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California Air Resources Board
P.O. Box 28151
Sacramento, CA 95812

Dear Members of the California Air Resources Board:

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 California's infrastructure rebuilding efforts, the health of the state's construction industry and its overall economy.

We agree that we need to work collectively to improve the state's air quality and all of us want to provide a healthy environment employees on job sites. However, in their current form, the Board's proposed regulations are not viable from an economic or technological perspective.

There is currently no diesel engine that is capable of addressing both PM and NOx emissions. This lack of equipment technology and availability are serious barriers to meeting targets set by CARB under these rules. In some cases the engines and equipment necessary to meet the stringent standards in these regulations will not come to market until 2014. In addition, an estimated 165,000 pieces of machinery will have to be retrofitted, re-powered or replaced over the next 13 years to meet these yearly reduction targets. This is financially way out of our feasibility.

My wife and I own a few pieces of equipment and we have no employees. There is no way I can afford to retrofit or replace this equipment. I like to think that I contribute to the state's economy with my small company. If these new regulations are passed without considering small businesses like mine, the state's economy is going downhill.

Please don't tell me to apply for state programs that help us redo the equipment I own. Whenever the state programs are used, the recipient is obligated to the state agency and loses his or her freedom concerning the business. And, I don't believe our state budget can stand any more additions for "help programs".

My wife and I look forward to working with you, CARB, the Legislature and other stakeholders to find a **FEASIBLE** solution that achieves the state's air quality goals while keeping California's economy moving forward and allowing California's citizens to continue to feel free to run their businesses as they can afford.

Sincerely,
Pat and Rita Browning