

## **Comment 1 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Head Mechanic

Subject: DOORS Reduced Horsepower Credits

Comment:

The DOORS program does not give the same reduced horsepower credit as the CARB calculator. DOORS should show the same credit information as the calculator. We are told to use the CARB calculator for fleet evaluation but when we input our information into DOORS it doesn't give us the same credit for the reduced horsepower. The calculator is a tool we use throughout the year to prepare us for the compliance date. How can we prepare if both programs aren't showing the same information? This needs to be fixed.

The other issue is what about the companies that have sold machines, installed VDECS, and repowered machines to meet the April 1st. deadline. If CARB is going to push the compliance date back a couple of years we should be able to freeze our credits and be able to use them later. It cost our company a lot of money to meet the April 1st. deadline.

Ron Nuss  
Northwest Excavating, inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-15 10:05:02

No Duplicates.

**Comment 2 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Theresa

Last Name: Lyngso

Email Address: Non-web submitted comment

Affiliation:

Subject: Lyngso Garden Materials

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/onoffroad10/2-theresa.pdf'

Original File Name: theresa.pdf

Date and Time Comment Was Submitted: 2010-04-15 10:07:57

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area AQMD

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/onoffroad10/3-jack.pdf'

Original File Name: Jack.pdf

Date and Time Comment Was Submitted: 2010-04-15 10:18:31

No Duplicates.

## **Comment 4 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Head Mechanic

Subject: Smoke Testing Trucks Twice

Comment:

Truck fleets like ours have to smoke test their trucks with an opacity test machine once a year. I just received a registration renewal in the mail for one of our diesel pickups and it requires diesel trucks less than 14,000 GVW to be smog tested at a local smog station. The smog stations don't have the opacity test equipment like we have. They are told to look to see if it smokes.

If it does, fail it. Why do we have to smoke test our trucks then have them smog tested when the registration is due? That's doing the same job twice. Can you please consider removing one of the requirements. Having us do a test then the State do a test is ridiculous.

Ron Nuss

Northwest Excavating, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-15 10:41:59

No Duplicates.

**Comment 5 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: JR

Last Name: Bowling

Email Address: jr@raycomfg.com

Affiliation: manufacturer

Subject: registrations for off road diesel engines

Comment:

CARB needs a system in place to allow for those people who failed to register their Tier 2 and/or Tier 2 Flex engines on time to now do so. If there is a fine/penalty/etc, that's understandable as the deadline has certainly passed. But to now have no way to get within compliance is both frustrating and counter-productive. Please put a system in place for people to continue registering their engines, even if it now comes at a higher price, it is better than being in violation of the law.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-15 11:36:38

No Duplicates.

**Comment 6 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Richard

Last Name: DeAndero

Email Address: rick@americanindependentinc.com

Affiliation: Business owner serving construction

Subject: Off road diesel regulation

Comment:

This regulation is an outrage and an abuse of taxpayer dollars!

It puts undue burden on an already depressed industry while wasting tax dollars subsidizing the replacement of perfectly good engines in PARKED machines all in the name of unproven science that should not be a state issue in the first place.

There is so much illogic that it seems obvious that there is a hidden agenda at the source.

Richard DeAndero

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-16 07:50:16

No Duplicates.

## **Comment 7 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Ralph

Last Name: McIntosh

Email Address: ralphmcintosh@rmwd.org

Affiliation: Ramona Municipal Water District

Subject: ARB On/Off Road Diesel Regulations

Comment:

To Whom it may concern:

I am sending this short email to express my concern over the ARB On/Off Road Diesel Regulations.

Currently we are in what I believe to be the perfect storm. Drought, declining water sales, declining property tax revenues, increasing water costs, a bad economy and the ever increasing amount of new regulations is hamstringing all public agencies. Asking us to conform to these standards with all of the above mentioned issues just makes a bad situation worse.

The state and federal government are not the only beneficiaries of the bad times. Every branch of government is impacted in the same manner. No one is immune. To keep passing this type of thing on to us will only worsen the situation. This is the trickle down theory at its worse.

Although we are a small agency staff wise, we serve a fairly large community of about 45,000 people and basically provide city services such as water, parks & recreation, sewer, recycled water, fire, paramedic, rescue, etc. Over the last year I have had to eliminate jobs and cut programs within this organization in an effort to cut costs and lessen the burden of the rate payer.

To date this regulation is taking up the time of one employee full time. We can't afford that being we have such a small staff.

Don't get me wrong, we are all very concerned about environment and our childrens and grandchildrens future.

This plan should have been implemented much in the same manner as are passenger vehicles and light trucks. Make the industry comply with the new regulations by a certain time period to meet certain regulatory requirements. Don't just take a vehicle and say that it doesn't comply so if you can't get it into compliance you must replace it. This has been done in our case.

We have a 1987 International 10 yard dumptruck with approximately 70K miles on it. There is nothing wrong with this vehicle other than the fact that it doesn't meet your standards when it comes to diesel particulate requirements. We have tried to retrofit it at an enormous cost but we still can't meet your regulation standards.

These regulations will hit us hard in the next few years as well with our off road fleet.

So now I am forced to expend \$150K of taxpayer/ratepayer funds to purchase a replacement vehicle. This alone will cause a 1-2% increase in our water rates. Water rates are skyrocketing at historical paces. With rates projected to increase by 20-30% in the next year I don't know how much more I can ask of our customers. I have no more positions I can cut. The only thing I guess to look at would be to consider closing fire stations, or cutting safety personnel.

These regulations are also very complicated and hard to figure out due to the differing deadlines. I believe that if you want a certain vehicle off the road then state the date that it is required to be off the road. Don't just string along dates that are all over the place to meet a requirement for one vehicle vs. another.

I would very much like to be in attendance for this weeks public meeting, but I don't even have the funds to fly to Sacramento to attend.

I believe these regulations will drive the states economy further into the tank. I personally know of five local construction businesses that have gone belly up due to the economy, but mostly because they know they can't afford to comply with these regulations and stay in business. I feel that this will drive private business to leave this state, further compounding our economic crises.

So I emplor you to look at for this regulation a little harder so that government agencies and private companies can stay in business, and keep this state the greatest state in the union.

Ralph McIntosh  
General Manager  
Ramona Municipal Water District

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-19 09:02:27

No Duplicates.



**Comment 8 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Rasto

Last Name: Brezny

Email Address: rbrezny@meca.org

Affiliation: MECA

Subject: MECA Comments on In-Use On-Road and Off-Road Regulation

Comment:

Please find attached comments provided by the Manufacturers of Emission Controls Association regarding the update to the Board on the in-use truck and bus and off-road regulations (Agenda item 10-4-2).

Regards,

Rasto Brezny  
MECA

Attachment: 'www.arb.ca.gov/lists/onoffroad10/9-meca\_comments\_fleet\_rules\_042210.pdf'

Original File Name: MECA Comments Fleet Rules 042210.pdf

Date and Time Comment Was Submitted: 2010-04-19 14:13:38

No Duplicates.

## **Comment 9 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: David

Last Name: Noetzli

Email Address: davetrees@aol.com

Affiliation:

Subject: diesel engine regulations

Comment:

I do not think it is fair that I was not notified about these regulations, when my brush chipper was registered with the CALIF DMV from the day I bought it in 2004. I could have been contacted when these regulations took effect. Also, the manufacturer could have contacted us to warn us of the impending regulations. I paid \$3000.00 to CARB and it is not fair. Are cities exempt? I haven't seen any CARB stickers on any city trucks.

Mary Nichols-is this really about clean air, or about revenue for the state? The little orange sticker you gave me doesn't help clean up the air at all. I am a strong advocate for clean air, but fining the businesses that drive this state's economy is just wrong. Many small businesses are going to fold because of these unfair fines and regulations

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-04-19 19:30:56

No Duplicates.

**Comment 10 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Michael

Last Name: Steel

Email Address: msteel@mofo.com

Affiliation:

Subject: Morrison and Foerster LLP

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/onoffroad10/11-steel.pdf'

Original File Name: Steel.pdf

Date and Time Comment Was Submitted: 2010-04-20 09:31:24

No Duplicates.

**Comment 11 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

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

Subject: Comment to Board  
Comment:

see attachment

Attachment: 'www.arb.ca.gov/lists/onoffroad10/14-comment\_-4-22-2010-board-meeting.doc'

Original File Name: Comment -4-22-2010-board-meeting.doc

Date and Time Comment Was Submitted: 2010-04-20 14:29:28

No Duplicates.

**Comment 12 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Michael

Last Name: Steel

Email Address: msteel@mofo.com

Affiliation:

Subject: Morrison and Foerster LLP

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/offroad09/24-package1.pdf'

Original File Name: Package1.pdf

Date and Time Comment Was Submitted: 2010-04-20 15:46:06

No Duplicates.

**Comment 13 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Miles

Last Name: Heller

Email Address: miles.heller@bp.com

Affiliation: BP

Subject: Truck and Bus Rule Low-Use Exemption

Comment:

BP appreciates the opportunity to provide these comments regarding the low-use exemption in the Truck and Bus Rule. BP believes that these two comments will add flexibility to operators with low-use engines and reduce potential adverse economic impacts from the rule on engines with minimal emission potential.

Attachment: 'www.arb.ca.gov/lists/onoffroad10/16-truck\_and\_bus\_rule\_comments\_4-21-2010.doc'

Original File Name: Truck and Bus Rule Comments 4-21-2010.doc

Date and Time Comment Was Submitted: 2010-04-21 07:35:40

No Duplicates.

**Comment 14 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

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/onoffroad10/17-skip.pdf'

Original File Name: Skip.pdf

Date and Time Comment Was Submitted: 2010-04-21 11:31:34

No Duplicates.

**Comment 15 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10) - Non-Reg.**

First Name: Steven

Last Name: Brink

Email Address: steveb@foresthealth.org

Affiliation: California Forestry Association

Subject: onoffroad10

Comment:

Attached are California Forestry Association comments on  
modifications needed to the On-Road Diesel Engine Emission Rule

Attachment: 'www.arb.ca.gov/lists/onoffroad10/18-  
100419\_\_cfa\_to\_carb\_on\_rd\_diesel\_engine\_emission\_rule.doc'

Original File Name: 100419\_\_CFA\_to\_CARB\_On\_Rd\_diesel\_engine\_emission\_rule.doc

Date and Time Comment Was Submitted: 2010-04-21 11:55:20

No Duplicates.



**Comment 1 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: James

Last Name: Little

Email Address: Non-web submitted comment

Affiliation:

Subject: Waste Connections, Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/19-james.pdf](http://www.arb.ca.gov/lists/onoffroad10/19-james.pdf)

Original File Name: James.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 2 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: Henry

Last Name: Hogo

Email Address: Non-web submitted comment

Affiliation:

Subject: South Coast AQMD

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/20-henry.pdf](http://www.arb.ca.gov/lists/onoffroad10/20-henry.pdf)

Original File Name: Henry.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 3 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: Damian

Last Name: Breen

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area AQMD

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/21-damien.pdf](http://www.arb.ca.gov/lists/onoffroad10/21-damien.pdf)

Original File Name: Damien.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 4 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: Timothy

Last Name: Pohle

Email Address: Non-web submitted comment

Affiliation:

Subject: Air Transport Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/22-timothy.pdf](http://www.arb.ca.gov/lists/onoffroad10/22-timothy.pdf)

Original File Name: Timothy.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 5 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: Michael

Last Name: Kennedy

Email Address: Non-web submitted comment

Affiliation:

Subject: AGC of America

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/23-michael.pdf](http://www.arb.ca.gov/lists/onoffroad10/23-michael.pdf)

Original File Name: Michael.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 6 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: James

Last Name: Jack

Email Address: Non-web submitted comment

Affiliation:

Subject: Emission Controls Technology Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/24-james\\_jack.pdf](http://www.arb.ca.gov/lists/onoffroad10/24-james_jack.pdf)

Original File Name: james Jack.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.

**Comment 7 for In-Use Off-Road Diesel Vehicles and the In-Use On-Road Diesel Vehicle Regulation (onoffroad10). (At Hearing)**

First Name: John

Last Name: Lawson

Email Address: Non-web submitted comment

Affiliation:

Subject: Lawson Rock and Oil

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/onoffroad10/25-john.pdf](http://www.arb.ca.gov/lists/onoffroad10/25-john.pdf)

Original File Name: John.pdf

Date and Time Comment Was Submitted: 2010-04-23 14:01:39

No Duplicates.