

Form Letter 1 for Comment 265 for In-Use Off-Road Diesel Fueled Engines (ordiesl07) - 45 Day.

First Name: Bob
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Affiliation:

Subject: Off Road Diesel Regulations
Comment:

Dear Members of the California Air Resources Board:

Hello, my name is Bob Engel and I am a second generation owner of a small construction, trucking and recycling company. I am aware that the California Air Resources Board (CARB) is currently considering the adoption of off-road diesel regulations that, if implemented as presently drafted, would have a profound, negative impact on my business. We have been in business since 1946, YES, 61 years of providing jobs and service for Californians. These regulations would cripple our ability to provide services such as our regional compost facility that provides crucial recycling for our region of California. The economic burden would be too much for our small company to absorb on top of cutting our asset values significantly.

Recyclers, environmental company's, Construction contractors and the many workers want these regulations to work for everyone. That's why we understand the industry has proposed an alternative approach which would clean up the air while keeping the most number of recyclers, environmental and construction companies in business and WORKERS employed. Adopting the industry proposal would keep the bidding environment at its most competitive; the Rebuild California bond program on schedule; and construction cost increases to a minimum.

I am writing to ask you to support this alternative at the CARB meeting on July 26th. It will give California the cleanest off road fleet in the world while ensuring recyclers, environmental companies, construction contractors and workers are kept on the job.

The goals of this plan are simple:

1. Achieve better emission reduction for 2015 than the CARB proposal.
2. Keep the same starting date as the CARB proposal.
3. Require annual reporting to demonstrate progress toward the goal.
4. Provide maximum flexibility for contractors to reach the target.
5. Allow more time at the back-end for new Tier 4 engines to enter the fleet (estimated to be approximately 2014/2015)
6. Recognize the wide divergence in fleet sizes, emissions and capabilities.
7. Permit each fleet to determine how best to achieve the

reductions.

8. Give credit to those fleets that provide early emissions of both NOx and PM.
9. Minimize the financial impact to keep the most firms in business.
10. Maintain a highly competitive bidding environment.

The most significant difference between the CARB proposal and the alternative plan is moving the 2020 goal for large fleets to 2025, which is necessary in order to allow more time for Tier 4 engines – which will achieve all the emission targets without any further retrofitting and will not be available until 2014/2015 – to enter the market and be acquired by contractors.

I want to be clear: Engel & Gray, Inc. is very supportive of reducing particulate matter (PM) and NOx emissions from diesel engines. There is no disagreement that we need to work collectively to improve the state's air quality and all of us want to provide as healthy an environment as possible for our employees on our job sites. Please consider adopting this sensible alternative that accomplishes the same, if not better, emission reductions while keeping California's construction industry and our state moving forward.

Sincerely,

Bob Engel
Vice President
Engel & Gray Inc.

Attachment:

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