IN OFFICE

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California Air Resources Board
Dr. Robert Sawyer Chairman
1001 I Street
Sacramento, CA 95812

Dear Members of the Board,

Your decision to reopen registration on December of last year was a step in the right directions but I feel that it fell short of getting all portable diesel engines registered that operate in California.

Not allowing Tier O engines into the program will cost small business and the construction industry millions of dollars. There are an estimated 127,000 pierces of portable engine equipment in this state and assuming 25,000 engines have been registered. It leaves 102,000 engines out of the registration program. By manufacturer's estimates, one-third of all portable engines currently operating, contain Tier O engines. This means that 34,000 pieces of equipment will be omitted from the registration program. If these engines are not allowed to be used, this would have a huge effect on California's economy. To replace this equipment could cost as high as 850 million dollars and take as much as 15 years to do so. In the concrete pumping industry, with 7,000 portable pumps, it will take 25 years to replace Tier O & Tier 1 engines at the rate of 200 new pumps a year.

It will also have a dramatic effect on construction jobs in the state. Take 34,000 engines out of service and minimum of 100,000 jobs would be lost. This would be close to 10% of the work force in the construction industry.

Staff claims only a cost of 6.6 million over three years, but this is for the fee only, to replace the equipment is much higher cost. They state that it will save on engine replacement in the amount of 250 million dollars, but the problem is that the new engines do fit the plant, and can not be done, so hence replacement is, the whole piece of equipment at a much higher impact to the business owners – if they can even find the equipment.

I feel that the penalty for late registration should fall both on the owner of the equipment and on the Air Resource Board since the ARB did such a poor job of notification. To impose high fines on the equipment owners is truly unfair and unjust.

A lot of lip service is paid to global worming in this country and around the world. A comment made at the open forum by a local Air Enforcement Inspector said "take Tier O engines to other state" is just moving the problem. If it is truly global, wouldn't it be better to control through registration and have our hands on phasing out lower tier engines?

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California Air Resources Board
Dr. Robert Sawyer Chairman
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Sacramento, CA 95812

Dear Members of the Board,

The board should open all engines to registration and reduce the fines that are imposed.

I have lived in California all my life and love this great state that we have. We should protect the environment, but not at the cost of jobs and small business.

Sincerely,

Mike Cusack
Vice President Operations.