions.
- Incentivize installation of ARB or EPA verified Level 1 or Level 2 retrofits on under 26,000 pound trucks before turnover to provide additional reductions in toxic exhaust emissions from the medium duty fleet.
- Add mandatory PM retrofits for school buses under 26,000 pounds and prioritize incentive funding to cover the costs.

For the Off-Road rule, key requested modifications include:

- Inclusion of a retrofit for life provision for up to 15% of the fleet horsepower until January 2013 and double credits for retrofits installed up to one year prior to the compliance date as a way to incentivize early PM reductions via retrofits.
- Add mandatory PM retrofits on high use equipment (>500 hours) that remains in the fleet and does not have a diesel particulate filter.

Donaldson also requests near term reviews with ARB staff and short term ARB interim policy guidance on various approaches that would provide economic relief to retrofit device manufacturers and insure that verified technologies are available when they are needed.

Donaldson believes that more can be done to further streamline the verification process by increasing the cooperative effort to harmonize the application and test plan approval process with U.S. EPA to better move toward true reciprocity of the two verification processes.

Streamlined, more cost effective verification procedures are suggested such as:

- Establishing a more streamlined verification process to broader applications within a given sector (examples: Off-Road tracked vehicles, high horsepower Dual exhaust systems).
- Establish an engineering or running change procedure for non-emission critical part changes with notification but without ARB approval need.

Additional streamlined, more cost effective in-use testing procedures are suggested such as:

- Consider change of current 50 unit threshold to 500 unit sales trigger for in-use compliance to harmonize with EPA 500 unit sales trigger.
- Allow use of data obtained from vehicles that operate outside of California.
- Allow legacy retrofits where feasible to only do Phase 2 testing (showing long term performance).

In overall summary, we urge the Board to adopt the proposed changes to the fleet regulations and also request near term ARB policy guidance adjustments for existing verification and in-use compliance procedures.

In closing, we commend the Air Resources Board and staff members continuing efforts with healthy air quality, and in implementing the Diesel Risk Reduction Plan. Donaldson intends to provide continued commitment and support of ARB's objectives and looks for continued cooperative effort with ARB staff and other stakeholders.

Thank you,

Julian Imes

Director, Advanced Technology &  
Government Affairs  
Donaldson Company, Inc.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/162-statement\_dated\_december\_17\_2010.doc'

Original File Name: Statement dated December 17 2010.doc

Date and Time Comment Was Submitted: 2010-12-15 11:34:03

No Duplicates.

## **Comment 149 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Richard  
Last Name: Battersby  
Email Address: rebattersby@ucdavis.edu  
Affiliation: NAFA CARB Advisory Council

Subject: public comments  
Comment:

December 15, 2010

Mary Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: Proposed Amendments to the Regulations to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel Fueled Vehicles, Off-Road Diesel Fueled Fleets, and LSI 2010

Dear Chairman Nichols:

NAFA Fleet Management Association (NAFA) is the world's premier fleet professional organization, representing members from all facets of the fleet industry including public and private fleets. The 2100 vehicle fleets managed by NAFA's 3,000 members collectively total more than 3.5 million vehicles, of which more than 1.1 million are trucks, and of those over 350,000 are medium and heavy-duty trucks. The NAFA CARB Advisory Council has reviewed the proposed regulatory actions and respectfully submits the following public comment.

NAFA's Council recommends increasing all vehicle and equipment minimum usage exemption parameters (mileage and hours of operation). This will provide a small measure of relief to public and private fleets which have been incredibly impacted by the current economic situation. It is no secret that this state has been especially hard hit by the recession and that current diesel vehicle operation and usage is far below projections due to the economic environment. Additionally, there is a general lack of retrofit devices available for larger equipment such as construction and heavy GVW forklifts; especially older equipment. Increasing minimum usage parameters would allow fleets to make better use of existing units for which no suitable retrofit device exists and therefore greatly aid fleets struggling just to remain in business with minimal impact to overall projected diesel emissions.

NAFA's Council recommends that in order to provide equity if implementation is delayed, CARB should identify and provide preferential incentives to fleets that have already made efforts to comply with CARB regulations. Fleets that committed to early or as

scheduled compliance made significant financial investments in vehicles and other capital assets. These fleets will be at a severe competitive disadvantage against other similar businesses with fleets that did not take any compliance actions. Some possible options include establishing a preferential priority for grant funding for these fleets, establishing tax credits or incentives for these fleets, or providing additional equipment "grandfathering" opportunities for those fleets that may take advantage of them. NAFA looks forward to working with CARB staff to develop a plan to ensure equity for those fleets that made good faith efforts to comply with CARB regulations.

NAFA's Council also recommends that CARB consider allowing use of up to B20 biodiesel blends as a means of compliance or partial compliance, especially with off-road equipment. There is a severe lack of available retrofits for much of the older and larger off-road equipment. Those retrofit devices that are available are unproven and costly. While there have been concerns expressed in the past regarding NOx emissions when using biodiesel, NOx emissions are for all practical purposes neutral with B20 biodiesel. DOE's National Renewable Energy Laboratory confirms the positive impact of B20 on emissions of HC, CO, and PM and states that "the data are insufficient for users to conclude anything about the average effect of B20 on NOx, other than that it is likely very close to zero" in their "Biodiesel Handling and Use Guide, Fourth Edition". Allowing B20 biodiesel use as a compliance measure is a low cost solution to immediately lower PM emissions and generally increase the usage of lower carbon content and renewable biodiesel in California.

NAFA's Council also recommends that CARB consider waiving certification requirements for manufacturers willing to build alternative fuel off-road and construction equipment. There are fleets willing to consider alternative fuel off-road equipment options; however the equipment is not currently available. Part of the problem is that the low volume of sales cannot justify the expense of undergoing CARB certification. In order to jumpstart innovation and expansion in the area of alternative fuel off-road and construction equipment, NAFA recommends CARB survey the manufacturers of this equipment for sale in California to determine if waiving CARB certification of this equipment would stimulate development in this area.

In closing, NAFA supports CARB's efforts to reduce vehicle emissions and appreciates CARB's commitment to amend existing rules in acknowledgement of the current economic situation and corresponding change to projected vehicle and equipment emissions that the rules were originally based upon. NAFA greatly appreciates the opportunity to comment on the proposed rulemaking and we look forward to continue working together with CARB staff in the future.

Sincerely,

Richard E. Battersby

Chairman, NAFA CARB Advisory Council

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 11:50:37

No Duplicates.

**Comment 150 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Const. Industry Air Quality Coal.

Subject: CIAQC Recommendation for Low-use Exemption Criteria for On-Road Construction Trucks

Comment:

Attached is the CIAQC Recommendation for establishing Low-Use Exemption Criteria for On-Road Construction Trucks.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/164-ciaqc\_-  
\_low\_use\_exemption\_criteria\_for\_on-road\_construction\_trucks.pdf'

Original File Name: CIAQC - Low Use Exemption Criteria for On-Road Construction Trucks.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:46:08

No Duplicates.

**Comment 151 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Air Quality Management District

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/166-broadbent.pdf'

Original File Name: Broadbent.pdf

Date and Time Comment Was Submitted: 2010-12-15 15:17:22

No Duplicates.

**Comment 152 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Ronald

Last Name: Biang

Email Address: Non-web submitted comment

Affiliation:

Subject: Puente Ready Mix, Inc.

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/167-biang.pdf'

Original File Name: Biang.pdf

Date and Time Comment Was Submitted: 2010-12-15 15:17:22

No Duplicates.

**Comment 153 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Christopher

Last Name: Cannon

Email Address: Non-web submitted comment

Affiliation:

Subject: Port of LA

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/168-cannon.pdf'

Original File Name: Cannon.pdf

Date and Time Comment Was Submitted: 2010-12-15 16:32:20

No Duplicates.

**Comment 154 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Richard

Last Name: Steinke

Email Address: Non-web submitted comment

Affiliation:

Subject: Port of Long Beach

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/169-steinke.pdf'

Original File Name: Steinke.pdf

Date and Time Comment Was Submitted: 2010-12-15 16:32:20

No Duplicates.

**Comment 155 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Pamela

Last Name: McDonald

Email Address: Non-web submitted comment

Affiliation:

Subject: Orange Unified School District

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/170-mcdonald.pdf'

Original File Name: McDonald.pdf

Date and Time Comment Was Submitted: 2010-12-15 16:32:20

No Duplicates.

**Comment 156 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Robert

Last Name: Hassebrock

Email Address: robert.hassebrock@weatherford.com

Affiliation:

Subject: Weatherford

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/171-hassebrock2\_.docx'

Original File Name: Hassebrock2 .docx

Date and Time Comment Was Submitted: 2010-12-15 16:32:20

No Duplicates.

**Comment 157 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 158 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Carre

Last Name: Brown

Email Address: browncd@co.mendocino.ca.us

Affiliation:

Subject: Mendocino County AQMD

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/174-brown.pdf'

Original File Name: Brown.pdf

Date and Time Comment Was Submitted: 2010-12-21 10:57:09

No Duplicates.

**Comment 159 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Srikanth

Last Name: Balasubramanian

Email Address: Non-web submitted comment

Affiliation:

Subject: Department of Transportation

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/193-balasubramanian.pdf'

Original File Name: Balasubramanian.pdf

Date and Time Comment Was Submitted: 2010-12-22 10:34:28

No Duplicates.

**Comment 160 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Diane

Last Name: Cox

Email Address: Non-web submitted comment

Affiliation:

Subject: Pioneer Union Elementary School District

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/on-offroad10/194-cox.pdf'

Original File Name: Cox.pdf

Date and Time Comment Was Submitted: 2010-12-22 10:34:28

No Duplicates.

**Comment 161 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 45 Day.**

First Name: Stephen

Last Name: Rhoads

Email Address: [steve@strategicadvocates.com](mailto:steve@strategicadvocates.com)

Affiliation:

Subject: Strategic Education Services

Comment:

Please see attached.

Attachment: '[www.arb.ca.gov/lists/on-offroad10/224-steve.pdf](http://www.arb.ca.gov/lists/on-offroad10/224-steve.pdf)'

Original File Name: steve.pdf

Date and Time Comment Was Submitted: 2011-07-19 16:07:47

No Duplicates.

**Comment 1 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Betty

Last Name: Plowman

Email Address: sweitekamp@thecmsa.org

Affiliation:

Subject: California Moving and Storage Association - Received at November Board Meeting  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/17-betty.pdf](http://www.arb.ca.gov/lists/on-offroad10/17-betty.pdf)

Original File Name: Betty.pdf

Date and Time Comment Was Submitted: 2010-11-23 11:06:40

No Duplicates.

**Comment 2 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Henry

Last Name: Hogo

Email Address: Non-web submitted comment

Affiliation:

Subject: SCAQMD - Received at November Board Meeting

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/18-henry.pdf](http://www.arb.ca.gov/lists/on-offroad10/18-henry.pdf)

Original File Name: Henry.pdf

Date and Time Comment Was Submitted: 2010-11-23 11:06:40

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: William

Last Name: Davis

Email Address: Non-web submitted comment

Affiliation:

Subject: SCCA - Received at November Board Meeting

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/19-william.pdf](http://www.arb.ca.gov/lists/on-offroad10/19-william.pdf)

Original File Name: William.pdf

Date and Time Comment Was Submitted: 2010-11-23 11:06:40

No Duplicates.

**Comment 4 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Steve

Last Name: Thomson

Email Address: Non-web submitted comment

Affiliation:

Subject: Syar Concrete

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/173-thomson.pdf](http://www.arb.ca.gov/lists/on-offroad10/173-thomson.pdf)

Original File Name: Thomson.pdf

Date and Time Comment Was Submitted: 2010-12-21 09:59:52

No Duplicates.

**Comment 5 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Tim

Last Name: Fortier

Email Address: Non-web submitted comment

Affiliation:

Subject: Commercial Transfer Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/175-fortier.pdf](http://www.arb.ca.gov/lists/on-offroad10/175-fortier.pdf)

Original File Name: Fortier.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 6 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Richard

Last Name: Coyle

Email Address: Non-web submitted comment

Affiliation:

Subject: Devine Intermodal

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/176-coyle.pdf](http://www.arb.ca.gov/lists/on-offroad10/176-coyle.pdf)

Original File Name: Coyle.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 7 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Seyed

Last Name: Sadredim

Email Address: Non-web submitted comment

Affiliation:

Subject: San Joaquin Valley APCD

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/177-sadredim.pdf](http://www.arb.ca.gov/lists/on-offroad10/177-sadredim.pdf)

Original File Name: Sadredim.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 8 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Michael

Last Name: Rea

Email Address: Non-web submitted comment

Affiliation:

Subject: California Association of School Transportation Officials

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/178-rea.pdf](http://www.arb.ca.gov/lists/on-offroad10/178-rea.pdf)

Original File Name: Rea.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 9 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Marty

Last Name: Lassen

Email Address: Non-web submitted comment

Affiliation:

Subject: Johnson Matthey Catalysts

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/179-lassen.pdf](http://www.arb.ca.gov/lists/on-offroad10/179-lassen.pdf)

Original File Name: Lassen.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 10 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Steven

Last Name: Brink

Email Address: cfa@foresthealth.org

Affiliation:

Subject: California Forestry Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/180-brink.pdf](http://www.arb.ca.gov/lists/on-offroad10/180-brink.pdf)

Original File Name: Brink.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 11 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Matt

Last Name: Schrap

Email Address: Non-web submitted comment

Affiliation:

Subject: California Trucking Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/181-schrap.pdf](http://www.arb.ca.gov/lists/on-offroad10/181-schrap.pdf)

Original File Name: Schrap.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 12 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Don

Last Name: Anair

Email Address: Non-web submitted comment

Affiliation:

Subject: Union of Concerned Scientists

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/182-anair.pdf](http://www.arb.ca.gov/lists/on-offroad10/182-anair.pdf)

Original File Name: Anair.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 13 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Diane

Last Name: Bailey

Email Address: Non-web submitted comment

Affiliation:

Subject: NRDC

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/183-bailey.pdf](http://www.arb.ca.gov/lists/on-offroad10/183-bailey.pdf)

Original File Name: Bailey.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 14 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Sean

Last Name: Edgar

Email Address: Non-web submitted comment

Affiliation:

Subject: Clean Fleets Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/184-edgar.pdf](http://www.arb.ca.gov/lists/on-offroad10/184-edgar.pdf)

Original File Name: Edgar.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 15 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Clayton

Last Name: Miller

Email Address: [ciaqc@uia.net](mailto:ciaqc@uia.net)

Affiliation:

Subject: Construction Industry Air Quality Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/185-miller.pdf](http://www.arb.ca.gov/lists/on-offroad10/185-miller.pdf)

Original File Name: Miller.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 16 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Camille

Last Name: Kustin

Email Address: Non-web submitted comment

Affiliation:

Subject: Better World Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/186-kustin.pdf](http://www.arb.ca.gov/lists/on-offroad10/186-kustin.pdf)

Original File Name: Kustin.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 17 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Corey

Last Name: Wardlaw

Email Address: Non-web submitted comment

Affiliation:

Subject: Wardlaw Trucking

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/187-wardlaw.pdf](http://www.arb.ca.gov/lists/on-offroad10/187-wardlaw.pdf)

Original File Name: Wardlaw.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 18 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Ralph

Last Name: Meza

Email Address: ralph.meza@fresnounified.org

Affiliation:

Subject: Fresno Unified School District

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/188-meza.pdf](http://www.arb.ca.gov/lists/on-offroad10/188-meza.pdf)

Original File Name: Meza.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 19 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Chris

Last Name: Cannon

Email Address: Non-web submitted comment

Affiliation:

Subject: Port of Los Angeles

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/189-cannon.pdf](http://www.arb.ca.gov/lists/on-offroad10/189-cannon.pdf)

Original File Name: Cannon.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 20 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Skip

Last Name: Brown

Email Address: Non-web submitted comment

Affiliation:

Subject: Delta Construction Co, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/190-brown.pdf](http://www.arb.ca.gov/lists/on-offroad10/190-brown.pdf)

Original File Name: Brown.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 21 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Barbara

Last Name: Lee

Email Address: Non-web submitted comment

Affiliation:

Subject: Northern Sonoma County APCD

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/191-lee.pdf](http://www.arb.ca.gov/lists/on-offroad10/191-lee.pdf)

Original File Name: Lee.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

**Comment 22 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10). (At Hearing)**

First Name: Jill

Last Name: Ralner

Email Address: Non-web submitted comment

Affiliation:

Subject: Rose Foundation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/192-ralner.pdf](http://www.arb.ca.gov/lists/on-offroad10/192-ralner.pdf)

Original File Name: Ralner.pdf

Date and Time Comment Was Submitted: 2010-12-21 14:15:57

No Duplicates.

## **Comment 1 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: sean

Last Name: galleher

Email Address: sgalleher@miramartruck.com

Affiliation:

Subject: Heavy on road engine requirements

Comment:

I am still amazed at the level of rule and regs to deliver products to market. With the OE engines and fuel quality improvements, the number of new truck orders coming into the market place, I feel this entire program is a waste of time and money. Older equipment is being replaced at an acceptable pace to create cleaner air. The cost and effect on the business models is damaging. I think the cost and pressure on OE technology improvements is a sufficient burden for the transportation industry to carry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-20 08:49:06

No Duplicates.

## **Comment 2 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: john

Last Name: blough

Email Address: bloughjohn@yahoo.com

Affiliation:

Subject: thanks for nothing

Comment:

Were do i get money to retro fit 13 trucks at \$15,000 to \$20,000 per truck i guess i will just through it all away. I cant even sell them and thats just this year. I have 42 trucks and the newest is a 2006 not counting all of my off-road that will soon be trash. so thank you for putting comanys out of business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-20 10:04:04

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Ronald

Last Name: Light

Email Address: ron@weststate.org

Affiliation: West State Alliance

Subject: Attached three documents submitted in comment on drayage rule

Comment:

Please find three .pdf documents attached and compressed in folder:  
Archive.zip

Attachment: [www.arb.ca.gov/lists/on-offroad10/197-archive.zip](http://www.arb.ca.gov/lists/on-offroad10/197-archive.zip)

Original File Name: Archive.zip

Date and Time Comment Was Submitted: 2011-05-20 15:40:20

No Duplicates.

**Comment 4 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation: California Trucking Association

Subject: Truck And Bus

Comment:

Truck and Bus Rule Comments Attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/198-15daytruckbuscomments2011.pdf](http://www.arb.ca.gov/lists/on-offroad10/198-15daytruckbuscomments2011.pdf)

Original File Name: 15daytruckbuscomments2011.pdf

Date and Time Comment Was Submitted: 2011-05-23 11:47:54

No Duplicates.

**Comment 5 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: RUPINDER

Last Name: GILLON

Email Address: RUBY@OPLOGISTICS.COM

Affiliation:

Subject: DRAYAGE TRUCK

Comment:

I WOULD LIKE TO KNOW IF WE ARE GETTING ANY COMPOSESATION FOR 2006  
MODE TRUCKS (ENGINE 2005)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-19 15:17:00

No Duplicates.

## **Comment 6 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: David

Last Name: Chidester

Email Address: ccaltrans@aol.com

Affiliation: Central Cal Transportation

Subject: Tightening up of loose regulations

Comment:

Thank you for tightening up this regulation to effectively include dray-offs or equipment swaps that have been occurring in our industry. I am pleased that this practice will finally come to an end. The thought that trucks could travel hundreds of miles with a dirty polluting engine that is not allowed in the Ports or Rails, fouling our air literally flies in the face of the intent of your laws. I think that holding everyone accountable for this practice is very fair as the intent of the regulations was to clear our air, not to provide a loophole to be gotten through. There are far too many trucks operating in this loophole from the Central Valley. All you have to do is to park either on the valley side of the Altamont or the Grapevine and just look for the smoke. If there is smoke, there is a problem that needs to be addressed. I realize that this will come as a hardship for many, and I truly feel for the industry that has had to deal with all the uncertainty and delays in compliance, but we need a level playing field and until this takes effect, it is unfair and gives a marketing advantage to truckers operating in this manner. All I have ever looked for is the opportunity to compete in an equal manner with all. I believe this will go a long way in leveling the playing field for us all.

Sincerely

David Chidester

President

Central Cal Transportation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-24 08:56:56

No Duplicates.

## **Comment 7 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Alan

Last Name: Osofsky

Email Address: alano@rodgerstrucking.com

Affiliation: Rodgers Trucking Co

Subject: Oppose implementation of 2007 stds for Drayage

Comment:

I respectfully oppose the elimination of the delay of the 2007 standards for the drayage truck rule.

There was consideration of delaying that requirement until 1/1/17 but instead it has been decided to require that drayage trucks can only access ports and rail yards with 2007 emissions compliant engines starting on 1/1/14.

Per a study of emissions at the Port of Oakland conducted by Prof. Robt Harley, UC Berkeley, during 11/2009 through 6/2010, it was learned that the PM emissions had been reduced by 50%. Also, the NOx was reduced by 40%. This study was presented to CARB in Dec 2010 at the Mobile Source Emissions Workshop in Sacramento.

I believe this was attributed to the replacement of older 1980-1990's vintage trucks with 2004-2006 truck engines. Also, the retrofitting of late model 1990's engines with DPF has had a positive affect on reducing PM emissions.

Many small trucking companies and owner operators invested in 2004-2006 technology in 2008 & 2009 in order to be compliant and to ensure that they would be able to continue to service the Port of Oakland for years to come. Many did this at a tremendous financial burden. They have the option of retrofitting those trucks but it only gets them until 1/1/14. With the burden of a truck payment and a DPF install, it would have a devastating financial consequence for them. In our fleet, we installed 23 DPF's on trucks 1996 to 2001. We feel that these trucks are much cleaner than before and have helped to achieve a huge reduction in PM and NOx, as stated above.

In conclusion, I request that CARB reconsider its cancelation of the 1/1/17 compliance date for 2007 compliant engines. I know that some fleets were able to upgrade to 2007 & 2010 standard engines, and I know it was a financial burden to them. Perhaps offering an attractive credits package to them would help offset the anticipated competitive edge they feel older trucks would pose to them.

Thank you for your consideration

Alan Osofsky

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-27 14:52:33

No Duplicates.

## **Comment 8 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Martin

Last Name: Gordon

Email Address: valleyspreader@sbcglobal.net

Affiliation:

Subject: Comments on 2nd admentments to truck and bus rule

Comment:

My first comment is the second amendments to the original proposed regulation are unwieldy. There is not a practical way for the public to completely understand it. I am not sure that the authors have a good idea of what they have written or the would have written it in an understandable way.

The conditions that led to the December 2010 amendments are still relevant. Therefore the proposal should be postphoned.

1. Diesel is still expensive which means: a. Better fuel management is in place. b. Freight is increasing therefore there will be less shipping. c. Inefficient engines will be used less.
2. There is unlikely to be 2007 level construction in the near future because: a. the housing inventory is well over market. b. The foreclosures will continue for another 1 - 2 years.
3. The phase in period does not accommodate the ability of trucking rates to pay for the increased expense. The exemptions of the pre 1996 motors are arbitrary and do not apply to all affected fleets evenly.
4. The lack of interest in the early retrofit credits can now be documented and indicates:
  - a. Lack of faith in the government's will to follow through on the enforcement of this law.
  - b. The unwillingness for the industry to spend \$18,000 to keep using a \$10,000 truck.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-30 14:17:59

No Duplicates.

## **Comment 9 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Steven

Last Name: Brink

Email Address: steveb@foresthealth.org

Affiliation: California Forestry Association

Subject: onoffroad10

Comment:

On-Road, page 6 - definition of Ag Operations precludes chipping of wood waste in the field as an Ag/Forestry operation. We have argued with ARB staff for 3 years that chipping of orchard removals, vine removals, orchard and vine prunings, forest harvested tops and limbs and related brush and small tree removal are all standard Ag/Forestry in-the-field operations before transport to a biomass powerplant.

It makes no sense for ARB to preclude these activities from the Ag/Forestry definition. The chipping is simply to put the wood waste in a transportable form. You cannot haul the raw material in a box truck because you cannot generate a sufficient payload to make the transportation cost affordable. Hence, the wood waste is chipped in-the-field and then dumped into a chip van for transport.

ARB is, in essence, encouraging use of inefficient box trucks that will require two or three times as many trips to haul ag or forestry wood waste to a biomass powerplant compared to in-the-field chipping and using a chip van.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-30 19:55:33

No Duplicates.

## **Comment 10 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Jay

Last Name: Wells

Email Address: jay@wellssweeping.com

Affiliation: North American Power Sweeping Assoc

Subject: Ca. Chapter, Street Sweeping Industry

Comment:

To the Board,

As the need to control emissions for Street Sweepers and other in-use diesel on-road vehicles has evolved, we feel (NAPSA) that the vital remediation role Street Sweepers play has been overlooked. Under the National Pollutant Discharge Elimination System (NPDES) Street Sweepers play the most important role under Best Management Practices (BMPs) to remove pollutants from streets and roadways that otherwise would enter our storm water systems, streams and rivers. Even with concessions and extensions given to our industry during the proposed changes there will be a large number of Sweepers removed from service and not replaced. In fact because of economic conditions cities and counties have cut back on their Sweeping Programs which will directly lead to more pollutants entering our water systems. Private sweeping fleets will be downsized to meet the regulations and in many cases will not be able to retrofit or replace because of the high cost of replacement now nearing \$250,000.00 each. Private fleets play a critical role to supplement sweeping operations not carried out by state, county, city and other government agencies. This will lead to additional pollutants entering our water systems.

To summarize this issue the CAL/EPA departments of AIR and WATER need to collaborate to maintain an adequate number of Street Sweepers needed to remediate the streets and roadways to protect Air Quality and Water Quality under the (NPDES) storm water system.

Jay S Wells, Chairman, Ca. Chapter, NAPSA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-05-31 08:44:39

No Duplicates.

## **Comment 11 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Dave

Last Name: Coapstick

Email Address: davecracing@verizon.net

Affiliation:

Subject: Amendments

Comment:

I understand the facts that we need to get the dirty old trucks of the roads and keep out of the ports and rails The Trucks that have been put in service with 2004 or newer engine are much cleaner than the older ones

I am a single truck owner and cant keep spending money to up grade two a newer truck with the truck loads rates as low as they are I go the the ports for military equipments deliverys and pick ups

Maybe four times a year for a week at a time I cant aford two spend up to \$10,000 for a upgrade for my truck I will lose up to \$25,000 a year in gross income

Can we get a exception to delliver/Pick ups for our United State Military ?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-01 20:18:00

No Duplicates.

**Comment 12 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Shellie

Last Name: Archer

Email Address: archertrucking@comcast.net

Affiliation: Archer Trucking, Inc.

Subject: Construction Truck Low Mileage

Comment:

Archer Trucking, Inc. would like to thank the CARB for listening to our needs in the matter of low-mileage construction dump trucks! This new language will be a great help to our Company.

Sincerely,

Shellie A. Archer

Archer Trucking, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-02 08:52:29

No Duplicates.

**Comment 13 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Glenn

Last Name: Neal

Email Address: gneal@vacavilletow.com

Affiliation: California Tow Truck Association

Subject: CTTA's Comments on CARB's Truck & Bus Regulation

Comment:

Attached are the written comments of the California Tow Truck Association (CTTA).

Attachment: [www.arb.ca.gov/lists/on-offroad10/209-ctta.arb.writtencomment.6-3-11.pdf](http://www.arb.ca.gov/lists/on-offroad10/209-ctta.arb.writtencomment.6-3-11.pdf)

Original File Name: CTTA.ARB.WrittenComment.6-3-11.pdf

Date and Time Comment Was Submitted: 2011-06-03 11:23:26

No Duplicates.

**Comment 14 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Skip

Last Name: Brown

Email Address: skipbrown@deltaconstr.com

Affiliation:

Subject: Comments on Resolution 10-44

Comment:

Attached Comments

Attachment: [www.arb.ca.gov/lists/on-offroad10/210-delta\\_letter\\_comments\\_on\\_resolution\\_10-44\\_060211.pdf](http://www.arb.ca.gov/lists/on-offroad10/210-delta_letter_comments_on_resolution_10-44_060211.pdf)

Original File Name: Delta Letter Comments on Resolution 10-44 060211.pdf

Date and Time Comment Was Submitted: 2011-06-03 11:56:53

No Duplicates.

**Comment 15 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: K. Michael  
Last Name: O'Connell  
Email Address: mike@cvta.org  
Affiliation:

Subject: Diesel Particulate Emissions  
Comment:

Attached please find comments on the proposed rule.

Attachment: [www.arb.ca.gov/lists/on-offroad10/211-coalition\\_of\\_california\\_truck\\_driver\\_training\\_schools.doc](http://www.arb.ca.gov/lists/on-offroad10/211-coalition_of_california_truck_driver_training_schools.doc)

Original File Name: Coalition of California Truck Driver Training Schools.doc

Date and Time Comment Was Submitted: 2011-06-03 12:34:39

No Duplicates.

**Comment 16 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Nick

Last Name: Pfeifer

Email Address: Nicholas.Pfeifer@gcinc.com

Affiliation: Granite Construction

Subject: Comments on 15 day Onroad Language

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/212-granite\\_onroad\\_comments\\_june\\_2011.pdf](http://www.arb.ca.gov/lists/on-offroad10/212-granite_onroad_comments_june_2011.pdf)

Original File Name: Granite Onroad Comments\_June 2011.pdf

Date and Time Comment Was Submitted: 2011-06-03 14:10:56

No Duplicates.

## **Comment 17 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Julius

Last Name: Rim

Email Address: dieseltrap@gmail.com

Affiliation: IMET

Subject: PM & NOx reduction Mandate

Comment:

Our DPF-Hydrated EGR system was verified in Japan to meet both PM level 3 and NOx 35%.  
California should mandate both PM and NOx by 40-50% as a retrofit.

2007 US EPA's PM-NOx regulation is achievable economically and 2010 NOx regulation must be changed. It is because 90% NOx spikes the cost too much, and NOx is not toxic as PM.  
[www.autogreenpower.com](http://www.autogreenpower.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-03 14:11:08

No Duplicates.

**Comment 18 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Charles

Last Name: Rea

Email Address: crea@calcima.org

Affiliation:

Subject: On-road diesel - 15 day comments

Comment:

CalcIMA comments are attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/214-calcima.pdf](http://www.arb.ca.gov/lists/on-offroad10/214-calcima.pdf)

Original File Name: calcima.pdf

Date and Time Comment Was Submitted: 2011-06-03 15:01:47

No Duplicates.

**Comment 19 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Kevin

Last Name: Kroeger

Email Address: [info@powersweeping.org](mailto:info@powersweeping.org)

Affiliation: North American Power Sweeping Associatio

Subject: Proposed Amendments to the In-Use Off-Road Regulations

Comment:

Please see attached file

Attachment: [www.arb.ca.gov/lists/on-offroad10/215-napsa\\_carb\\_response\\_june\\_3\\_\\_2011.pdf](http://www.arb.ca.gov/lists/on-offroad10/215-napsa_carb_response_june_3__2011.pdf)

Original File Name: NAPSA CARB response June 3, 2011.pdf

Date and Time Comment Was Submitted: 2011-06-03 15:07:50

No Duplicates.

**Comment 20 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Mark

Last Name: Carter

Email Address: mnc@streetsweeper.com

Affiliation: NAPSA CA

Subject: In-Use Off-Road Regulations - Street Sweepers

Comment:

Please see attached file

Attachment: [www.arb.ca.gov/lists/on-offroad10/216-bis\\_carb\\_letter\\_6-3-2011.pdf](http://www.arb.ca.gov/lists/on-offroad10/216-bis_carb_letter_6-3-2011.pdf)

Original File Name: BSI CARB Letter 6-3-2011.pdf

Date and Time Comment Was Submitted: 2011-06-03 15:15:45

No Duplicates.

**Comment 21 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Diane  
Last Name: Bailey  
Email Address: dbailey@nrdc.org  
Affiliation: NRDC

Subject: Comments on 15 Day Changes for Diesel Truck Reg  
Comment:

Please find attached our comments.  
Thank you.  
Sincerely,  
Diane Bailey  
NRDC

Attachment: [www.arb.ca.gov/lists/on-offroad10/217-diesel\\_truck\\_15\\_day\\_changes\\_comments.doc](http://www.arb.ca.gov/lists/on-offroad10/217-diesel_truck_15_day_changes_comments.doc)

Original File Name: Diesel Truck 15 day changes comments.doc

Date and Time Comment Was Submitted: 2011-06-03 16:13:32

No Duplicates.

## **Comment 22 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Bill & Jo Ann

Last Name: Bawks

Email Address: joann@centralvalleysweeping.com

Affiliation:

Subject: Comments on changes to the On Road Bus & Truck Rule

Comment:

We have been involved in the on going discussion with CARB Staff, regarding the On Road Bus & Truck Rule and developing a solution that would allow the sweeping industry to survive through this process. We appreciate their willingness to hear our concerns and make some changes that are positive. The following are still concerns that we have:

Section 2025 (d) (40) Low mileage Construction Truck - Construction Sweepers should be included in this definition. Sweepers remove many tons of air and water pollution from the environment each year, much more than they add. Including the construction sweepers in this definition would help compliance and reduce overall PM. Construction sweepers work a limited number of days per year.

Section 2025 (s)(7)(y)- Compliant fleets without motor carrier numbers should be posted on the website as well

In addition to these items, the slow economic recovery has resulted in less work, employees on extended unemployment, and many property owners and or business owners reducing or canceling sweeping service. This only adds to the air pollution problem. As a service business, people have a choice as to whether or not they choose to use the service. Passing on the price increases that staff has proposed, has not been received well by property owners.

Thank you for considering the above suggestions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-03 15:51:25

No Duplicates.

## **Comment 23 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Larry

Last Name: Rennacker

Email Address: LarryR@Arrow-Tek.com

Affiliation:

Subject: 15 Day Notice Revised Truck and Bus Regulation

Comment:

Text at (j)(2)(C) allows the use of excess off-road regulation PM VDECS credits to meet truck and bus PM BACT requirements, and visa versa. In general the same model year off-road engine emits significantly more PM than the same model on-road engine. In addition, the same passive or active PM VDECS costs at least 25% more in off-road applications than in on-road applications. It would therefore be in all parties best interests to give excess off-road PM VDECS' additional credit when used to meet on-road PM BACT requirements. I would suggest a minimum of 25%. So, for example, if a 300 hp of off-road piece of equipment were retrofit generating an excess credit, the amount of credit when applied to the Truck and Bus PM BACT would be at 375 hp.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-03 16:17:22

No Duplicates.

**Comment 24 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: Proposed Amendments to Regulation for In-Use On-Road Diesel-Fueled Fleets  
Comment:

See attached comments submitted by the Construction Industry Air Quality Coalition (CIAQC) on the 15-Day Proposed Amendments to the Truck and Bus Regulation.

Attachment: [www.arb.ca.gov/lists/on-offroad10/220-ciaqc\\_-\\_comments\\_on\\_carb\\_15-day\\_truck\\_\\_\\_bus\\_regulation\\_-\\_6-3-11.pdf](http://www.arb.ca.gov/lists/on-offroad10/220-ciaqc_-_comments_on_carb_15-day_truck___bus_regulation_-_6-3-11.pdf)

Original File Name: CIAQC - Comments on CARB 15-Day Truck & Bus Regulation - 6-3-11.pdf

Date and Time Comment Was Submitted: 2011-06-03 16:43:57

No Duplicates.

**Comment 25 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Rebecca

Last Name: Kaplan

Email Address: atlarge@oaklandnet.com

Affiliation:

Subject: Comment on disparity between truck rule proposals

Comment:

Attached, in PDF Format, I submit my Comment on the proposal to widen the gap between the truck rules. (Drayage/Truck & Bus).

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/on-offroad10/222-kaplan\\_comment\\_arb\\_truck\\_rules.pdf](http://www.arb.ca.gov/lists/on-offroad10/222-kaplan_comment_arb_truck_rules.pdf)

Original File Name: Kaplan Comment ARB Truck Rules.pdf

Date and Time Comment Was Submitted: 2011-06-03 17:02:43

No Duplicates.

**Comment 26 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-1.**

First Name: Bob

Last Name: Shepherd

Email Address: BShepherd@QuinnPower.com

Affiliation:

Subject: Quinn Company

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/hdiuc11/2-shepherd.doc](http://www.arb.ca.gov/lists/hdiuc11/2-shepherd.doc)

Original File Name: Shepherd.doc

Date and Time Comment Was Submitted: 2011-06-06 09:11:15

No Duplicates.

## **Comment 1 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-2.**

First Name: John

Last Name: Yandell

Email Address: john@yandelltruckaway.com

Affiliation:

Subject: Green house Gas Emission Amendment

Comment:

I would again ask that the Board consider increasing the Short Haul Exemption to mirror the DOT to 150 mile radius versus the 100 mile radius as stated and or consider that trailers hauled by tractors that return to their local haul base within a 24 hour period are exempt from the rule. As a short haul/regional with excess trailing equipment (3 trailers for every 1 tractor), there is no return on investment or fuel savings due to the limited miles hauled. Our tracking devices will support that our average miles per hour per day are approximately 45 mph. This GHG rule for the 53' trailers coupled with simultaneously complying with the Truck Bus Rule is impossible in today's economic climate. Your amending this regulation is imperative for our continued operation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-08-08 15:11:24

No Duplicates.

**Comment 2 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-2.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation:

Subject: CTA's HDGHG Reduction Measure 15-Day Comments

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/on-offroad10/227-15dayhdghg82011.pdf](http://www.arb.ca.gov/lists/on-offroad10/227-15dayhdghg82011.pdf)

Original File Name: 15dayHDGHG82011.pdf

Date and Time Comment Was Submitted: 2011-08-18 13:40:10

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-2.**

First Name: Kenneth

Last Name: Lund

Email Address: ken.lund@allenund.com

Affiliation: Allen Lund Company

Subject: Comments

Comment:

Comments attached

Attachment: [www.arb.ca.gov/lists/on-offroad10/228-comments\\_for\\_california\\_air\\_resources\\_board\\_1.docx](http://www.arb.ca.gov/lists/on-offroad10/228-comments_for_california_air_resources_board_1.docx)

Original File Name: Comments for California Air Resources Board 1.docx

Date and Time Comment Was Submitted: 2011-08-18 16:58:29

No Duplicates.

**Comment 1 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-3.**

First Name: Allan

Last Name: Daly

Email Address: [adaly@sierraresearch.com](mailto:adaly@sierraresearch.com)

Affiliation: Sierra Research

Subject: Comment on behalf of ADSC

Comment:

See Attached Letter

Attachment: [www.arb.ca.gov/lists/on-offroad10/230-adsc\\_15-day\\_change.pdf](http://www.arb.ca.gov/lists/on-offroad10/230-adsc_15-day_change.pdf)

Original File Name: ADSC 15-Day Change.pdf

Date and Time Comment Was Submitted: 2011-09-05 04:46:29

No Duplicates.

## **Comment 2 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-3.**

First Name: William E

Last Name: Davis

Email Address: williamedavis@cox.net

Affiliation: Southern California Contractors Assoc.

Subject: Change required to VDECS Safety Provisions

Comment:

Starting with the provisions that begin "VDECS That Impairs Safe Operation of Vehicle" you should strike all of the convoluted requirements for Executive Officer hearings, etc., and simply substitute "all VDECS installations shall comply with the regulations of the California Occupational Health and Safety Agency."

This may be too simple for a regulatory agency, but, it reflects the Cal/OSHA requirements and you can't possibly want to make a responsible fleet owner jump through two sets of hoops on this topic.

If this is not the appropriate place to make the necessary changes, we can and will go before the Board to achieve this goal.

Thanks

Bill Davis  
SCCA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-09-06 10:17:09

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-3.**

First Name: John

Last Name: McClelland

Email Address: john.mcclelland@ararental.org

Affiliation: American Rental Association

Subject: COMMENTS on LSI Equipment

Comment:

Attached are the comments of the American Rental Association regarding the LSI engine fleet requirements.

Should you have problems with this attachment please contact me at 202-289-4460 or Marie Foster at 800-334-2177 ext 254 (marie.foster@ararental.org)

Thank you for allowing us the opportunity to submit our comments regarding this issue.

Attachment: [www.arb.ca.gov/lists/on-offroad10/232-comments\\_lsi\\_rule\\_for\\_rental\\_companies\\_090611.pdf](http://www.arb.ca.gov/lists/on-offroad10/232-comments_lsi_rule_for_rental_companies_090611.pdf)

Original File Name: Comments LSI Rule for Rental Companies 090611.pdf

Date and Time Comment Was Submitted: 2011-09-06 12:34:11

No Duplicates.

**Comment 4 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-3.**

First Name: Jimmy

Last Name: Samartzis

Email Address: jimmy.samartzis@united.com

Affiliation: United Continental Holdings, Inc.

Subject: UCH comments on amendments to the In-Use ORD and LSI fleet regulations

Comment:

Please see attached letter for detailed comments.

Attachment: [www.arb.ca.gov/lists/on-offroad10/233-united\\_contintental\\_holdings\\_-\\_comments\\_on\\_proposed\\_in-use\\_off-road\\_diesel\\_fleets\\_regulation\\_-\\_090611\\_1\\_.pdf](http://www.arb.ca.gov/lists/on-offroad10/233-united_contintental_holdings_-_comments_on_proposed_in-use_off-road_diesel_fleets_regulation_-_090611_1_.pdf)

Original File Name: United\_Contintental\_Holdings\_-\_Comments\_on\_Proposed\_In-Use\_Off-Road\_Diesel\_Fleets\_Regulation\_-\_090611[1].pdf

Date and Time Comment Was Submitted: 2011-09-06 15:16:51

No Duplicates.

**Comment 5 for In-Use Off-Road Diesel-Fueled Fleets and Off-Road Large Spark Ignition Engine Fleet Requirements (on-offroad10) - 15-3.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: 15-Day Modified Regulation Order for In-Use Off-Road Diesel-Fueled Fleets  
Comment:

On behalf of the Construction Industry Air Quality Coalition (CIAQC), see attached comment letter on Off-Road regulation.

Attachment: [www.arb.ca.gov/lists/on-offroad10/234-ciaqc\\_comments\\_on\\_15-day\\_notice\\_for\\_off-road\\_regulation\\_-\\_9-6-11.pdf](http://www.arb.ca.gov/lists/on-offroad10/234-ciaqc_comments_on_15-day_notice_for_off-road_regulation_-_9-6-11.pdf)

Original File Name: CIAQC Comments on 15-Day Notice for Off-Road Regulation - 9-6-11.pdf

Date and Time Comment Was Submitted: 2011-09-06 16:09:54

No Duplicates.