

**Comment 1 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Anonymous

Last Name: Anonymous

Email Address: Anonymous@Anonymous.com

Affiliation:

Subject: Wasteful Policies

Comment:

CARB is going to have a significant impact to the cost of transporting goods out of the state of California and all in an effort to reduce the emissions of a gas, the effects of which, are highly disputed. Far too much money, regulation and resulting costs are being thrown at this unproven problem and quite frankly it's getting ridiculous.

Carrier's have and will continue to stop sending trucks to California. Receivers have already started shipping fresh produce from other regions of the country and I'd predict in the near future importers will start using other, less costly and difficult, ports to import their goods.

They say some day California may break away from the Continental US. Although that hasn't happened physically, yet, clearly it's already happening in terms of policy and regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-27 14:25:18

No Duplicates.

**Comment 2 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Charles  
Last Name: Keppel  
Email Address: c.keppel@insightbb.com  
Affiliation:

Subject: Truck regs. in California  
Comment:

I say let the people in California figure out how to get all their goods delivered. Stop all trucks from entering the state. Who could they blame for all the smog, smoke, fires and everything else on then.  
California and their government are totally blind to the people trying to make an honest living delivering their goods.  
I know, let all the illegals back pack everything in. You all give them something for nothing anyway. Truckers can meet them at the border and transfer their loads to mules.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-28 06:04:20

No Duplicates.

**Comment 3 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gary

Last Name: Heit

Email Address: Non-web submitted comment

Affiliation:

Subject: Form Letter 1- CitizenLetter

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/3-truckbus0001.pdf](http://www.arb.ca.gov/lists/truckbus08/3-truckbus0001.pdf)

Original File Name: truckbus0001.pdf

Date and Time Comment Was Submitted: 2008-10-29 11:11:46

103 Duplicates.

**Comment 4 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Monique  
Last Name: Toubia  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Form Letter 2- Support Strong Diesel Regulations!  
Comment:

Honorable Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Honorable Nichols,

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Sincerely,  
Monique Toubia  
6512 W. 87th Place  
Los Angeles, CA 90045

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-29 11:56:02

19 Duplicates.

**Comment 5 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Norma  
Last Name: Butler  
Email Address: ddtransport@neb-sandhills.net  
Affiliation:

Subject: CARB Regulations  
Comment:

We have one truck and cover all 48 states. I find it rather ironic that the truckers who now want to go to California will have to retrofit their trucks in order to meet air standards. We have been caught in rush hour in various California cities where every vehicle in sight has its engine running just like the trucks do. Are you telling me that the only vehicles that emit toxins are trucks? Give me a break.

I'm not opposed to cleaning up the air, but I just don't want to see us carry the burden for everyone else as well. Because of the new regulations in place already, we no longer go to California and hope that the rest of the country's truckers choose to do the same. Then we'll see how California gets their freight. I have always hated the traffic and the rude people out there anyway so we surely aren't going to miss you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-31 09:10:28

No Duplicates.

**Comment 6 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jim  
Last Name: Bowans  
Email Address: jbo106@aol.com  
Affiliation:

Subject: truckbus08  
Comment:

I think you would be well advised to think about what you are proposing. I am 1 of many owner operators that have been hauling products in and out of california for many years. A large percentage of the trucks, even the big companies, are owner/ops like me. What you are proposing this time is too much and much to expensive. I think you will find that most companies will no longer haul in and out of Ca. Without the trucks your produce will not be hauled and the things youe people need also will not be delivered. So far I have been able to meet the current requirements ie, apus emision stickers ect. but I cannot afford new trucks and the updates you are proposing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-31 14:52:36

No Duplicates.

**Comment 7 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Shelly  
Last Name: Ward  
Email Address: shellyward99@aol.com  
Affiliation: small business owner

Subject: proposed regulation  
Comment:

how can the state of cal. possibly require a emmissions retrofit on a med. or heavy vehicle IE. 2004 to a stricter standard than that engine was ever designed or intended.  
the burden financily is beyond most small fleets , just one more reason to leave this place I call home

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-31 15:25:49

No Duplicates.



**Comment 8 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom  
Last Name: Brian  
Email Address: tmbrian@verizon.net  
Affiliation: Trucking co.

Subject: emission's control  
Comment:

Having driving in and out of CA for the last 6 years taking dairy products to the Bay Area and loading vegetables up and down the state (avg 1000 miles a month in state) this is about 8% of average miles per unit per year . I find that most of long haul trucks are for the most part better maintained an newer than the local equipment out of necessity to operate in the profit zone . The fact that the State CA is getting too far ahead of the rest of the country on up dates (some of the technology is not ready yet ) will be a very tough thing for the trucking industry to meet these standards . The average food hauler coming into state now has 3 separate engines on board all with different rules an regulations  
Please do not get too far ahead of the curve

Thank you , Tom

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-03 16:08:09

No Duplicates.

**Comment 9 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bill  
Last Name: Faris  
Email Address: Non-web submitted comment  
Affiliation:

Subject: George Reed Inc.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/9-truckbus0001.pdf](http://www.arb.ca.gov/lists/truckbus08/9-truckbus0001.pdf)

Original File Name: truckbus0001.pdf

Date and Time Comment Was Submitted: 2008-11-05 14:15:27

No Duplicates.

**Comment 10 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tyler  
Last Name: Wellman  
Email Address: tcw8@pge.com  
Affiliation: PG&E

Subject: IOU Letter Regarding On-Road Rules  
Comment:

Attached is the joint letter from California's Investor-Owned Utilities regarding the latest outcome of the On-Road Heavy-Duty In-Use Diesel Truck regulations.

Attachment: [www.arb.ca.gov/lists/truckbus08/10-iou\\_letter\\_regarding\\_on-road\\_agreement.pdf](http://www.arb.ca.gov/lists/truckbus08/10-iou_letter_regarding_on-road_agreement.pdf)

Original File Name: IOU Letter Regarding On-Road Agreement.pdf

Date and Time Comment Was Submitted: 2008-11-06 10:25:22

No Duplicates.

**Comment 11 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Joanna  
Last Name: Clark  
Email Address: jclark@amcat.org  
Affiliation:

Subject: Diesel Trucks  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/11-truckbus0002.pdf](http://www.arb.ca.gov/lists/truckbus08/11-truckbus0002.pdf)

Original File Name: truckbus0002.pdf

Date and Time Comment Was Submitted: 2008-11-06 16:02:29

No Duplicates.

**Comment 12 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bill  
Last Name: Sudhoff  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Black Diamond  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/12-truckbus0001.pdf](http://www.arb.ca.gov/lists/truckbus08/12-truckbus0001.pdf)

Original File Name: truckbus0001.pdf

Date and Time Comment Was Submitted: 2008-11-06 16:03:51

No Duplicates.

**Comment 13 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom  
Last Name: Frantz  
Email Address: ini@lightspeed.net  
Affiliation: Association of Irrigated Residents

Subject: Agricultural exemptions and loopholes  
Comment:

attached comment

Attachment: [www.arb.ca.gov/lists/truckbus08/13-tom\\_frantz\\_comments\\_on\\_proposed\\_diesel\\_rule\\_oct\\_2008.doc](http://www.arb.ca.gov/lists/truckbus08/13-tom_frantz_comments_on_proposed_diesel_rule_oct_2008.doc)

Original File Name: Tom Frantz comments on proposed diesel rule Oct 2008.doc

Date and Time Comment Was Submitted: 2008-11-06 21:58:24

No Duplicates.

## **Comment 14 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Norris  
Email Address: [dnorris@lakeport.k12.ca.us](mailto:dnorris@lakeport.k12.ca.us)  
Affiliation: Lakeport Unified School District

Subject: Proposed Regulation In-Use On-Road Diesel Vehicles  
Comment:

LAKEPORT UNIFIED SCHOOL DISTRICT  
Transportation Department / From the desk of David Norris /  
Director of Transportation  
2503 Howard Ave, Lakeport, CA 95453  
707/262-3022 Fax 707/262-3034

November 7, 2008

Dear ARB Board Members, Please take into consideration the following issues when making your decisions on the proposed regulation; In-Use Heavy-Duty Diesel-Fueled Vehicles.

Lake County Air Quality Management District; Exempt all busses that only operate inside of air districts that are in attainment.

Low-use vehicles exemptions; currently the regulation allows an exemption for busses that accumulate 1,000 miles per year or less. This regulation should be increased to 2,000 miles per year to allow school districts to use these busses as back up busses to fill in when the daily operating busses are out of service for safety inspections and repairs. By adding exhaust retrofit devices the down time for service, inspection and regeneration will be increased.

Match waivers 20%; Presently the proposal is to allow only 20% of the busses that are funded are eligible for match waivers for air districts that comply totally with air quality standards; Lake County is the only one in the state. Lake County Air Quality District cannot receive AB 923 funds from DMV fees. This means less revenue for all Lake County school districts to comply with lower emissions program. It is imperative that the match waiver be extended to all bus replacements grants.

Electrical Infrastructure; The regulation allows for \$20,000 to complete each retrofit. Out of the \$20,000 the install is about \$16,000 and \$2,500 for maintenance, which leaves about \$1,500 for electrical infrastructure. LUSD applied for 7 retrofits, which leaves us with \$10,500 for electrical infrastructure. Our proposal came in at \$38,127. Will ARB cover the balance of \$27,627?

Lake County Air Quality Management District (bus replacement only); Lake County is unique, as it is the only county in the state that is in compliance with state air quality standards. The funds allocated to Lake County should be spent on bus replacements only. Each school district would be able to replace at least 2 busses each, based on the funds allocated. These busses would be on daily runs immediately, and would deliver the best performance (cleaner exhaust, longer range and fuel economy). In addition they would last for the next 20 years. It does not make good sense to spend \$20,000 on a retrofit device on a bus that has used up ½ to 2/3 of its life.

Lake County Air Quality Management District (exempt all busses or fully fund); Lake County does not have a problem with air quality so either totally exempt or fully fund school busses in Lake County. Reward air districts for meeting state standards. Smoke test; Is the smoke necessary to continue after we are in full compliance with the law.

The Yellow School Bus has been an essential part of providing public education to the children of Lakeport. It is part of the fabric of this American institution, the very foundation in how we educate our children. In California we have developed a system that has proven to be the safest form of transportation in the world. We have the strictest regulations relating to the construction and use of the school bus and the education and training of our drivers. Lets not, over under fund this new regulation, which appears to be mandated, to the point that we can't afford to operate them.

Sincerely,

David Norris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-07 09:38:53

No Duplicates.



## **Comment 15 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: George  
Last Name: Maillo  
Email Address: gpmaillo@sbcglobal.net  
Affiliation: Pozas Bros Trucking

Subject: CARB regulation of on road diesel engines  
Comment:

Pozas Bros Trucking is a California less than truckload (LTL) company, established in 1943 operating continuously and strictly in California. An LTL company like ours and other LTL companies ie. (FedEx, UPS, Conway, Yellow, etc) run routes in various California communities. These trucks usually stay in their specific route 100% of their day. Many of the trucks used by LTL companies to run these routes with class 7 equipment. Under the current proposal only class 8 tractors greater than 33000 GVWR that operate only 50% of their time in the trade corridor are eligible for state funding for replacement. Pozas Bros would like to see class 7 tractors also eligible for state funding to replace. These class 7 tractors use the same diesel engines that are used in class 8 tractors and many spend 100% of their time in the trade corridor. It can be argued fairly easily that there would be a significant larger impact on improving air quality by targeting these specific companies that run routes in our California communities. Please consider including class 7 tractors with less than a 33000GVWR for state funding to replace.

Sincerely,  
George Maillo  
Pozas Bros Trucking-President

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-07 11:08:29

No Duplicates.

**Comment 16 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Shallenberger  
Email Address: jshallenberger@sygmanetwork.com  
Affiliation:

Subject: Private Fleet Rule Adoption  
Comment:

Based purely on current economic conditions, fleet owners or the State of California or the Federal Government are all in poor financial positions to spend the type of money required for adoption of this bill. I propose that this bill be delayed until all parties are better prepared to fund this project. Review this again in 6 months and make further recommendations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-07 11:10:41

No Duplicates.

## **Comment 17 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ron  
Last Name: Silva  
Email Address: rsilva@westartransport.com  
Affiliation: Westar Transport

Subject: On- Road Fleet Rule  
Comment:

Dear ARB Board Members,

I have operated a Trucking fleet in California for 30 years. Currently my fleet comprises of 50 Heavy Duty Trucks and 150 Large Semi Trailers. I have run both New and used Trucks over the years and know the cost of running both. Like you I am concerned about Clean Air and Health Risks. Like you I want clean Air also. This rule will likely put me out of business and over 60 people out of work. This Rule is to MUCH to FAST. We in California have known for a long time this EPA target for Emissions was coming. We neglected to start doing something about years ago when we should have. The Trucking Industry cannot afford to correct the Air problem by its self. This the worst possible time for this regulation. I urge you to delay this rule for three more years to give our economy and financial markets to recover. This Rule will eliminate many carriers and Freight Rates will rise out of control. Supply and demand will take over and there no regulatory body that will be able to stop price gouging. This rule can cripple the California Economy as we know it. Prices will be high for Transportation that the Farmers will not be able to afford to have the crops hauled out of the field. People will loose there jobs and Fore closers will grow. The current Fleet Modernization Programs need to be improved and expanded to help fleets get Newer Faster while staying business and keeping Rates reasonable. This way Tax Payers help pay for the Clean Air we ALL need to breath. Please do not saddle the Trucking Industry with the Financial Burden of Cleaning the Air for ALL Californians. In closing I will suggest the following actions by the board to Clean the Air Faster and save the Trucking Industry at the same time. First push this rule for three years, Then keep pupping money into Fleet Modernization Programs. Last BUILD SHORT SEA SHIPPING AS QUICKLY AS POSSIBLE. There is no better or Faster way to help Californias emmission and Congestion poblems. As most of you know I tried for several years to convince this State we need a New Transportation System. The Current Administration does not have the willingness to take on the Ports and Unions nessary to lower the Costs to divert Cargo by Water. The ARB needs to do what ever is nessary and build a New System as quickly as possible. Sooner or Later this will have to happen. Its the ARB Boards Job to get Cleaner Air Faster. This is the Best way to accomplish that goal and Protect the California Economy. Thank you letting submit Comments on this Job Killing Rule.

Ron Silva  
CEO

Westar Transport  
Selma, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-07 13:28:54

No Duplicates.

**Comment 18 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Blain  
Last Name: Stumpf  
Email Address: bstrsg@aol.com  
Affiliation: BST Services, Inc.

Subject: Proposed on-road rules  
Comment:

I own 21 dump trucks that range in age from 1984-2007. My practice is to replace the oldest trucks first. However the rate that I can afford to replace these vehicles is quite a bit longer then the proposed rules.

I understand the need to meet Federal air regs, however the financial burden cannot be born during this economic climate.

Yes, I know that the economy will return to a normal growth rate sometime in the future. But please consider how most companies weather the recession; spending cash to retain employees, tapping credit lines to cover daily operating costs. This debt requires some time to "Catch up". Cash and debt that would otherwise be used for equipment replacement. This translates to more then just a year or so after the economy rebounds. That rebound is predicted to be no sooner then 2011 for the construction industry.

Should California appeal to the Federal Government for an extention of time to meet air regs? Considering what the government is doing to prop up various private companies, the state of California should be entitled to this consideration.

Please consider the livelyhood of the families this rule will effect.

Sincerely,  
Blain Stumpf  
Blain Stumpf Trucking  
BST Services, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-10 08:50:33

No Duplicates.

## **Comment 19 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Scott  
Last Name: Cramer  
Email Address: scramer@cfl-usa.com  
Affiliation:

Subject: Truck & Bus Rule  
Comment:

Dear Members of the California Air Resources Board,

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted, would have a profound and negative impact on California's overall economy.

I want to be clear: Certified Freight Logistics is very supportive of reducing particulate matter (PM) and oxides of nitrogen (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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business, today, and jeopardizes our future viability in the trucking industry.

I am writing to urge the state to adopt a regulation that allows for flexibility and early incentives, while also achieving significant emission reductions. To that end, the Driving Toward A Cleaner California Coalition, has submitted an alternative proposal to the current ARB proposed regulation. This alternative proposal would achieve the early PM and NOx emissions reductions to improve the state's air quality that you are seeking in the ARB's current proposed rule, while providing much-needed flexibility to comply based on a variety of factors including mileage, type and use of the vehicle, and the best use of the available technology.

This rule comes at a time when California truck owners are struggling to make ends meet in the most severe economic climate we've experienced in decades -- skyrocketing diesel prices, record home foreclosures, a 17-year low in housing starts, a credit crisis and the imminent threat of a full-blown recession.

Under the annual emission reduction targets required under the current ARB proposal, many truck owners will be required to first retrofit an engine, only to have to turn around a few years later and replace those trucks.

Many of California's trucking companies have already begun the process of retrofitting or replacing its fleet, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by

the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses. Additionally, many of these companies simply do not have the resources or access to capital to retrofit their engines and may be forced to sell off their trucks or shutter the company's doors, ultimately costing jobs and revenue to the state's economy.

We must not forfeit California's economy for the sake of protecting our environment. That's why, as a member of the Driving Toward a Cleaner California Coalition, we're working together, across industry sectors to develop a feasible solution that achieves the state's air quality goals while keeping California's economy moving forward. I ask that you evaluate the coalition's alternative proposal and work with the industries impacted by this rule to adopt a final product that achieves the balance this alternative proposal seeks to find.

We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Scott Cramer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-10 09:15:42

6 Duplicates.

## **Comment 20 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: R.

Last Name: D.

Email Address: orindalinda@aol.com

Affiliation:

Subject: AB 32 On Road Diesel Emission Regulations

Comment:

First of all, let me state that I want clean air. I want it for me, my family and my children. Everybody wants clean air.

As California's economy crumbles and The Governor has called the state of the economy a "crisis", I can't even fathom why this draconian regulation implementation would be considered. The costs associated with this implementation is absurd.

As the bill is written, the most economical way to abide by the law would be to retrofit diesel engines. To do this, it would cost California public schools more than \$1 BILLION DOLLARS. This could be fatal to California's agricultural industry. Our business has only 12 diesel units and it could cost us \$1.5 Million. As a small family owned trucking company in business for three generations, this would put us out of business.

The businesses that would survive, would be forced to pass the new costs along to the public. By adding the transportation cost to the public, every commodity would be priced higher in California. Gas would be \$8.00 per gallon instead of \$3.00. The cost of milk would double, clothing would double, every item in the grocery store would cost the consumer more money. At a time when unemployment is at a high, this regulation would guarantee more unemployment, less consumer spending, and less taxable income. That means less money for police, fire, and other essential services for all. As baby boomers ready themselves for retirement and fixed incomes will be the norm, how will the elderly pay for the price increases to every commodity?

Even if companies wanted to upgrade their equipment to meet the new regulation standards, right now, they could not get a loan to retrofit or upgrade their engines. If The State of California can't get a loan, then how can a small company get a loan to purchase new equipment?

If common sense prevails, then the The State will do as they did with vehicle emissions in the past. All new vehicles purchased will have the new engines with California standards. As new trucks are purchased to replace older vehicles, then the older vehicles will be eliminated. The effects would be a win-win for everybody. Companies with diesel engine vehicles would be able to stay in business, commodities would still be priced reasonable for the consumer, and emissions would be reduced as new vehicles are put on the road.

AB 32 can work for all, however, the regulations have to be reasonable for all.

Sincerely,

R.D.



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-10 18:22:25

No Duplicates.

## **Comment 21 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: mike  
Last Name: fletcher  
Email Address: bobefletcher@yahoo.com  
Affiliation:

Subject: Truck rule  
Comment:

Let me start by saying that the truck rule is very aggressive and should be reconsidered by taking smaller steps of cleaning up the pre 1994 engines. the engines of 1994 and newer are mostly electronic and burn very clean if taken care of. For the ignorant comments from the public that think this rule is a good idea, you will be the first people to complain of milk that cost over \$10.00 a gallon. The trucking industry & farming industry does not make the money the public thinks! It was proven that USC is the only study to support the health problems caused by trucks, UCLA does not support and infact commented that they seen no sign of diesel PM present in the study( from 1985 to 1999). I run a diesel repair shop and see everyday how clean we can get these trucks to run to reduce PM levels, as for NoX technology has not come out yet for this reduction so how can you reduce it. The state fund (carl Moyer) is running out of money, how can my customers afford it if the state cant even afford it. The ARB says "pass it on" but thats to me and you. I want to be apart of cleaning the air but at a resonable cost so we can all survive the transition. My customers which include companies from one truck to fifty trucks and only 10% can afford this, that means you will kill the smaller companies. If the state wants to make this work then set some hauling standards, like rates companies have to follow like PUC of the past, but again that drives up everyones cost. Cars are just as much to blame as trucks specially because there is 10 times the cars on the road then trucks. 30% of cars are pre 1995 but the arb denies this. Does the ARB attack truck because they make money? Why not make a rule for everything and everyone, how will that go over? Is this about clean air or is this political ?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-10 18:30:13

No Duplicates.

**Comment 22 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael

Last Name: Rea

Email Address: mikerea-wcta@juno.com

Affiliation: CASTO

Subject: Comments on Bus and Truck proposed rules

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/29-casto\\_carb\\_comments\\_re\\_13ccr2025\\_\\_11-14-08.doc](http://www.arb.ca.gov/lists/truckbus08/29-casto_carb_comments_re_13ccr2025__11-14-08.doc)

Original File Name: CASTO CARB Comments re 13CCR2025 11-14-08.doc

Date and Time Comment Was Submitted: 2008-11-14 10:00:24

No Duplicates.

**Comment 23 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael

Last Name: Rea

Email Address: mikerea-wcta@juno.com

Affiliation: West County Transportation

Subject: Comments on Bus and Truck proposed rules

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/30-carb\\_bus\\_and\\_truck\\_rules\\_comments\\_11-14-08.doc](http://www.arb.ca.gov/lists/truckbus08/30-carb_bus_and_truck_rules_comments_11-14-08.doc)

Original File Name: CARB bus and truck rules comments 11-14-08.doc

Date and Time Comment Was Submitted: 2008-11-14 10:01:47

No Duplicates.

**Comment 24 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bill  
Last Name: Ingram  
Email Address: ingramhw@sbcglobal.net  
Affiliation:

Subject: new diesel regulation (12/11/08)  
Comment:

I'm for the new diesel rules that you will hopefully vote in favor of on December 11th, but I hope you will also consider easy and obtainable standards for the many independent and commercial truckers who move our materials and products across our state highways. We all definitely want cleaner air, but in turn we don't want to lose any of our freight-haulers who have huge investments in their trucks. An acceptable time frame and a reasonable cost factor should be considered.

Thank you.  
Bill Ingram  
Tulare, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-16 08:31:04

No Duplicates.

## **Comment 25 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Darling  
Email Address: Michaeld@westerntruckschool.com  
Affiliation:

Subject: Adoption of proposed regulation  
Comment:

November 11th, 2008

California Air Resources Board  
  
1001 "I" Street  
  
P.O. Box 2815  
  
Sacramento, CA 95812

Dear Members of the California Air Resources Board,

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted, would have a profound and negative impact on California's overall economy.

I want to be clear: Western Truck School, who has been an active small business in California since 1976, is very supportive of reducing particulate matter (PM) and oxides of nitrogen (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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business, today, and jeopardizes our future viability in the Commercial Driver Training industry.

I am writing to urge the state to adopt a regulation that allows for flexibility and early incentives, while also achieving significant emission reductions. To that end, the Driving Toward A Cleaner California Coalition, has submitted an alternative proposal to the current ARB proposed regulation. This alternative proposal would achieve the early PM and NOx emissions reductions to improve the state's air quality that you are seeking in the ARB's current proposed rule, while providing much-needed flexibility to comply based on a variety of factors including mileage, type and use of the vehicle, and the best use of the available technology. Further, we urge that the state consider, due to the limited mileage and primarily off-road use of Commercial Driver Training trucks, as well as the excessive cost incurred to retrofit or bring our aging

fleets into compliance, an exclusion for trucks in the Commercial Driver Training field.

This rule comes at a time when California truck owners are struggling to make ends meet in the most severe economic climate we've experienced in decades -- skyrocketing diesel prices, record home foreclosures, a 17-year low in housing starts, a credit crisis and the imminent threat of a full-blown recession.

Under the annual emission reduction targets required under the current ARB proposal, many truck owners will be required to first retrofit an engine, only to have to turn around a few years later and replace those trucks at inflated prices from the dealerships brought on by demand and inventory.

Many of California's trucking companies have already begun the process of retrofitting or replacing its fleet, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, or Commercial Driving School fleets of 10-40 trucks, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses. Additionally, many of these companies, including us, simply do not have the resources or access to capital to retrofit their engines and may be forced to sell off their trucks or shutter the company's doors, ultimately costing jobs and revenue to the state's economy. With locations throughout the state of California, the impact to our livelihood as well as the future of Commercial Driver Training in California is threatened.

We must not forfeit California's economy for the sake of protecting our environment. That's why, as a member of the Driving Toward a Cleaner California Coalition, we're working together, across industry sectors to develop a feasible solution that achieves the state's air quality goals while keeping California's economy moving forward. I ask that you evaluate the coalition's alternative proposal, give special thought to further exclusions to Commercial Driving Schools in California, and work with the industries severely impacted by this rule to adopt a final product that achieves the balance this alternative proposal seeks to find. Our successful future depends on it.

We look forward to working with CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Michael Darling - Vice President of Operations  
(800) 929-1320 [www.westerntruckschool.com](http://www.westerntruckschool.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 11:53:09

No Duplicates.



**Comment 26 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Clem  
Last Name: Molony  
Email Address: cmolony@lyngsogarden.com  
Affiliation: Lyngso Garden Materials, Inc.

Subject: Financial impact data on a small Bay Area company  
Comment:

Attached is a letter sent to the CARB Board and staff in 9/08 which contains financial analysis of the regulation's impacts on a small (45 employee), local Bay-area, garden supply company with 42 delivery trucks. It includes suggestions for minor modification of the regulation and of the grants process, so that small companies can have a chance to cope with the Huge annual cost of this regulation (~\$200-\$250K per year for 13 years). Thank you.

Attachment: [www.arb.ca.gov/lists/truckbus08/33-carb\\_letter\\_8-28-08.doc](http://www.arb.ca.gov/lists/truckbus08/33-carb_letter_8-28-08.doc)

Original File Name: CARB letter 8-28-08.doc

Date and Time Comment Was Submitted: 2008-11-18 08:39:30

No Duplicates.

**Comment 27 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Liz

Last Name: McDannel Bell

Email Address: lizmacbell@roadrunner.com

Affiliation: former ARB staffer (1975-79);now retired

Subject: PM in auto carrier trucks

Comment:

I currently moved to mid-Santa Monica, California to 18th St., just south of Santa Monica Blvd. Santa Monica Blvd at this location is "car row" with numerous auto dealers. Our house is immediately adjacent to the American Honda dealer at 18th and Santa Monica. Numerous times during the week, multi-vehicle carrier trucks on- and off-load cars. According to City standards, I think they are not load/unload on this street, but on Broadway, an adjoining commercial street. (I'm checking into this.) However, this is not always the case and sometimes the trucks are left in idle for long periods of time. However, whether they are in front of our house (a joint-use residential/commercial street), or on a commercial street, I can't imagine the idling is good for the general air quality. I can't remember if PM is emitted during idling, but certainly other air pollution contaminants are. So my husband, Dale Bell, and I add our strong support to any proposed regulation that would cut down on particulate and other emissions. You've done a great job in keeping the focus on health effects of air pollution while also recognizing that strong but effectively applied air quality regulations actually help businesses be more efficient, which adds to their overall positive bottom line. Thank you and best wishes. Liz and Dale Bell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-18 13:56:28

No Duplicates.

**Comment 28 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mike  
Last Name: Anderson  
Email Address: mike@andersonlogging.com  
Affiliation:

Subject: On Road Rule  
Comment:

Attached please find a Resolution regarding the rule package passed by unanimous vote of the Mendocino County Board of Supervisors.

Attachment: [www.arb.ca.gov/lists/truckbus08/35-carb\\_resolution.pdf](http://www.arb.ca.gov/lists/truckbus08/35-carb_resolution.pdf)

Original File Name: CARB resolution.pdf

Date and Time Comment Was Submitted: 2008-11-19 17:21:54

No Duplicates.

**Comment 29 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lawrence

Last Name: Sabbath

Email Address: lsabbath@nationalarmoredcar.com

Affiliation: National Armored Car Association

Subject: Comments on proposed on-road diesel regulation

Comment:

Attached are the comments of the National Armored Car Association with regard to the on road diesel vehicle regulation

Attachment: [www.arb.ca.gov/lists/truckbus08/36-naca\\_comments\\_on\\_proposed\\_idling\\_regulation.doc](http://www.arb.ca.gov/lists/truckbus08/36-naca_comments_on_proposed_idling_regulation.doc)

Original File Name: NACA Comments on proposed idling regulation.doc

Date and Time Comment Was Submitted: 2008-11-20 09:01:15

No Duplicates.

**Comment 30 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Todd  
Last Name: Wells  
Email Address: twells@miramartruck.com  
Affiliation:

Subject: On Road Reg  
Comment:

I have several customers ready and gearing up to reconfigure their fleet, whether replace or upfit. These customers are

1. Ready to resise exhisting fleet
2. most the equipment is old and in need of upgrading.
3. Your timing is probably not the best as far a retail enviroment is concerned, with bank rates as high as I have seen them in awhile. But when trucks start to sell finance with start to compete and rates will drop.
4. ROCK ON!! Clean air is the bottom line here and I want my kids to enjoy it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 15:02:00

No Duplicates.

## **Comment 31 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rod  
Last Name: Winkle  
Email Address: rod@franklinconstruction.com  
Affiliation: Franklin Construction, Inc.

Subject: On Road Truck and Bus Replacment Regulation  
Comment:

Here I am just 6 months after the passage into law the in use off road diesel regulation, staring into the jaws of another similar regulation that is going to directly impact my company. We are a general engineering contractor that owns 70 pieces of off road equipment covered under the off road regulation. We also have 12 on road trucks (water trucks, dump trucks, and low beds)that will be impacted by this new regulation. I have spent the last 3 years spending \$1 million dollars per year on off road equipment replacement and retrofitting in order to get a jump on compliance for the off road regulation. I have not had the money to deal with the trucks yet and it's looking like I am not going to have it due to the economy and the current construction contracting market. Once the on road regulation is passed into law, in any form, I will have 82 pieces of machinery governed by California's excellerated and costly regulations. I am also dealing with a tanking construction market that is not going to provide the work or revenue required for me to even keep up with these regulations.

I have 38 employees that are all well paid, have family plan insurance, 401K, profit sharing, and a bonus program. Some or all of these employees are going to lose their jobs so that I can stay in business. Others are going to lose at least some of thier benefits. I am also going to get rid of equipment because I can no longer affort to retrofit or replace it. I will have a smaller on and off road fleet, less employees, and less flexibility to remain competative. These regulations were difficult to deal with in a good economy. I fear that it will be impossible to cope with under current economical conditions. CARB and the supporters of these regulations are going to force us further into a downward spiral in the economy with these costly and abrupt regulations.

People and Companies that own this equipment just cant take all of this right now. It's just going to kill us. I am pleading with CARB and the Governor to provide us relief through delaying the onset of these regulations and lengthening the time frames to allow us to accomplish compliance with them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 15:26:41

No Duplicates.

**Comment 32 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tony  
Last Name: Hobbs  
Email Address: thobbs2411@sbcglobal.net  
Affiliation:

Subject: proposed regulation 2008  
Comment:

please vote no on the new regulatiion. This will put my company out of business along with other small trucking companies. The only companies that will gain from this will be big business. The foundation of the United States was built by small business, without this foundation The American people will suffer.

Sincerly Yours,  
Tony E. Hobbs  
President  
Baker Trucking Inc.

Attachment: [www.arb.ca.gov/lists/truckbus08/39-baker\\_trucking\\_3.complete.jpg](http://www.arb.ca.gov/lists/truckbus08/39-baker_trucking_3.complete.jpg)

Original File Name: Baker Trucking 3.Complete.JPG

Date and Time Comment Was Submitted: 2008-11-20 15:33:39

No Duplicates.



## **Comment 33 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ron  
Last Name: Nuss  
Email Address: ron@nwexc.com  
Affiliation: Equipment Manager

Subject: On Road Diesel Regulation  
Comment:

Northwest Excavating, Inc.  
18201 Napa st. Northridge, CA 91325  
(818) 349-5861

November 20, 2008

Governor Arnold Schwarzenegger  
Members, California Legislature  
California Air Resources Board

Dear Governor Schwarzenegger or  
Members of the California State Legislature or CARB:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

I want to be clear Northwest Excavating, 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes our future viability in the construction and trucking industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression. California truckers, construction companies and bus operators are struggling to make ends meet in the face of a massive slow down in the construction sector due to falling home prices and home foreclosures, declining consumer confidence and spending and a freeze in the credit markets. Today there is virtually no access to capital for businesses, large and small.

Companies like ours are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. Our company and others like us simply don't have the

resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shut our companies' doors, ultimately costing jobs and revenue to the state's economy.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like ours the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Ron Nuss  
Northwest Excavating, Inc  
18201 Napa St.  
Northridge, CA  
91325

Attachment: [www.arb.ca.gov/lists/truckbus08/40-letter.doc](http://www.arb.ca.gov/lists/truckbus08/40-letter.doc)

Original File Name: Letter.doc

Date and Time Comment Was Submitted: 2008-11-20 15:54:41

32 Duplicates.

**Comment 34 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Yandell  
Email Address: john@yandelltruckaway.com  
Affiliation:

Subject: Smartway Trailer retrofit  
Comment:

Our family has been in the truckload business solely in the State of California for 63 years. While we understand and support the need to establish a clean air solution, the stringent criteria of time implementation is too short to cost justify. We would ask, as the CTA has, for a longer time table since coupled with the economic crisis, we cannot afford the dramatic cost increase in today's marketplace. Also, we would ask that the 53' trailer exemption mileage radius be increased to 150 miles to mirror the DOT short haul radius, not the proposed 100 miles. With excess trailing equipment versus the number of power units, we do not travel enough miles to support the retrofit components. Your positive consideration would be appreciated as we continue to struggle in today's business environment.  
Regards,  
John Yandell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 15:55:22

No Duplicates.

## **Comment 35 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kent  
Last Name: Baucher  
Email Address: kentb@technicon.net  
Affiliation:

Subject: Proposed Diesel Engine Legislation  
Comment:

Dear Governor Schwarzenegger or  
Members of the California State Legislature or CARB:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

Technicon Engineering Services, 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes our future viability in the construction industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression. California truckers, construction companies and bus operators are struggling to make ends meet in the face of a massive slow down in the construction sector due to falling home prices and home foreclosures, declining consumer confidence and spending and a freeze in the credit markets. Today there is virtually no access to capital for businesses, large and small.

Companies like mine are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. My company and others like us simply don't have the resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shutter our companies' doors, ultimately costing jobs and revenue to the state's economy.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by

the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Kent S. Baucher  
Technicon Engineering Services, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 08:15:28

No Duplicates.

**Comment 36 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tim  
Last Name: Hanson  
Email Address: tim@interiorwooddesign.com  
Affiliation: Parkside Church

Subject: CARB proposed regulation  
Comment:

Dear Governor Schwarzenegger

In regards to the California Air Resources Board's (CARB) proposed retrofit diesel truck and bus regulation, I am writing to express my concerns regarding this proposal. I am director of bus ministries at Parkside Church in Auburn. We currently have one 1991 MCI coach that is a viable piece of equipment used throughout the community in service to hundreds of needy people and other non-profit organizations such as ourselves. Our bus is in very good condition and runs very clean.

Clearly our organization is supportive of reducing particulate matter and NOx emissions from diesel engines. This regulation will absolutely shut down our non-profit ministry services. This will profoundly impact our ability to help our community and those in need.

As a non-profit in the midst of the worst economic crisis since the Great Depression we will be forced to dispose of our coach long before it's useful life has been expended. We will not be able to afford to replace or retrofit this vehicle in order to meet your standards. Since our bus travels less than 15,000 miles per year and is maintained to impeccable standards I feel it poses little to no threat to our air quality. I suggest language within the regulation that makes allowance for non-profit ministries such as ours who own 3 vehicles or less and travel less than 20,000 miles per year per vehicle. Today there is virtually no access to capital within lending institutions or our church for these retrofit costs.

We are grateful for the efforts expended in the cause of clean air in California. We are also aware that our economy depends the ability to truck products and people across the state. We must be careful not to forfeit this ability for the sake the insignificant amount of emissions produced by a small non-profit organization such as Parkside Church. We look forward to working with you to accomplish clean air and reasonable regulations imposed on diesel engines.

Sincerely

Tim Hanson

Parkside Church  
Bus Ministries  
Auburn Ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 10:48:28

No Duplicates.

**Comment 37 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Patti  
Last Name: Born  
Email Address: pharristrucking@yahoo.com  
Affiliation:

Subject: death blow of mandated regulation  
Comment:

This regulation, especially at this dire financial time in the economy, will be the final death blow for our company. We are a small trucking company with 3 older trucks and do not have the capital or the sustained accounts to responsibly leverage for credit of newer or retrofitted trucks. Even the grants that are being offered require committments that we will be doing business for a set amount of years. Heck, right now I'm not sure if I'll have enough loads to keep us going through next year, yet along commit to the guidelines of the grants.

This regulation will surely send many of our type of companies packing and not only will this leave many people unemployed, but it will create a huge gap in the procurement of transportation for the needs of Californians. CARB is "CALIFORNIA" Air Resource Board. Really think about "California" as this act will surely cripple our state.

I urge CARB to not pass this regulation.  
Patti Born  
President  
Pharris Trucking, Inc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 11:08:03

No Duplicates.



**Comment 38 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Frank

Last Name: De Smidt

Email Address: government@milpitaschamber.com

Affiliation: MILPITAS CHAMBER OF COMMERCE - GOV'T AFF

Subject: NEW CARB DIESEL RULES

Comment:

THIS IS NOT THE TIME TO INVOKE COSTLY TRUCK EMISSION RULES DURING A DEEP ECONOMIC CRISIS. THESE DRACONIAN RULES WOULD ESPECIALLY HARM OUR MEMBER SMALL TRUCKING BUSINESSES AND COULD RESULT IN MASSIVE JOB LOSS AND STATE REVENUE LOSSES.

WE URGE YOU TO SUPPORT THE ALTERNATIVE PROPOSAL BY THE DRIVING FOR A CLEANER CALIFORNIA (DTCC) COALITION THAT WOULD GIVE OUR MEMBER COMPANIES THE OPPORTUNITY TO COMPLY IN THE MOST REASONABLE TIMEFRAME AND FLEXIBLE MANNER POSSIBLE WHILE STILL ATTAINING AGGRESSIVE EMISSION REDUCTIONS.

PLEASE DON'T FORFEIT CALIFORNIA'S ECONOMY FOR SAKE OF PROTECTING THE ENVIRONMENT.

SINCERELY,

Frank J. De Smidt  
Chairman: Government Affairs Committee  
Milpitas Chamber of Commerce  
828 N. Hillview Dr.  
Milpitas, CA 95035  
408-262-2613  
408-262-2823 fax

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 15:20:59

No Duplicates.

## **Comment 39 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Binkley  
Email Address: mbinkley@cox.net  
Affiliation:

Subject: You are going to put me out of business  
Comment:

Your regulations as they stand now will put me out of business. I have a 1989 Peterbilt transfer rig with a 3406B Cat motor. Its a mechanical motor that will not pass your proposed regulations. My problem is I just bought this truck 2 years ago for \$75,000.00. I have a note I need to pay for 3 more years. According to your time table I have only 2 more years before I will have to scrap my truck. What gives you the authority to tell me that not only do I have to junk my truck, but that I also lose the capital investment that I already have in it? If you want to purchase my truck for what I payed for it then fine. By all means I'll cooperate. But I certainly cannot afford to abide by your proposed rules as they are written at this time. That's like me telling you that that new car you just bought isn't legal to operate on California roads anymore and you will have to buy a new that that is legal. Oh sorry you still have to make the payments on that car though. Give me a break. Your grant programs are all well and fine but it doesn't address my situation. I only had 3 more years to pay and I would be out of debt. Your rules will force me to be in debt for a lot longer then 3 years. You should know what costs are involved in purchasing a vehicle that will conform. At the present time I still owe over \$43,000. Your grant program would give me about \$50,000 with strings attached to purchase new equipment. Well the new equipment costs over \$175,000.00. That puts me in the hole for \$168,000.00. Do you realize what kind of monthly payment that will work out to be that I will not be able to afford? You people really need to look at what you are about to do. I am not against what you are trying to achieve, however can you see to it that you pass something that will give individuals like me some way to conform without putting us in a hole that we cannot get out of? I'm only asking you to work with me on this. Give me some way to conform that I can afford. It's hard enough now with the economy the way it is and the lack of work and the high cost of living in southern CA. I only have one truck. That's it. Do the right thing and help me instead of hurt me.

Thank you

Mark Binkley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 19:55:57

No Duplicates.

## **Comment 40 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Donald  
Last Name: Nielsen  
Email Address: Niensentrucking@aol.com  
Affiliation: CTA

Subject: Truck & Bus proposed ruling  
Comment:

I am commenting because there are no one size fits all for the transportation industry.

I am a small fleet owner who operates 10 trucks mostly in California. We are based on the central coast in Salinas, CA. My business employs 14 people and has been operating continuously for 38 years.

We are an on call business who loads & delivers fresh produce for railroad intermodal companies (piggybacks)we load & deliver block ice for small produce companies into the central valley for shipping corn & broccoli. This is a valuable service for small shippers who cannot afford to own or lease ice generating machines.

We also haul ice for construction companies making structural concrete for bridges & buildings throughout CA. We haul ice during the holidays for cities & business' for snow days for children as well as sporting events (X Games skiing exhibitions).

We haul heavy equipment for produce companies & refrigeration equipment that requires drivers with haz mat endorsements. We are a diversified, service oriented company that has vans, reefers, flatbeds & low beds. We do not have steady, everyday routs. Our trucks average less than 35,000 miles per year. Our equipment is mid 1990's to early 2000's. Our Equipment is well maintained, smoke tested & is in compliance with all current regulations.

If the proposed regulation is passed in it's current form our company quire simply couldn't continue to operate. Much of our equipment would have to be disposed of before it's useful life, and expensive retrofits would be required for the balance. Paying for the replacement of disposed units as well as retrofit of other units would not be possible due to current financial conditions. To pay for the added investment we would require more work & it is currently not available in our sector of business. We would cease to exist, denying the public a valuable service oriented company that has paid taxes & provided jobs for over 38 years.

Trucking companies purchasing new trucks generally expect to run these vehicles in excess of 120,000 miles per year & generally have dedicated routes that they can put these trucks on. While replacement of these vehicles may impose a financial burden on these companies they will be able to recover this because of dedicated routes. I believe an alternative method or exceptions for companies who run their equipment under 40,000 miles per year would allow for smaller business, such as myself, to continue to operate.

Thank you for your consideration on this matter.

Sincerely,  
Donald Nielsen

Nielsen Trucking Co., Salinas, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-22 14:18:51

No Duplicates.

## **Comment 41 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: Upfold  
Email Address: wupfold@aol.com  
Affiliation:

Subject: Diesel regulations  
Comment:

I am a one truck owner operator leased to KNIGHT TRANSPORTATION. They WILL NOT allow me to adopt any of these so called energy effiecent technologies as long as I am leasing the truck from them. When the truck is paid for in 2010, its value will not be worth the estimated \$30,000 it would cost to get these upgrades. And with the economy in the shape that it's in, it would not be cost effective to upgrade. Nor, would I be able to make enough money in the 11 month period that I would have before 2012 required replacement of the engine to purchase a newr truck that would meet these requirements. Cost effective solution for me would be to sell my property in CALIFORNIA and move some place else and avoid operating in CALIFORNIA.

Now, lets look at the added expenses that the CARB has not taken into consideration of these purposed regulations.

- 1) Super single/wide based tires:
  - a) More trucks sitting on the shoulder of roads and highways waiting for the repair trucks to fix a flat. This would cause an increase of potential accidents. Plus, if the wheel is damaged due to a blow out, it would cost estimated \$900 for new wheel and tire, plus the cost of up to \$200 to the repair truck to even come out there. Plus the cost of any damage done to the equipment before it would be legal to operate on the road again.
- 2) Aerodynamic kits:
  - a) The only kit that I have seen to date that is smart way approved would add another 3 feet to the overall lenght of the operating units. Which in my case would be a total of 76 feet from the front bumper of the truck to the protruding edge of the kit. CALIFORNIA currently has a 65 foot overall lenght restriction on all state and local highways.

I would ask that the panel please look into all of the extra and potentially extra costs of adopting these purposed changes.

Thank you,  
William A Upfold

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-23 11:07:33

No Duplicates.

**Comment 42 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Charlie  
Last Name: Alford  
Email Address: charlie@alforddistributing.com  
Affiliation: Alford Distributing Company

Subject: Truckbus 08  
Comment:

It is very important to consider the economic impact these new regulations will have on all who must run diesel trucks as part of their business. The added expense will effect many businesses and in some cases put people out of business. The expense will effect businesses, its employees and trickle down to the consumer who are already having difficulties in these hard economic times. Please consider everything and how it will effect the lives of people and their families. This is a very expensive hit to absorb for any industry, so please keep this in mind in making this decision.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 09:36:03

No Duplicates.



**Comment 43 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael

Last Name: Iwata

Email Address: miwata@cityautosupply.com

Affiliation:

Subject: (CARB) proposed on-road truck and bus replacement rule

Comment:

See attached Word file

Attachment: [www.arb.ca.gov/lists/truckbus08/53-carb\\_letter2008.doc](http://www.arb.ca.gov/lists/truckbus08/53-carb_letter2008.doc)

Original File Name: CARB letter2008.doc

Date and Time Comment Was Submitted: 2008-11-24 11:55:33

No Duplicates.

**Comment 44 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gordon  
Last Name: Rayner  
Email Address: grayner@cpmamerica.com  
Affiliation:

Subject: Regulation Changes  
Comment:

Dear Sir,

I have watched the ongoing thrash over your latest proposed changes with interest as it may well put us out of business. In looking at truck upgrades I have been told by engine manufacturers that they are simply pulling out of the California market and our current only engine choice is Cummins. We have experience with two trucks equipped to meet the new standards and they have been a nightmare to try and operate.

Everyone is for clean air but the current changes are overwhelming no matter when they are phased in but are devastating at a time that couldn't be worse for anyone trying to stay alive in business. If you think this economy is going to be good for California, you think wrong. If you think your regulations are going to improve the air, they might, but at a cost beyond your wildest imagination.

I can only speak for myself but we cannot afford these regulations at this critical time, we would have to downsize to afford them in a normal economy. Trading clean air goals for unemployment just doesn't seem like the right answer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 12:29:47

No Duplicates.

**Comment 45 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jennifer  
Last Name: Secord  
Email Address: jennifer@e-pacificcoast.com  
Affiliation:

Subject: Truckbus08  
Comment:

While I understand the need to clean up the air it could not be coming at a worse time. My independent contractors are currently making about half the trips they were making at this time last year and are being asked to either retrofit a \$10,000.00 truck with a \$25,000.00 part or hand over their truck which is paid in full and take on a \$600 truck payment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 12:58:52

No Duplicates.

**Comment 46 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Danny

Last Name: Neal

Email Address: dneal@trucking.org

Affiliation:

Subject: Statewide Truck and Bus Regulation 2008

Comment:

Strongly oppose...this will hurt all small businesses operating in the state of California. The trucking industry is already choking to death with over-regulating by states doing their own thing. Enough is enough!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 13:29:42

No Duplicates.

**Comment 47 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: mike

Last Name: renner

Email Address: rtipresident@aol.com

Affiliation: rock hard transportation inc

Subject: on-road diesel regulation

Comment:

After review of the latest perposed regulations on, on-highway diesel trucks,I want to you to know this is the kiss of death for my company (65 trucks) and most all others in the construction trucking bussness. There is no way any extra cost to operate could be passed on, as the rates from lack of work is diving prices down .This would cuase our company to close its doors as new equipment would be imposable to pay for in todays market. Please do not pass this regulation!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 13:49:13

No Duplicates.

## **Comment 48 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lee  
Last Name: Hobbs  
Email Address: lee@hobbstrucking.com  
Affiliation: CTA, ATA, NFIB among others

Subject: Please adopt the DTCC plan instead of the CARB plan  
Comment:

November 24, 2008

From: Lee Hobbs, Chief of Operations  
Hobbs Trucking Co.

To: The California Air Resources Board

Dear CARB Board Members

This letter is sent to strongly urge you to reconsider your current proposed General Fleet rule for California for trucks operating in California.

Instead, I respectfully request that you adopt a simple but effective alternative that is similar to your ban on all trucks 1988 or older. My idea is to ban, on an annual basis, all trucks that are older than 12 years old as of the date of registration renewal. The fleet of trucks operating in the state would then reach your goal of only 2010 engines on the highway in the target year of 2022.

Adoption of this alternative would accomplish your end goal in the same year and save the trucking industry millions of misspent dollars on retrofit equipment that does not work as advertised. I know that many of the current verified DPF devices are not producing the CARB's reported result and have been removed from the verified list as a result. Those truckers who bought those devices are out the money on devices that do not operate as advertised. We can no longer afford to comply with your requirements when they simply do not produce the reported results. If you adopt my suggested plan, we, the truckers will be allowed to get the expected life out of the trucks that we buy and the older more polluting trucks will just go away. The result of my idea is a guaranteed result of cleaner air over time with no administration or enforcement costs to anyone. This is a good thing when you consider that we are in the worst economic downturn since the Great Depression of the 1930's.

Please, for the sake of fiscal responsibility and sanity, do not adopt the proposed General Fleet rule and if you cannot accept my suggestion, please then consider the proposal set forth by the coalition called Driving Toward a Cleaner California. Anything is better and fiscally more responsible than the plan currently set forth by the CARB.

Respectfully,

Lee Hobbs

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 14:26:39

No Duplicates.

**Comment 49 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Samuel  
Last Name: Iaconis  
Email Address: sammyicon@sbcglobal.net  
Affiliation: cdtoa

Subject: carb bill on emissions  
Comment:

As written will put me out of business. Do not have the resources to get in compliance. Thank you Sammy's Transportation Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 15:19:37

No Duplicates.



**Comment 50 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Darby  
Last Name: Barclay  
Email Address: darby@towtrucksforless.com  
Affiliation:

Subject: Upcoming CARB Diesel Emissions  
Comment:

Please consider the DTCC Alternative.  
My business is already off over 50% because of the confusion  
around compliance with the proposed and because of the economic  
times we find ourselves in. It is likely I will have to shut the  
doors if this is passed as proposed.  
Thanks for your consideration,

Darby Barclay  
Tow Trucks For Less

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 15:58:11

No Duplicates.

**Comment 51 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: john  
Last Name: sambucetti  
Email Address: jsambucetti@westerntrailer.com  
Affiliation:

Subject: truckbus08  
Comment:

To whom it may concern, I have been in the transportation industry as a vendor for over 32 plus years . I believe your over regulation in this area is too excessive . I believe it has caused and will cause excessive hardship on Califrnia buisness and in todays economy we cant afford to take these measures.California will suffer more harm than good at this time . Sinerely John Sambucetti

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 16:16:35

No Duplicates.

## **Comment 52 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Andy  
Last Name: Cox  
Email Address: acox@mcalog.com  
Affiliation:

Subject: Fleet Calculators and Emissions numbers  
Comment:

I work for a company that will need to meet the requirements of the ARB's new Truck and Bus Rule. I have examined the language and numbers of the proposed regulation and have found some numbers that seem to be incorrect.

The numbers in the fleet calculator further prove my point. The numbers are such that no HHD truck older than Engine Model Year 2007 will ever meet the required PM emissions target of .110 g/mile, even with a DPF that cuts emissions by 85%. As shown in the attached file "Fleet Calc Error PM 2.xls," all of the trucks with Engine MY1994-2006 will only reach .122 g/mile of PM. The Fleet Calculator shows that a fleet of MY1994-2006 engines will meet BACT 100%, but the numbers do not show that.

On the opposite end of the spectrum, I can insert an incredibly old Engine Model Year (MY1923 in "Fleet Calc Error PM 1.xls") into the calculator and still return 100% BACT compliance even though the Fleet Average PM level would be .504 g/mile.

As for the NOx emissions, the greatest reduction as required by the Truck and Bus Rule will only get a MY2006 Engine (85% NOx reduction) down to 1.80 g/mile of NOx (see "Fleet Calc Error NOx 1.xls") . The NOx target is below that number at 1.60 g/mile NOx.

In fact, in the "Fleet Calc Error NOx 2.xls" file even a MY2011 Engine will not meet MY2010 emissions requirements, as the numbers show that it still emits 2.50 g/mile NOx.

The numbers must be addressed before this rule is approved. As it currently stands, the ARB's numbers for calculating Emissions Targets and Averages are conflicting in the both the language of the rule and the fleet calculators. I believe that one way to repair this conflict is to change the numbers in the Appendix A section of the rule (page A-45). (For instance, in Table A-1 of Appendix A, MY1994-2006 HHD should change the PM emissions factor from 0.81 to 0.73). If the numbers stay the same, then the ARB will have to require further PM and NOx reduction from filters that are already required to eliminate 85% of PM emissions and 20-85% of NOx emissions.

Please consider these conflicts when you meet to finalize your regulation. These types of errors could create immense problems with the implementation of the ARB regulation and require a complete overhaul of the rule.

Thank you.

Attachment: [www.arb.ca.gov/lists/truckbus08/63-fleet\\_calc\\_errors.zip](http://www.arb.ca.gov/lists/truckbus08/63-fleet_calc_errors.zip)

Original File Name: Fleet Calc Errors.zip

Date and Time Comment Was Submitted: 2008-11-24 16:40:08

No Duplicates.

## **Comment 53 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dan  
Last Name: Ruoff  
Email Address: dan@alegretrucking.com  
Affiliation:

Subject: IN-USE ON-ROAD PROPOSAL  
Comment:

The trucking industry has already made tremendous cutbacks in emissions, and is continuing to do so. Engine manufacturers have met requirements to reduce NOx from 500 ppm to .5 ppm. This is already a substantial reduction. In addition each truck must pass an annual smoke opacity test to make sure it's exhaust is clean. In 2010 additional requirements are having to be met that will result in an extremely clean burning engine.

Even without considering the current economic strains, the trucking industry is already on the path to doing it's part to clean the air. But to spend billions of taxpayers dollars; require truckers to come up with funds to replace or retrofit trucks when there isn't even a guarantee of jobs; and to ask the general public to pay higher costs for all goods hauled by trucks, just seems unreasonable and irresponsible at this time.

I would ask that this proposal be tabled. Allow the economy to regain strength. In the mean time continue to monitor the air quality. Allow the current process of cleaner engines to continue showing positive results. After 2010 these results are going to continue proving that this program is working. This is going to take place even without any additional mandates.

It is very likely that the money ear-marked for this project could be better utilized in researching other areas for cleaner air that could net greater results, with less economic impact.

The trucking industry absolutey is in agreement with efforts for obtaining better air quality. We are proud of our accomplishments so far and with the path we are currently headed. But consider allowing this process to continue without imposing any further hardships on this industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 17:11:21

No Duplicates.

**Comment 54 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tim  
Last Name: fortier  
Email Address: timfortier@ctibulk.com  
Affiliation:

Subject: diesel rules  
Comment:

WE ARE A 102 YEAR OLD TRUCKING FIRM IN FRESNO WITH 5 GENERATIONS OF MY FAMILY WHO HAVE MADE THEIR LIVING FROM TRUCKING IN CALIF. WE HAVE BEEN THROUGH ROUGHER TIMES IN OUR HISTORY THEN THE PRESENT, HOWEVER I BELIEVE YOU NEED TO SPREAD THE TIME TABLE OUT TO AVOID MANY TRUCKERS FROM GOING OUT OF BUSINESS. WE JUST CANNOT AFFORD THE INVESTMENT ON SUCH A SHORT TIME. WE NEED YOUR HELP TO SURVIVE. THANKS TIM FORTIER.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 17:20:37

No Duplicates.

**Comment 55 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William

Last Name: Callahan

Email Address: arcbacexec@gmail.com

Affiliation: Associated Roofing Contractors

Subject: Adopt Alternative DTCC Proposal Instead

Comment:

As per the attached letter, we respectfully urge the Board to adopt the DTCC alternative proposal.

Attachment: [www.arb.ca.gov/lists/truckbus08/66-arb\\_diesel\\_reg\\_ltr\\_11-24-08.pdf](http://www.arb.ca.gov/lists/truckbus08/66-arb_diesel_reg_ltr_11-24-08.pdf)

Original File Name: ARB Diesel Reg Ltr 11-24-08.pdf

Date and Time Comment Was Submitted: 2008-11-24 18:29:49

No Duplicates.

## **Comment 56 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Grande  
Email Address: dwgrande@sbcglobal.net  
Affiliation:

Subject: Truckbus08  
Comment:

Ladies and Gentlemen,

I was born and raised into a family construction trucking company. My parents came to California in 1955, started their own company transporting construction materials, ie. rock and sand products. They both worked in the business, as well as my brother and I when we became of age to start washing and greasing the rigs. Eventually we became drivers and have been involved in the industry for our lifetime. As time progressed, we have seen the changes, and demises of this industry. Deregulation and open permit process was the first blow in my opinion, that opened up the flood gates to more competition and lower profit margins. We saw our company dwindle down in size primarily due to operating expenses skyrocketing and increased competition with fewer jobs. This era was the 1990's.

With over 50 years in business, we ceased operations last year. Unstable fuel prices, increasing insurance costs for employee benefits, Workman's compensation increases, liability insurance, DMV expenses, maintenance expenses, employee compensation and the lack of construction projects all contributed. Notice that I did not mention the expense of equipment, since the older trucks we operated were paid for. Buying new trucks was just another expense that the company could not afford to absorb in these economic times.

At 43 years of age, I am now a single truck owner operator raising a traditional family on my income. My wife is an educated professional, recently a victim of economic times and was laid off a job she held for seven years. As I read through your proposals for truck modernization, I ask that you stop and look around at what is happening to our economy. The lack of projects within the housing and commercial developments, the State of California's budget reducing construction funding, the lack of private projects due to lending restrictions, all affect our businesses. I operate an older 1991 Peterbilt tractor, I specialize in local hauling via semi end dump and flat bed services. If I were to update my tractor to a new '07+, it would add an additional \$3K per month expense. Simply an expense at this time no one in this industry can absorb...a bail out?...wishful thinking.

I ask Carb to support the DTCC alternative that will protect California's economy and improve our air quality.

Sincerely,



David Grande  
9933 Lakevista Street  
Ventura CA 93004  
805-290-5213

Attachment: [www.arb.ca.gov/lists/truckbus08/67-daves\\_rig\\_002.jpg](http://www.arb.ca.gov/lists/truckbus08/67-daves_rig_002.jpg)

Original File Name: Daves Rig 002.jpg

Date and Time Comment Was Submitted: 2008-11-24 20:41:08

No Duplicates.

**Comment 57 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Rowe  
Email Address: d.c.rowe@jetforwarding.com  
Affiliation:

Subject: Support DTCC  
Comment:

The proposed regulations forcing the replacement/retrofitting of diesel engines for trucks starting in 2010 will DESTROY JOBS AND SMALL BUSINESSES IN CALIFORNIA if passed.  
If you want to responsibly regulate for cleaner air, then you should support the alternative proposal submitted by Driving Toward a Cleaner California (DTCC).

David Rowe  
Jet Forwarding Inc.  
Torrance, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 09:42:06

No Duplicates.

**Comment 58 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tyler  
Last Name: Wellman  
Email Address: tcw8@pge.com  
Affiliation: PG&E

Subject: Minor Clarifications Proposed  
Comment:

PG&E is requesting a couple of minor clarifications to the regulations that we believe will have no impact on their meaning or effect. The intent of these clarification is to avoid possible confusion in the future by making certain points explicit.

In the attached document I have underlined the proposed revisions.

Thank you!

Attachment: [www.arb.ca.gov/lists/truckbus08/72-pgeproposedclarifications.doc](http://www.arb.ca.gov/lists/truckbus08/72-pgeproposedclarifications.doc)

Original File Name: PGEProposedClarifications.doc

Date and Time Comment Was Submitted: 2008-11-25 11:08:07

No Duplicates.

**Comment 59 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michele

Last Name: Bowen

Email Address: mbowen@rentacrate.com

Affiliation: The CA Moving & Storage Assoc-CMSA

Subject: CARB's regulations

Comment:

Dear Governor Schwarzenegger:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

As a member of The California Moving and Storage Association (CMSA) and its over 550 member companies, I am 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes many of my fellow members future viability in the moving and storage industry, which is already reeling from unprecedented financial turmoil. I have been a witness to 4 moving businesses closing just in the last 3 months from the current economic state.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment.

Thank you for your time,  
Michele Bowen  
Operations Manager  
Rentacrate, LLC  
(562)801-1800  
(562)801-5600 fax

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 11:12:15

No Duplicates.

**Comment 60 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jack  
Last Name: Macy  
Email Address: macy@macymovers.com  
Affiliation:

Subject: CARB diesel truck regulations  
Comment:

Macy movers is a small company with about 15 employees , a CMSA member with a fleet of less than 4 diesel trucks. The proposed CARB regulations would require our small business to spend dollars that we simply do not have.

Our moving company does local moves around the bay area, and usually does not involve driving more than 10 to 20 miles per day, per truck (not always diesel trucks) Macy Movers would be severely hampered by the costs of retrofitting or replacing the trucks.

Jack Macy,  
president,  
Macy movers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 11:21:50

No Duplicates.

## **Comment 61 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Barrett  
Email Address: dave@patriotpropaneusa.com  
Affiliation:

Subject: Diesel Truck Proposal  
Comment:

The California Air Resources Board (CARB) is considering an on-road diesel truck and bus regulation that will have a huge negative impact on the state's economy and my company.

In today's economic environment, it's unreasonable to impose costly regulations on small businesses already struggling to get by. I'm in favor of cleaning up emissions, but the timing is horrible. I don't have tens of thousands of dollars at my disposal to retrofit my small fleet.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression, and small businesses are struggling to make ends meet. Companies like mine are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. My company and others like us simply don't have the resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shutter our companies' doors, ultimately costing jobs and revenue to the state's economy.

Given the multi-billion dollar cost of this regulation and the current volatile economic environment, please support the alternative proposal proposed by the Driving Toward a Cleaner California Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions. In fact, CARB's own analysis of the DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 12:15:52

96 Duplicates.



## **Comment 62 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Dorazio  
Email Address: marym911@aol.com  
Affiliation:

Subject: On Road Truck Rule (proposed)  
Comment:

The proposed method merits consideration of alternative plans, primarily due to the present plan's economic improbability for any measure of success. The recent past with electric de-regulation made this state the object of many lessons; please do not create another debacle with the trucking.

One principle feature of the proposed rule is the 'Best' available control technology. With the present rule, the retrofit DPF device is essentially the only acceptable solution. However, the word "best" is an oxymoron. The technological "best" is a 2010 engine with matched SCR filter. A mandate toward a retrofit filter may not provide the overall solution being sought as it will relegate limited economic resources toward a retrofit technology which may include an upgraded engine. These engines which were not designed for the retrofit filter from a backpressure standpoint or an oil consumption standpoint. The use of Level I and II devices should be allowed as part of this emission reduction plan.

My one truck is operated less than 2000 (two thousand) miles annually (and passes the smoke test). With the proposed rule, at the end of 2012 it will need a filter. There is no filter available for the engine so we must change the engine and add a filter - big bucks necessary with (1) no financing options and (2) not being able to 'pass the cost on' for the mileage utilized.

As a suggestion, why not provide an option for a level 1 or 2 device with a five or ten thousand mileage limit? If this was allowed for far less cost, then the funds would hopefully diverted to a used 2010 truck in say around 2015 or 2016 where the economy must certainly be better.

I recently noticed a specific business sector has recently arranged for a mileage cap and deadline extension in order to absolutely exempt some vehicles - any reason level 1 or 2 devices were not invoked to at least obtain some of the credit needed to meet the EPA mandated targets?

Please consider suggestions being offered and provide a clean air solution that we can all live with - yes, literally so for many folks.

Sincerely, Robert Dorazio PO Box 604, Avila Beach, CA 93424 (San Luis Obispo County)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 13:18:49

No Duplicates.

**Comment 63 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Cara

Last Name: Bandera

Email Address: Cara.Bandera@sdcounty.ca.gov

Affiliation: San Diego Air Pollution Control District

Subject: Proposed Changes to Portable Diesel Engine ATCM and PERP

Comment:

The San Diego County Air Pollution Control District submits the attached comments regarding the proposed modifications to the Portable Diesel Engine ATCM and PERP.

Attachment: [www.arb.ca.gov/lists/truckbus08/83-arb\\_comments\\_1108.pdf](http://www.arb.ca.gov/lists/truckbus08/83-arb_comments_1108.pdf)

Original File Name: ARB Comments 1108.pdf

Date and Time Comment Was Submitted: 2008-11-25 13:19:01

No Duplicates.

**Comment 64 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Paul

Last Name: von Ranzow

Email Address: pvonranzow@heritagepropane.com

Affiliation:

Subject: proposed regulation in-use on-road diesel vehicles

Comment:

from Heritage propane

Attachment: [www.arb.ca.gov/lists/truckbus08/84-heritage\\_letter\\_head.doc](http://www.arb.ca.gov/lists/truckbus08/84-heritage_letter_head.doc)

Original File Name: Heritage Letter Head.doc

Date and Time Comment Was Submitted: 2008-11-25 13:23:51

No Duplicates.

## **Comment 65 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jill

Last Name: Longo

Email Address: jill.longo@andystransfer.com

Affiliation: Andy's Transfer & Storage

Subject: Oppose CARB Regulation

Comment:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

At Andy's Transfer and Storage, we are 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes many of our members future viability in the moving and storage industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression. California moving companies are struggling to make ends meet in the face of a massive slow down in the residential real estate market. The proposed legislation will require small businesses, such as ours, to spend dollars that we don't have, in a market where there is virtually no access to capital for business, large or small.

Companies like ours are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. We simply don't have the resources or access to capital to retrofit our engines. We will be forced to sell off our trucks at a loss or shut their companies' doors, ultimately costing jobs and revenue to the state's economy.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

We have many independent contractors who have invested the bulk of

their income into the equipment they operate. These are one-truck operators. They do not have the gross revenue volume of large companies. These men and women would be forced to sell their other assets, most likely their homes or personal vehicles, in order to purchase new commercial trucks. Their entire livelihood is tied up in this capital asset, and the CARB initiative would make it useless.

DON'T DO THIS TO THE WORKING MEN AND WOMEN OF CALIFORNIA. They do not have the funds to survive a change like this.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. I look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Jill Longo  
Owner, Andy's Transfer and Storage  
Glendale, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 15:28:55

No Duplicates.

**Comment 66 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Chris

Last Name: Carney

Email Address: ccarney@ucsusa.org

Affiliation: submitted on behalf of 4600 CA residents

Subject: Protect Californians: adopt strong health protections, reduce pollution from trucks

Comment:

Diesel trucks and buses on the road represent the largest source of toxic diesel emissions in California. These toxic diesel emissions are responsible for causing approximately 4,500 premature deaths and more than 38,000 asthma attacks annually in the state. Truck drivers, children, the elderly and those with compromised immune systems are especially vulnerable to the health risks of diesel pollution. The loss of life, health care costs, and lost work and school days cost an estimated \$40 billion each year, far more than the cost to clean up the trucks.

The California Air Resources Board (CARB) must develop an effective, health protective In-Use Truck and Bus rule in order for California to meet its federal commitments to reduce ozone and particulate pollution, benefit truckers' health, lessen the health impacts of toxic diesel pollution, and save lives.

Additionally, CARB must adopt a strong Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Measure to reduce the truck pollution that causes global warming and meet our commitments under the landmark Global Warming Solutions Act of 2006 (AB 32).

Signed,

[See attached file to view the names of the 4600 Californians who have signed this letter]

Attachment: [www.arb.ca.gov/lists/truckbus08/95-comments\\_on\\_diesel\\_truck\\_regulations\\_on\\_behalf\\_of\\_4600\\_californians\\_11-25-2008.pdf](http://www.arb.ca.gov/lists/truckbus08/95-comments_on_diesel_truck_regulations_on_behalf_of_4600_californians_11-25-2008.pdf)

Original File Name:

Comments\_on\_diesel\_truck\_regulations\_on\_behalf\_of\_4600\_Californians\_11-25-2008.pdf

Date and Time Comment Was Submitted: 2008-11-25 16:40:21

No Duplicates.

**Comment 67 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Leroy  
Last Name: Gelsi-Medeot  
Email Address: grafstorage@earthlink.net  
Affiliation:

Subject: (CARB) (statewide Truck & Bus Regulation 2008)  
Comment:

Please see the attached letter:

Attachment: [www.arb.ca.gov/lists/truckbus08/96-schwarzenegger\\_letter.doc](http://www.arb.ca.gov/lists/truckbus08/96-schwarzenegger_letter.doc)

Original File Name: Schwarzenegger Letter.doc

Date and Time Comment Was Submitted: 2008-11-25 16:50:05

No Duplicates.



## **Comment 68 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matt

Last Name: Stern

Email Address: msearthworks@yahoo.com

Affiliation:

Subject: support DTCC

Comment:

MS Earthworks 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes our future viability in the construction industry, which is already reeling from unprecedented financial turmoil. Companies like mine are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. My company and others like us simply don't have the resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shutter our companies' doors, ultimately costing jobs and revenue to the state's economy.

The smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. I look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-25 19:09:36

No Duplicates.

**Comment 69 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: JACK RONALD  
Last Name: RUDOLF  
Email Address: yvonne@jacksbutane.com  
Affiliation: wpga

Subject: diesel truck proposal  
Comment:

The CARB is currently considering the adoption of an on-road diesel truck and bus regulation that if implemented as presently drafted would have a profound, negative impact on California's economy.

We small businesses are already suffering, now you want us to dispose of equipment before their useful life has been completed. We just don't have enough money to retrofit all of our engines. Forcing small business into this retrofit will surely force some of us out of business, thereby costing jobs and revenue to the state's economy.

Please support the alternative proposal proposed by the Driving Toward a Cleaner California Coalition that would give small companies a more flexible timeframe to afford the retrofit.

thank you...Jack Ronald Rudolf, CEO...Jack's Butane Service Inc  
Biola, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 08:43:47

No Duplicates.

**Comment 70 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Gomez  
Email Address: wide\_to\_receive@hotmail.com  
Affiliation:

Subject: Notice of Public Hearing to Consider Adoption of a Proposed Regulation In-Use On-Road Dies

Comment:

I support the adoption of this regulation.

South Coast AQMD, staff keeps saying that air quality has improved. Yet, we have not done enough and studies like these keep coming out  
<http://www.latimes.com/news/local/la-me-pollute13-2008nov13,0,3895359.story>

We need to do a lot more to improve air quality and this is a HUGE step.

So far the South Coast is only proposing to regulate chimney emissions. Intuitively that proposal seems like a joke. Not that will not help, but this regulation will not do nearly enough, especially in the summer months when pollution is at it's worst.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 09:18:25

No Duplicates.

**Comment 71 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Earl  
Last Name: Farnsworth  
Email Address: cal@farnsworthmayflower.com  
Affiliation:

Subject: Proposed CARB Diesel Regulations  
Comment:

November 26, 2008

The Honorable Governor Arnold Schwarzenegger  
State Capitol Building  
Sacramento, CA 95814

Dear Governor Schwarzenegger:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

I want to be clear: The California Moving and Storage Association (CMSA) and its over 550 member companies are 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes many of our members future viability in the moving and storage industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression. California truckers, particularly moving companies, are struggling to make ends meet in the face of a massive slow down in the residential real estate market. The proposed legislation will require small businesses to spend dollars that they don't have, in a market where there is virtually no access to capital for business, large or small.

Companies like those represented by the CMSA are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment

worth pennies on the dollar. Many CMSA member companies and others like us simply don't have the resources or access to capital to retrofit our engines. Some of our members may be forced to sell off our trucks at a loss or shut their companies' doors, ultimately costing jobs and revenue to the state's economy.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We are a small Mayflower moving agent in northern California with 9 trucks in our fleet. Based on the proposed new regulations we would have to retrofit or replace 7 of them. This is not something we could afford or budget for.

Sincerely,

Earl Farnsworth JR  
President  
Farnsworth Mayflower  
Member of the California Moving and Storage Association  
[www.thecmsa.org](http://www.thecmsa.org)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 09:24:08

No Duplicates.

**Comment 72 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Curtis  
Last Name: Olsen  
Email Address: colsen@mayflower-sac.com  
Affiliation:

Subject: CARB Regulations  
Comment:

The Honorable Governor Arnold Schwarzenegger  
State Capitol Building  
Sacramento, Ca. 95814

Currently under consideration by the California Air Resources Board (CARB) is adoption of on the road diesel truck and bus regulations that if implemented in their present form are both costly and ill thought out.

I as any other forward looking citizen, parent and business person certainly want to do the best I can to protect our environment air quality and way of life here in the Golden State. This cannot be done however while disregarding the economic impact of the regulations as proposed by CARB.

The regulations proposed by CARB in the best of economic times were both arbitrary and expensive. Retroactively requiring private citizens to either upgrade or replace assets purchased in the normal course of business with projected life expectancies and depreceiation schedules was onerous at best. Moving forward with this type of regulation in the current environment would have a terrible effect on small business owners.

I urge you to support the Driving Toward a Cleaner California Coalition (DTCC) proposal that has realistic and reasonable time frames for compliance with the new emission standards. As a fellow republican I ask that your return to your roots rather than how you have governed our state place the interest of the citizens and small business people who make up the tax base before the interest of State Bureaucracies. Thank You for your time.

Sincerely:

Curtis R Olsen, Jr.  
Vice President General Manager  
Olsen & Fielding Moving Services

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 15:22:26

No Duplicates.

**Comment 73 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Carl  
Last Name: Frank  
Email Address: dbrs@verizon.net  
Affiliation:

Subject: Statewide Truck and Bus Regulation  
Comment:

I am the owner of a small business in Chino, CA. I own one diesel tractor and a dozen trailers which contain medical equipment. I drive between 5,000 and 10,000 miles per year with my tractor. In fact, the 1987 Freightliner tractor I own has less than 80,000 miles on it. Legislation that forces me to upgrade my tractor to a new vehicle would create a tremendous financial hardship on myself and my business. Since I don't use my tractor very much, it would be cost prohibitive to purchase a new one. I don't think the state of California is concerned about very low mileage operators like myself. We are not the problem. There should be an exception in this case. High Mileage Operators are the ones that should be targeted. Bear in mind, however that high mileage tractors are the first to be retired, so there will be a natural attrition rate amongst these vehicles. I would even go so far as to agree to paying a "Road Mileage Tax" or a "Vehicle Registration Tax" to supplement a incentive program to encourage these high mileage vehicle owners to retire the non-compliant trucks, but the tax must be reasonable and the proceeds must go only for this purpose and not be redirected into the general fund for the state. I appreciate any response. Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 20:04:14

No Duplicates.



## **Comment 74 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Olson  
Email Address: mark.olson@maha.de  
Affiliation: MAHA GmbH

Subject: Have courage and do the right thing  
Comment:

Dear Governor Schwarzenegger and ARB members,

I have been reading the other comments and have made a few observations.

1. The majority of the comments are against the proposed rules because it personally affects them financially. The problem is the financial impact is much greater to society if nothing is done and the impact is spread over the masses which does not notice the damage as it quietly kills.
2. There are heart breaking stories of weak small companies that will be wiped out by this law. On the other side there are many untold stories of citizens without health insurance that are being wiped out by health problems caused by polluted air.
3. One good argument I read was about maintenance and performance of the engines. This argument is good for making the polluter pay the costs for fixing the pollution problem. The way to do that is to test the trucks and base the operational fee on the pollution testing results. This is the fairest way to pass the costs on to those producing the problem. An annual test with random checks to keep the users honest is the best way. The peoples' money should not be used to subsidize any industry by paying to fix their unintended consequences.
4. The testing program should also be increased because the incentive by the users to cut corners or out right cheat is too great.

Breathing clean air must be the first right of all the members of a free and fair society and burden of this right must be born by those who pollute the air not the tax payers. Therefore have the courage to do the right thing for the people you represent.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-27 07:37:17

No Duplicates.

**Comment 75 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Grover  
Last Name: Perrigue  
Email Address: grover@perriguelaw.com  
Affiliation: Attorney

Subject: Diesel Regulations  
Comment:

Further diesel regulation now will further serve to damage our economy. We can't handle it. Thank you, Grover A. Perrigue III

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-27 20:01:54

No Duplicates.

**Comment 76 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jim  
Last Name: Galusha  
Email Address: jgalusha@silveradostages.com  
Affiliation: California Bus Association

Subject: Support of new diesel engine regulations  
Comment:

As an operator of over 65 full-size motorcoaches out of 3 locations (Sacramento, San Luis Obispo, Santa Barbara) I support your efforts to improve air quality in California through the implimentation of new regulations.

The financial impact to my company, Silverado Stages, will be significant but not unmanageable.

The one provision that will harm my operations is the proposal to allow small operators additional time in which to comply. These operators are already provided a 5% bidding advantage over larger companies through the 'California Small Business Certification' program. Allowing them to avoid the increased expense of upgrading their equipment will further expand that advantage.

Do your studies not show that the small companies operate a proportionally larger percentage of the older diesel equipment that is causing the most harm to the environment?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-28 05:45:20

No Duplicates.

**Comment 77 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Wilson  
Email Address: markwilson@pacbell.net  
Affiliation:

Subject: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation  
Comment:

Dear CARB Staff:

I am writing to support the proposed On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. I believe that the changes brought about by this regulation would contribute to the better health of Californians, particularly in areas that are already affected by hazardous air quality conditions.

I also strongly urge you to ensure that CARB support the owners of one or two trucks in implementing this regulation. It is often these independent operators who cannot afford to pay for such changes, and any financing that is tied to this program should focus on these individuals before large companies more able to afford such changes.

Thank you for the opportunity to comment.

Mark Wilson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-28 07:58:17

No Duplicates.

## **Comment 78 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Walter  
Last Name: Benson  
Email Address: wbenson@dslextreme.com  
Affiliation: CDTOA

Subject: Board Hearing  
Comment:

Dear Board

As A Californian since 1946 and owner of a 1 truck operation, I see the need to continue to clean the air as we have been for the last 40 or so years. The speed that this is taking place seems to be adequate and the plan CARB has come up with would without a doubt put a great burden on people like me not to mention the fact you are asking truck manufacturers to produce a million or so replacement units for the 2003 or older trucks. Truck dealers WILL be charging a hefty price for these units since they have to be had!!!

The plan sounds like the only reason for the plan is to get federal highway funds through a guilt complex that 11,000 people die each year from truck exhaust.

For one thing, if the politicians would leave the fuel and road taxes where they belong there would be an abundance of funds available for road and highway work and I'm curious as to how much of the \$17.2 billion dollar budget is going to CARB?

How do you feel the people that put you in office are going to take the added expense YOU are adding to their already taxed, inflated, over bearing cost of living in California when they hear of what YOUR plan is? If you will, look around your office and try to find something that has not been on a truck and how much more it will cost now?

I now own a 2000 year model truck and being close to retirement my truck was to be worth around \$60,000 to add to my retirement funds but now you want to make worth SCRAP.

The trucking industry is striving to help with pollution and I for one keep my truck well maintained and as fuel efficient as possible to help keep my costs down.

I would like to suggest an idea to allow trucks to haul bigger payloads in order to lessen the amount of trucks and trips required thereby significantly reducing pollutants contributed to our surrounding atmosphere. Just a thought.

Sincerely  
Walt Benson CA 5835

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-28 09:46:45

No Duplicates.

**Comment 79 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ron  
Last Name: Faulkner  
Email Address: ron@faulknertrucking.com  
Affiliation: Faulkner Trucking, Inc

Subject: CARB regulation of on road diesel engines  
Comment:

PLEASE SEE ATTACHMENT

Attachment: [www.arb.ca.gov/lists/truckbus08/114-letterto\\_carbboard.doc](http://www.arb.ca.gov/lists/truckbus08/114-letterto_carbboard.doc)

Original File Name: letterto carbboard.doc

Date and Time Comment Was Submitted: 2008-11-28 11:08:20

No Duplicates.

**Comment 80 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sandra  
Last Name: Furlich  
Email Address: apollutionsolution@yahoo.com  
Affiliation:

Subject: In-Use On-Road Diesel Truck and Bus proposal  
Comment:

I urge CARB to adopt the above proposal at the December hearing. Air quality in many parts of CA is, despite improvements, still some of the dirtiest in the US. And diesel emissions (particulate matter and NOx) accounts for 40% of this "bad air."

Where CA goes, other states will follow - and I praise the the current Board for its visionary, no-nonsense approach to solving our air quality problems.

Sincerely, Sandy Furlich

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-29 23:54:05

No Duplicates.



## **Comment 81 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom  
Last Name: Tanner  
Email Address: ttanner777@aol.com  
Affiliation: A-1 Sweeping Service

Subject: financial impact will kill many  
Comment:

These new smog rules are going to have adverse economic reactions. Industry (any trucking, const, heavy equipment, etc...) will always eventually replace their old equipment anyhow, by virtue of natural attrition. The way CARB proposes to accelerate this, by mandating expensive retrofits to older value-less equipment, will simply mean that "the big get bigger, and the small get smaller" :( Only those with deep pockets (the larger fat cats) will be able to go out and buy the newer engines or new units, and dump their old fleet "overnight".

It's the small time startups, or small-time guy in a niche industry, or in a small-town geographic locale, that keep the market economics fair play. In other words, if only the larger fat-cats either already have equipment that's already new, or can simply afford to dump their old fleet overnight, then what do you think will happen to the competition factor? Those big enough to weather this would control the market, that was previously "kept in check" by small time startups, small-town mom-&-pops suppliers, etc... If those of us with older equipment are forced to abandon ship, those that remain will simply have a captive market to gouge for whatever price they want.

I know for a fact that I can not survive, if the laws as proposed, go through. The equipment I have is not worth retrofitting at \$20k+ each with after-market devices. It is questionable whether it can even be done, whether it fits, whether it's safe, etc... I could certainly go out and buy several new units at \$250k each, but there is no way in h\*ck that my customers will shoulder the cost per hour I'd need to charge. They'd simply call up a "fat cat" in a larger city 1 hr. away. So much for checks and balances of market economics, eh? Get ready to love your future tax-burden for cost of public works, public roads, etc...

I could shoulder perhaps retrofitting one or two, or perhaps getting a unit per year, over the next few years, but in our industry, we need backup machines. The grueling type of work we do (sweepers on paving jobs), takes a lot of abuse. Yes even on brand new units, they can breakdown on a job. So we are accustomed to keeping a spare within "striking distance". Therefore I have spares that litterally may only go out a few weeks or a month's worth per year. Common sense says that they are not worth spending any time or extra money on these. I would simply fold my cards and bail.

There's got to be some concession by CARB to allow some sort of

low hours/miles backups, or exemptions for niche industries.

CARB personell seems to think that "supply and demand" will naturally step up to the plate, and commerce will keep at the current pace. Their logic is simple, to those who cry "financial impact": They'll say "Raise your price". To that, a friend of mine challenged that logic, and said "If McDonalds raised Big Mac's to \$14 each, people would buy less". The CARB person responded: "No they wont. Because people still have to eat". Well unfortunately sir, people don't need to "eat" new streets. People don't need to "eat" clean parking lots and cleaner streets. Believe me, cities (for their street programs) and private shopping center owners (for their parking lots) do choose ALL THE TIME to buy less (in your analogy "eat less"). A city, for example, that cleans residential streets 2x per month, could indeed elect to drop down to 1x per month, if the cost became prohibitive. Afterall, the leaves and litter "can wait a bit longer". Heck, I'm old enough to remember when my residential street was swept 1x per week in my neighborhood as a kid. Why do you think they decreased? The almighty dollar speaks! And the same is true for shopping center owners, industrial plant owners, etc...: When times get tough, they cut back on frequency. I've had many customers go from, for example, 2x per week service, to 1x per week service. And Uncle Sam can indeed elect to delay road repairs for "awhile longer" if it becomes too expensive. Afterall, "people can drive a \*little longer\* on roads with pot-holes, eh?" So PLEASE! don't tell us that "people will continue to buy the same amount of Big Macs". They won't in a lot of cases, where your analogy doesn't hold.

In the case of street sweepers, if your stated goal is to reduce pollutants, then it would seem to me that you should aim to have as many as possible street sweepers roaming the streets! Example: I have many customers who, if they seek to "watch their budget", will have us only come in at the end of a day during a truck haul (where dirt is getting drug out of construction sites). Or, if the cost is reasonable, will elect to keep us there all day, not letting it build up to begin with. Which option do you think is more effective at fugitive dust control? Which option do you think will arrest the dirt before it is spread onto side streets (invisible enough, yet still present, at places that aren't on sweep routes) So let's be reasonable, if street sweepers are reasonably priced, customers will use them more liberally. You can't have it both ways. You will indeed have more pollution with less sweepers, and you will indeed have less sweepers with higher cost-per-hour/less competition.

The sole purpose of a sweeper is to pick up and remove debri, which results in air-borne cilicate pollution, ground water runoff with silt, etc.. What better tool for use in your stated goal??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 12:10:41

No Duplicates.

**Comment 82 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: Rogers  
Email Address: brogers@sksoil.com  
Affiliation:

Subject: On-road Diesel Regulations  
Comment:

With the recent publication from DOT (BTS57-08 Dec. 1, 2008 - copy attached), how can CARB possibly check every vehicle that enters the State for compliance? I don't believe it can be done. With the California businesses baring the brunt of this regulation, the vehicle owners that are affected by this regulation are being subjected to higher costs. The reduction in tons per day of pollutants claimed in this regulation are false due to the inability to regulate the vehicles entering from our borders. There is nothing in the regulation that states vehicles entering this State will be checked for compliance. The only reference is a penalty to the companies inside the State of California that uses a non-compliant vehicle. Please consider the proposal made by the DTCC and also take into consideration the many Industry educated supporters for this proposal. Thank you for the opportunity to express my concerns,  
Bill Rogers

Attachment: [www.arb.ca.gov/lists/truckbus08/125-border\\_info\\_12-08.pdf](http://www.arb.ca.gov/lists/truckbus08/125-border_info_12-08.pdf)

Original File Name: Border info 12-08.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:33:52

No Duplicates.

**Comment 83 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Yandell  
Email Address: john@yandelltruckaway.com  
Affiliation:

Subject: DTCC Alternative Proposal  
Comment:

I would ask the Board to consider the DTCC Proposal as it lends to a more practical solution. More practical because of the time elements that would help companies better manage the cost. The 20th century was a period of an industrial revolution and now in the 21st century to try and cure the ills in such a short time frame is not making a smart decision. While the goal is the right one, let us use an intelligent economic approach to get there. Amortization, depreciation are all functions that are part of making business decisions for a prudent business plan. The economy is the worst we have seen since the Great Depression; are we going to further damage our industry and the State as we try to compete in this global environment? There should be a mutual relationship that exists so that the Board could obtain the goals and help, rather than hamper, a vital part of the States infrastructure. Your help in this urgent matter would be appreciated.  
Regards,  
John Yandell  
Yandell Truckaway, Inc.  
Oakland, CA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 15:26:40

No Duplicates.

## **Comment 84 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mary  
Last Name: Proctor  
Email Address: proctortrucking@att.net  
Affiliation: cdtoa - bcda

Subject: CARB ON ROAD RULE  
Comment:

My partner / husband and I started our construction trucking business in 1978. We primarily operate in the S.F. Bay Area as a legally filed general partnership; we are Class A drivers and are both age 59 .We pride ourselves as honest and successful small business owners. We currently own one 1990 three axle tractor and four semi end dump trailers. Three years ago, prior to any available knowledge regarding CARB's plans, we had Caterpillar put a rebuilt 1990 motor in our tractor at the cost of \$25,000.00. Our average mileage is 40,000 per year.

We do not regret the updating we made to our equipment. We determined at 720,000 miles we should replace the motor or purchase a new truck. We determined after thorough review of the age and condition of all components of our tractor, average mileage traveled per year and a desired retirement age of about age 65-67 the "updating motor plan" best suited all the above requirements.

We have filed for a tractor replacement grant however, it seems we don't qualify. Under the Carl Moyer Funding program or the 1B Funding program, we do not qualify for retrofit and we do not travel enough miles to be a company that will provide the "most bang for the buck".

We are people who have never relied upon a hand out. We have worked hard all of our adult lives as self employed and self sufficient; home owner, raised a college / masters educated daughter with no loans or grants, assist in raising two grandchildren. We both have volunteered our time over the years to the community as; PTA Co Presidents / SIP committee members / Camp Fire Leaders / Homeowner Association President, Secretary / Bay Counties Dump Truck Owners Association members, Director, President, Secretary / California Dump Truck Owners Association, members, Director.

We currently have three gentlemen pulling trailers for us.

- #1 - 1993 Tractor-owned, he is age 27 newly married, responsible person for elder parents care, homeowner
- #2 - 2000 Tractor-owned, he is age 41 married sole support of two college age children with no loans or grants, homeowner
- #3 - 1965 Tractor-owned (fully restored), he is age 69 wife deceased, homeowner

Currently #1 and #2 have no idea how they can possibly afford new(er) trucks by the end of 2012 and do not have skills to start new careers. #3 determined he must fully retire (no part time work) no later than the end of 2012 without option.

As for my partner/husband and me, retirement at age 63 would be a luxury I can't see how we can afford. But, payments on a new(er) truck for 5 or maybe 3 years respectfully also plays out as crippling even with a conservative retirement plan.

The 2008 economy (Recession) destroyed our construction work season and we are looking at 2009 being as severe (probable Recession), relegating survival as our only

realistic goal. Saving for and obtaining a loan towards truck replacement will continue to be extremely difficult, if not impossible until the construction economy stabilizes and grows. Current economic conditions alone, demonstrate the current CARB on Road timeline to be unrealistic and unreasonable.

Tell me, at our age and circumstance what would you do?

My partner / husband and I started our construction trucking business in 1978. We primarily operate in the S.F. Bay Area as a legally filed general partnership; we are Class A drivers and are both age 59 .We pride ourselves as honest and successful small business owners. We currently own one 1990 three axle tractor and four semi end dump trailers. Three years ago, prior to any available knowledge regarding CARB's plans, we had Caterpillar put a rebuilt 1990 motor in our tractor at the cost of \$25,000.00. Our average mileage is 40,000 per year.

We do not regret the updating we made to our equipment. We determined at 720,000 miles we should replace the motor or purchase a new truck. We determined after thorough review of the age and condition of all components of our tractor, average mileage traveled per year and a desired retirement age of about age 65-67 the "updating motor plan" best suited all the above requirements.

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with no loans or grants, homeowner

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Tell me, at our age and circumstance what would you do?

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Tell me, at our age and circumstance what would you do?

My partner / husband and I started our construction trucking business in 1978. We primarily operate in the S.F. Bay Area as a legally filed general partnership; we are Class A drivers and are both age 59 .We pride ourselves as honest and successful small business owners. We currently own one 1990 three axle tractor and four semi end dump trailers. Three years ago, prior to any available knowledge regarding CARB's plans, we had Caterpillar put a rebuilt 1990 motor in our tractor at the cost of \$25,000.00. Our average mileage is 40,000 per year.

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Tell me, at our age and circumstance what would you do?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 16:19:07

No Duplicates.

**Comment 85 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Linda

Last Name: Mounday

Email Address: Non-web submitted comment

Affiliation:

Subject: Monterey Bay

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/139-tb1.pdf](http://www.arb.ca.gov/lists/truckbus08/139-tb1.pdf)

Original File Name: tb1.pdf

Date and Time Comment Was Submitted: 2008-12-01 16:22:12

No Duplicates.

**Comment 86 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Douglas

Last Name: Straw

Email Address: Non-web submitted comment

Affiliation:

Subject: Larry Jacinto Construction

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/140-tb2.pdf](http://www.arb.ca.gov/lists/truckbus08/140-tb2.pdf)

Original File Name: tb2.pdf

Date and Time Comment Was Submitted: 2008-12-01 16:23:01

No Duplicates.

**Comment 87 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: N/A

Last Name: Kellagan

Email Address: Non-web submitted comment

Affiliation:

Subject: Merced/Mariposa County Asthma Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/142-tb3.pdf](http://www.arb.ca.gov/lists/truckbus08/142-tb3.pdf)

Original File Name: tb3.pdf

Date and Time Comment Was Submitted: 2008-12-01 16:42:22

No Duplicates.

**Comment 88 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Marc

Last Name: Berstasch

Email Address: Non-web submitted comment

Affiliation:

Subject: International Surfacing System

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/143-tb4.pdf](http://www.arb.ca.gov/lists/truckbus08/143-tb4.pdf)

Original File Name: tb4.pdf

Date and Time Comment Was Submitted: 2008-12-01 16:49:41

No Duplicates.

## **Comment 89 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: jeffrey  
Last Name: filiault  
Email Address: filiault@comcast.net  
Affiliation:

Subject: please stop this now  
Comment:

I have attended the meetings . What I do not understand is why you are not listening to us .I am a one truck company in the construction industry .Let me state this is no small terms it will put me out of buisness on 12/31/2012. I worked long and hard to attain my truck and build my buisness but I simply cannot obsorb another blow like this .

Just a few points . Dealers do not have to do the retrofits before sales I do, HUHHHH . this is against everything you have stood for scince the smog programs began ,would you do this at a car dealership, I think not !I also read that your findings said that the dealers said there would be plenty of used trucks that meet the standard for the market huhhhhh. You have not looked at the market .I have looked at my fair share of used trucks and I must say maybe a few are available but no where near what we will need to get thru this .

I also read the proposed arbitration rules . This is not fair it should be done by some one who has no stake in the decision can you not see the conflict of interest ! I have looked at the other programs suggested and I must say yours is not the best of the bunch ! Can you not see that .You as a board even admitted that the dtcc plan would obtain the same thing yet cheaper and in the same time frame . I have read the comments and they all say the same thing can you not read and see what we are saying .Even major municipalities say the same thing can you not hear them ! I urge you to listen and read what we are saying before you make a move that could be a death blow to us. PLEASE LISTEN TO US JEFF

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 17:58:07

No Duplicates.

**Comment 90 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Richard  
Last Name: Davis  
Email Address: mt.pockets2@roadrunner.com  
Affiliation:

Subject: CARB adopt DTACC proposal  
Comment:

The economy is in such drought it effect us all. And the work in California especially the construction end directly affects me along with Thousands of other Small Fleet Owners. The work just isn't there to justify the upgrade of equipment now, There Just isn't anyway to afford a \$150,000 dollar piece of equipment when I'm only struggling with \$3,000.00 income a month now and shrinking. I've had to get a night job to try to survive and that is slowing down and might even be out of a job by years end. With my savings I can only survive another 4 months and then I'm done California can't afford MORTE unemployment and need to just SUCK IT UP and put this outrageous proposal aside till the economy picks up. My original plan was to up date my truck by 2015 before CARB went wacky and economy south now we can only wait and try to survive till it gets better. Believe me the majority of us would like a new truck but ONLY when economics can assure it

Thanks for your time  
Richard D. Davis  
JDSR company  
Nuevo, Ca

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 00:15:35

No Duplicates.



**Comment 91 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dwayne  
Last Name: Fosseen  
Email Address: fosseen@mirenc.com  
Affiliation: Mirenc

Subject: Healthy Diesel Combustion Saves Money  
Comment:

Mirenc has mining customers that pay \$\$ to maintain clean burning diesel engines. Caterpillar folks are helping Mirenc with our service. Longer engine life and fuel savings can be the driver for better air quality. Check it out [www.mirenc.com](http://www.mirenc.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 06:47:32

No Duplicates.

**Comment 92 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Nick  
Last Name: Pfeifer  
Email Address: Nicholas.Pfeifer@gcinc.com  
Affiliation: Granite Construction Inc.

Subject: Comments regarding the Proposed Regulation for In-Use On-Road Diesel Vehicles  
Comment:

Please see attached letter:

Attachment: [www.arb.ca.gov/lists/truckbus08/157-granite\\_on\\_road\\_comments.pdf](http://www.arb.ca.gov/lists/truckbus08/157-granite_on_road_comments.pdf)

Original File Name: Granite On Road Comments.pdf

Date and Time Comment Was Submitted: 2008-12-02 09:04:02

No Duplicates.

**Comment 93 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bob  
Last Name: Mason  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Truck Bus Comments  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/159-tb5.pdf](http://www.arb.ca.gov/lists/truckbus08/159-tb5.pdf)

Original File Name: tb5.pdf

Date and Time Comment Was Submitted: 2008-12-02 10:45:16

No Duplicates.

**Comment 94 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Randy  
Last Name: DeBecchi  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Industrial Drayage, Inc.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/160-tb6.pdf](http://www.arb.ca.gov/lists/truckbus08/160-tb6.pdf)

Original File Name: tb6.pdf

Date and Time Comment Was Submitted: 2008-12-02 10:46:03

No Duplicates.

**Comment 95 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: todd  
Last Name: wells  
Email Address: toddsellstrucks@gmail.com  
Affiliation:

Subject: On Road Rule  
Comment:

As everyone know the economy is in a slump. However I have been doing some work with companys quoting new trucks in prep for the new rule. What I am seeing is banks getting competitive, Manufactures getting excited and the customers are not as concerned with upgrading as one might think. Cleaner air is something we all benefit from. Truck owners even know this.  
I really think passing this On Road Rule would actually do the economy in California good. Trucks would sell, in turn everything that has to do with that will do better and down the line it would flow. People that want to stay in business over the next decade will. Those who were hoping to retire early, might. Some may go to work for somebody else. The bumps in the road will be there regardless. ARB go for it!!!!  
Todd

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 12:39:50

No Duplicates.

## **Comment 96 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Angel & Jake

Last Name: Raposa

Email Address: angjak@sbcglobal.net

Affiliation: CDTOA - Ca. Dump Truck Owner's Assn.

Subject: On-road Diesel Truck/Bus Regulation

Comment:

My husband, Jake and I have been a small trucking company within the greater San Francisco Bay area for over 43 yrs. We had thought that our 2007 year was the worst we would ever had...we thought that until 2008 happened. This year has tested us in all aspects of our business; we are quickly approaching winter with no funds put aside to carry us through this historically slow time of year. We currently are working 3 of our 5 trucks between 2 -3 days a week and know we are blessed to have this much work. Many of our friends have little or no work.

My husband is 74 yrs old. We, like many of our friends within the construction trucking industry, have placed our entire retirement plans within our equipment. Our plan had always been to sell the equipment with our job and thus have the dollars needed for our retirement. When 2008 began and we began to see just how poorly we were doing, we attempted to sell 2 pieces of our equipment. We have been hit, not only with the volatile economic environment, but with the industries' anticipation of the on-road rule <> our equipment has lost so much value that we are unable to sell it.

Both my husband and I have been members of CDTOA for over 20 yrs. We are part of the segment of truckers' who - because of the knowledge we gain - maintain our equipment and keep current with all laws. When CARB came up with the smoke testing rule, we obeyed. Our last test, had our equipment between 2 and 4 percentile <> CARB's "rule" allows our equipment to have a 40% test. How can equipment with such a low reading be called worthless by CARB? No one in California and/or surrounding states wants our equip. - we have lost our retirement and soon our livelihood.

Although I am holding onto my husband's medical insurance by a thread, I have had to close my health insurance acct. because we can't afford the premium. I am thankful I am a healthy woman. I can only shudder to think what will happen should I have a medical problem.

Please, especially due to the insanity we can all see in our economy over the last 2 yrs, please - look to the alternative proposal proposed by the Driving Toward a Cleaner California [DTCC] Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

We want to be part of the solution - we want cleaner air for our descendants - we can not see how by using CARB's suggested rule this will not destroy us and many of our friends within the construction trucking industry. Our primary asset-s are our equipment and especially those of us who have tried to keep our equipment 'newer' [ 1999's and 2000's] will be severely hampered

with the retrofit and/or replacement rule as CARB currently has stated.

Please help us to help California.

Sincerely,

Angel and Jake Raposa

Raposa Trucking

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 13:05:48

No Duplicates.

## **Comment 97 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Alvaro  
Last Name: de la Cerda  
Email Address: adelacerda@seniorsonthemoveinc.com  
Affiliation:

Subject: CARB  
Comment:

Decemebr 2, 2008

The Honorable Governor Arnold Schwarzeneggar  
State Capitol Building  
Sacramento, CA 95814

Dear Governor Schwarzeneggar:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

I operate a small company dedicated to move senior citizens within the State of California. I am also a member of the California Movers & Storage Association with 8 employees and two trucks. One of my trucks will need to be replaced due to CARB proposed regulatory changes putting us in a precarious position of choosing to close down or look for a truck replacement.

Our business dropped 46% during this year and I am having problems meeting my operating needs.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. I look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,



Alvaro de la Cerda  
Seniors On-The-Move, Inc  
Tracy, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 13:58:45

No Duplicates.

**Comment 98 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Paul  
Last Name: Henkart  
Email Address: henkart@att.net  
Affiliation:

Subject: SUpport of truckbus08  
Comment:

Honorable Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Honorable Nichols,

I support the proposed Statewide Truck and Bus Regulations measures.

Bringing the 500,000. non-CA registered vehicles to the same standards as the 400,000 in-state vehicles will help California meet it's required pollution goals. These measures will particularly important when foreign (Mexican) diesel vehicles travel through the state burning foreign grade fuel.

The measures do not discuss enforcement or inspection or maintenance of the equipment.

Thank you.

Paul Henkart  
918 Santa Hidalgo  
Solana Beach, CA. 92075

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 15:47:37

No Duplicates.

**Comment 99 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Vardanian  
Email Address: jav7@pge.com  
Affiliation:

Subject: Diesel Pollution  
Comment:

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 4,500 premature deaths and 71,000 cases of asthma and lower respiratory symptoms each year. Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 16:00:01

333 Duplicates.

**Comment 100 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: gaile

Last Name: carr

Email Address: bgcarr@finestplanet.com

Affiliation:

Subject: clean air

Comment:

Since 50 percent of all Californians live near a highway, these pollutants impact each and every one of us. To protect the health of all Californians, we are asking you to tell the California Air Resources Board to adopt strong, effective and health protective On-Road Heavy Duty Truck and Bus Rule.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 16:29:01

No Duplicates.

**Comment 101 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Tom & Barbara  
Last Name: Hamilton  
Email Address: tetch@pacbell.net  
Affiliation: ALA

Subject: Tighten Diesel standards  
Comment:

The smallest diesel particles are also the most cancer-causing. Poor maintenance (dirty air filters) and poorly designed combustion air management systems make diesels burn inefficiently causing waste of fuel as well as smoke health hazards. Truckers will save on fuel, as well as their lives.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 18:53:46

No Duplicates.

**Comment 102 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sherry  
Last Name: Carr  
Email Address: mountainfolk@comcast.net  
Affiliation:

Subject: Diesel pollution  
Comment:

Hello,

I am an asthmatic and also highly allergic to many chemical smells and smoke as well. We live in the Sierras in California. Sometimes on the windy roads, we are often stuck behind trucks spewing black diesel smoke and it is awful. This is a daily occurrence. We would like to see some changes to help all that have to breathe this junk, including the truck & bus drivers. Our lives actually depend on it. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 19:51:21

No Duplicates.

**Comment 103 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Barbara  
Last Name: Camacho  
Email Address: Barbara@myCamacho.com  
Affiliation: California Trucking Association

Subject: On-road diesel truck and bus regulation  
Comment:

December 2, 2008

California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Members of the California Air Resources Board,

Currently you are considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted, would have a profound and negative impact on California's overall economy.

I want to be clear that Camacho Brokers, Inc. is very supportive of reducing particulate matter (PM) and oxides of nitrogen (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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business, today, and jeopardizes our future viability in the trucking industry.

I am writing to urge the state to adopt a regulation that allows for flexibility and early incentives, while also achieving significant emission reductions. To that end, the Driving Toward A Cleaner California Coalition has submitted an alternative proposal to the current ARB proposed regulation. This alternative proposal would achieve the early PM and NOx emissions reductions to improve the state's air quality that you are seeking in the ARB's current proposed rule, while providing much-needed flexibility to comply based on a variety of factors including mileage, type and use of the vehicle, and the best use of the available technology.

This rule comes at a time when California truck owners are struggling to make ends meet in the most severe economic climate we've experienced in decades -- skyrocketing diesel prices, record home foreclosures, a 17-year low in housing starts, a credit crisis and the imminent threat of a full-blown recession. Our volume of business has decreased substantially at a time when the costs of doing business have risen sharply. This is not the time to burden the trucking industry with new requirements that demand expenditures that would put us out of business.

Our trucking operations are part of our services as a U.S. Customs brokers at the border of California with Mexico. Because we are involved in cross-border operations we are not eligible for any grants to assist us with the expenses of upgrading equipment. The same is true of many smaller companies who occasionally provide service out of state in order to produce income, but this means that they too are then unable to benefit from any grants offered.

Under the annual emission reduction targets required under the current ARB proposal, many truck owners will be required to first retrofit an engine, only to have to turn around a few years later and replace those trucks. The costs of operating a transportation company are many. The amount of finger-pointing at the trucking industry as the cause of so many of the country's woes is ludicrous.

Trucking is a vital part of the movement of goods. Even if goods arrive in the country by ship or by airplane they arrive at their final destination by truck. When the increasing costs of business drive the smaller companies out of business, decreasing the competition, the prices of transportation will only go up, further affecting the prices of all goods, adding to the problems that already exist in our economy, both within California and across the United States. We do not need to force businesses out of existence and raise the prices of goods for an already beleaguered citizenry, no matter how important the cause. We must work together to find better methods of accomplishing our goals.

Many of California's trucking companies have already begun the process of retrofitting or replacing its fleet, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses. Additionally, many of these companies simply do not have the resources or access to capital to retrofit their engines and may be forced to sell off their trucks or shutter the company's doors, ultimately costing jobs and revenue to the state's economy.

We must not forfeit California's economy for the sake of protecting our environment. That's why, as a member of the Driving Toward a Cleaner California Coalition, we're working together, across industry sectors, to develop a feasible solution that achieves the state's air quality goals while keeping California's economy moving forward. I ask that you evaluate the coalition's alternative proposal and work with the industries impacted by this rule to adopt a final product that achieves the balance this alternative proposal seeks to find.

We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

Barbara J. Camacho, President  
Camacho Brokers, Inc.



Attachment: [www.arb.ca.gov/lists/truckbus08/264-arb\\_ltr\\_12\\_02\\_08.pdf](http://www.arb.ca.gov/lists/truckbus08/264-arb_ltr_12_02_08.pdf)

Original File Name: ARB ltr 12 02 08.pdf

Date and Time Comment Was Submitted: 2008-12-02 20:21:28

No Duplicates.

**Comment 104 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: anne  
Last Name: peters MD  
Email Address: alpet506@aol.com  
Affiliation:

Subject: regulation of diesel fuel emissions  
Comment:

I am deeply concerned about the continued pollution in the LA area and the remaining southern californian cities. We are seeing record numbers of allergic airway disease in patients of all ages. Curbing diesel emissions is critical to the health of many people in these areas. The cost of lost wages and long term health care will far exceed the financial outlay to invest in new cleaner diesel-burning vehicles. We need to have long term planning and set our priorities for the future health of our citizens. Anne Peters, MD Internal Medicine

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 22:14:13

No Duplicates.

**Comment 105 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jay  
Last Name: Jones  
Email Address: jonesj@ulv.edu  
Affiliation: University of La Verne

Subject: Statewide Truck and Bus Regulation 2008  
Comment:

Decision Makers,

The relationship between polynuclear aromatic hydrocarbon bearing diesel soot has been known for decades. Please bite the bullet and install rigorous regulations to control these harmful emissions. Yes the industry will resist. Yes it will increase their cost but if not enacted others will pay a much greater distributed cost through health care and a broad range of other impacts. Please visit the University of La Verne sometime and I would be delighted to show you the accumulation of this soot in our ventilation systems, computers, and analytical instrumentation. We pay the cost that the truckers, buses, trains etc. are "saving" without regulation many times over.

I am serious. Please visit. Look at the crap on the cooling fans and think about what is accumulating in your lungs. Then lets look at the results of exposure to the aromatic compounds and other agents associated with this soot on disease rates. Let me be clear. Know that if you do not enact rigorous regulation to control this you will be responsible for significant morbidity and mortality in addition to the equipment degradation and other issues. If I can be of assistance in your deliberations please do not hesitate to contact me.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 23:11:29

No Duplicates.

**Comment 106 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Cheryl  
Last Name: Taylor  
Email Address: avenalchimes@sbcglobal.net  
Affiliation: Avenal Chimes newspaper

Subject: truckbus08  
Comment:

Are you guys crazy? California is losing business already. Our economy is going to go even more into the dirt with this regulation. What do you think will happen to the farmers? Truckers? Construction industry workers? A billion dollars to load out is a drop in the bucket. Even though I don't own any equipment that would be effected by this regulation, it makes me want to shut down my business, sell my houses and move out. I don't want to live is such a crazy state. If this passes, it will be the last straw for me. Talk about shooting yourself in the foot! You guys need to come up with a better idea...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 06:38:47

No Duplicates.

**Comment 107 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tony

Last Name: Morales

Email Address: tmorales@iab-sd.com

Affiliation:

Subject: On-road diesel truck and bus regulations

Comment:

As the General Manager of a small trucking company I am sending the attached letter stating our concerns.

Attachment: [www.arb.ca.gov/lists/truckbus08/312-california\\_air\\_resource\\_board.doc](http://www.arb.ca.gov/lists/truckbus08/312-california_air_resource_board.doc)

Original File Name: California Air Resource Board.doc

Date and Time Comment Was Submitted: 2008-12-03 08:31:53

No Duplicates.

**Comment 108 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kristy  
Last Name: Richardson  
Email Address: Kristy@westernpropane.com  
Affiliation:

Subject: Diesel Truck Proposal  
Comment:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that if implemented as presently drafted would have a profound, negative impact on California's economy.

Western Propane Service supports improving the state's air quality. However, the Board's proposed regulation places a significant economic risk on our business today, which is already under stress from the recent financial crisis.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression, and small businesses are struggling to make ends meet. Companies like mine are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. My company and others like us simply don't have the resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shutter our companies' doors, ultimately costing jobs and revenue to the state's economy.

Given the multi-billion dollar cost of this regulation and the current volatile economic environment, please support the alternative proposal proposed by the Driving Toward a Cleaner California Coalition that would give companies like mine the opportunity to comply in the most reasonable time frame and flexible manner possible while still attaining aggressive emission reductions. In fact, CARB's own analysis of the DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 08:58:27

No Duplicates.

**Comment 109 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Guglielmetti  
Email Address: david@reddingtrailer.com  
Affiliation:

Subject: Truck Proposal  
Comment:

Wlth regulations such as you have proposed, I do not foresee being able to continue our transportation operations.

Attachment: [www.arb.ca.gov/lists/truckbus08/318-guglielmetti\\_trucking\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/318-guglielmetti_trucking_letter.pdf)

Original File Name: Guglielmetti Trucking Letter.pdf

Date and Time Comment Was Submitted: 2008-12-03 09:38:03

No Duplicates.



**Comment 110 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Doug  
Last Name: Britton  
Email Address: nbenson@caltrux.org  
Affiliation: CA Trucking Company

Subject: Proposed Diesel Regulation  
Comment:

PLEASE SEE ATTACHMENT

Attachment: [www.arb.ca.gov/lists/truckbus08/321-britton\\_trucking\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/321-britton_trucking_letter.pdf)

Original File Name: Britton Trucking Letter.pdf

Date and Time Comment Was Submitted: 2008-12-03 10:01:20

No Duplicates.

**Comment 111 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ty  
Last Name: Ellington  
Email Address: tierod4@yahoo.com  
Affiliation:

Subject: TRUCKBUS08  
Comment:

We are totally AGAINST this new bill. We are a small business that has been in business for over 45 years. It is laws and bills like this that is putting the small mom & pop business's OUT OF BUSINESS. Please do not vote for this. Thanks You, Anza Gas Service, Inc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 10:45:39

No Duplicates.

**Comment 112 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Wendy

Last Name: Mitchell

Email Address: wmittchell@chla.usc.edu

Affiliation: USC-Keck School of Medicine

Subject: Diesel vehicle regulation

Comment:

As a physician I am writing to urge that you adopt the strongest possible regulation of diesel particulate and ozone pollution. Diesel exhaust causes and exacerbates asthma, chronic lung disorders, heart disease and cancer, particularly affecting people who live near heavily traveled freeways and truck routes. This disproportionate affects poor and minority communities, whose children, in turn, show high rates of asthma and chronic lung conditions. Please adopt the strongest possible regulation of diesel emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 11:10:09

No Duplicates.

**Comment 113 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Linda

Last Name: Weiner

Email Address: linwiner@earthlink.net

Affiliation: American Lung Association of California

Subject: Support of Strong On-Road Diesel Vehicle Regulation

Comment:

See attached letter in support of On-Road Diesel Vehicle regulation signed by 17 statewide and regional health and medical organizations.

Attachment: [www.arb.ca.gov/lists/truckbus08/341-health\\_professionals\\_truck\\_reg\\_letter\\_final-1.pdf](http://www.arb.ca.gov/lists/truckbus08/341-health_professionals_truck_reg_letter_final-1.pdf)

Original File Name: Health Professionals Truck Reg Letter FINAL-1.pdf

Date and Time Comment Was Submitted: 2008-12-03 11:57:32

No Duplicates.

**Comment 114 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Linda  
Last Name: Ferzoco  
Email Address: lindaferzoco@yahoo.com  
Affiliation:

Subject: Diesel Fumes  
Comment:

I have asthma and have felt the effects of diesel fumes just while driving in traffic around the San Francisco Bay area.

My heart aches for those who live near the port of Oakland, where trucks spew diesel fumes into our air just about 24x7. You just have to go to an emergency room in those districts to see the fright on the faces of parents of asthmatic children, to see the faces of the children who can't breathe. It's terrifying for all of them.

Ask a pulmonologist in the bay area and they'll tell you that asthma is on the increase. Many, like me, are getting it for the first time as adults. Please help us all out by putting a regulation in place to reduce the diesel fumes coming from our trucks and buses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 12:00:09

No Duplicates.

**Comment 115 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: McClelland  
Email Address: john.mcclelland@ararental.org  
Affiliation:

Subject: American Rental Association Comment on On-Road Diesel Rule  
Comment:

Attached is our comment on the proposed On-Road Diesel Truck Regulation which goes before the ARB on December 11-12, 2008.

Attachment: [www.arb.ca.gov/lists/truckbus08/343-ara\\_comment\\_on\\_on-road\\_diesel\\_final\\_-\\_dec\\_3\\_2008.pdf](http://www.arb.ca.gov/lists/truckbus08/343-ara_comment_on_on-road_diesel_final_-_dec_3_2008.pdf)

Original File Name: ARA Comment on On-road Diesel final - Dec 3 2008.pdf

Date and Time Comment Was Submitted: 2008-12-03 12:20:49

No Duplicates.

**Comment 116 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dennis  
Last Name: O'Sullivan  
Email Address: dosullivan@bluestargas.com  
Affiliation: Blue Star Gas Garberville Co

Subject: Diesel Truck and Bus Proposal  
Comment:

I support your efforts to improve our air quality. I am employed at Blue Star Gas Garberville as a plant manager for propane bulk sale and service in Humboldt and Mendocino counties. The proposal as written is far reaching not only in its goals but its effect on business. Please consider a flexible and attainable policy that will not hurt the business environment. I know you may be as affected by the economy as we and our fellow employees. Consider a more manageable approach.

In addition I am a member of the Southern Humboldt Unified School District and we have had many discussions on the consequences to a district that relies so heavily on its transportation department. Please act prudently.

Thank you for your efforts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 12:42:41

No Duplicates.

**Comment 117 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Lee  
Last Name: Cooper  
Email Address: lcooper@eaglematerials.com  
Affiliation: Mathews Readymix, LLC

Subject: Support of DTCC proposal  
Comment:

(See Attached)

Attachment: [www.arb.ca.gov/lists/truckbus08/347-carb\\_letter\\_12-3-08.pdf](http://www.arb.ca.gov/lists/truckbus08/347-carb_letter_12-3-08.pdf)

Original File Name: CARB letter 12-3-08.pdf

Date and Time Comment Was Submitted: 2008-12-03 13:01:35

No Duplicates.



**Comment 118 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Daniel

Last Name: Williamson

Email Address: drwtrk2004@yahoo.com

Affiliation:

Subject: Impossible situation with new proposed regs

Comment:

What you are about to implement is unlawful at this present time with the economy the way that it is. Just take a look at the daily headlines you will see that with the auto industry on the brink of bankruptcy with their hands out for my taxpayer dollars also with over 33 state governors asking for financial assistance balance their budgets, so with that in mind what you are proposing for trucking in California is equivalent to a huge new program in the state budget that you already don't presently have the funding to pay for as well as the governor has already made cuts for the fiscal year in vital services. So do you see the problem with your proposed timing of the regs. So keep in mind that I want to go green with the state's commercial private fleet. Just wait till the economy can support the industry changes. Please concerned citizen that represents the American Lung Association's point of view as well as the California trucking industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 13:29:33

No Duplicates.

**Comment 119 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Glenn  
Last Name: Reibin  
Email Address: greibin@kampspropane.com  
Affiliation:

Subject: Diesel Truck Proposal  
Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/truckbus08/354-letter\\_to\\_arb\\_on\\_diesel\\_truck\\_rules\\_december\\_2008\\_\\_4\\_.doc](http://www.arb.ca.gov/lists/truckbus08/354-letter_to_arb_on_diesel_truck_rules_december_2008__4_.doc)

Original File Name: Letter to ARB on Diesel Truck Rules December 2008 (4).doc

Date and Time Comment Was Submitted: 2008-12-03 14:14:12

No Duplicates.

**Comment 120 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lorena

Last Name: Fisher

Email Address: lorena@nceca.org

Affiliation:

Subject: On-Road Diesel Emission Regulation

Comment:

The California Air Resources Board is currently considering the adoption of an on-road diesel truck regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

The Northern California Engineering Contractors Association 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business(es) today, jeopardizes our future viability in the Engineering Construction industry, which is already reeling from unprecedented financial turmoil.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 14:15:49

No Duplicates.

**Comment 121 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Andrew  
Last Name: Phillips  
Email Address: Andy@VickersInc.com  
Affiliation:

Subject: Don't make us park an employee  
Comment:

I am disheartened when I here that our entire fleet of trucks will have to be parked in a fairly short period of time because they do not comply with new standards that effectively condemn not only my trucks, but my business.

We are a small construction services company with 40 employees who cut and core drill concrete. It has been not only tough, but impossible for us to generate a profit in the past few years, so we haven't replaced many trucks and can't afford to replace any at all now.

When I am forced to park a truck, I have to park an employee too. They can't work without the trucks, so when a truck parks, they go home.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 14:23:37

No Duplicates.

**Comment 122 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Susan

Last Name: Frank

Email Address: susan@betterworldgroup.com

Affiliation: Clean Truck/Bus Rule Coalition

Subject: Comments from Clean Truck/Bus Rule Coalition

Comment:

Thank you for accepting these comments on behalf of the undersigned environmental, public health and environmental justice organizations committed to a strong truck/bus rule.

Attachment: [www.arb.ca.gov/lists/truckbus08/361-final\\_coalition\\_letter\\_to\\_arb\\_12\\_3\\_08.pdf](http://www.arb.ca.gov/lists/truckbus08/361-final_coalition_letter_to_arb_12_3_08.pdf)

Original File Name: Final Coalition Letter to ARB 12\_3\_08.pdf

Date and Time Comment Was Submitted: 2008-12-03 14:59:07

No Duplicates.

**Comment 123 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Phillips  
Email Address: phillips689@yahoo.com  
Affiliation: Calif trucking Assoc.

Subject: new rules for truck smog  
Comment:

It is an knoble thing CARB is trying to do, but it is to drastic. To have a truck that is leagle one day and not the next is ludicrist. Just raise the fee to register them and they will leave the state. But at a easyer rate that is better for the economy. But if you insist on your presant plan it will cost truck associated buisness money they can't afford and many people there job or put the buisness out of buisness. Please rethink these new rules that I DID NOT VOTE ON. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 15:40:35

No Duplicates.

**Comment 124 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Janice  
Last Name: Matthes  
Email Address: janice@cdmatthes.com  
Affiliation:

Subject: Proposed Diesel Regulation  
Comment:

PLEASE SEE ATTACHED

Attachment: [www.arb.ca.gov/lists/truckbus08/366-c.d.\\_matthes\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/366-c.d._matthes_letter.pdf)

Original File Name: C.D. Matthes Letter.pdf

Date and Time Comment Was Submitted: 2008-12-03 16:25:48

No Duplicates.

## **Comment 125 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Stan  
Last Name: Bennett  
Email Address: stanbennett@calbennetts.com  
Affiliation: small business

Subject: On-Road Diesel Truck/Bus Regulation  
Comment:

December 3, 2008

Air Resources Board  
1001 I Street, 2nd Floor  
Byron Sher Auditorium  
Sacramento, CA 95814

Dear Board Members,

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would not only have a profound, negative impact on California's economy but would also be a huge financial detriment to our small business.

All-Ways Moving and Storage are members of the California Moving and Storage Association (CMSA) and we would otherwise be supportive in working collectively to improve the state's air quality to provide a healthy environment not only for us, but also for our families, employees and all Californians. However, the Board's current proposed regulation places an even more economical burden on our Small Business. Due to the financial turmoil of the economy today, the proposed regulation will jeopardize our future viability in the moving and storage industry.

CARB is proposing this regulation during the worst economic crisis we've seen in decades. Our Small Business Moving Company is struggling to make ends meet in the face of a massive slow down in the residential real estate market, and you are proposing a legislation that will require us to spend dollars we don't have, in a market where there is no access to capital for business.

In proposing this legislation and if it passes, we will be forced to dispose of the old equipment and assets and purchase new before it would otherwise be acquired, in which the trade-in value or resale value of our equipment will only be worth pennies on the dollar. Simply put, our small business simply does not have the resources or funds to retrofit our engines, and in doing so would put such a financial loss to our company, that could result in loss of jobs for our employees and possibly closing our doors and in turn be detrimental to the state's economy.

Given the large financial burden this regulation would cost us in



this already volatile economic environment, I urge CARB to find an alternative proposal that would give small companies like ourselves the opportunity to comply in a more reasonable timeframe and flexible manner as possible.

Sincerely,

Stan Bennett  
President, Owner  
All-Ways Moving and Storage  
[www.all-waysmoving.com](http://www.all-waysmoving.com)

Attachment: [www.arb.ca.gov/lists/truckbus08/367-carblett.doc](http://www.arb.ca.gov/lists/truckbus08/367-carblett.doc)

Original File Name: CARBlett.doc

Date and Time Comment Was Submitted: 2008-12-03 16:26:37

No Duplicates.

## **Comment 126 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: eric

Last Name: bassett

Email Address: eric@riverview-trucks.com

Affiliation:

Subject: Proposed on highway laws

Comment:

I am a partner of Riverview International Trucks in West Sacramento. Riverview is a full service truck dealership that has 80 employees, sells over 400 new and used trucks per year, and has a rental and lease department that has over 350 trucks in its fleet.

Riverview and it's 80 employees are very concerned that the proposed legislation is going to put our customers out of business, is going to hurt the financial stability of our company, and is going to put our dealership at a competitive disadvantage with dealerships and lease and rental companies that are based in other states outside of California.

The proposed legislation will put California business owners out of business. They will be forced to shut down instead of attempting to find loans that do not exist to take on new equipment. Do you know that a new truck over 33,000 GVWR has nearly 20% of its cost is taxes? State sales tax at 7.75% plus Federal Excise Tax at 12%. Do you know that finance companies are not financing commercial vehicles due to the issues with the banking institutions? My #2 truck financier GE Capitol has frozen all of its capitol for commercial vehicles. My #1 lender Navistar Financial now requires A and B credit to have substantial down payments at less than aggressive interest rates.

These California businesses that have equity in the equipment that you are forcing them to replace are now finding out that the used equipment has little or no value in the California Market Place. These Proposed laws in combination of the economy have killed the used truck market place. My dealership has 60 used trucks on the lot that are all 2000 model and newer that we cannot sell because of these laws. You have scared the 2nd user into fixing his old equipment and not investing in good used trucks. Sounds counterproductive??

My competitors in the lease and rental world namely Ryder and Penske are located in all 50 states. They are simply taking there used equipment and sending it out of state. We do not have that network to spread the used trucks to. I heard one of my customers, a California based business, was selling some 2004 model trucks with low miles because his business had slowed. He actually took a low offer from a competitor of his who sent the 2004 units out of state to one of their many job sites. The company simply has been sending 2008 model trucks with 2007 emmission engines to California and sending their used equipment to other states to use. Riverview nor other California based businesses do not have this option. We are losing money on our used trucks because of your legislation and we are at a competitive disadvantage in the market place. When customers close their business we lose sales. We lose sales

the state loses sales tax revenue. When we lose enough sales we will downsize. When we downsize you have people out or work not spending the paycheck, not creating all the taxes that a working employee creates.

Riverview may gain some new truck sales with the proposed legislation but it will not equate to the loss of business from our customers, the loss of money on used trucks, and the competitive disadvantage you have created.

My last point is you have to look at the current economic situation that the State of California is in. Look at the fleet of trucks that the state owns and runs to fix the roads, to go to fires, to transport state owned goods. For you to comply with the proposed legislation it would cost millions and millions of dollars. To put particulate filters on some of these units is a piss poor alternative that is an expensive band aid that will last only a few years. Why expect the business owners of California to comply with this legislation if the State of California cannot comply on its own fleet? The State will go out of business as well...

Attrition and a sliding scale will put new units into the hands of California Businesses. In 2011 do not allow a 1990 or older vehicle to be registered or brought into California. In 2012 move to 1991 and 1992 model years. In 2013 move to 1993 and 1994 model years. You will get to where you want to get to in time. We all want cleaner air. We all want our trucks to run cleaner. But at what cost?

Thanks  
Eric Bassett  
Partner  
Riverview International Trucks LLC  
916-371-3110  
[www.riverview-trucks.com](http://www.riverview-trucks.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 16:36:00

No Duplicates.

**Comment 127 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Curtis

Last Name: Wright

Email Address: [cwright@imperialwesternproducts.com](mailto:cwright@imperialwesternproducts.com)

Affiliation:

Subject: Truck and Bus Regulation 2008

Comment:

See attached letter

Attachment: [www.arb.ca.gov/lists/truckbus08/374-carb\\_buy\\_new\\_trucks\\_letter.doc](http://www.arb.ca.gov/lists/truckbus08/374-carb_buy_new_trucks_letter.doc)

Original File Name: CARB buy new trucks letter.doc

Date and Time Comment Was Submitted: 2008-12-03 17:19:46

No Duplicates.

**Comment 128 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

**Comment 129 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Pat  
Last Name: McDonald  
Email Address: nawicpat@sbcglobal.net  
Affiliation:

Subject: CARB decisions  
Comment:

I am the owner of a construction trucking company that is almost 15 years old -- started by a woman and run by a woman -- very unusually in this male-dominated industry.

I started in 1994 with one truck and have built it slowly but surely over the last 15 years to the point where I now run 22 units (double bottom dumps, semi bottom dumps, end dumps, ten wheels, transfers and super dumps.)

We have seen a decline in revenues this last year of over 40% while seeing our costs increase dramatically. Fuel used to comprise approximately 15% of our expenses and this last year it rose to over 30%. Parts, oil, labor and other expenses have risen also due to the underlying cost of transportation and base oil prices.

The proposed CARB regulations will essentially put my company and 20 of my 22 owner operators out of business. These young entrepreneurs are primarily minorities -- Hispanic, Polish, and Vietnamese. The net profit of their companies have dwindled to the point that they will be unable to either upgrade their equipment and there is no way they are in any position to be able to purchase new. The fact is that their tractors are too old to even BE retrofitted, but at the costs we are hearing, they could not afford it anyway.

In a struggling industry with little or no work other than Public Works, the timing of these regulations will decimate the construction transportation industry. I implore the California Air Resource Board to reconsider the proposal on the table in order to not further destroy our California economy.

Very truly yours,

Pat McDonald, CCA, CIT  
President  
STI Trucking

National President  
National Association of Women in Construction

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 18:50:33

No Duplicates.

**Comment 130 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Claude

Last Name: Cooley

Email Address: chocexp@comcast.net

Affiliation:

Subject: CARB Proposed truck regulations

Comment:

To whom it may concern,

I am a single truck owner operator. I am having a hard time making ends meet during the recession that our country is in. My income is down about fifty percent. It would be impossible for me to buy the new equipment that you are proposing. My bank will not give me a loan for equipment. They suggested that I take an equity loan on my home but because of the real estate market I owe more than my house is worth. I strongly urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California(DTCC)Coalition. Thank You for your consideration. Mr. Claude Cooley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 19:21:25

No Duplicates.



**Comment 131 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Joe  
Last Name: Torres Jr.  
Email Address: Joe@jtccorp.com  
Affiliation:

Subject: Economy vs Pollution  
Comment:

I am for making the environment cleaner and Greener. The air emission standards are too aggressive and have begun a massive decline in purchasing new equipment due to the uncertainty of how carb can change laws and also how the enforcers choose to interpret. The economy is slumbering and will become comatose if we do not incentivize instead of penalize. The electric Hybrids do not get any incentives in the refuse market even if it was totally electric. Due to the over regulated BACT. The money that is being made on taxation of fuels is going towards enforcement which will help reduce the number of buyers in a depressed market. Please don,t regulate an over regulated only state into chaos. We can only do so much. The days of being able to make a living trucking is coming to an absurd end, people will cheat the systems and thus we will get more enforcement and where is the end to this. Force all air emission causing machines into another state. The other states don,t seem to have a major problem with it. We need better leadership not agents!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 20:09:37

No Duplicates.

**Comment 132 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Frank

Last Name: Nieman

Email Address: fpn@sbcglobal.net

Affiliation: Public High School Teacher

Subject: Diesel Truck and Bus Emissions

Comment:

Dear Board Members,

My name is Frank Nieman. I live in San Ramon, California. I am writing to you to ask you to please vote to impose the most stringent smog controls possible on the diesel vehicles on our highways. I suffer from severe, chronic asthma and am always on 3 medicines or more to combat this terrible disease. My son also suffers from asthma as do other family members. Maybe my disease was inherited, but it is also made much worse by diesel exhaust. When I am on the freeway behind a semi tractor-trailer rig, I often must hold my breath until I am past the offending diesel truck in order to get clean air to breathe again. For healthy people, I can understand ambivalence, but for those of us who suffer daily from a compromised respiratory system, the decision of whether or not to require diesel engines to burn cleaner is not a choice, but rather an imperative. I applaud your decision in July to ban wood smoke on Spare-The-Air days and now ask you once again to do the right thing regarding the health of thousands of people in California like me who will benefit from clean diesel regulations. Thank you for reading my letter; I feel as though my health is in your hands.  
Frank Nieman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 21:02:46

No Duplicates.

**Comment 133 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Fred  
Last Name: Mena  
Email Address: fredmenatrucking@hotmail.com  
Affiliation: owner/operator

Subject: statewide truck regulation  
Comment:

To Whom it may Concern,

I am an owner, operator and want to know if there will be any federal money to update my 1988 Peterbilt to make it legal in 2010?

I do not want to go out of business. It is difficult enough trying to stay ahead. By the time this law gets enforced it will be like starting my business all over. Please inform me of any grants or low interest loans.

Fred Mena  
Colusa, Ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 21:58:21

No Duplicates.

**Comment 134 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Steven  
Last Name: Clay  
Email Address: towguy50@charter.net  
Affiliation:

Subject: On-road diesel truck and bus regulation  
Comment:

December 3, 2008

Dear Governor Schwarzenegger or Members of the California State Legislature or CARB:

I own a small business in the towing industry. My trucks are the sole assets of my business. I fully support any initiative to help clean up our states air quality. However, there needs to be a careful study of the impact on businesses that will be immediately affected by the current proposal that CARB is making.

There is no doubt that many small businesses like mine would not be able to comply in the time allowed according to the CARB regulation as it now reads. Also, given the current recession that our state and nation faces combined with the prolonged period of time that is being forecast for meaningful economic recovery, it would be financial suicide to force small businesses to spend money that we simply don't have to replace equipment that hasn't had its useful life is used.

Most small businesses like mine have a planned life cycle for using and replacing our equipment and that is how we budget the expenditures for new equipment. It also doesn't make sense to waste money on retrofitting equipment at costs that often exceeds their market value.

Currently, all trucks being manufactured in the US are being equipped with new emission systems. Therefore, any new truck being purchased is already compliant and it would only be a matter of 10 - 15 years that most pre-emission vehicles would be naturally phased out.

I support the alternative proposal that Driving Toward a Cleaner California Coalition is promoting because it gives companies like mine a more reasonable time frame for compliance. I would strongly urge you to give it careful consideration.

Sincerely

Steven H. Clay

Northcrest Auto Center

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 00:15:01

No Duplicates.

**Comment 135 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Thomas

Last Name: Kramer

Email Address: tom.kramer@navistar.com

Affiliation: Navistar, Inc Engine Group

Subject: HD Truck idle shutdown exempt vehicles

Comment:

Comments on proposed on-road diesel regulation

Attachment: [www.arb.ca.gov/lists/truckbus08/393-armoredexempt\\_idle.docx](http://www.arb.ca.gov/lists/truckbus08/393-armoredexempt_idle.docx)

Original File Name: armoredexempt\_idle.docx

Date and Time Comment Was Submitted: 2008-12-04 05:35:59

No Duplicates.

**Comment 136 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mike  
Last Name: Cook  
Email Address: mcook@assocrmc.com  
Affiliation: Associated RMC

Subject: Statewide truck and bus regulation 2008  
Comment:

Our company is producing less than half the concrete that it was producing in the past. While our revenue has been cut in half the operating costs have not gone down nearly that much. We are being forced to replace fully functional equipment with much higher priced new or late model equipment. This is something that could seriously jeopardize the future of our company which was founded in 1949. Emissions have already been drastically reduced because our vehicles usage has been cut in half.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 07:00:03

No Duplicates.

**Comment 137 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Atwater  
Email Address: gm@vandepol.us  
Affiliation:

Subject: Statewide Truck and Bus Regulation 2008  
Comment:

CARB is at it again...forcing businesses in the state to stop using legally purchased equipment and vehicles before their end of life. This is an illegal "taking" of private property. If you want it buy it! The trouble with CARB is you people want us in business to pay for all your hairbrained ideas.

If you want to buy all of my older trucks FINE! But if you want to follow through with this illegal taking of my property and the devaluuing of my used equipment COMPENSATE ME FOR IT! of course you will next atempt to make me pay you to to pay me for my own stuff!?? I will not do that!

AND IN THIS ECONOMY????????????? You people must be daft. I have trucks that run seasonally and in support of the State's Ag economy (which you are also trying to regulate out of business)they get very few miles and last for decades. My oldest and still fully licenced and road worthy vehicle with a motor, is a 1984 and it pulls a 1990 trailer. Another is a 1989 truck that pulls a 1976 trailer. I expect that a couple of my newer units, 2000 models will be serviceing businesses and Ag for decades to come.

It is my decision to buy and when to do so as it is MY MONEY. I am trying to keep the dozens of families employed in this business working. I know you want to chage that (though you will deny that in public). You will say that you are just trying to save the enviroment from us "bad people" who have supported you and your driving habits and agriculture since my grandfather's days in the 30's.

I WILL RESIST, I WILL REFUSE TO COMPLY, I WILL BE A PART OF ANY LAWSUIT INDUSTRY BRINGS ON YOUR WACKED OUT PLAN TO STEAL VALUE FROM MY 75 FAMILTY BUSINESS! YES, IT IS STEALING TO TAKE SOMETHING THAT BELONGS TO OTHERS BEFORE THEY ARE DONE USING IT.

The saddest part is you don't even realize what you are doing, you think it is a good thing to TAKE FROM OTHERS as long as you can justify it in your own mind!

David Atwater  
3rd Generation Petroleum Distributor

Attachment:



Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 07:44:07

No Duplicates.

**Comment 138 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bradley  
Last Name: Edgar  
Email Address: brad.edgar@cleaire.com  
Affiliation: Cleaire Advanced Emission Contolrs

Subject: Cleaire Letter of Support for On-Road Rule  
Comment:

Please accept the attached letter in support of the In-Use On-Road Diesel Truck and Bus Regulation.

Brad Edgar  
President  
Cleaire Advanced Emission Controls

Attachment: [www.arb.ca.gov/lists/truckbus08/405-microsoft\\_word\\_-\\_cleaire\\_letter\\_in\\_support\\_of\\_on-road\\_rule\\_4dec08.pdf](http://www.arb.ca.gov/lists/truckbus08/405-microsoft_word_-_cleaire_letter_in_support_of_on-road_rule_4dec08.pdf)

Original File Name: Microsoft Word - Cleaire Letter in Support of On-Road Rule 4DEC08.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:15:10

No Duplicates.

**Comment 139 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: LARRY  
Last Name: CHARETTE  
Email Address: larry@lpgassystems.com  
Affiliation: silver valley propane

Subject: DIESAL TRUCK PROPOSAL  
Comment:

PLEASE CONSIDER THE COST OF THIS REFIT TO SMALL AND FAMILY OWNED BUSSES WITH THE ECONOMY IN SUCH QUESTIONABLE SHAPE. THIS COULD PUT MANY SMALL BUSINESS OUT OF BUSINESS AND MANY HARD WORKING MEN AND WOMAN OUT OF WORK. THERE WILL BE MANY TRUCKS ENTERING CALIFORNIA FROM IT'S BORDERS NOT MEETING THESE REQUIREMENTS BUT TAKING CALIFORNIA'S MONEY WITH THEM AS THEY LEAVE. PLEASE CONSIDER THIS FOR IT'S TRUE VALUE BEFORE JUST BLINDLY PASSING IT AS A "DO GOODERS BILL", THE ENVIRONMENT IS IMPORTANT BUT IF THERE IS NO ONE LEFT TO PROVIDE GOODS AND SERVICES TO THE ENVIRONMENTALISTS THEN THOSE GOODS AND SERVICES WILL BE PROVIDED BY THOSE WHO AREN'T REQUIRED TO MEET CALIFORNIA'S LAWS! LARRY CHARETTE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 09:37:58

No Duplicates.

**Comment 140 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Brian  
Last Name: Zinn  
Email Address: jzinn123@bak.rr.com  
Affiliation: Brian Zinn Trucking

Subject: Clean Air Emissions  
Comment:

I am a small owner operator maintaining six trucks that work seasonally. The proposed regulations will put me and my six employees out of business. I am slowly trying to upgrade my power units but with the cost of the upgrades, fuel prices, and just the economy as a whole it is difficult. This regulation also makes it difficult to sell my current power units because no one wants to buy them for fear that they will be put out of service by CARB. The monies I would make on selling the power units would be my down payment for upgrading. I feel that what I have has been made worthless. I support the clean air emissions however there must be a way of doing that, that wouldn't put the small businesses out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 10:06:31

No Duplicates.

**Comment 141 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bob  
Last Name: Shuster  
Email Address: oildrop@juno.com  
Affiliation: Shuster Oil Co.Inc.

Subject: Proposed Diesel truck regulations  
Comment:

As the proposed regulations now stand, our company is in serious jeopardy of not being financially able to comply with the replacement of our 4 diesel trucks nor would we be able to sell our trucks in California. Two of our trucks are small tankers for the delivery of gasoline and diesel, one is a stake truck and the 3rd one is a class A tanker. These are special built trucks and there is not a ready market out of state for them. There is a strong possibility that we will have to shut down our business, which is 3rd generation and has been in operation since 1924. Not a pleasant thought. The regulations do not make a great deal of sense as the cost to business and government, State, local and Federal (all fire service equip. will have to be replaced, what do you do with a fire engine that cannot be used in the State) in this time of recession and hard times on small business. The cost to all involved far outway the benefits.  
Thank you for your time and consideration.  
Bob L.Shuster

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 10:07:54

No Duplicates.

**Comment 142 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Thomas  
Last Name: Goodspeed  
Email Address: tomg@goodspeednet.com  
Affiliation: CIOMA

Subject: New On-Road Diesel Vehicals  
Comment:

We are a small petroleum jobber located in the Hesperia. As you may or may not know we in the petroleum industry have been hit time and time again with new regulations ranging from SB981 to current phase II vapor recovery requirements. Over the past nine years we have dug up every one of our stations three times to comply with these regulations now we are being mandated to purchase new tankers. We own and operate 17 tankers, four with engines meeting 2007 or sooner emmission standards. This means we will have to purchase 13 new trucks within the next few years to meet your new standards. We will not be able to borrow the funds to do this with the current banking mess. There is no money out there and we will be forced to shut down our fleet, taking 17 tankers off the highway serving the many stations, school districts, mining, and other various customers we now serve. We are looking at an end to our business if these regulation time tables are not relaxed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 10:14:36

No Duplicates.

**Comment 143 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kenny  
Last Name: Lloyd  
Email Address: klloyd@hpc.bz  
Affiliation:

Subject: item 8-11-3 diesel truck regulation  
Comment:

You people at CARB are so far removed from the realities of business and the environment. Poor science does not create great laws. All you have to do is examine all the inconsistencies of the UN IPCC Technical Paper VI (the corner stone of your environmental hype) to see that you are all full of crap. "Likely", "high confidence", and "assume" are not the most convincing words of science. You people are frigg'n idiots. In your drive to place humanity in some utopian state you are actually driving us in to the toilet. You are crushing the economy of California. Is China or India or Russia going to be burdened w/ these wasteful and meaningless trucks? Will Mexico swap out its fleets? Hell NO! Our used trucks will end up in Mexico. You frigg'n idiots. I never met a more stupid bunch of people, well maybe over at DGS? Your estimates on the costs to our economy are so far off. Our State is BROKE! Arnold has no money to subsidize these trucks. We don't need these trucks. If you want to really help Calif. get a real job and produce something.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 11:51:22

No Duplicates.

**Comment 144 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Charlie  
Last Name: Sciammas  
Email Address: carlo@podersf.org  
Affiliation: Â¡PODER!

Subject: Comments on Truck Bus Rule  
Comment:

Dear CARB:

PODER has been working to reduce the health impact of diesel truck pollution in southeast San Francisco.

We have won support from our Board of Supervisors to direct our Municipal Transportation Agency to develop a mitigation plan for each of the designated hot spots in our community where diesel truck pollution makes our community sicker.

We support CARB's efforts to pass and implement a new Truck Bus rule, and we also caution the agency to ensure that provisions for enforcement, incentive funding programs, and outreach to the trucking community are improved in order to increase the effectiveness of the new rules.

Sincerely,  
Charlie Sciammas  
for PODER

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 12:18:54

No Duplicates.



**Comment 145 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David

Last Name: Dills

Email Address: OnyxCollector@aol.com

Affiliation:

Subject: Truck/Bus Regulation 2008

Comment:

I would strongly urge the Board members not to cave in to the trucking company pressure to allow this process to take a longer time to become a regulation. Drastic measures are needed, and I believe that slowing the process down is a way for the industry to gain more time to find ways to avoid the regulation.

For years the automobile industry has had lobbyists fighting regulations that would improve quality of life, everything from seatbelts to airbags, letting people die until the inevitable occurred. The trucking industry would like to do the same thing, delaying their costs at the expense of our quality of life, specifically the air we breathe. The health effects this regulation will have are tremendous, and the effect will be felt across the country. Please implement the Regulation asap.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 12:22:21

No Duplicates.

**Comment 146 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: francine  
Last Name: pinoni  
Email Address: francine@wag.com  
Affiliation:

Subject: PLS VOTE FOR Diesel Regulation!!

Comment:

To whom it may concern...

My best friend died from asthma while living in Oakland, CA. He was 28 and was found on the side of his bed attempting to get to the phone for help. I can hardly believe that our state legislators WOULDN'T vote to minimize diesel truck and bus emissions. I mean, why not?? Truckers and Buses are 'businesses' and business's can write off expenses so how who will this hurt?? Its not a tax, its a regulation. Therefore I am writing to express my deep concern and support for the On-Road Heavy Duty Truck and Bus Rule, which the California Air Resource Board will vote on 12/11.

I urge the California Air Resources Board to secure the strongest anti-exhaust regulation in the country. You can be the 'help' my friend so desperately was attempting to get while taking his last California breath.

JUST DO IT!!

Thank you.  
Sincerely, your California State Taxpayer  
Francine Pinoni

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 12:23:44

No Duplicates.

**Comment 147 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Spainhoward  
Email Address: spainhowardtrk|@aol.com  
Affiliation:

Subject: retro law  
Comment:

I am a small business of 6 trucks 6 drivers And my family of 7. I fear that this might be a strain on this company and its employees. I know that this isnt a lot, but I am sure that the effects would be huge in affecting businesses state wide who are the same size as I am. My business alone affects the lively hood of about 40, (employees,Wifes and family).This would also make my equipment unsaleable in ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 12:25:49

No Duplicates.

**Comment 148 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Chris

Last Name: Carney

Email Address: ccarney@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Letter supporting diesel regulations signed by public health experts

Comment:

See attached letter in support of On-Road Diesel Vehicle regulation signed by researchers, public health, and medical experts.

Attachment: [www.arb.ca.gov/lists/truckbus08/426-public-health-letter--truck-and-bus-rule-dec-2008.pdf](http://www.arb.ca.gov/lists/truckbus08/426-public-health-letter--truck-and-bus-rule-dec-2008.pdf)

Original File Name: Public-health-letter--truck-and-bus-rule-Dec-2008.pdf

Date and Time Comment Was Submitted: 2008-12-04 13:13:59

No Duplicates.

**Comment 149 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Nancy  
Last Name: Nard  
Email Address: artcldy@yahoo.com  
Affiliation: CDTOA

Subject: CARB Ruling  
Comment:

I have been following the proposal by the ARB Board for some time now. It is so disturbing to me, that as we are in the most difficult times since the great depression. Is there any consideration for an industry that supplies us all with the goods that we "all" need to survive. Including all that are employed at ARB. You drive on the roads that we all help build, you go to the market and purchase the food you need to nourish your families, You go to doctor and pharmacy's that all the items used at your visits or given at the pharmacy to help you feel better are most likely delivered by a truck. Do many of you understand how badly you are impacting the industry that actually helps "you". If we lose half of these small businesses due to this new law you are wanting to pass, it will hurt many of us, the cost of goods could possibly rise, the deliveries might become slower etc. I cannot express upon you enough to reconsider this action you are proposing. It is the most difficult times in our lives and we just do not need this now. I urge you to reconsider your time line and the pricing of these devices to be retrofitted. I do not foresee that the trucking industry can go to the federal government and ask for a bailout, so the only hope we have is that you take our requests into account.

Sincerely,  
Nancy Nard

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:21:57

No Duplicates.

**Comment 150 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Alan  
Last Name: Osofsky  
Email Address: alano@rodgerstrucking.com  
Affiliation:

Subject: Private Fleet Rule  
Comment:

Dear ARB, We are a family owned trucking company in the SF East Bay Area for the last 45 years, that employs about 150 people. Our drivers are members of Teamsters Local #70 in Oakland, Ca. We are concerned over the aggressive nature of the Private Fleet rule in regards to replacing or retrofitting trucks that do not have the latest emission technology. Our company purchases good quality used trucks when it is time for replacement. Due to the nature of competition we face in a typically non union environment, we have to watch our costs in order to stay competitive and continue to employ quality union labor. Our employees receive an attractive benefit package that is virtually unheard of in these current times. In return our employees stay for many years and consider their employment as a "career" rather than a "job". The point being that we can provide an attractive working environment using the latest equipment we can afford that suits our operational needs. Our trucks only travel within N. California and average about 40,000 miles per year. Their useful life for us is about 10 to 15 years. In the last 2 years we have replaced 17 of our oldest equipment, 1980 vintage, with late 1990 early 2000 equipment. For us to purchase "new" equipment is not economically feasible. We take advantage of the quality used truck market. It affords us the latest equipment at a price we can afford. Basically, we feel that through this attrition rate, we can do our part to deal with the emission problems that our state is facing and still maintain a competitive posture in these uncertain times. Thank you for your consideration.  
Alan Osofsky, Gen Mgr.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:29:40

No Duplicates.

**Comment 151 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert

Last Name: Johnson

Email Address: bob@goldeneaglemoving.com

Affiliation: United Van Lines-CMSA

Subject: Concern with cost of compliance

Comment:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck regulation that, if implemented as presently drafted, would have a profound negative impact on California's economy and on my business.

My wife and I founded Golden Eagle Moving Services based in Upland, CA in 1981 with no resources except the willingness to work hard and the belief that no matter what, we would succeed. We grew a little at a time, paying cash for old equipment and upgrading little by little as we could afford to. We have grown steadily since that time. Two years ago, before the housing market started to tank, we were grossing almost 10 million dollars per year with 75 employees and 20 independent truck owner-operators. Even with necessary cutbacks, we have the same number of owner-operators and about 60 employees and will gross a little under \$8 million in 2008. Golden Eagle Moving Services is the embodiment of the American Dream and that dream for us and for thousands of other California trucking companies is in jeopardy

As a native Californian, I know how much good the CARB has done to improve the quality of the air in California. I remember how bad it was in the sixties and seventies and I support continued improvement. The diesel retrofit regulations proposed by CARB, however, go too far too fast and will force companies like ours to dispose of equipment that still has years of useful life. The only buyers for our current older equipment are Mexican truck dealers who pay pennies on the dollar. We recently sold two of our oldest trucks to one of these dealers and will accept delivery on two 2009 replacement units next March. We cannot, however, replace our entire fleet in a matter of a couple of years. We will be faced with the prospect of severely downsizing or just closing our doors.

Golden Eagle Moving Services is a member of the California Moving and Storage Association and along with the CMSA and other California trucking organizations we support an alternative proposal advocated by the Driving Toward a Cleaner California Coalition. This proposal would give companies like ours the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions. I ask you to do what you can to bring common sense to this situation. The State of California cannot afford to implement well-intentioned laws without considering the unintended negative consequences.

Sincerely,

Robert Johnson, President

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:30:04

No Duplicates.



**Comment 152 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jacob  
Last Name: Singer  
Email Address: Jacob@obdc.com  
Affiliation:

Subject: Letter of Support/ ARB Loan Program  
Comment:

This letter is in support of the ARB Loan Program.

Attachment: [www.arb.ca.gov/lists/truckbus08/433-arb\\_support\\_letter.\\_calcap.pdf](http://www.arb.ca.gov/lists/truckbus08/433-arb_support_letter._calcap.pdf)

Original File Name: ARB Support Letter. Calcap.pdf

Date and Time Comment Was Submitted: 2008-12-04 13:50:19

No Duplicates.

**Comment 153 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: STEVE  
Last Name: ROSSI  
Email Address: info@rossitransport.com  
Affiliation: ROSSI TRANSPORT SERVICE

Subject: SAY YES TO DTCC PROPOSAL  
Comment:

Dear Sirs;

We are a small family owned trucking company, started in 1951 by my father and now run by my sister and me. We employ 10 full time and 2 part time employees. We have 5 heavy duty trucks, 2 hay squeezes, a small dump truck and one large JD loader. Our equipment ranges in age from one 1991 truck to the rest between 2000 and 2003. We sell hay and landscape materials. At this time our business is severely depressed due to no construction. If you enact the regs in the time frame that you are proposing, we would be unable to purchase the new eq or sell the old eq which is still in good operating condition. OUR BUSINESS WOULD MOST LIKELY FAIL AND YOU WOULD PUT AT LEAST 12 PEOPLE OUT OF WORK.

WE want cleaner air and support what you are trying to do but need more time to make the transition. The DTCC proposal would give us the time to get the useful life out of our equipment, but with your proposal it would make the eq worthless and unrecyclable. Please pass the DTCC proposal or there will only be big trucking companies operating in Ca and most will be based elsewhere. Loss of the small companies will increase the cost of everything you buy. Thank you for listening.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:51:42

No Duplicates.

**Comment 154 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Dave

Last Name: Kiker

Email Address: Non-web submitted comment

Affiliation:

Subject: Blue Star Gas- Redding Co.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/435-01.pdf](http://www.arb.ca.gov/lists/truckbus08/435-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:07:11

No Duplicates.

**Comment 155 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William

Last Name: Stewart

Email Address: Non-web submitted comment

Affiliation:

Subject: Blue Star Gas- Engineering

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/436-02.pdf](http://www.arb.ca.gov/lists/truckbus08/436-02.pdf)

Original File Name: 02.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:09:09

No Duplicates.

**Comment 156 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Tin

Last Name: Tran

Email Address: Non-web submitted comment

Affiliation:

Subject: NTK Construction, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/437-03.pdf](http://www.arb.ca.gov/lists/truckbus08/437-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:14:28

No Duplicates.

**Comment 157 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David

Last Name: Roberts

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Solana Beach

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/438-04.pdf](http://www.arb.ca.gov/lists/truckbus08/438-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:15:28

No Duplicates.

**Comment 158 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Michael  
Last Name: Slabaugh  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Blue Star Gas- Mt. Shasta Co.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/440-05.pdf](http://www.arb.ca.gov/lists/truckbus08/440-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:19:27

No Duplicates.

**Comment 159 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Jeanne

Last Name: Cain

Email Address: Non-web submitted comment

Affiliation:

Subject: Driving Toward a Cleaner California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/441-06.pdf](http://www.arb.ca.gov/lists/truckbus08/441-06.pdf)

Original File Name: 06.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:21:49

No Duplicates.



**Comment 160 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Alan  
Last Name: Berger  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Valley Slurry Seal Co.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/442-07.pdf](http://www.arb.ca.gov/lists/truckbus08/442-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:22:26

No Duplicates.

**Comment 161 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Reed  
Last Name: Rinehart  
Email Address: rrinehart@rinehartoil.com  
Affiliation:

Subject: CARB "buy new trucks" regulation  
Comment:

Dear Board Member,

I am writing in opposition to CARB's proposed buy new trucks program being voted on next week. We own a small hauling company in Ukiah California. We have 38 employees and a total of 12 trucks. The total cost to replace and retrofit all of our vehicles will be in the millions of dollars. Our older equipment will just have to be scrapped or exported to another state. We simply cannot afford to make these purchases and expect to stay competitive enough to stay in business at our current size. At the least we will have to downsize our company and release the employees to keep pace with this proposal. Please consider some of the alternative proposals that have been presented to prolong this new regulation. At least we may have a chance if we have more time to cycle out our rolling stock.

I appreciate your consideration.

Sincerely,

Reed Rinehart

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 14:24:15

No Duplicates.

**Comment 162 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Ron

Last Name: Nuss

Email Address: Non-web submitted comment

Affiliation:

Subject: Northwest Excavating, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/444-08.pdf](http://www.arb.ca.gov/lists/truckbus08/444-08.pdf)

Original File Name: 08.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:28:08

No Duplicates.

**Comment 163 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Milton

Last Name: Davis

Email Address: Non-web submitted comment

Affiliation:

Subject: Milton Davis

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/445-09.pdf](http://www.arb.ca.gov/lists/truckbus08/445-09.pdf)

Original File Name: 09.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:29:01

No Duplicates.

**Comment 164 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Jim  
Last Name: Kelly  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Kelly Freight Services, Inc.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/446-10.pdf](http://www.arb.ca.gov/lists/truckbus08/446-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:29:53

No Duplicates.

**Comment 165 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Moe  
Last Name: Whitchurch  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Whitchurch & Son  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/447-11.pdf](http://www.arb.ca.gov/lists/truckbus08/447-11.pdf)

Original File Name: 11.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:30:45

No Duplicates.

**Comment 166 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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/truckbus08/448-12.pdf](http://www.arb.ca.gov/lists/truckbus08/448-12.pdf)

Original File Name: 12.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:31:23

No Duplicates.

**Comment 167 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Tiffany

Last Name: Tsu

Email Address: Non-web submitted comment

Affiliation:

Subject: Housing slowdown spurs auction of construction equipment

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/449-13.pdf](http://www.arb.ca.gov/lists/truckbus08/449-13.pdf)

Original File Name: 13.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:32:43

No Duplicates.



**Comment 168 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Michael

Last Name: Rea

Email Address: Non-web submitted comment

Affiliation:

Subject: West County Transportation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/450-14.pdf](http://www.arb.ca.gov/lists/truckbus08/450-14.pdf)

Original File Name: 14.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:36:28

No Duplicates.

**Comment 169 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Jim

Last Name: Morris

Email Address: Non-web submitted comment

Affiliation:

Subject: Siskiyou County Farm Bureau

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/451-15.pdf](http://www.arb.ca.gov/lists/truckbus08/451-15.pdf)

Original File Name: 15.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:37:31

No Duplicates.

**Comment 170 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Norman

Last Name: Brown

Email Address: Non-web submitted comment

Affiliation:

Subject: Delta

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/452-17.pdf](http://www.arb.ca.gov/lists/truckbus08/452-17.pdf)

Original File Name: 17.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:41:24

No Duplicates.

**Comment 171 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Chris

Last Name: Fleming

Email Address: Non-web submitted comment

Affiliation:

Subject: Blue Star Gas- Santa Rosa Co.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/453-18.pdf](http://www.arb.ca.gov/lists/truckbus08/453-18.pdf)

Original File Name: 18.pdf

Date and Time Comment Was Submitted: 2008-12-04 14:42:31

No Duplicates.

**Comment 172 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: ROD

Last Name: STALLINGS

Email Address: RODSTRUCKREPAIRVIS@EARTHLINK.NET

Affiliation: ROD'S TRUCK REPAIR, INC.

Subject: RE: PRIVATE FLEET RULE AND GREEN HOUSE GAS REGULATIONS

Comment:

ROD'S TRUCK REPAIR  
11910 GREENSTONE AVE.  
SANTA FE SPRINGS, CA 90670  
562-946-2808 PHONE  
562-946-2848 FACSIMILE  
800-559-1778 TOLL FREE  
RODSTRUCKREPAIRVIS@EARTHLINK.NET

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12-4-08

To Whom It May Concern:

I am not a truck owner or a fleet owner but I do have a truck repair shop that provides repairs, opacity testing, emissions testing, 90 day inspections, road service, etc. I believe if the new regulations are imposed in today's economy it will not only hurt the truckers but also thousands of repair shops who employ hundreds of people.

Everyone wants clean air and there has been great progress in the last few years and there will be more in the future. I think that C.A.R.B. needs to delay this requirement on the trucking industry and let people come forward with their ideas and to make testing more inexpensive so people with real results on lowering the emissions and cleaning up the air can afford the testing of their products.

Remember California needs clean air, but also needs transportation and small businesses of which I think will cost a lot of jobs if the private fleet rule is imposed at this time, can we afford this? Just look and ask your truck dealers how business is and why are they lying off people. It could be that no one can afford the expenses. What I am asking is please look at how bad things are and don't put people out of business. If you give businesses a chance clean air will come.

There are businesses out there that can lower emissions with their products, but can't afford to have them tested.

Thank you,

Rod Stallings

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 14:48:11

No Duplicates.

**Comment 173 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Terry  
Last Name: Klenske  
Email Address: terry@daltontrucking.com  
Affiliation: CTA, CDTOA, ATA

Subject: CARB Rules  
Comment:

Dalton Trucking, Inc. is committed to operate in an environmentally friendly manner. For example: This year we have purchased 16 new compliant trucks. However, the economy is as such that we have had to alter our plans for future fleet upgrades until the construction industry improves.

We urge CARB to postpone implementation of these proposed rules for at least 2 years until the economy recovers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 15:26:08

No Duplicates.

**Comment 174 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: michael

Last Name: crum

Email Address: heavenbound268@aol.com

Affiliation: mike crum trucking

Subject: clean air emissions

Comment:

i am a small trucking company who is very making ends meet if this is passed right now you will put me an hundreds off little companys out of business i know that we need to clean-up our air but you also have to remember that we have to make a living. Im asking that you find another way to go about this, because of the way our economy is right now, and this would bankrupt us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 16:18:03

No Duplicates.



**Comment 175 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mike  
Last Name: Killingsworth  
Email Address: bestfalcon@sbcglobal.net  
Affiliation:

Subject: Diesle Truck Rule  
Comment:

Dear CARB:

It is imperative that the unwatered down version of the Diesel Truck Rule that reduces emissions of hydrocarbons and gases that become ozone. My 6 year-old grandson Philip lives in Modesto. He has asthma. Periodically he has an attack and has to be put on a venitlator. It is always a frightening experience to see him gasping for air and turning pale before his treatment takes effect.

I am broderline asthmatic and I also get short of breath when the ozone and other auto/truck pollutants are high. I cough up a lot of phlegm too. Sometimes I develop a hearth arhythmia from so much coughing. Fortunately it lasts only a short time, but it scares me.

I know how important agriculture is to the valley. Everybody wants an exemption from rules that cost money. In this case, they are in effect asking for permission to continue causing asthma and other chronic lung and other health problems associated with pollution by diesel engines. Why would we outlaw smoking in public places to protect health and not do the same for burning diesel?

I find it hard to believe that CARB is in favor of leniency that costs lives and creates severe health problems for children and adults. It saddens me when my grand son Philip comes home from school and says, "We couldn't play outside at recess today because the teacher said it was dangerous."

Please, please vote for the original Diesel Truck Rule that is so badly needed here in the valley where engine pollutants cause so much illness and damage to our environment.

Thank you.

Sincerely,

Mike Killingsworth  
Modesto, CA 95350

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 17:03:35

No Duplicates.

**Comment 176 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Traci

Last Name: Roberts

Email Address: [traci@montereycfb.com](mailto:traci@montereycfb.com)

Affiliation: Monterey County Farm Bureau

Subject: Unnecessary, jeopardizes California's economy

Comment:

31 farming and ranching families speak out.

Attachment: [www.arb.ca.gov/lists/truckbus08/467-mcfb\\_11.20.08\\_comment\\_letter.doc](http://www.arb.ca.gov/lists/truckbus08/467-mcfb_11.20.08_comment_letter.doc)

Original File Name: MCFB 11.20.08 comment letter.doc

Date and Time Comment Was Submitted: 2008-12-04 17:21:11

No Duplicates.

**Comment 177 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Richard

Last Name: Zinn

Email Address: zriders2@comcast.net

Affiliation: Rich Zinn Trucking

Subject: Survival of the small independant truckers

Comment:

I am a small trucking buisness owner with only a few trucks. I do support the clean air act but the proposed regulations will most certainly put me and alot of other families out of work. I am in the process of trying to build enough buisness to be able to move and retire in California. If these strict regulations go into effect without allowing some time for the small buisness owners to upgrade to newer equipment only the big buisnesses will survive. I'm sure myself and others in my shoes would greatly appreciatiate it if there was adequate time for the small buisness owners to upgrade their equipment so that they could stay competitive and keep thriving like the more powerful buisnesses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 18:14:06

No Duplicates.

**Comment 178 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: STEVE  
Last Name: CORTIE  
Email Address: STEVEANDCINDY@BAK.RR.COM  
Affiliation:

Subject: CALIFORNIA TRUCK OWNERS/OPERATORS  
Comment:

Please understand one thing...California truck owners/operators are essential to the growth and prosperity of California. Period! Chances are very good that the very computer I used to send this message, was delivered by a California truck owner/operator. These owner/operators are a major part of the "lifeline" of California. Without them, goods would be priced out of reach! We should all be supporting our California truck owners/operators, instead of trying to put them on skid row!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 20:27:27

No Duplicates.

**Comment 179 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Davinder  
Last Name: Chandhok  
Email Address: freddo63@gmail.com  
Affiliation: Merced Bike Coalition Member

Subject: Exemptions to Proposed Regulation In-Use On-Road Diesel Vehicles  
Comment:

I do detest emissions from practically all motorized vehicles (including emissions from humans on electric scooters!) Nevertheless, the list of exemptions to the proposed regulation could be reduced to just one! Pesticides and fertilizers should not even be going around, for if we biodiversify farms as nature does through randomness, soils would recycle themselves, and plants would survive without pesticides. Low mileage trucks have nothing to do with agriculture necessarily, and therefore should not be exempt without further proof of agriculture involvement. Logging trucks have nothing to do with agriculture, since we do not eat logs, nor do we feed them to any of our livestock! Do we even have logging farms in Merced? If not, then these trucks should not be spending any time around here!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 23:01:44

No Duplicates.

**Comment 180 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Steven  
Last Name: McKenna  
Email Address: steven.mckenna@NAVL.com  
Affiliation: North American Van Lines

Subject: CARB Proposal to Aggressive  
Comment:

December 5, 2008

The Honorable Governor Arnold Schwarzenegger  
State Capitol Building  
Sacramento, CA 95814

Dear Governor Schwarzenegger:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes many of our members future viability in the moving and storage industry, which is already reeling from unprecedented financial turmoil.

The Agents that represent North American Van Lines in California are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. Many of our Agents simply don't have the resources or access to capital to retrofit our engines. Some may be forced to sell off our trucks at a loss or shut their companies' doors, ultimately costing jobs and revenue to the state's economy.

Given the multi-billion dollar cost of this regulation, I urge you to support the alternative proposal advanced by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

Thank you for your consideration.

Steven McKenna  
Vice President

North American Van Lines, Inc  
700 Oakmont Lane  
Westmont, IL 60510  
630-570-3996

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 07:00:32

No Duplicates.



**Comment 181 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Marc  
Last Name: Silverman  
Email Address: dhalgrn@pacbell.net  
Affiliation:

Subject: Truck Emissions  
Comment:

50 percent of all Californians live near a highway. These pollutants impact each and every one of us. To protect the health of all Californians, the California Air Resources Board needs to immediately adopt strong, effective and health protective On-Road Heavy Duty Truck and Bus Rule to significantly cut emissions now!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 07:25:35

No Duplicates.

**Comment 182 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: fran

Last Name: turano

Email Address: fturano@caanet.org

Affiliation:

Subject: DTCC

Comment:

I support the DTCC alternative and thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 07:27:31

No Duplicates.

**Comment 183 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Brice  
Last Name: Weyer  
Email Address: brice@hensellmaterials.com  
Affiliation: Hensell Materials, Inc.

Subject: On Road Diesel Regulation  
Comment:

The new on road diesel regulation will ruin our small business, which employs 15 people in the economically depressed area of Eureka. We bought two used trucks in the past few years. Since no NOx filters are available to bring them into compliance with regulations in the Sacramento or San Francisco areas, and this is where we pick up materials to sell here in Eureka, these trucks will become worthless. We cannot afford to buy new trucks. I don't see how it is environmentally beneficial to junk such a large quantity of trucks. Also, we have four local delivery trucks that are too old to be retrofitted with particulate filters. We pay our employees good wages for the area and provide insurance and other benefits. We cannot afford to buy six new trucks in the next two years. These regulations will close a small business and put 15 people out of work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 09:05:38

No Duplicates.

**Comment 184 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tina  
Last Name: Chavez  
Email Address: tinavchavez@yahoo.com  
Affiliation:

Subject: Regulation in on road diesel  
Comment:

As an asthmatic in the Valley, I feel I have experienced first hand the suffering of living with asthma caused and aggravated by the County's bad air.

The Board must seriously weigh the deadly effects of diesel fumes to the health and welfare of the adult and children in Merced County and in the State vs. the financial gain these vehicles bring to the valley. What would be the benefit of gain if we are all dead, or sick. Bad air is an equally opportunity culprit. It does not pick and choose who will be effected. Even you (Board members) and your children will eventually be touched by the devastating results of bad air. More reason to pass the strongest regulations possible. This is a must. No exceptions!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 10:09:45

No Duplicates.

**Comment 185 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lucy  
Last Name: Snyder  
Email Address: lucysnyder@hotmail.com  
Affiliation:

Subject: Support Strong Diesel Regulations  
Comment:

CARB regulations may impact the cost of transporting goods in CA, but likewise will reduce the amount of untold dollars spent on rising health care costs, due to increasing respiratory related illnesses that are unquestionably tied to California's worsening air quality.

California may take the "heat" for being the first state to enact stringent regulations, but the rest of the states must follow as the US takes a new direction in committing to reducing our carbon emissions.

Please take the lead and adopt the strongest regulations possible to clean up one of the top sources of California's worsening air quality; diesel particulate matter.

Sincerely,  
Lucy Snyder R.N.  
3554 Beals Ave.  
Merced, CA 95348

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 10:21:04

No Duplicates.

**Comment 186 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dan  
Last Name: Parquette  
Email Address: dan@northamericantrailer.com  
Affiliation:

Subject: Statewide Truck and Bus Regulation  
Comment:

Dear CARB board members,  
All of us at North American Trailer Sales,L.L.C. would suggest to you the use of the table of replacement submitted by DTCC.  
As a member of the CTA and a business that supports the trucking business in California we are fighting for our financial life in this current financial crisis.  
If enforced in it's original format and along with the TRU enforcement that is currently suggested, CARB could single handedly kill all trucking commerce in the state of California and delete the jobs of thousands of hard working people.  
Now is NOT the time for costly regulation on the trucking business nor is it time to increase the cost of all goods and services delivered by trucks.  
Thank you for taking the time to read my comments.  
Dan Parquette

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 10:31:33

No Duplicates.

**Comment 187 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sarah  
Last Name: Henderson  
Email Address: sarah.henderson@reed.net  
Affiliation: Basic Resources, Inc.

Subject: On-Road Truck and Bus Rule  
Comment:

Our company supports the DTCC's alternative to CARB's Truck and Bus Regulation. The end result and time period allotted come to the same goal in a different more manageable manner. A healthy environment with clean air is of the utmost importance, but the regulations being passed by CARB, off-road diesel, large-spark ignition, PERP all cost billions of dollars to the construction industry, and the construction company employee's are paying the price not the consumers. It is time for CARB to see that while they are increasing their workforce, we are losing ours. Let's work together for an alternative with the greatest impact to save the environment, but not kill the livelihood of millions of Californian's.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 10:34:41

No Duplicates.

**Comment 188 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Blain  
Last Name: Stumpf  
Email Address: bstrsg@aol.com  
Affiliation:

Subject: On road rules  
Comment:

The financing of all new equipment was nearly impossible during the last strong economy.

In the foreseeable future, equipment replacement on the proposed schedule WILL be impossible.

You know, I see trucks every day that are running "mechanical" diesel engines. No question that these are the most dirty of the states inventory. Just replacing those with "Electronic controlled" engines would be the logical next step. It seems that this step was jumped over in favor of the drastic steps proposed.

Personally, what if you were told that your home has been identified as needed to be demolished, at your expense and replaced with one twice its size, at your expense?

Get it?

Blain Stumpf

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 10:54:13

No Duplicates.



**Comment 189 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Don  
Last Name: Sambucetti  
Email Address: djbackhoe@netzero.net  
Affiliation:

Subject: Carb ruling  
Comment:

Please reconsider the approach being taken on existing equipment  
the financial burden that it would create will put many out of  
business, especially in the economic environment existing now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 11:19:47

No Duplicates.

**Comment 190 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Daniel

Last Name: Miller

Email Address: Non-web submitted comment

Affiliation:

Subject: Smart Refrigerated Transport

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/491-010001.pdf](http://www.arb.ca.gov/lists/truckbus08/491-010001.pdf)

Original File Name: 010001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:39:48

No Duplicates.

**Comment 191 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Wade

Last Name: Boyman

Email Address: Non-web submitted comment

Affiliation:

Subject: Blue Star Gas-Lake Co.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/493-020001.pdf](http://www.arb.ca.gov/lists/truckbus08/493-020001.pdf)

Original File Name: 020001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:41:03

No Duplicates.

**Comment 192 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Donovan

Last Name: Albright

Email Address: Non-web submitted comment

Affiliation:

Subject: Ellis Trucking, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/494-030001.pdf](http://www.arb.ca.gov/lists/truckbus08/494-030001.pdf)

Original File Name: 030001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:41:42

No Duplicates.

**Comment 193 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Don  
Last Name: Albright  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Geise Trucking, Inc.  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/495-040001.pdf](http://www.arb.ca.gov/lists/truckbus08/495-040001.pdf)

Original File Name: 040001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:42:48

No Duplicates.

**Comment 194 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Harkrishan

Last Name: Heer

Email Address: Non-web submitted comment

Affiliation:

Subject: Nor-Cal Pump & Well Drilling, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/496-050001.pdf](http://www.arb.ca.gov/lists/truckbus08/496-050001.pdf)

Original File Name: 050001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:43:51

No Duplicates.

**Comment 195 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Russell

Last Name: Smith

Email Address: rsmith@pacificenterprisebank.com

Affiliation: Pacific Enterprise Bank

Subject: ARB/CalCAP Truck Program

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/497-calcap\\_truck\\_program\\_support.doc](http://www.arb.ca.gov/lists/truckbus08/497-calcap_truck_program_support.doc)

Original File Name: CalCAP Truck Program Support.doc

Date and Time Comment Was Submitted: 2008-12-05 11:44:05

No Duplicates.

**Comment 196 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Blain  
Last Name: Stumpf  
Email Address: bstrsg@aol.com  
Affiliation:

Subject: On road rules  
Comment:

I want to take another shot at an analogy;

You have a nice house the the suburbs  
I have a late model diesel truck  
You have a mortgage  
I have an equipment loan  
Your house is condemned  
My truck can't be operated in California after 2010  
You must dispose of your house  
I must dispose of my truck  
Neither has any value  
Any equity WE may have planned on using for retirement is gone

Yet 3 billion people in China will continue to use the same assets  
California has banned. Then sell the product back to us.

Does anyone on the board get it?

Blain Stumpf

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 11:46:54

No Duplicates.



**Comment 197 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: JOE

Last Name: KROENING

Email Address: JOEKROENING@ANDYSTRANSFER.COM

Affiliation: ANDY'S TRANSFER & STORAGE/CMSA

Subject: RESOLUTION 08-23 = ON ROAD DIESEL TRUCKS

Comment:

I AM THE OPERATOR OF A NUMBER OF LOW MILEAGE ON ROAD DIESEL TRUCKS. OUR COMPANY, A MOVING AND STORAGE FIRM, IS FACING TOUGH FINANCIAL TIMES AND IF WE NEED TO REPLACE/RETROFIT OUR TRUCKS IT WOULD BE AN IMPOSSIBLE TASK TO DO ALL AT ONCE. I WOULD LIKE TO REQUEST A TIMETABLE THAT ALLOWS REPLACING/RETROFITTING OVER A LONGER PERIOD OF TIME. WE DO SUPPORT THE EMISSION STANDARDS IN GENERAL AND IN BETTER TIMES WOULD NOT HESITATE TO THE ADOPTION OF THEIR RESOLUTION AS PRESENTLY PLANNED. HOWEVER IF WE NEED TO REPLACE OUR LOW MILEAGE TRUCKS IN THE ORDER BEING CONSIDERED WE WOULD HAVE NO CHOICE BUT TO CURTAIL OPERATIONS WHICH WOULD IMPACT ALL OF OUR WORKERS RESULTING IN A FURTHER BLOW TO THE FRAGILE ECONOMY THAT WE ARE PRESENTLY IN. GIVEN THE COST OF THIS REGULATION COUPLED WITH OUR PRESENT ECONOMY I WOULD URGE ADOPTION OF THE DTCC PROPOSAL WHICH IS MORE REASONABLE IN MY OPINION. THANKS!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 11:47:55

No Duplicates.

**Comment 198 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Lydia

Last Name: Bourne

Email Address: Non-web submitted comment

Affiliation:

Subject: Blood Centers of California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/501-060001.pdf](http://www.arb.ca.gov/lists/truckbus08/501-060001.pdf)

Original File Name: 060001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:57:01

No Duplicates.

**Comment 199 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Paul

Last Name: Trump

Email Address: Non-web submitted comment

Affiliation:

Subject: Mike Campbell & Associates, Ltd.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/502-070001.pdf](http://www.arb.ca.gov/lists/truckbus08/502-070001.pdf)

Original File Name: 070001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:58:21

No Duplicates.

**Comment 200 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Doug

Last Name: Hogue

Email Address: Non-web submitted comment

Affiliation:

Subject: Saunco Air Technologies

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/503-080001.pdf](http://www.arb.ca.gov/lists/truckbus08/503-080001.pdf)

Original File Name: 080001.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:59:24

No Duplicates.

**Comment 201 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

## **Comment 202 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert

Last Name: Engel

Email Address: Bob@engelandgray.com

Affiliation:

Subject: On Road Diesel Regulation 2008

Comment:

We are a transportation and organics recycling company that has been in business since 1946. We Care about clean air and want to work to achieve a reasonable goal for California. The regulations CARB is looking to implement as presently drafted will have a prolonged negative effect on the California economy. They will reshape trucking industry, cause service disruptions, hurt infrastructure programs as many small SERVICE businesses are put out of business. Why?

1. Your actions have devalued our current assets 30-70% meaning Banks that look for assets to loan against will not loan us money since you devalued our existing trucks.
2. With no borrowing power from this devaluation and the current state of the national economy, previously well capitalized business cannot purchase the equipment you are asking them to buy.
3. The time frame of the replacement is unreasonable even in good times!

Your regulations are based on inadequate information and a complete lack of understanding economics and business, more importantly the Trucking Business. Why?

1. Your inventory of on road equipment is not accurate!
2. Your inventory of miles driven either does not exist or is completely inaccurate.
3. Your equipment upgrade schedule does not take into account a trucks yearly mileage so therefore does not reflect the trucks contribution to air pollution. Ex. Three 1993 trucks, one travels 100,000 miles a year one travels 25,000 and one 12,000. Which harms the air quality the most? Answer is #1 using common sense but your calculations say all three.
4. Some companies like ours have two trucks per driver because the trucks are configured differently. This means only one truck is emitting PM or NOX at a time. CARB does not figure this out.
5. We have looked to Carl Moyer for funding but are told our mileage is high enough but CARB says we have to replace this same equipment Moyer says is not worthy of funding!

So what does the above mean?

We have replaced an older truck with a new 2007 truck but even this is truck is facing limited life. Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions. In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions

benefits to the proposed regulation in the long-term.  
We must be careful not to forfeit California's economy and ability  
to move goods across the state, build construction projects and bus  
our children to and from school for the sake of protecting our  
environment. (I/We) look forward to working with you, CARB,  
environmental organizations, the Legislature and other stakeholders  
to accomplish these goals.

Sincerely,  
Bob Engel  
Engel & Gray, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 12:01:20

No Duplicates.

**Comment 203 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: tom

Last Name: squyres

Email Address: squyrestrucking@aol.com

Affiliation: CDTOA

Subject: statewide truck and bus regulation 2008

Comment:

I have been a dump truck owner operator in ca. for over 25yrs.I request you to consider DDTC proposed changes to your regulations. Your proposed regulations will cause economic hardship for my family owned company and ultimate failure. My trucks average less than 35,000 miles/1500hrs anually.I recently purchased newer 2007 and later models in support of your newer regulations.These trucks are already having serious engine/emission related problems,too costly for me to absorb in our economic crisis.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 12:05:41

No Duplicates.



**Comment 204 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Camille

Last Name: Kustin

Email Address: ckustin@edf.org

Affiliation: Environmental Defense Fund

Subject: Statewide Truck and Bus Rule and GHG Rule Comments

Comment:

On behalf of Environmental Defense Fund, I submit this comment letter. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/truckbus08/507-edf\\_truck\\_rule\\_letter\\_12\\_05\\_08final.pdf](http://www.arb.ca.gov/lists/truckbus08/507-edf_truck_rule_letter_12_05_08final.pdf)

Original File Name: EDF Truck Rule Letter 12\_05\_08FINAL.pdf

Date and Time Comment Was Submitted: 2008-12-05 12:11:14

No Duplicates.

**Comment 205 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: DEANNE  
Last Name: ROSE PADEL  
Email Address: rosepadel@sbcglobal.net  
Affiliation: EUCA

Subject: Carb/putting us out of business  
Comment:

We are a new small struggling business in Northern California, we have only been in business for a little over a year. We have tried to do everything right and by the book. If this bill passes it will put us and many many other small businesses like our self out of business. Only the rich will survive, as usual and little indepents that are trying to make a living will die. Please consider what you are doing, especially in this economy, as if it is not bad enough, you are just adding to the problems.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 12:29:56

No Duplicates.

**Comment 206 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Shelli  
Last Name: Shepherd Wahl  
Email Address: shelli@epicincentives.com  
Affiliation: AGC & EUCA

Subject: VISIBILITY & HEAT ARE MAJOR SAFETY ISSUES

Comment:

Impaired visibility and added heat exposure when the filters are installed on some pieces of equipment is a major problem that needs to be addressed sooner rather than later.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 13:11:44

No Duplicates.

**Comment 207 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Paul  
Last Name: Donaldson  
Email Address: pauld@teamghilotti.com  
Affiliation:

Subject: CARB Regulations  
Comment:

Our company (a small business enterprise) was started up in March of 2007. We are fighting hard to provide jobs and keep ourselves afloat in these tough times. We understand the importance of clean air and emissions that affect our environment. We have analyzed the costs impacts to our company to retrofit or sell our equipment in this market and it is an economic impact that could cause our company financial distress and potential ruin. We also understand that there is an alternate proposal currently on the table.

I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining emission reductions.

In these times, another expense to our business is a like a kick in the stomach when you are already on the ground gasping for air. PLEASE RECONSIDER THE ADOPTION OF THESE REGULATIONS AT THIS TIME. IF ADOPTED NOW IT WILL ONLY MAKE THE RECOVERY OF OUR ECONOMY WORSE.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 13:28:14

No Duplicates.

**Comment 208 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Vince  
Last Name: Reiser  
Email Address: [reddingoil@shasta.com](mailto:reddingoil@shasta.com)  
Affiliation:

Subject: Statewide Truck & Bus Regulation 2008  
Comment:

See attached word document.

Attachment: [www.arb.ca.gov/lists/truckbus08/512-carb\\_dtcc.doc](http://www.arb.ca.gov/lists/truckbus08/512-carb_dtcc.doc)

Original File Name: CARB\_DTCC.doc

Date and Time Comment Was Submitted: 2008-12-05 13:48:51

No Duplicates.

**Comment 209 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Ciano  
Email Address: bciano@hfsnet.com  
Affiliation:

Subject: DTCC Alternative Proposal.....CLEAN AIR  
Comment:

As the TM for a small CA trucking company, United Drayage ,we support the DTCC Alternative Proposal.....for Cleaner Air. With high unemployment, housing foreclosures, billion dollar bail outs, and corruption rampant at the highest levels it appears our leadership has shipwrecked us!! We do not need strong currents, and sharks circling.....we must think, then react...

Thank you,  
Bob C

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:12:50

No Duplicates.

**Comment 210 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: DeWitt  
Email Address: jedi@dewittpetroleum.com  
Affiliation: CIOMA, CSBA

Subject: Diesel powered truck requirement proposal  
Comment:

Please accept my support for DTCC proposal for mitigating diesel emissions. The businesses located in California have a larger investment committed to a cleaner environment than any business located elsewhere in the world. California's leadership in environmental matters suffers when draconian measures are enacted without regard of its economic impact on employers and employees. Mandating truck replacement without regard to economic utility will be devastating to the small business segment, the largest employers in transportation. This segment is battered by volatile fuel costs, increased permit fees, high repair costs, higher environmental fees and lower business volume. This will be a very difficult

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:20:27

No Duplicates.

## **Comment 211 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Stuart  
Last Name: Sowell  
Email Address: erniesvan@sbcglobal.net  
Affiliation:

Subject: Diesel Truck and Bus Regulation  
Comment:

The content of this letter is intended to express the disastrous implications that the regulations which CARB proposes would have on our small family owned business located in Grass Valley, CA.

We started our company in 1976 with one 1957 Studabaker 2-ton truck. In the beginning we did whatever work we could find just to make ends meet. Slowly we added trucks and manpower as Nevada County continued to grow. We built one warehouse, then another, and then another until we finally out-grew our facilities and thus acquired land closer to town, where we built our new facility, moving in July of 1998.

Our family history dates back 74 years in the moving industry. Ernie Sowell, our father and name sake of the company, started Ernie's Van & Storage in 1935 in Berkeley, CA where it ran continuously until 2001, when he sold the property and closed the company. We asked permission to use the family name when we started our company, since it was well established at the time. Dad graciously agreed to let us use the name with a warning that this was our company to sink or swim with. At first, thankfully we learned to swim, slow and steady, keeping in mind the best advice our father gave us, work hard, and be honest and fair.

If the regulations proposed by The California Air Resources Board are approved, our family business dating back to 1935 will be forced to shut it doors. The finances required to update or replace our entire fleet of trucks that we have acquired slowly over the course of the last 32 years are an impossibility for our company in today's economy where we are already struggling to remain in business in this time of recession.

We are in no way opposed to CARB's intentions of improving the air quality in California. This is a matter that they and obviously many others feel very passionately about. The problem with their proposal lies in it being the responsibility of the business owner to cover the costs involved in this transition.

How is it that the government can hand out billions of dollars to companies that have dug their own grave, yet responsible business owners must figure out how to come up with the cash to comply with regulations that must be met in too short of a time frame? If CARB is so passionate about resolving problems with the air quality in California in such a small amount of time, why can it not be their financial responsibility to insure that the funds for this sort of project are covered in order to avoid shutting down hundreds of



companies within the state resulting in increased job loss and further economic meltdown?

In addition, if CARB is attempting to pass this regulation for the sake of the environment, it doesn't make sense to simply discard thousands of perfectly functioning trucks only to use up more of our nation's resources by replacing these vehicles that have many more years of performance still ahead of them. Do they not understand the severe amount of waste that would be produced from such an event?

We as a family are proud of our service to California and wish for many more years of providing quality care to all that give us the privilege of serving them. We ask simply that greater thought is given to the distress that this regulation would pose on businesses throughout California as well as the economy and we plead with you not to approve of regulations that will result in the end of all that we have created through our hard work over the years.

Sincerely,

Douglas Sowell

Stuart Sowell

Ernie's Van & Storage

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:24:01

No Duplicates.

**Comment 212 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: D&H Transportation  
Last Name: G.Howe  
Email Address: greg@dhtransportation.com  
Affiliation:

Subject: carb regulations  
Comment:

To Whom it may Concern, Many of the regulations purposed by CARB will cripple not only the Trucking Industry in our state but every aspect of the functionality of commerce in california. We as a company are concerned about CLEAN AIR but we need to implement these regulations in a time frame that will not bankrupt the trucking industry or our STATE!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:40:05

No Duplicates.

**Comment 213 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dean  
Last Name: Marietta  
Email Address: tctruck@earthlink.net  
Affiliation:

Subject: CARB Ruling-On Road  
Comment:

The proposed ruling to reduce emissions could not have come at a worse time. We are in the middle of the "perfect storm" in the construction trucking industry. The combination of the lack of work, the high cost of buying new equipment or retrofitting current equipment, and the rates for work decreasing instead of increasing, has been the kiss of death for many companies.

We have been in this business over forty years and have never had to layoff any employees. Now, we have no choice but to cut our work force and hope we can hold on until the economy recovers. We have lost a lot of good workers.

To understand this industry, you need to take a closer look at how it operates on a day-to-day basis. You can't compare this type of trucking to over-the-road freight or any long-haul companies. If you researched this industry the same way the Port situation in L.A. was, maybe you would have a better understanding of how devastating the proposed Rules are going to be for the typical one truck owner-operator.

We all want cleaner air, but the cost to obtain it should not wipe out thousands of companies. Please delay this decision and do some more investigation and come up with a solution that everybody can live with.

Dean Marietta  
Tri-County Transportation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:44:04

No Duplicates.

## **Comment 214 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Wes

Last Name: Curtis

Email Address: commercialtruckconsulting@msn.com

Affiliation: Commercial Truck Consulting, LLC

Subject: Proposed new CARB Regulations

Comment:

Being a truck safety consultant from Grants Pass Oregon and having customers in Washington, Oregon and California, I have the opportunity to talk to a lot of motor carriers about the proposed CARB regulations. The following is what I hear from motor carriers from out of state:

1. They will quit traveling in California.
2. They are looking of ways to drop their loads at the border with California (reload yards).
3. They are worried that their states will be dumping grounds for equipment from California.

As far as my customers in California, most of them are small companies (mostly in construction) and have older equipment. There is the assumption that "old iron is bad" when in reality with the "BIT" program in California, that "old iron" has to be kept up just as new trucks are.

To make these small companies comply with the proposed new set of rules will put 90% of them out of business. The funding isn't there to assist them if they want to come into compliance and with the State of California \$15,000,000.00 short in their budget, who is going to help them? Do the math, less trucks on the road, less vehicle registration fees, fuel taxes, less jobs, who are the real losers?

I would hope the board would take into consideration our economic hard times and at the very least consider the alternative set of rules before you.

We all want cleaner air and less pollution but with the state of our economy, now is not the time to add any further burden to the very people who work hard everyday and are trying to survive.

Respectfully Submitted

Wes Curtis, Owner

Commercial Truck Consulting, LLC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 15:31:09

No Duplicates.

## **Comment 215 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kevin  
Last Name: Albanese  
Email Address: kalbanese@jbalbanese.com  
Affiliation:

Subject: On Road Diesel Regulation: DTCC  
Comment:

First, I want to assure you that Jos. J. Albanese, Inc. supports the reduction of PM and NOx emissions from diesel engines. This fact is evidenced by the hundreds of thousands of dollars we spent to comply with the PERP regulations and the additional hundreds of thousands of dollars we've committed to comply with the off-road diesel regulations. Although both of the aforementioned were well intentioned regulations, I suggest they were ill-conceived without any regard to the true economic impact on jobs and business in California.

Second, given the current economic crisis and resulting dramatic decrease in jobs, the enactment of this On Road Regulation will hurt our business while crippling the industry. This regulation, like the off-road, will force the disposal of capital equipment prior to the end of its useful life, reduce any potential re-sale value of same, and require the investment of significant capital in new equipment (or alternatively simply get out of the business).

Individually, each of the aforementioned consequences will cost jobs, tax revenue, and create an impossibility to comply given the frozen credit markets; cumulatively, they will continue to eradicate any opportunity for construction to lead the State out of its current economic turmoil.

As the engine of job creation, this is the last industry that can afford this economic assault, albeit a well intentioned one. This regulation will cost billions of dollars and last I checked, our industry is not eligible for federal bail out money!

I urge you to carefully consider the consequences of this regulation and either reject it until a better time or support the alternative proposal proposed by the DTCCC (Driving Toward a Cleaner California Coalition). The latter would give companies like ours a reasonable and flexible time frame to absorb this regulation.

Please, look at this regulation, not through a narrow view of on-road regulation, but from the global view of all the expensive regulations adopted by this Board. California needs a chance to crawl from the depths of this recession; passage of this regulation will reduce the likelihood of this happening.

Kevin J. Albanese  
Vice President/Chief Operating Officer  
Joseph J. Albanese, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 15:37:56

No Duplicates.



**Comment 216 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mike  
Last Name: Doggett  
Email Address: mike@mjtanklines.com  
Affiliation: CIOMA / CTA

Subject: New Emissions regulations TruckBus 08  
Comment:

As a small business owner and employer responsible for the livelihood 50 plus families in California the newly proposed regulations will have an enormously negative impact on us. We work on a small single digit profit margin as it is, putting any more financial burden on companies our size will simply put a number of us out of business. We all want a cleaner California, however we need to more time to allow for the implementation of cleaner burning vehicles. The standards which you are requesting are just not reasonable when it comes to emissions or particulate matter.

The mandates that are being proposed are simply too fiscally aggressive for our industry to be able to handle without extreme hardship, not only on us, but the state as a whole will feel the effects because transportation is such a large part of our infrastructure.

Simply stated, CARB is out of touch with what is reality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 16:15:56

No Duplicates.

**Comment 217 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Stephen

Last Name: Rhoads

Email Address: srhoads@strategicadvocates.com

Affiliation: Strategic Education Services

Subject: Opposition to the School Bus Regulations

Comment:

Please refer to attached testimony.

Attachment: [www.arb.ca.gov/lists/truckbus08/525-2008\\_arb\\_reg\\_-\\_final.doc](http://www.arb.ca.gov/lists/truckbus08/525-2008_arb_reg_-_final.doc)

Original File Name: 2008 ARB REG - Final.doc

Date and Time Comment Was Submitted: 2008-12-05 16:51:12

No Duplicates.

**Comment 218 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Anne

Last Name: Lamb

Email Address: [anne@rampasthma.org](mailto:anne@rampasthma.org)

Affiliation: Community Action to Fight Asthma

Subject: Support of the Statewide Truck and Bus Regulation

Comment:

On behalf of Community Action to Fight Asthma, I submit this letter for your consideration.

Attachment: [www.arb.ca.gov/lists/truckbus08/526-cafa\\_letter\\_-\\_dtr.pdf](http://www.arb.ca.gov/lists/truckbus08/526-cafa_letter_-_dtr.pdf)

Original File Name: CAFA Letter - DTR.pdf

Date and Time Comment Was Submitted: 2008-12-05 16:57:55

No Duplicates.

**Comment 219 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Henry  
Last Name: Schlinger  
Email Address: hschling@hankschlinger.com  
Affiliation:

Subject: Proposed Regulation For In-Use Off-Road Diesel Vehicles  
Comment:

Diesel trucks are one of the primary sources of carcinogenic particles breathed in by citizens and any proposed regulations that would limit, reduce, or eliminate these would benefit the public health of the State.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 16:58:05

No Duplicates.

**Comment 220 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Tony  
Last Name: Luiz  
Email Address: TLuiz@sbcglobal.net  
Affiliation:

Subject: AB 32  
Comment:

see attachment

Attachment: [www.arb.ca.gov/lists/truckbus08/529-ab32.doc](http://www.arb.ca.gov/lists/truckbus08/529-ab32.doc)

Original File Name: AB32.doc

Date and Time Comment Was Submitted: 2008-12-05 17:16:15

No Duplicates.

## **Comment 221 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Micheal

Last Name: Collier

Email Address: mike@cdmatthes.com

Affiliation: Operations Manager Cd Maththes, Inc.

Subject: Proposed Truck And Bus Rule

Comment:

By industry standards, CD matthes is a small company with 20 power units and 45 57 foot trailers. We have 2 owner operators that work with us as well. We are a speciality carrier in the fact that we have just 57 foot trailers and haul empty food and beverage containers. The proposed rules, as they a currently written, will effectively outlaw 57 foot trailers in the State of California. The companies that use this type of trailer are required to maintain an overall length of 65 feet or less. This requires a small cab over engine truck with a cab no larger than 75 inches. There is no truck maker in North American building any of these trucks any longer. All production appears to have ceased in 2004. The NOX retro fit kits will not fit on these trucks and still be able to maintain the 65 foot rule. Newer engines will not fit into the the engine compartment as they are to large for the available area.

This leaves the few carriers that use these trucks with only 2 options. By new conventional trucks and new 53 foot trailers or go out of business. We want to comply with the new rules but the cost is prohibitive to a small company like this one in such a short time frame. CD Matthes grew to its' present size from one truck over a period of 23 years. These rules will require us to purchase an even greater number of new trucks and trailers in 2 to 3 years. The cost of this equipment will be somewhere around 4 to 5 million dollars. This company's gross revenue per year is approximately 3.5 Million.

If we can afford to re-equip our entire fleet in such a short time period, we will need to place an extra 3 trucks on the road to be able to haul the same volume of product we are hauling now. This, of course, would be at a greater cost to the customer because it is 3 more loads than what we are currently hauling. We would also need to increase our current rates by 10 to 15 percent to cover the cost of new equipment. We do not believe that the current market will bear this cost. That bottle of water that used to cost \$1.50 will probably cost \$2.00 after this happens.

Basically, If we do nothing we are out of business. If we try to comply with the new rules we will go out of business. We need a better soultion to this problem. We need a soultion that will not destroy the States's ecomony by bankrupting the states trucking infrastructure. Only the very large companies will be able to survive and do business in California. They will not be able to handle the volume of product to be hauled and therefore the cost of everyday products will rise because the surviving carriers will set the rates at much higer prices due to less competition for the

freight.

In short these rules will wreak California's economy and destroy our ability to compete in the world market place.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 17:53:34

No Duplicates.

**Comment 222 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Egger  
Email Address: etrucking@hotmail.com  
Affiliation:

Subject: AB32  
Comment:

12/5/08  
Governor Arnold Schwarzenegger  
Members, California Legislature  
California Air Resources Board

I have owned a Dump Truck since 1986 and have been paying taxes, permits, fees, insurance, registration, ect. For 22 years. In 1996 I purchased a new truck, its clean Running, well maintained and looks great. The last 3 years in Construction has been slow and been tough to make a profit. We may have 3 more rough years ahead of us. Many of us will not survive. It will many years before I can afford to up grade into a newer Truck, well after your proposed deadline of AB32 ON 12/31/11.

I looked into funding support, but I did not qualify because last year I only drove 20,000 miles regionally in San Diego. At this time I could not afford any Truck payment.

If you pass your current proposed time lines I will be put out of business and rather then paying taxes I will be collecting unemployment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 22:46:50

No Duplicates.



**Comment 223 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Betty  
Last Name: Plowman  
Email Address: betty@cdtoa.org  
Affiliation: CDTOA

Subject: Truck-Bus  
Comment:

As we near the vote for the Truck/Bus Rule, it is becoming apparent that CARB Staff is immune to what happens out here in the real world, where hard working folks are losing their equipment, homes, medical insurance and can barely afford to feed their families. While unemployment figures continue to rise, there is one group you do not have statistics on, and that is of the small, independent operator. In the construction trucking industry we are entering our second year of declines. Many are sitting, unable to pay either registration or insurance. They are unknown to any government agency because they are not anyones employee.

While your incentive funding and loan programs are to be commended, it is "too little,too late," we have no work. I believe we are seen as "collateral damage." Please consider the DTCC Alternative.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-06 03:38:21

No Duplicates.

**Comment 224 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Audrey

Last Name: Alorro

Email Address: aalorro@sbcglobal.net

Affiliation:

Subject: Diesel Truck Rule

Comment:

If there is any doubt that diesel emissions need to be eliminated or at least regulated, read the series currently running in the Merced Sun Star about health in the Central Valley. (<http://www.mercedsunstar.com/sowinghope/>) They are repeating the same statistics that we all know, e.g., the high rate of asthma in children, poor air quality, etc. Is anyone listening besides the choir? Do we need to draw a picture showing the connection between vehicle emissions and poor health? We need much more than the DTR, but it is at least a step in the right direction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-06 12:10:23

No Duplicates.

## **Comment 225 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Thomas R.  
Last Name: Knapp  
Email Address: tknapp5@juno.com  
Affiliation:

Subject: Standards for diesel-powered vehicles  
Comment:

California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Premature deaths from fine airborne particulate matter

Dear Board Members:

I am writing to you concerning the October 24, 2008 staff report entitled "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California", which was subsequently cited in the November, 2008 report by Hall, Brajer, and Lurmann entitled "The Benefits of Meeting Federal Clean Air Standards in the South Coast and San Joaquin Valley Air Basins". My principal concerns are these:

1. In neither document is the term "premature death" defined. In the section on public comments and staff responses (Appendix 5) of the staff report, BNSF Railway expressed that same concern (Point # 19). I found the staff response to be unsatisfactory. Expected based upon what? Air pollution only a contributing factor and not a cause of death? Then why emphasize it? Hall et al. claim a reduction of 3860 such deaths in SC and SJ for age 30+ and 13 for infants if the proposed standards are met. That degree of precision is unwarranted.
2. No "de minimus" value of PM 2.5 was ever provided. (BNSF also asked about that in Point #19.) I think there should have been. Our air will never be perfectly pure.
3. In parts of the report relative risks were reported as increases of 10% and 3%, rather than the conventional values of 1.10 and 1.03 that are used in epidemiology. And I take exception to the response to Point # 26 raised by JDD: "It is interesting to note that no epidemiological organization has agreed to this standard of evidence [a RR of 2.0 or higher]." See the attachment to this letter. RRs of 1.1 and 1.03 are very much of a size that an unmeasured confounder could be the cause of the RR.
4. In the Executive Summary the authors referred to "uncertainty intervals". Do they mean confidence intervals? (Confidence intervals are not appropriate, since there was no random sampling. I taught statistics for 42 years and still serve as a statistical

consultant.) Or are those intervals solely connected with the various sensitivity analyses that were employed? The "uncertainty intervals", whatever they are, should reflect the fact that multiple factors are under consideration and the bounds specified in the report are almost certainly too narrow.

5. As suggested by several of the peer reviewers, the  $\hat{\alpha}$  impact equation for estimating numbers of premature deaths should have been more carefully explained, especially how the value of  $\hat{\alpha}$  and its bounds are estimated.

The purpose for my writing to you now is my understanding that on December 11th of this year a decision might be made to require diesel-powered vehicles to meet standards for air pollution that would cost the trucking industry billions of dollars. I recommend that the December 11th decision be deferred until a later time, since there are so many technical problems that remain to be resolved.

Respectfully submitted,

Thomas R. Knapp (Prof. Emer., University of Rochester and The Ohio State University)

Att:

Attachment: [www.arb.ca.gov/lists/truckbus08/539-05\\_numberwatch\\_rr.pdf](http://www.arb.ca.gov/lists/truckbus08/539-05_numberwatch_rr.pdf)

Original File Name: 05\_NumberWatch RR.pdf

Date and Time Comment Was Submitted: 2008-12-06 12:26:02

No Duplicates.

**Comment 226 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Eric  
Last Name: Rader  
Email Address: erader03@comcast.net  
Affiliation:

Subject: Diesel Truck Rule  
Comment:

I do not think further regulation of diesel trucks is warranted. This would add a huge cost to the trucking industry. It would wipe out the smaller haulers and make all goods delivered by truck more expensive. Diesel pollution is minor compared to the cost of cleaning it up. Go slow, if at all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-06 13:19:25

No Duplicates.

**Comment 227 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dean

Last Name: Gabrelcik

Email Address: bowser00@gmail.com

Affiliation: Truck Comp. Owner, Mobil Diesel Service c

Subject: Carb

Comment:

Fight for this hard as you can I don't think this subject is even close to being fair how can the government expect us as owners pay for there mistakes, if these trucks weren't compliant when they were built than why let them be sold to begin with? Also the economy is not in good shape and you want us to spend more money to just put us further into a recession? Also how can it be legal to make us retro fit our trucks to meet emissions when they approved for operation before on public highways? If they plan on going ahead with particulate systems and carb action then the government should be able to pay for all expenses and retro fits due to they allowed them to be manufactured to begin with, I think they say thats an Indian Giver(ya know the old saying givith and takith)! Please fight for this I think everyone in the gov. sector has to sit back and look at what the final out come is going to be, more expensive trucking and putting most every small outfit out of business, and sit there and call that fair!!!! HMMMM

Dean Gabrelcik

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 08:22:15

No Duplicates.

**Comment 228 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Bryan  
Last Name: Bloom  
Email Address: bryan@prioritymoving.com  
Affiliation:

Subject: CARB regulations as proposed for Diesels  
Comment:

Please do not pass this regulation. It will kill our business and  
we will leave the state with our trucks. Please read attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/545-carb\\_leter.pdf](http://www.arb.ca.gov/lists/truckbus08/545-carb_leter.pdf)

Original File Name: CARB leter.pdf

Date and Time Comment Was Submitted: 2008-12-07 11:01:34

No Duplicates.

**Comment 229 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Thomas  
Last Name: Grave  
Email Address: tgrave@sbcglobal.net  
Affiliation:

Subject: Diesel Truck Rule  
Comment:

I am writing to voice my support for the strongest regulations governing diesel-truck exhaust emissions. We need to work together to find additional ways to fund the necessary retrofits, and in many cases the purchase of improved engines, which will significantly reduce the pollution caused by on-road diesel vehicles. The health of all Californians, including the drivers of these trucks, is at stake. Sacrifices will have to be made to protect our health, and we are willing to make those sacrifices.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 14:03:12

No Duplicates.



## **Comment 230 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ed  
Last Name: Welch  
Email Address: edwelch08@gmail.com  
Affiliation: Save the Air in Nevada County

Subject: In-Use Diesel Truck  
Comment:

In-Use Diesel Truck Rule

"Monika, honey, five more minutes, then I want you and your friends to come inside."  
"Five minutes, why Dad? We want to stay outside."  
"The day, sweetheart...it just isn't good to be outside."  
"Why, Daddy, we want to play on the swing set!"  
"It's....well... the air...it's not a great day. Let's do an art project."  
"NO, Dad! I hate you! We're staying outside!"

Painful arguments persist throughout the Sierra Foothills during the hot summer months between concerned parents and their children. The Ozone levels rise to unsafe parameters and parents start negotiating, and then forcing their children to retreat to the relative safety of indoors.

Nevada County is a beautiful, amazing place to live and raise your children. Nestled in the Sierra Nevada Foothills, we escape urban congestion and rest in the solitude of these sacred hills. One persistent problem, however, is air pollution. According to EPA rankings, elevated Ozone levels during the hot summer month's ranks our county as tied for the 10th worst in the entire nation. One in six kids have been diagnosed with asthma, a rate higher than the overall California average.

And every fall, we brace ourselves for questions about whether it is wise to continue living here. Last September, two friends, both medical doctors, chose to leave because their twin 4 year-old daughters were showing signs of pulmonary distress. After consulting a pediatric pulmonologist at Stanford, they decided the risk of staying outweighed the comforts of the hills. My heart sank. My wife and I also have two small children of similar ages, so how could we stay when two doctors have chosen to leave.

In short, we love our lives here and cherish our community of friends. For now, we have decided that if we can travel every summer for up to eight weeks with those young, developing lungs, maybe we can make it work. It means extra expense, separation from family and friends due to work obligations, and a pretty dramatic disruption of our lives.

After deciding to stay, I got heavily involved with a local organization called Save the Air in Nevada County (STainNC). We are seeking to educate the public about the air quality problems

and join the forces advocating for clean air solutions within our region and the entire state.

One very important clean air solution is coming before the Board at the California Air Resources Board (CARB), the in-use Diesel Truck Rule. This rule concerns the 1.1 million heavy-duty and medium-duty diesel trucks, which operate within California regularly, driving approximately 47 million miles per day.

Diesel truck pollution accounts for 40% of the Particulate Matter and up to 50% of the Nitrous Oxide (a key ingredient in formulating ground-level Ozone) pollution in California, which costs approximately \$28 billion dollars annually from hospitalizations for respiratory and cardiovascular ailments, asthma treatments, lost work days and school absences. In 2008, an estimated 4,800 premature deaths will occur, which are directly linked to diesel truck pollution!

The rule would first phase in particulate matter filters for all appropriate diesel trucks, then require owners to repower or retrofit trucks to reduce NOx emissions over a ten year period between 2013 and 2023. Grants and loans will be available to help trucking companies with expenses. All Californians must willingly share the costs of this rule, which is vitally important to the health of our communities.

When fuel burns, lungs suffer. The cost of driving trucks and vehicles is far more than the original purchase price, fuel costs, maintenance, and insurance. Our children, the elderly, athletes and all outside workers suffer. Our population and our lifestyles have reached a point where avoiding all related consequences is no longer possible. Now, we must pay the true costs of transporting and receiving goods, by cleaning up the diesel truck industry.

By Ed Welch, a Board member of Save the Air in Nevada County lives in Sierra Foothills with his wife and two daughters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 14:14:05

No Duplicates.

## **Comment 231 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Peter

Last Name: Yoss

Email Address: pyoss@goldenwestmoving.com

Affiliation: C.M.S.A. / AMSA

Subject:

Comment:

The Honorable Governor of the State of California  
State Capitol Building  
Sacramento, CA 95814

Governor Schwarzenegger:

The California Air resources Board is considering the adoption of an on-road diesel truck and bus regulation. It is obvious that the zealously of today's society to Go Green and the political votes being gathered by the politicians has spurred legislature. This is catastrophic, not only to the trucking industry, but to the very pockets of the California consumer.

Are you aware of the cost, per vehicle, for owners of trucks to comply with this legislation? The cost, today, for a truck to be fitted with an APU unit, which allows the trucker to have air conditioning in the summer, and heat in the winter while we are sleeping in our sleeper births is an average of 10,000.00 \$ for any worthwhile unit. The no idle law has put that burden on all truckers that run the road and sleep in their sleeper births. The cost of an additional filtration system to comply with the carb legislature is equal. Should I just send the keys to my company to the state of California now? Why should I even think of the almost 30 years I've spent building it.

Are you and the legislatures ready to answer their consumer when he or she is breathing the same air but cannot afford to buy anything in the store because the cost of transportation has put the cost of goods out of sight? How do you think that we are going to recoup these costs? According to the CARB board there are 440,000 trucks registered in this state, and 1,000,000 others that enter it.

It bothers me to no end to think of the people of California or any state, local, county, and state wide, and their attitudes to the trucks and trucking industry. No one wants us in front of them on the road. No one wants us on their street or parked on the side of the road. How do your constituents think every product they buy, every chair they sit on every bed they sleep, every car they drive in, got to where they bought them? There would be nothing if the truck didn't deliver it. I hiked through Europe years ago, and I can tell you that the trucker and truck bring the goods to towns were revered. It's sad that we are portrayed as a nuisance. The truck and trucker are a great source of revenue for all levels of government. The rules and inspections alone make us an absolute target for being ticketed. We're a great source of revenue. Give us a break.

Why don't you consider letting attrition take care of the trucks that are old? The truck builders will make lots of money adding all these new devices on their new trucks. But at least the companies, small and big, will be able to get the most out of their present fleet, and when we buy new and get rid of the old we won't have to do it all at once. You want to breathe better, let us breath also. Thank you very much  
Peter M.Yoss

President and founder  
Golden West Moving Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 15:21:44

No Duplicates.

**Comment 232 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Joseph  
Last Name: Silva  
Email Address: silvajp@yahoo.com  
Affiliation:

Subject: Unfiltered diesel exhaust - a public meanace  
Comment:

The facts are clear - unfiltered diesel exhaust damages the lungs of everyone nearby, especially children, the elderly, and those with cardiovascular illness. It's a public meanace.

In addition the nitric oxides are painful to the nose and eyes...a public neusance.

CARB has an oppportunity to right this wrong, I strongly urge the board to vote in favor of regulations to clean the diesel trucks and buses on or roads.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 16:08:15

No Duplicates.

## **Comment 233 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: George  
Last Name: King  
Email Address: booszoo@netzero.com  
Affiliation: CDTOA

Subject: On Road Diesel comments

Comment:

I am a 62-year-old owner operator with one construction dump truck that is very well maintained and with low mileage usage. I planned to use this vehicle until my retirement, which should have been in 2014. However, with the regulations you are proposing that will not be possible. I will be faced with an additional financial burden to keep my business operational. These very costly proposed regulations will definitely put me out of business.

With the proposed regulations, my vehicle investment will have a zero dollar value. Selling it with the proposed regulations will not be an option. It now has no value at all because of the proposed regulations. There will be no option of selling to obtain money for a new vehicle. Ms. Nichols suggested that everyone affected by this proposal could ship his or her equipment to other states to be purchased. Of course at a cost to us as business owners, which means we are losing more money. The likelihood of other states wanting our equipment is an unlikely scenario.

I am troubled as to how the board and Ms. Nichols are making decisions regarding these regulations without the knowledge of what it takes an individual owner operator to maintain their business. These regulations as they are projected within the timeline proposed will affect the owner operator far more than a large company.

I understand the need for clean air as my grandson has an airway disease. However, a reasonable solution must be enacted. The DTCC solution would assist in the cleaner air and allow companies to gradually make the changes needed.

Maintaining my business with the slowdown of construction and the economy is extremely challenging. This business is my only source of income and the business that supports my family. If the proposed regulations are instituted as proposed, I will be left with NOTHING, no business or job, no income, or any retirement. My plans to pass on this business to my grandson and provide him with a future will certainly no longer be possible.

All of you who have my fate and the fate of all owner operators in your hands will continue to have job security, benefits, and retirement provided to you.

I hope you will consider the devastation you will be imposing on those of us who have worked hard to build our businesses and will be left to try to start over at another career. Not that the board

is concerned but, consider what it will be like trying to start over with a new career at my late age without a secure future.

In conclusion, I support cleaner air and the need for a solution, however, the ability to support myself and my family must be taken into consideration. Please consider the DTCC solution and the state of the economy. If the regulations are placed into affect as proposed, in the timeline projected, there will be thousands of people who will become unemployed. If the requirements and timeline are changed possibly, we can continue to operate, not placing a burden on the state or ourselves until the recession is over.

Thank you for your consideration,  
George King, King Trucking

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 17:32:19

No Duplicates.

**Comment 234 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sal  
Last Name: DiSalvo  
Email Address: Sal0548@aol.com  
Affiliation:

Subject: Proposed CARB Regulations for trucks  
Comment:

I have been in the trucking business for 35 years. I have been through many ups and downs in this business. I regret to say that CARB proposals will put many trucking companies out of business. We are barely making ends meet now. This will be the straw that breaks the camels back, not only to the trucking industries, but to all of California. My truck is a 2001 model with 232,408 original miles. That's an average of 29,501 miles per year. You are going to allow out of state non CARB trucks to operate in Ca. that will be putting more miles in Ca. than I will. Are you going to require they conform to the same rules that we do? Also, what about the Mexican and Canadian trucks. The recession that we are going through now will be nothing compared to what will happen if these regulations are pass. I believe that the requirements should met as the older trucks are replaced by the new ones. We all want cleaner air, but not at the expense of a total economic meltdown. IT WILL HAPPEN. Sincerely Sal DiSalvo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 18:49:05

No Duplicates.



## **Comment 235 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Larry and Dianne

Last Name: Long

Email Address: ldt@npgcable.com

Affiliation: L & D Transportation (Sole Proprietorship)

Subject: Statewide Truck and Bus Regulation 2008

Comment:

Larry and Dianne Long do support the state's efforts to improve air quality. Our problem with the proposal is the timing and the cost factors.

We are a single-truck sole proprietorship in San Bernardino County, California. We purchased our 2000 Freightliner in 2004 and replaced the engine (Cost \$30,000) in late 2006. Because we had good personal and business credit, we have been able to stay in business to this point and because we know how to manage money and control costs.

During the year 2008, the trucking industry saw the highest fuel prices in history. No one at the state or federal government level did anything to help us and many owner-operators stopped operating in California, many refused to come to California because of the anti-idling laws, and now they will refuse because of the impending regulations that will require expensive changes for all truck owners.

Right now, the economy of the entire country is in a mess. Things are not going well in California either. Since every resident and visitor breathes the same air, why isn't there a fee for breathing?

We can understand the need to reduce pollution. So, why not test individual trucks to see just how much pollution they are producing? Using those results, create programs that will assist the owners of the polluting equipment make the needed changes.

We are not currently in a position to make expensive changes. The SmartWay program refers us to lenders that want 12% or more as the interest rate for APU equipment that avoids the idling of the truck's engine while parked for US DOT's REQUIRED 10-hour rest period. Between the cost of the equipment and the cost of the loan on it, there will be no saving to the equipment owner, at least, not now, when the fuel prices have come down again.

Why is it that there are no sole operators represented on the CARB committees when the CARB's plans directly affect them? The CARB has chosen to ignore our pleas from the beginning.

Individual drivers have no control over the rules under which they must operate. Air quality is important, but so is driver safety. A tired driver, whether driving a car, motorcycle, bus, or truck) is a dangerous driver.

The CARB and other concerned branches of government need to consider more than only what they want. They also need to take into consideration the impact these rapid changes and new regulations will have on the sectors affected. In other words, let's use some common sense.

For the most part, the trucks that are producing the most pollution are those that run short-haul from the ports to distribution centers outside of the port areas. The trucks going into the ports are very old, not maintained to the same degree as most over-the-road trucks are; and they are subject to fewer in-depth inspections because they rarely cross a scale where they can be inspected periodically.

In an ideal world everyone would always have the money needed to make desirable changes as soon as possible. This is not that time. Inadequate thought about the consequences for small fleets and individual truck owners is the big problem for us who are trying to stay in business in a failing economy in an industry that is over-regulated anyway.

Please use some common sense and create more and better opportunities for those of us who want to comply to do so without having to face bankruptcy in the process. Even postponing these changes for another five years would allow those of us who reside and have a business in California to make preparation and put more money aside for the required changes.

Thank you for your consideration of our comments.

Larry & Dianne Long  
Owners  
L & D Transportation  
(A California Sole Proprietorship)  
PO Box 1080  
Earp, CA 92242-1080  
760-665-8131  
ldt@npgcable.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 22:40:02

No Duplicates.

**Comment 236 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark

Last Name: Ostrow

Email Address: mostrow@aol.com

Affiliation:

Subject: Street Sweepers

Comment:

Using the latest recommendations, I will be forced to shut down my entire operation. I currently have 30 employees and 10 trucks. We are the solution to Waste Water Run off and these regulations, while helping air quality will impact water quality. The EPA has mandated requirements for Storm water quality. It is obvious that the Air Quality Board has not taken in consideration Storm Water Quality in regards to Street Sweepers. Many of our trucks are considered highly modified and cannot be adapted to meet these new standards. Most of the small sweeper business which have older machines that are not manufactured anymore, will be forced to shut down. Rates will sky rocket and municipalities who all have major budget issues will be forced to lower service or eliminate service. This will be a pollution disaster. WE ARE A SOLUTION, NOT A POLLUTER. WE COLLECT MUCH MORE THAN WE PRODUCE. I have read the staff report and its just wrong. 2010 is going to be a distaster for California water quality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 06:08:58

No Duplicates.

**Comment 237 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert

Last Name: Walker

Email Address: rwalker6@aol.com

Affiliation:

Subject: statewide truck and bus regulation 2008

Comment:

I am opposed to the proposed regulation to retrofit or replace all diesel vehicles over 14,000 pounds. I am a small, one truck owner, and I simply can't afford it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 07:31:17

No Duplicates.

**Comment 238 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jamie  
Last Name: Song  
Email Address: jsong@meca.org  
Affiliation: MECA

Subject: Comments on ARB Proposed Regulation for In-Use On-Road Vehicles  
Comment:

Please find attached MECA's public comments on ARB's Proposed Regulation for In-Use On-Road Diesel Vehicles.

Regards,  
Jamie Song

Attachment: [www.arb.ca.gov/lists/truckbus08/561-arb\\_in-use\\_on-road\\_vehicles.zip](http://www.arb.ca.gov/lists/truckbus08/561-arb_in-use_on-road_vehicles.zip)

Original File Name: ARB In-Use On-Road Vehicles.zip

Date and Time Comment Was Submitted: 2008-12-08 08:52:55

No Duplicates.

**Comment 239 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Brian  
Last Name: Paquette  
Email Address: bgptrucking@sbcglobal.net  
Affiliation:

Subject: 08 diesel exhaust regulation  
Comment:

I own 98 tractor spece,d for light weight specialized trailer.Overhauled cummins engine with lo-nox overhaul kit, purchased apu. run 150,000 mi a year about 10,000 ca would be happy to install particulete filters but funny thing nobodys got one for my truck apu found one 1389.96.so before you run me out of business check to see if equipment is available to comply with new regulations or give manufactures and trucking companys a fair amount of time to install and comply with new law .I live in the imperial valley how are you going to control all the farm equipment [tractors,crawlers,swathers,pumps,field harvesters etc,] just driving around in 2 days i counted 89 pieces of equipment blowing diesel exhaust.and calif. is a one damn big farmfield spotted with a few cities The economy is bad freight is at a all time low freight rates suck and companys are going under daily.so give us some decent time to comply and manufactures time to build equipment needed to upgrade exhaust systems as some of us do not want to forced to buy high priced trucks because grants,discounts,tax breaks,you have to be able to make the money before you can spend it and right now over a million people laid off no money ,no purchasing,no trucks needed to deliver goods.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:04:37

No Duplicates.

**Comment 240 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ric

Last Name: Costales

Email Address: rcostales@co.siskiyou.ca.us

Affiliation: Siskiyou County Nat. Resource Specialist

Subject: Proposed Amendments to CCR Titles 13 and 17

Comment:

Attached is cover letter and Resolution adopted by Siskiyou County on December 2, 2008 about the proposed amendments.

Attachment: [www.arb.ca.gov/lists/truckbus08/563-carb\\_resolution\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/truckbus08/563-carb_resolution_to_carb.pdf)

Original File Name: CARB Resolution to CARB.pdf

Date and Time Comment Was Submitted: 2008-12-08 09:07:21

No Duplicates.

**Comment 241 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Patrick  
Last Name: McGinnis  
Email Address: bdmusic1@sbcglobal.net  
Affiliation:

Subject: Diesel pollution  
Comment:

Diesel trucks and buses should be held to the same air pollution laws that have been applied to autos. The fuel source and the technology exists but the trucking industry doesn't want to spend the money to upgrade.  
Farm vehicles should be required to conform as as well.  
In addition, diesel biofuels could be made more available along major interstates. The biofuels have already proven to be less polluting.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:07:49

No Duplicates.



**Comment 242 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Martin

Last Name: Ward

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

Affiliation: Mid-Placer Public Schools Transportation

Subject: Proposed 2025 Truck Bus on Road Regulation

Comment:

Please see attached file containing a

Attachment: [www.arb.ca.gov/lists/truckbus08/566-arb\\_2025\\_comment\\_letter\\_-\\_mary\\_nichols.doc](http://www.arb.ca.gov/lists/truckbus08/566-arb_2025_comment_letter_-_mary_nichols.doc)

Original File Name: ARB 2025 Comment Letter - Mary Nichols.doc

Date and Time Comment Was Submitted: 2008-12-08 09:24:47

No Duplicates.

**Comment 243 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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

Subject: DUMP TRUCKS RECEIVE NO FUNDING - NO MILES

Comment:

IN PROJECTS IN THE CITY OF LOS ANGELES, PORTS, FREEWAYS REQUIRING 2004 OR NEWER ENGINES IS A JOKE. THE NEWEST TRUCK IS AROUND A 2002..... GOOD LUCK TO THE STATE IN FINDING 2004 OR NEWER TRUCKS TO DO CONSTRUCTION TRUCKING.

"DUMP TRUCKS" DO NOT RECEIVE FUNDING FROM THE STATE OF CALIFORNIA SINCE WE DO NOT DRIVE ENOUGH MILES.... DOES ANYONE KNOW THAT OR IS SCHWARZENEGGER AND HIS GANG ARE THEY AWARE??

"EVERYBODY SAYS THE STATE HAS TOO MANY LAWS, AND YET EVERY MAN THINKSS HE KNOW OF A LAW THAT OUGHT TO BE PASSED. IGNORANCE OF THE LAW IS NO EXCUSE, EVEN TO THE LAWMAKERS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:31:30

No Duplicates.

## **Comment 244 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: C. Edmund  
Last Name: Wright  
Email Address: cedmundwright@mac.com  
Affiliation: Non California Fleet Owner

Subject: Diesel emission regs  
Comment:

Is it any wonder that the entire housing industry and economy of your beautiful state is in trouble? I must say, as a contractor with a fleet of vehicles, this is one of those moments when I am glad that I operate 3 thousand miles away from the clutches of Kalifornia's government.

I have friends and associates in Calif whose businesses will be devastated by this legislation. These are intelligent and careful business owners who realize what the government often does not -- the fact that businesses must first successfully bring in a dollar before it can be taxed or regulated -- or else there is no reason to have a business.

This legislation will make that first step, bringing in a dollar, very difficult indeed. It will make bringing in that dollar illegal in many cases frankly. This legislation will, as evidence presented to your office has demonstrated, terminate a lot of businesses. It is simply not practicle or possible to instantly turn over or retrofit expensive motor vehicle equipment. This was true even before the recent credit tightening.

This will also have a huge ripple effect on all California citizens. They apparently have no idea how the trucking industry effects every aspect of their lives, and by extension, have no idea how those apsects are about to come to a screetching halt. These ripples will further harm an already limping economy.

CARB can make laws as a matter of legal fiat. That does not mean, however, that the citizens are immune to the laws of unintended consequences and the laws of supply and demand. If this diesel legislation is successful, those two laws will be some large ugly chickens that will indeed come home to roost.

I suggest these factors be considered carefully before any moves are made to make futher sacrifices on the alter of politically correct environmentalism.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:50:48

No Duplicates.

**Comment 245 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sofia  
Last Name: Sarabia  
Email Address: [ssarabia@crpe-ej.org](mailto:ssarabia@crpe-ej.org)  
Affiliation:

Subject: Submission of joint letter on Statewide Truck and Bus Rule  
Comment:

Attached please find a joint comment letter on the proposed statewide truck and bus regulation.

Attachment: [www.arb.ca.gov/lists/truckbus08/569-12.8.08\\_ltr.to.arb.re.truck.rule.pdf](http://www.arb.ca.gov/lists/truckbus08/569-12.8.08_ltr.to.arb.re.truck.rule.pdf)

Original File Name: 12.8.08\_ltr.to.ARB.re.truck.rule.pdf

Date and Time Comment Was Submitted: 2008-12-08 09:52:57

No Duplicates.

**Comment 246 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: john  
Last Name: frailing  
Email Address: john.frailing@frkdlaw.com  
Affiliation: n/a

Subject: support of diesel fuel truck regulation  
Comment:

the latest medical research indicates that the cases of asthma are increasing exponentially in the central valley specifically and california generally. one of the two major causes is the exhaust from all vehicles and especially diesel vehicles. for the health of the population we should have stronger regulation of all vehicles esp diesel trucks. this can be easily and inexpensively provided by the industry (protestations to the contrary, notwithstanding). i encourage you to fight for the health of all californians!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:13:04

No Duplicates.

**Comment 247 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Andrew  
Last Name: Vasconi  
Email Address: aj@ajvasconi.com  
Affiliation: EUCA

Subject: on-road diesel truck and bus regulation  
Comment:

At this last hour I once again implore you to at a minimum review the Legislative Analyst (LAO) report on the impact of implementation of AB 32. The LAO report raises serious questions regarding the methodology of the scoping.

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 families, our employees and all Californians. However the proposed regulation places a significant economic risk on this State and jeopardizes future viability in almost every industry. Industries that are already reeling from unprecedented financial turmoil.

The economy of this state is on the ropes. Moving forward with these measures at this time will be the final KO. Your responsibility is not only to the health of the people and our environment but also to their financial welfare.

Please prevent this crippling regulation from moving forward.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:17:09

No Duplicates.

**Comment 248 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Plowman  
Email Address: svopwr@aol.com  
Affiliation:

Subject: Proposed diesel Regulation 2008  
Comment:

To whom it may concern, I am againsts the new proposed diesel regulations due to the extreme financial hardship it will cause me to replace my one truck. I have been an owner-operator since 1972 and operate one tractor and trailer. Since I am caught in a time period that I am too young to retire but too old to seek employment as a driver or anything else and if I am forced to replace my equipment I cannot afford in order to stay in business. My operation only requires me to travel 15-20K miles a year to service my customers and my income cannot justify the huge additional expense of a new truck or a very expensive retro-fit that, at best is unproven and unreliable. This technology has not yet been tested and the long term effects on engines and the equipment itself is not known. Please do not force me to add unproven and untested equipment to my truck that may effect the reliability of it. Thank you for your time to read this. Sincerly, Robert Plowman,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:33:40

No Duplicates.



**Comment 249 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tracy  
Last Name: Ferea, Ph.D.  
Email Address: tferea@gmail.com  
Affiliation:

Subject: Diesel Pollution Impacting Our Health  
Comment:

Dear Air Resources Board,

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Thank you from my entire family,

Tracy Ferea, Ph.D

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:37:58

No Duplicates.

**Comment 250 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Karen

Last Name: Hardy

Email Address: khardy@mail.cho.org

Affiliation: children's hospital oakland

Subject: diesel fuels and pulmonary health

Comment:

I am the director for the pediatric pulmonary and cystic fibrosis division at CHRCO Children's Hospital and Research Center at Oakland. Everyday I take care of many children with asthma and other lung diseases who are negatively impacted by the pollution in our city. The increase in admission and death from asthma is directly correlated with proximity to freeways and this alone is a great reason to remove this risk from the lives of californians. I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:43:55

No Duplicates.

## **Comment 251 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jim  
Last Name: Tognazzini  
Email Address: jim@togbev.com  
Affiliation: CTA

Subject: Air Quality and Trucks  
Comment:

There should be a exemption for low use vehicles, those used 45 days or less a year, these should not be under the same constraint as the other vehicles. Also we should have a division, for small companies that drive less than 30,000 miles per year, per vehicle. They should have a more relaxed phase in, say one vehicle by 2011, another by 2015, another by 2019. The reason is we have to pay for these new vehicles, through operations; otherwise we will only have a lease option available to purchase new vehicles, with a balloon payment sometime in the future. As a owner of 3 trucks that drive weekly and a spare truck that drives only when we have holiday routes, 10 days a year, this proposed ruling would make us get rid of the spare truck, cause us to buy imperfect trucks earlier than the manufactures can produce engines that will meet the future specifications. I am told by a International dealer that a 2010 spec engine will not be available until 2011 model year which means late year 2010. Why would I want to buy any interim motor that would not meet even the 2010 spec? California would be further ahead to have the vehicles purchased as the technology is available to meet their specification.

In my business we can run a truck for 20, twenty years, currently I have a 15 year old truck with 273,377, 1519 miles per month, the motor was rebuilt in the last twelve month, no smoke or visible particulate. I have a 12 year old truck with 309132 miles, 2146 miles per month, motor was rebuilt in the last six months, no smoke or visible particulate. I have a ten year old truck with 169,099 miles, 1409 miles per month, not yet rebuilt, no visible smoke or particulate. The 24 year old spare truck has less than 600 miles this year, and it is used on the holiday route, ten days a year and if another truck needs repair in a shop for a few days. This truck has been in spare status since 1996 when we purchased the other replacement truck. Its motor was rebuilt after we bought it around 1992, it was a used truck so it had higher existing miles and very little miles since 1996. No smoke or visible particulates.

Let me sum up what I have stated above, small businesses cannot afford to take on several new trucks in a very short time. If a truck runs only limited mileage it should be exempt, as long as it passes the smoke test for its model year. As can be seen from my average miles driven, we are not the target market to effect a large change on air quality that will be for trucks that drive more than 1000 miles per week. Please focus on these individuals, as, the greatest improvement to air quality will be seen sooner than, a one size solution for all of us truck owners.

I employ 12 people, three use trucks, even the economy is sluggish we will come out the other side with no lay offs. But if I have to buy new equipment, on a short schedule, we will have to lay off at least one to three individuals to meet the debt burden, depending on the time frame between the purchases.

If we have a slower phased in purchase schedule, I can buy the trucks and still retain my employees, driving cleaner motor trucks than what is available in the next three to four years. Also, there should be an exemption for low use vehicles, those used 45 days or less a year, these should not be under the same constraint as the other vehicles. Also we should have a division, for small companies that drive less than 30,000 miles per year, per vehicle. They should have a more relaxed phase in; say one vehicle by 2011, another by 2015, another by 2019. The reason is we have to pay for these new vehicles, through operations; otherwise we will only have a lease option available to purchase new vehicles, with a balloon payment sometime in the future. As a owner of 3 trucks that drive weekly and a spare truck that drives only when we have holiday routes, 10 days a year, this proposed ruling would make us get rid of the spare truck, cause us to buy imperfect trucks earlier than the manufactures can produce engines that will meet the future specifications. I am told by an International dealer that a 2010 spec engine will not be available until 2011 model year which means late year 2010. Why would I want to buy any interim motor that would not meet even the 2010 spec? California would be further ahead to have the vehicles purchased as the technology is available to meet their specification.

In my business we can run a truck for 20, twenty years, currently I have a 15 year old truck with 273,377, 1519 miles per month, the motor was rebuilt in the last twelve month, no smoke or visible particulate. I have a 12 year old truck with 309132 miles, 2146 miles per month, motor was rebuilt in the last six months, no smoke or visible particulate. I have a ten year old truck with 169,099 miles, 1409 miles per month, not yet rebuilt, no visible smoke or particulate. The 24 year old spare truck has less than 600 miles this year, and it is used on the holiday route, ten days a year and if another truck needs repair in a shop for a few days. This truck has been in spare status since 1996 when we purchased the other replacement truck. Its motor was rebuilt after we bought it around 1992; it was a used truck so it had higher existing miles and very little miles since 1996. No smoke or visible particulates.

Let me sum up what I have stated above, small businesses cannot afford to take on several new trucks in a very short time. If a truck runs only limited mileage it should be exempt, as long as it passes the smoke test for its model year. As can be seen from my average miles driven, we are not the target market to effect a large change on air quality that will be for trucks that drive more than 1000 miles per week. Please focus on these individuals, as, the greatest improvement to air quality will be seen sooner than, a one size solution for all of us truck owners.

I employ 12 people, three use trucks, even the economy is sluggish we will come out the other side with no lay offs. But if I have to buy new equipment, on a short schedule, we will have to lay off at least one to three individuals to meet the debt burden, depending on the time frame between the purchases.

If we have a slower phased in purchase schedule, I can buy the trucks and still retain my employees, driving cleaner motor trucks than what is available in the next three to four years.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:54:19

No Duplicates.

**Comment 252 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James  
Last Name: Williams  
Email Address: jpw980@verizon.net  
Affiliation:

Subject: New Trucking Law  
Comment:

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:09:18

No Duplicates.

**Comment 253 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dave

Last Name: Kisor

Email Address: tigerpaw@redshift.com

Affiliation:

Subject: I breathe in So CA, but I don't inhale!

Comment:

Every passenger car is subjected to smogging and it stands to reason that heavy diesel transports should be also. It should be a simple fix with a system of filters or even some kind of osmosis. The cloud that is emitted from the exhausts is something you don't want to have to inhale and that crud must have a detrimental effect on the atmosphere. When the Santa Ana winds come to town, they blow it all away so we can share our cruddy air with the rest of the world, but their crud makes its way here, too. If we do something about the snog, perhaps the others will, too.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:12:40

No Duplicates.

**Comment 254 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Clare

Last Name: Brady

Email Address: opggalon3@mchsi.com

Affiliation: CLEAN AIR PLEASE Middletown 95461

Subject: Diesel truck & Bus PollutionDear Members of

Comment:

Dear members of the California Air Resources Board:

We here in Middletown, CA 95461 experience, on a daily basis, the odious toxic emissions from the many diesel trucks and buses which come right through the middle of our town on Highway 29. Even those of us with healthy lungs find it very difficult to breathe, while for folks with cardiac, COPD, asthma, diabetes, and the stroke-afected---the air pollution is overwhelming. I wake up many morniongs with my pulse pounding, coughing, my breathing labored, and the smell of petrochemicals in my nostrils.

I am a retired educator and veteran, and I had hoped to retire to a place with healthy, clean air. Regretfully, this is not the case, and that is why I started our local organization, CLEAN AIR PLEASE to clean up the persistent bad air in our valley. Your regulation of diesel emissions will help us breathe better.

Sincerely,  
Clare Brady

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 12:09:25

No Duplicates.



**Comment 255 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Budd  
Last Name: Elliff  
Email Address: budd@pcsnorcal.com  
Affiliation:

Subject: CARB PROPOSED REGULATION  
Comment:

Governor Arnold Schwarzenegger,

I would like to comment on the new CARB rules that will soon be taking place. I own a lot of equipment that will be affected by your new regulations. I purchased this equipment with hard earned money which has provided a lot of jobs including my own. It is funny that I sit in traffic daily, I have waited as long one hour to pay a five dollar toll but hear nothing about getting rid of toll booths. Private jets use 100 times the fuel my forklift uses but I am the easy target. I watched half of California burn due to forest service regulation but we don't want to bring that up. This equipment was going to be a large part of my retirement but is now worth 50 to 75% less since CARB's proposed regulations. Please remember the non government workers don't have guaranteed retirement packages. You need to take a long hard look at what you are doing. Very frustated, Budd Elliff

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 13:09:51

No Duplicates.

**Comment 256 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: ron  
Last Name: nelthorpe  
Email Address: ron.nelthorpe@riversidetrucksales.com  
Affiliation:

Subject: Proposed Diesel Regulations  
Comment:

Dear Gov.,

MY wife and I have been a Commercial Truck Dealer for over 21 years in California. This proposal as currently written will destroy not just the trucks but all the affiliated companies as well as drive the price of goods and services through the roof. California has benefited from lower costs for transportation for years. While my wife and I are also concerned about being green we also have to look at what cost. We have had the smoke law for 11 years and it was not enforced until the last 3 years. When it was enforced it was only on a selective basis. The State just allowed low sulfur Diesel this last year and this had made a substantial difference. I would propose that the allotted time for fleet improvement be increased to lessen the fiscal impact to the consumer. The rules are only going to speed the business flight from the State. The Kansas City Port of Entry opened 3 years ago and this alone will change the economics of our State---they are in the process of by-passing us now and it will just accelerate. Please stretch the rules out.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 13:58:39

No Duplicates.

**Comment 257 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Reed  
Email Address: drgoodwrench@gmail.com  
Affiliation:

Subject: BACT and VDECS do not allow for Natural Gas Conversion  
Comment:

The proposed regulations as currently written place an unfair burden on the use of clean fuel technology, particularly Natural Gas. Conversion of existing in-use diesel powered Buses and Trucks to run on Natural Gas is a widely adopted technology outside of the United States. Adoption of this Technology here in California is the ONLY possible way we can meet the AB 32 Global Warming Act deadlines.

Unfortunately, current certification for VDECS and BACT make no mention of Natural gas conversion as a viable option. This is due to CARBs definition of Diesel versus "Large Spark Ignition Engines". Essentially any diesel motor converted to run on Natural gas, that now has a spark ignition, is now considered a Large Spark Ignition motor, and must be certified as a BRAND NEW motor, and must meet 2010 on road emissions standards.

This is NOT the same criteria used for certifying VDECS and BACT for existing older engines. Additionally, certification of these converted motors must be then done on a model year, make and engine designation basis, rather than just for engine families as for current VDECS and BACT.

The advantages of converting these exact motors/vehicles to Natural Gas from both an environmental and economic standpoint have been well documented in other countries. The current regulations, as written, eliminates any chance of California being in compliance with AB 32 and puts an economically insurmountable barrier to certification of Natural Gas conversion technology solidly in place.

The emissions strategy as currently outlined in this proposed regulation will place an economic burden upon California business owners for which there will be no possibility of economic benefit. Conversion to Natural Gas for these fleets, where possible, will actually save these fleet owners in fuel and maintenance costs, with 100% conversion ROI usually realized with in the first year of operation. This CANNOT be said for any other emissions strategy. Before you adopt ANY further regulations for emissions of existing in-use engines, you MUST level the playing field for Natural Gas Conversion technology to compete against exhaust after treatment systems as an emissions strategy.

Dr. John Reed  
Director, Omnitek Engineering

Attachment: [www.arb.ca.gov/lists/truckbus08/657-afvi-delivery\\_workshop-yborra.ppt](http://www.arb.ca.gov/lists/truckbus08/657-afvi-delivery_workshop-yborra.ppt)

Original File Name: AFVi-Delivery\_Workshop-YBORRA.ppt

Date and Time Comment Was Submitted: 2008-12-08 14:26:24

No Duplicates.

**Comment 258 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: james  
Last Name: lewis  
Email Address: dmenace47@yahoo.com  
Affiliation: c.d.t.o.a.

Subject: new proposed carblaws  
Comment:

I am a one owner operation as most o/os are.I purchasd a 2005 tranfer truck in the same year,for the simple reson of having a truck that meets all california and federal standards what you are proposing is unfair, and should be unlawful. what your carb board is going to do the hard working o/os of this state is wrong,you shoud try making a 3000.00 a month payment in this econemy ,and now be told that my 2005 truck is not going to meet some critera that the board has passed. I think that the board should reconsider their action in this recession no one is going to be able to afford your propasals

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:33:50

No Duplicates.

**Comment 259 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Les  
Last Name: Davies  
Email Address: les@awdavies.com  
Affiliation:

Subject: On-Road Diesel Vehicles Regulation  
Comment:

To Whom It May Concern,

I am a contractor that is going to be burden with the new Off-Road regulations. Times are bad and it will be very difficult to do it, if we even can do it. I have my doubts.

But now with the On-Road regulations it will not be done. The industry does not have the kind of money in it to do both. Your assumptions are wrong.

Please consider the hard times, and the dual requirements to comply. At this time with the bad work situation and the heavy costs to comply with the regulations the future, is worst that starting over.

The Off-Road regulation alone has wiped out the value of my fleet to the point that it will not contribute to my retirement. That's not fair when I have worked a lifetime for it.

Spread the time out and lessen the impact on us and the industry.

Les

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:46:23

No Duplicates.

**Comment 260 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Shawn  
Last Name: Guttersen  
Email Address: sgbt@aol.com  
Affiliation: Sacramento Recycling

Subject: CARB

Comment:

Our Waste and Recycling industry is currently experiencing the most challenging economic times in California history. The recyclable materials we generate are not being purchased in the US or by the far east. Every expense item in our corporation has increased by double digits in the past four years however our prices are increase by the CPI which has remained very flat and actually negative for the last three months.

We can not afford the new regulations to retrofit or replace our current truck fleets. Those municipal customers we serve also are saying they can not support the increased costs that will come with the new truck regulations for solid waste trucks in California.

Please consider a new or revised plan to delay the new regulations. If the state can save the money now and implement the plan in a few years our industry will be better served in these uncertain economic times.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:49:02

No Duplicates.

**Comment 261 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Terry  
Email Address: mterry@llu.edu  
Affiliation: Loma Linda University Medical Center

Subject: On-Road Heavy Duty Truck and Bus Rule  
Comment:

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:49:30

No Duplicates.



**Comment 262 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James

Last Name: Thomas

Email Address: james.thomas@nabors.com

Affiliation:

Subject: Comments Regarding Proposed On-Road Diesel Truck Regulation

Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/truckbus08/667-comments\\_regarding\\_on-road\\_regulations\\_2.pdf](http://www.arb.ca.gov/lists/truckbus08/667-comments_regarding_on-road_regulations_2.pdf)

Original File Name: Comments Regarding On- Road Regulations 2.pdf

Date and Time Comment Was Submitted: 2008-12-08 15:19:23

No Duplicates.

**Comment 263 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Stewart  
Email Address: rstewart@dsbeverage.com  
Affiliation:

Subject: truckbus08  
Comment:

I support efforts to improve the quality of our air.  
I do not support efforts that are so onerous they put the financial viability of companies at risk. In order to meet the requirements of the current plan we would need to replace 28 power units in 2009. This amounts to over \$2,100,000 and is unrealistic for a company our size. We need additional time to phase in the new equipment. We do not qualify for any state or federal assistance. Please extend the compliance period.  
Thank you,  
Robert Stewart  
Delta Brands Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 15:21:04

No Duplicates.

**Comment 264 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Glenn

Last Name: Ely

Email Address: glennelyxir@mac.com

Affiliation:

Subject: Truck replacement rule

Comment:

Please forgo the current "truck and bus replacement rule" and use the guidelines provided by the "Driving Towards a Cleaner California:" proposal. My small business cannot afford to buy brand new trucks and it will effect our ability to stay in business and employ 80 people, many of whom are Hispanic. Our employees work as hard as any in California and deserve a good paying job like the one's we provide for them.

Thanks,  
Glenn Ely

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 15:45:31

No Duplicates.

**Comment 265 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kit  
Last Name: Sanders  
Email Address: kls@bacccorp.com  
Affiliation:

Subject: Carb On Road Use Regulation Proposal  
Comment:

I agree with helping make our air quality the best that we can. As an employer with 23 employees, all of whom operate equipment on a daily basis, I am much concerned as to where the profitable revenues will be generated from to stay in compliance with this proposed regulation.

The construction market is very competitive and often enough many contractors are bidding projects just to keep their employees working. This extra financial burden placed upon us with the proposed regulation will more than likely force the business to shut down.

With this shut down, comes loss of jobs, unemployment benefits, no tax revenues of any kind which in turn will cause financial burdens to many major California cities, towns and counties counting on tax revenues.

In as much as I agree with "clean air" concepts, one must consider the downside to the installation of this proposed regulation at "this time" in California history.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 15:52:34

No Duplicates.

**Comment 266 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Karen

Last Name: Ross

Email Address: rtsb@starband.net

Affiliation:

Subject: Diesel Vehicles

Comment:

Your intentions are admirable but you have failed to understand the implications this plan has on the trucking industry. Work with industry to put a plan in place that does not cause viable businesses in this state to either close or relocate to AZ or NV.

Look at the UK model of how they changed the face of trucking in their country. Peer pressure!! Tag a truck with a colored band so that everyone can see you are a gross polluter and in 5 years the worst offenders are now gone. No fights, no name calling, everyone working together.

What a novel idea. Use a plan proven to work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 16:03:36

No Duplicates.

**Comment 267 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Clay  
Last Name: Green  
Email Address: cats4u@sonic.net  
Affiliation: CATS4U INC

Subject: Proposed in-use on road diesel regulation  
Comment:

We have 3 Class 8 and 2 Class 6 diesel trucks in our construction business, most of which get only 10,000 miles or less per year. They allow us to provide faster and better service to our customers but are not by any means the profit center for our business. If the new regulations are passed as is, we will have to devote an enormous amount of money to replacing perhaps half the trucks and will in future only be able to afford to hire the remaining trucks. Our customers will receive lesser service than now and costs will escalate dramatically. The smarter and saner alternative would be to allow us to upgrade our trucks as their viability and safety requires instead of meeting an arbitrary deadline. Alternatively, since this artificial obsolescence is said to be for the greater public good, perhaps the public can foot the bill through a large direct payment upon purchase of these newer trucks. It is only fair. Clay Green

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 17:56:46

No Duplicates.

**Comment 268 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kristi  
Last Name: Hutchison  
Email Address: stc34@aol.com  
Affiliation:

Subject: Diesel pollution  
Comment:

I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 19:21:37

No Duplicates.

**Comment 269 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Attema  
Email Address: MA332@aol.com  
Affiliation:

Subject: On Road Diesel Regulation  
Comment:

My name is Michael Attema I have been an Owner-Operater for 28 years. What I can't understand is when I bought my 1994 truck it met all of the EPA standards of the year it was built. I do not see anything wrong with having new emissions on vehicles. So why can't the rules be like for autos? by year model. and in time all the old trucks (just like the old autos) will disappear.

If the CARB passes this rule will be out of business and probaly moving out of the state where business is more profitable.  
Thanks Michael Attema

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 19:35:53

No Duplicates.



**Comment 270 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Paul  
Last Name: August  
Email Address: paulaugust@suddenlink.net  
Affiliation:

Subject: AB32 Diesel Trucks  
Comment:

Monday, December 8, 2008

Paul August Trucking

California Environmental Protection Agency  
Air Quality Division  
RE: AB 32 Diesel Trucks

Dear Sirs;

My name is Paul August. I am an owner-operator of one 1981Kenworth log truck. I have been in the timber industry for over 35 years and have owned my own truck since 1998. This letter is to voice my concerns over your new proposed regulations concerning air quality which may become a new law. I sincerely hope you will listen to my concerns and hear this one voice.

I have always driven the truck I now own and have kept in excellent condition knowing that it would serve me well until retirement. I am 56 years old and retirement is not far away. Seven years ago Air Quality suggested that I should replace my engine instead of overhauling it so that it would be friendlier to the environment . So I did. I now have a 450 Cumins which is a mechanical engine and is the engine that Air Quality suggested that I replace my old engine with. I was told at the time that this would help clean the air and so I complied. I am all for helping the environment when I can. At that time the logging seasons were longer (8-9 months) and the demand for timber was high. I could afford to make these changes. However, now the season is less than five months a year due to increased environmental regulations and it keeps getting shorter. The economy is poor, most investments I have made for my future are gone because of the stock market and the housing problems. It is almost impossible to make a livable wage under the current restrictions and length of season.

Many truckers have just given up and gone out of the business. I see these guys from time to time and their outlook on life isn't good and they worry how they will feed their families. This isn't fair or equitable! The burden placed on the trucking and timber industry appears to have only one purpose, cease to exist.

I have paid taxes all of my life and now at 56 years old with the economy in the tank, no demand for lumber in the housing market and if these new regulation's are made into law, you may very well see

me on the street with a tin cup in my hand and not a single dollar paid to the government in taxes. This is unfair. Please think about what you are doing to this industry at a time it can ill afford to pay for it.

My truck has a retail value of less then \$15,000.00. This new filter that these regulations are requiring will cost \$15,000 to \$30,000 to retrofit my truck. This is more then my truck is worth!

If this new filter should pre-maturely lessen the life of my engine, which is designed to run up to 600,000 miles and to help clean the air, then what? Who is responsible for the cost of my engine if it pre-maturely blows up because of back pressure ( or some other unknown reason that may arise) on my engine caused my this new filter? No one has been able to answer this question for me. Also this new filter will most likely cause a fuel mileage reduction which could shorten my per gallon mileage from 5 miles to the gallon to 3 miles per gallon. Fuel is the single largest expense in this business and this could nearly double it. It seems counter productive to me. While everyone is trying to get more miles to the gallon this regulation nearly cuts our fuel mileage in half.

Please consider exempting trucks that work less then six months out of the year and drive less then 40,000 miles per year. These operators cannot afford any new regulations. If you want to regulate air pollution then regulate trucks that are built from 2009 and on.

Consider what would happen if you told everyone who owned a vehicle that was older then 2008 that they would have to retrofit their vehicles or quit driving them. What do you think would happen? If you want to be fair and equitable then do it across the board.

Your decisions effect families and people's lives. Please consider my letter and my plea to not put me out of business but to allow me to continue to contribute to our society and not be placed in a position to take from it.

Very Sincerely Yours

Paul August,  
Paul August Trucking  
Owner/Operator

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 20:04:48

No Duplicates.

**Comment 271 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jaime  
Last Name: Ortega  
Email Address: jozone.j@gmail.com  
Affiliation:

**Subject: PASS A STRONG DIESEL TRUCK RULE SO MY FAMILY CAN BREATHE CLEAN AIR**

**Comment:**

I've lived in the Central Valley my whole life. I've witnessed the air quality become worse and worse as the traffic on the roads increased. The proportion of truck traffic to passenger cars has become skewed so much towards trucks that they seem to outnumber cars on the roads, and many, if not most of them, are still spewing diesel fumes, soot and chemicals into the air at in enormous quantities. The time to get a handle on this problem is now. There are technologies available to clean up diesel engines. There are enough studies showing the direct effects of diesel pollutants on our children's health that the idea regulations governing diesel-truck exhaust emissions might actually be weakened defies all reason. Everything has a cost. I'd rather pay more money to bite the bullet and deal with cleaning up diesel emissions with more stringent rules than pay with my children's health and allow the diesel trucking and ag industries to continue to get a bye on cleaning up their act. Please pass a stronger diesel truck rule so that my family can breathe clean air.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 00:57:42

No Duplicates.

**Comment 272 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: Seberry  
Email Address: seberry6@msn.com  
Affiliation:

Subject: Statewide truck and bus regulation 2008  
Comment:

Dear Members of the California State Legislature:

I want to Make this very clear, High Sierra Distributing is very supportive of reducing particulate matter (PM) and NOx emissions from diesel engines, However in it's current form, the Board's proposed regulation, jepardizes our future viability in the Berr Distributing Industry, which is already reeling from unprecedented financial turmoil.

We are a small distributor in 2 very large territories, Inyo and Mono Counties that because of the pending Depression ( not just Recession) face very a bleak future, we have 25 employees that would be out of a job, if this company folded. When we replace a truck every couple of years, we normally would replace it with a new truck, that is up to date at that time. We need more time to change our fleet, with the pending fianacial future looking very bleak for small companies, we need more time to fix or replace our small fleet.

In fact CARB's own analysis of our DTCC alternative confirms that the Dtcc alterative proposal achieves roughly similar benefits of the proposed regulation in the long term.

We must be careful in this fragile economy not to put more people out of work and reduce our ability to keep this State together.

Sincerly, William B. Seberry,  
High Sierra Distributing,  
647 N.ain St., Bishop, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 02:42:36

No Duplicates.

**Comment 273 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Larry  
Last Name: Jenkins  
Email Address: larry@ljtrucking.com  
Affiliation: 530-626-0240

Subject: Air Resources Board  
Comment:

I'm a construction truck broker in Northern California. My company supplies trucks to most of the large construction companies in the Sacramento Valley. I also have 2 children ages 10 and 12. I think its horrible the financial devastation you will bring this industry. I employ over 100 owner operators that have said if this law takes effect, most of them will go out of business. 20% of my work force are close to retirement and do not want to spend their last few years trying to pay off a truck that costs over \$125,000.00 Dollars. That will totally screw up their chances of retiring with somewhat of a nickle in their pockets. The economy is in financial ruin. Banks can't seem to see straight to loan money. Work load is at its worst level since the 1990's and you want to impose this horrible rule? You simply can not do this with a clear concience, knowing full well the financial ruin you will bring going down this path. As for my kids they will still breath everyday. And hopefully enjoy the very food and clothing my job can supply them. You see we all need to eat and survive with our lives. And by the way unemployment has no room for the amount of people you are about to bring down. Let that little secret be known!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 06:32:19

No Duplicates.

**Comment 274 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Steven

Last Name: Brink

Email Address: steveb@foresthealth.org

Affiliation: California Forestry Association

Subject: In-Use On-Road Diesel Engine Emission Rule

Comment:

document attached

Attachment: [www.arb.ca.gov/lists/truckbus08/723-081109\\_cfa\\_response\\_to\\_on\\_rd\\_diesel\\_engine\\_emission\\_rule.doc](http://www.arb.ca.gov/lists/truckbus08/723-081109_cfa_response_to_on_rd_diesel_engine_emission_rule.doc)

Original File Name: 081109\_CFA\_response\_to\_On\_Rd\_diesel\_engine\_emission\_rule.doc

Date and Time Comment Was Submitted: 2008-12-09 07:11:26

No Duplicates.

**Comment 275 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: kevin  
Last Name: bush  
Email Address: kjbco@yahoo.com  
Affiliation:

Subject: truckbus08  
Comment:

dear arb board please stop this! The state is already in bad shape this will cause more unemployment and kill the already hurting small business in this state! It is time to move the state forward and not to the unemployment lines!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 07:25:54

No Duplicates.

**Comment 276 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Chris  
Last Name: Torres  
Email Address: christorres@fandltrucking.com  
Affiliation: Transportation company

Subject: ON road rule.

Comment:

To California Air Resources board,

I respectfully request that a longer time line for implimentation of this rule be used. In this time of financial crisis and economy turndown, money for new purchases is tight. I personally have been looking into appling for grant funding for several new trucks, we have replaced 5 of our 12 trucks in the past 2 years. Some with grant money some not. I can see no possible way to afford any more payments and not put my company at risk. Our debt to asset ratio is 4 to 1 now. The programs in place do not suit the size of my company.

With all of our costs rising and work dwindling all of this is a large gamble. I don't know of any banks that are willing to risk financing this type of a loan situation. Our company has no contract hauling, all we have is our service, banks are not willing to lend on "service" as security of income.

Please consider all the aspects of this rule before you impliment it. We have 15 employees, some may have to loose their jobs as a result of this.

Chris Torres  
F & L Farms Trucking Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 08:19:43

No Duplicates.



**Comment 277 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Louis  
Last Name: Davies  
Email Address: sldavies@dm-tech.net  
Affiliation: Corning Rentals

Subject: Proposed CARB 2008 Regulations  
Comment:

Please consider the economy and the disasterous effect on small family owned business if you pass the current recommended regulations. We have less than 5 trucks and cannot afford to upgrade at this time and stay in business. Please consider the DTCC alternative to this proposal as we all wanta to protect the air and reduce emmission, but not drive people out of business.  
THank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 08:21:35

No Duplicates.

**Comment 278 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rodney  
Last Name: Lawley  
Email Address: rlawley@mrtrucker.com  
Affiliation: Trucking Company Owner

Subject: Diesel truck regulations  
Comment:

I just want to say that the regulations that are being proposed are going to have a severe negative impact on the entire California economy. Nobody at the state level wants to address the issue of where the money is going to come from to implement these stringent regulations. Currently the trucking industry has experienced numerous financial hits such as the rediculously high fuel prices during the year (that we were unable to pass on), the reduction in freight due to the construction melt down, and now the lack of financing regardless of price. The trucking industry is under constant pressure to offer affordable transportation of goods in the state. It appears that the only companies that will be left standing after this takes effect will be the national mega fleets. As you are all aware the only thing that keeps freight rates in check is competition, now the CARB wants to unlevel the playing field and allow the huge companies to monopolize our state. Since the Mega fleets have the economies of scale they can merely send all of their new equipent in to California, and use their older equipment out of state. This has utterly no impact on their financial position. The companies that only operate in California are at a complete disadvantage given that we have no outlet for our non-compliance equipent. 100% of our revenue stays in California unlike the companies that are headquartered out of state. I am a native Californian and want nothing more than to have clean air for my family but, there has to be a better way to accomplish the goals of emision reduction without jeopardizing the livelihoods of so many Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 08:32:12

No Duplicates.

## **Comment 279 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Norris  
Email Address: [dnorris@lakeport.k12.ca.us](mailto:dnorris@lakeport.k12.ca.us)  
Affiliation: Lakeport Unified School District

Subject: Recuction of emissions from heavy-duty vehicles  
Comment:

LAKEPORT UNIFIED SCHOOL DISTRICT  
Transportation Department / From the desk of David Norris /  
Director of Transportation  
2503 Howard Ave, Lakeport, CA 95453  
707/262-3022 Fax 707/262-3034

December 9, 2008

Dear ARB Board Members, Please take into consideration the following issues when making your decisions on the proposed regulation; In-Use Heavy-Duty Diesel-Fueled Vehicles.

This proposed regulation could not have come at a worse time. California schools should not have to choose between books and buses

Lakeport is a small, rural town located on the west shore of Clear Lake in Lake County, approximately 100 miles northeast of San Francisco. The population of incorporated Lakeport is approximately 5,100. Our community is primarily made up of families with school-age children and retired senior citizens. The Lakeport Unified School District is comprised of Lakeport Elementary School (grades K-3), Terrace Middle School (grades 4-8), Clear Lake High School (grades 9-12), Natural High Continuation School, and Lakeport Unified Home School. We have approximately 1660 students that attend our schools and about 625 students ride our buses to school daily.

Students are subject to a required walking distance. Only students living beyond the walking distance will be eligible for bus riding privileges. Students in grades K - 5: 3/4 mile walking distance, grades 6, 7, 8 - 1 mile walking distance, and grades 9 - 12 have a 2 mile walking distance. The majority of the 625 students we transport rely on the bus service we provide, as they live beyond two miles and many of the families do not have cars. It is imperative that we maintain our current level of service. In 2003 we had to eliminate two bus routes due to a reduction in funding which put over 200 students on the streets, most without sidewalks.

The collection of fees for transportation is not an option as 65% of our children qualify for free and reduced programs. In addition, our district is experiencing declining enrollment which is what our funding is based on.

Our school district does not have the funds to comply with new PM regulations. Simply stated, the only way that our school district

can comply with these regulations is if the Air Resources Board provides full funding for bus replacement and or retrofits.

The Yellow School Bus has been an essential part of providing public education to the children of Lakeport. It is part of the fabric of this American institution, the very foundation in how we educate our children. In California we have developed a system that has proven to be the safest form of transportation in the world. We have the strictest regulations relating to the construction and use of the school bus and the education and training of our drivers. I encourage you to do one of the following:

1.Exempt all school busses from this regulation and let the busses be replaced through attrition.

2.Fully fund this new regulation, which appears to be mandated.

3.Spend all of the funds only on new school busses.

Let's not increase the price of operating school busses to the point that we can't afford to transport our children.

Sincerely,

David Norris

Attachment: [www.arb.ca.gov/lists/truckbus08/731-letter\\_to\\_arb.doc](http://www.arb.ca.gov/lists/truckbus08/731-letter_to_arb.doc)

Original File Name: Letter to ARB.doc

Date and Time Comment Was Submitted: 2008-12-09 08:33:09

No Duplicates.

**Comment 280 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bruce  
Last Name: Yates  
Email Address: bayatesfam@verizon.net  
Affiliation:

Subject: ON ROAD DIESEL REGS  
Comment:

TO THE BOARD--  
AS A SMALL FLEET OPERATOR, I WOULD LIKE TO EXPRESS MY OPINION ON THESE REGULATIONS. OUR ECONOMY IS IN A MAJOR SLUMP WITH CONSTRUCTION WORK ETC. IF MANY OF THE TRUCK OPERATORS THROUGHOUT THE STATE ARE REQUIRED TO IMPLEMENT EMISSION EQUIPMENT ON UNITS USED IN CONSTRUCTION ONLY, IT WOULD SIMPLY PUT THE SMALL BUISNESSMAN OUT OF BUISNESS. MUCH MORE STUDY NEEDS TO BE DONE ON THE EMISSION STANDARDS, WITHOUT JUMPING THE GUN ON REQUIREMENTS. THE PREVIOUS REPORTS ARE NOT ACCURATE ON THE STUDIES THAT WERE DONE IN PREVIOUS YEARS. ALL OF THE DATA NEEDS SERIOUS UPDATING, AND NEW DATA REVISED. THESE TESTS WERE DONE YEARS AGO WITH OLD FUEL ADDATIVIES AND DO NOT REPRESENT THE NORM OF TODAY.  
MY COMMENTS ARE DIRECTED ONLY AT CONSTRUCTION VEHICLES. THERE HAS BEEN VERY LITTLE MENTION OF ENFORCEMENT OF VEHICLES FROM ACCROSS THE BORDER. DO THESE VEHICLES HAVE TO COMPLY? THE ENFORCEMENT ASPECT HAS NOT EVEN BEEN ADDRESSED, AS TO OUT OF STATE ENTRY, OTHER BORDER CROSSINGS ETC.  
MY OPINION IS COMPLETE ALL STUDIES AND ASPECTS OF REQUIREMENTS BEFORE DROPPING THE HAMMER ON SMALL BUISNESS!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 09:06:05

No Duplicates.

**Comment 281 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jeff  
Last Name: Freitas  
Email Address: freitas.jeff.s@gmail.com  
Affiliation: Substitute Teacher

Subject: HUMAN HEALTH = ECONOMIC SAVINGS = NO BRAINER \*\*Please pass a strong diesel truck rule!!\*\*

Comment:

If the air quality continues to decline, I am afraid I will be forced to move out of the Central Valley. Unfortunately, so will many of the privileged population - leaving only those who cannot afford to relocate to better circumstances.

The World Health Organization estimates that air pollutions kills 656,000 people in China and 527,700 people in India each year. In many parts of these countries citizens wear masks to protect themselves.

Here in the Central Valley California, we have visibly SEEN our air quality decline over the past 40 years. We cannot wait any longer to take strong action to protect ourselves from both the visible and invisible dangers of air pollution.

On behalf of future citizens of California who cannot speak up: Please pass a strong diesel truck rule!

Attachment: [www.arb.ca.gov/lists/truckbus08/734-080806\\_beijing.jpg](http://www.arb.ca.gov/lists/truckbus08/734-080806_beijing.jpg)

Original File Name: 080806\_beijing.jpg

Date and Time Comment Was Submitted: 2008-12-09 09:29:48

No Duplicates.

**Comment 282 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jim  
Last Name: Ford  
Email Address: jimf@crengland.com  
Affiliation: C.R. England, Inc.

Subject: Statewide Truck and Bus Regulation 2008  
Comment:

The Board should consider the adverse economic effect to the carrier's business planning regarding the sale of used equipment ( both trucks and refrigerated trailers ). Prospective buyers of this equipment reduce the purchase price to compensate for the retrofits that the Board will require. As an example--- a reefer unit on a trailer costs about fifteen thousand dollars. Retrofitting the unit cost about seven thousand dollars. This translates to a loss to the seller of nearly the current value of the equipment when adjustment is made by the buyer anticipating the cost of upgrading to current regulations. The net result will be that the functionally and economically obsolete pieces of equipment will be kept on the road---the Board will have invested much needed capital in an obsolete piece of equipment. The sellers of the equipment will have to increase freight rates to compensate for the loss in trade-in value.

Is it not wiser to regulate in a fashion so that the manufacturers of the equipment will initiate the improvements to the diesel engines to accommodate the buyers need to comply with regulation? These will then be purchased and introduced into the cycle---resulting in reductions in emissions and removal of substandard equipment as a result of the economic cycle. We trade at three years and most over the road trucking companies do likewise. Local truckers are able to purchase our used equipment which is functional for local use. The result will be an upgrading which occurs in a timely manner and thru innovation and engineering by the manufacturers that already have the personnel and expertise in house.

It is almost never wise to expend new money in a functionally and economically obsolete piece of equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 09:34:52

No Duplicates.

**Comment 283 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Andy  
Last Name: Cox  
Email Address: acox@mcalog.com  
Affiliation: Mike Campbell & Associates

Subject: Statewide In-Use Diesel Truck and Bus Rule  
Comment:

December 9, 2008  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812-2815

Dear Chairperson Nichols and Members of the Board:  
Mike Campbell & Associates is actively exercising "green" technologies and practices, and is pleased with many of California's measures to reduce harmful emissions and air pollution from all facets of life. We are already employing alternative fuels (Biodiesel), new transport technologies (electric standby on Transportation Refrigerated Units), and innovative logistics programs (Turnpike GPS systems) to realize better fuel economy and more environmentally-sound practices. Overall, we support the ARB's regulations that should help clean the air quality throughout California.

Still, the ARB's Statewide In-Use Diesel Truck and Bus Rule may not yet be without fault. There are a couple of issues that seem to stand out when reading through the proposed regulation. The first hitch in the ARB's rule seems to be with the BACT scheduling. After surveying the jumbled compliance dates, it does not seem sensible to require some of the newer model trucks to comply with Particulate Matter (PM) constraints (MY2005-2006) before older trucks (MY2000-2002). The ARB's BACT schedule is not chronological and does not seem to offer the best quality of emissions reductions in the time constraints that it is looking for. The DTCC has penned an alternative schedule which structurally follows the ARB's schedule, but is organized in a more chronological order and accounts for the present unavailability of some reduction technologies (for nitrogen oxides - NOx) thus far. This schedule is clearer, more concise, and still delivers the emissions reduction that the ARB seeks within the time frame that the ARB has dictated.

After spending considerable time attempting to apply the ARB's fleet average model, I have found that the numbers are inaccurate. Using the calculations provided - and attached to this letter - I recognized that trucks that use Tier 3 PM DPFs and proper NOx filters will never meet the highest level of emissions reduction, even though the regulation states that they will. The numbers fall short of the ARB's requirements and could affect entire fleets in the future. These numbers and calculations need to be revised (along with the ARB's online calculators) so that they help retrofitted trucks meet the ARB's standards.

Again, Mike Campbell & Associates is encouraged by the efforts of the ARB and will continue to work with the organization to promote



clean air for California. However, we want to be certain that each aspect of this regulation is validated as true and keeps us moving in the right direction: toward a brighter, cleaner future.

Sincerely,

Andy Cox  
Environmental Manager

(Please see attachment for further information and statistics.)

Attachment: [www.arb.ca.gov/lists/truckbus08/741-truck\\_and\\_bus\\_rule\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/741-truck_and_bus_rule_letter.pdf)

Original File Name: Truck and Bus rule letter.pdf

Date and Time Comment Was Submitted: 2008-12-09 10:16:32

No Duplicates.

**Comment 284 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Richard  
Last Name: Smith  
Email Address: Richard.Smith@yrcw.com  
Affiliation: YRC Worldwide Inc.

Subject: Proposed Truck / Bus Regulation 2008  
Comment:

On behalf of YRC Worldwide Inc., I submit this comment letter. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/truckbus08/744-comment\\_letter\\_-\\_yrc\\_worldwide\\_-\\_proposed\\_ca\\_diesel\\_truck\\_regs.doc](http://www.arb.ca.gov/lists/truckbus08/744-comment_letter_-_yrc_worldwide_-_proposed_ca_diesel_truck_regs.doc)

Original File Name: Comment Letter - YRC Worldwide - Proposed CA Diesel Truck Regs.doc

Date and Time Comment Was Submitted: 2008-12-09 10:59:12

No Duplicates.

**Comment 285 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: J. Michael  
Last Name: Mortensson  
Email Address: wellguy@sonic.net  
Affiliation: California Groundwater Association

Subject: Statewide Truck and Bus Regulation 2008  
Comment:

California Groundwater Association  
An NGWA Affiliate State  
P.O. Box 14369 „H Santa Rosa, CA 95402 „H (707)  
578-4408  
Fax: (707) 546-4906 „H email: wellguy@groundh2o.org  
Established 1948

December 9, 2008

Mary Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chairman Nichols:

Re: Request for Modification of On-Road Diesel Truck and Bus Regulation

On behalf of the members of the California Groundwater Association, we are requesting that the California Air Resources Board make modifications, as noted below, to the proposed On-Road Diesel Truck and Bus Regulation. For the last 60 years, the California Groundwater Association (CGA) has represented the groundwater industry in the state. Our members include water well drilling and pump installing contractors, industry manufacturers and suppliers and technical experts such as geologists, hydrologists, engineers and others in the private sector and government.

CGA represents about 430 groundwater contracting firms employing about 2,440 persons. Non-contractor firms (1200) employ about 37,500 persons in the industry. The groundwater industry is not large in numbers but its functions are critical to the state's wellbeing. In times of drought, groundwater supplies up to 50% of the state's water needs. As you are well aware, California is experiencing insufficient water supplies, as it has in the past. The groundwater industry has been able to help meet past challenges of droughts but reduction of the industry's capability to provide groundwater will have adverse affects to all citizens of the state.

Current and proposed CARB regulations will lead to reduced capability to provide groundwater supplies unless modifications are

made. The groundwater industry deals with complex geology and hydrologic conditions throughout the state and must utilize a wide variety of equipment in order to develop groundwater supplies for the state's needs. Much of that equipment is quite specialized and has low or limited usage. Thus the groundwater industry has much equipment that is old (in years) but has had little usage and is still in sound, usable condition. For example, you may have a drill rig that that is 25 years old but only driven 10,000 miles. There is not rapid turnover of equipment in this industry.

The wide variety of equipment also means that groundwater contractors must comply with an number of CARB regulations such as the Portable Equipment Registration Program (drill rig deck engines), the Off-Road Diesel Vehicle regulation (dozers, backhoes, forklifts, etc.) and now the proposed On-Road Diesel Truck and Bus regulation (drill and pump rigs, water trucks, rig tenders and other vehicles needed for well construction and maintenance).

A CGA survey has shown that the industry is attempting to comply with the current regulations but many groundwater contractors have small, local operations and are being forced to downsize or perhaps even close their doors. One contractor told us he would have to cut his drill rig fleet in half (from 4 to 2 units). Another contractor estimated the replacement costs to bring the company's equipment into compliance with CARB regulations would be twice the company's net worth. He is considering closing his doors. The potential loss of the industry's capability, due to CARB regulations, to provide water could cripple the state. One can live without many things, but food and water are necessary with water being essential ;V even to grow crops.

We note that the proposed On-Road Diesel Truck and Bus regulation has agriculture industry provisions that provide exemptions for specialty agricultural vehicles and extension of compliance dates for both low-mileage and limited-mileage agricultural vehicles.

Certainly, the reasoning that resulted in the agricultural provisions would also apply for the groundwater industry that provides water for agricultural, domestic, municipal and industrial uses. In fact, a recent air emissions study prepared by a groundwater manufacturer determined that water well equipment accounted for 0.019% of all total emission hours in the US in 2007.

CGA requests that the California Air Resources Board delay approval of the On-Road Diesel Truck and Bus regulation and direct CARB staff to develop, and include in a subsequent revision, provisions that provide exemptions for specialty groundwater industry vehicles and extension of compliance dates for both low-mileage and limited-mileage groundwater industry vehicles. CGA stands ready to assist staff in the development of these new revisions.

While CGA proposes specific provisions for the groundwater industry to help avoid catastrophic impacts on needed current and future water supplies, we also recognize the impacts these regulations have on other sectors of California's economy, the environment and the public's wellbeing.

Thus, we support the alternative proposal from the Driving Toward a Cleaner California (DTCC) as a means to provide flexibility in attaining improved air quality. This proposal offers all affected

industries a number of ways to reach improved air quality. The more flexible mileage exemptions, dedicated specialty use vehicle considerations, and a personalized compliance schedule for businesses affected by two or more ARB rules would be of direct help to the groundwater industry. We look forward to meeting with ARB staff to help ensure the continued capability of the groundwater industry to help meet the water needs of all Californians.

Sincerely,

J. Michael Mortensson

J. Michael Mortensson  
Executive Director

cc: Governor Arnold Schwarzenegger

Attachment: [www.arb.ca.gov/lists/truckbus08/745-cga\\_letter\\_to\\_carb\\_on\\_truck\\_\\_\\_bus\\_regs.doc](http://www.arb.ca.gov/lists/truckbus08/745-cga_letter_to_carb_on_truck___bus_regs.doc)

Original File Name: CGA letter to CARB on truck & bus regs.doc

Date and Time Comment Was Submitted: 2008-12-09 11:07:54

No Duplicates.

**Comment 286 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: JOSEPH  
Last Name: STEWART  
Email Address: stewarttrucking\_llc@yahoo.com  
Affiliation: CDTOA,TEAMSTERS

Subject: IN -USE ON ROAD DIESEL VEHICLE PROPOSED REGULATION.  
Comment:

I OWN AND OPERATE A 1999 INTERNATIONAL DIESEL TEN WHEEL DUMP TRUCK. I AM VERY CONCERNED ABOUT POLLUTION. GLOBAL WARMING AND HEALTH. MY WIFE HAS LUNG CANCER. I DON'T BELIEVE IN THE WAY THE SCIENCE OF THE RESEARCH IS PRESENTED AGAINST THE TRUCKING AND CONSTRUCTION INDUSTRY. I BELIEVE THE REGULATIONS ARE BEING IMPLEMENTED TOO FAST FOR THE INDUSTRIES INVOLVED. DO TO THE RECENT HIGH FUEL PRICES. WHICH WILL RISE AGAIN. THE VERY POOR ECONOMY. MY BUSINESS MAY HAVE TO CLOSE. THE RETROFIT IS VERY COSTLY AND IS ONLY A SHORT TERM FIX. A NEW VEHICLE OR EVEN A NEWER USED VEHICLE IS OUT OF MY FINANCIAL REACH. I'M IN BUSINESS LESS THAN THREE YEARS. THE PROGRAMS AT THIS TIME FOR AID. I DO NOT QUALIFY FOR THEM. I WOULD LIKE TO SEE A SLOWER IMPLEMENTATION OF RETROFIT AND VEHICLE REPLACEMENT. THE ECONOMY MUST BE IN A LOT BETTER SHAPE FOR BUSINESS TO SURVIVE AND UPGRADE! A CHANGE IN QUALIFICATION FOR AID IS ALSO NEEDED. IT IS NOT STRUCTURED FOR VEHICLES THAT PUT ON MORE HOURS THAN MILES. THANK YOU FOR LETTING ME MAKE COMMENTS ABOUT THE PROPOSED REGULATIONS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 11:09:09

No Duplicates.

**Comment 287 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kenneth  
Last Name: Krauss  
Email Address: otheyellow@verizon.net  
Affiliation: C.D.T.O.A.

Subject: AB 32  
Comment:

As a owner/operator with only one truck and driving about 50,000 miles a year in the dump truck construction industry providing bulk hauling of dirt,rock,sand etc.this bill if passed will create such a hardship for all small business owners such as myself by having to purchase one or the other, new motor to comply with said proposed law or to purchase a brand new truck. Nether one of these purchase's is affordable, especialy since we are in an recession.I am asking all of you to please consider a alternitive such as an exempt status like the one in place for automobiles,1975 and older are exempt from smog testing.This would be a more practical solution for the small business owner.Don't take away our right to own our business by mandating such a profound absurd regulation AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 11:09:42

No Duplicates.

**Comment 288 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rudy  
Last Name: Aguirre  
Email Address: raguirre@beauchampdist.com  
Affiliation: Beauchamp Distributing Co

Subject: Statewide Truck regulation 2008  
Comment:

This will have a major impact to our small minority business. We all want clean air but at what cost? This will require our business to replace / retrofit trucks that are not worth the retrofit due to age / condition. We replace 2 trucks annually. This will require us to replace 5 trucks for the next 3 years and retrofit 22 by 2014. This will be ongoing retrofits until 2023 until all of our vehicles meet the 2010 standards. We need more time and financial assistance to meet these time standards proposed. In these tight financial times we are struggling just to keep our doors open. This may send us over and may not be able to meet the proposed regulation. We tried to get B1 funding, however our trucks do not meet the funding requirements. We urge a postponement of the rule and allow more time to get into compliance. Thanks for our chance to make our point to the board.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 11:12:34

No Duplicates.



**Comment 289 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Birgit  
Last Name: De La Torre  
Email Address: delatorre.birgit@verizon.net  
Affiliation: Long Beach Council PTA

Subject: Proposed Statewide Truck and Bus Regulation  
Comment:

Chairwoman Mary Nichols and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: Proposed Statewide Truck and Bus Regulation

Dear Chairwoman Nichols and Board Members:

As advocates for children, the members of the Long Beach Council PTA, have been very concerned about the negative impact on children of poor air quality associated with diesel pollution, and we urge you to approve health protective regulations.

We recognize the challenging economic times that the state is facing as the Board is presented with this regulation. However, the economic and health costs of doing nothing are apparent. Because California is home to some of the worst air quality in the country, it is not surprising that asthma is a major cause of lost school days and emergency room visits. In California, there are over 14,000 asthma-related hospitalizations a year just for children under the age of 15 with a cost of about \$19,000 per stay. Furthermore, the November 2008 Jane Hall study found that air pollution in the South Coast and San Joaquin Valley regions alone costs the California economy \$28 billion annually. The swift adoption of this regulation is vital to removing the health and economic burdens of unhealthy air and can ensure that California can meet federal air quality standards. However, we ask the Board to consider amending the regulation to restrict the proposed exemptions for agricultural trucks and provide a margin of safety for meeting SIP commitments.

We applaud ARB's efforts to move forward with this ground-breaking regulation that will reduce costly public health emergencies and clean our air. Our main concerns with the October 24, 2008 proposed regulations involve the agricultural exemptions. These exemptions are far too broad and compromise the health protections of the regulation for those living or working near the agriculture industry, especially the Central Valley. We suggest reducing the mileage threshold, requiring PM filters, limiting fleet size, and not expanding the definition of agricultural vehicle to include trucks owned by ancillary businesses will still provide special consideration to the agriculture industry, but will better protect public health.

Finally, we hope that CARB will continue vigorous outreach to truck owners to ensure incentive programs are understood and accessible. We will not see benefits from this regulation if owners are unable to comply with the rules. Ensuring owners are aware of the multiple funding sources that can be leveraged to assist individual truck and fleet owners, will maximize compliance with the rule and minimize the economic impact on owners and business.

Sincerely,  
Birgit De La Torre  
Air Pollution Committee, Chair  
Long Beach Council PTA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 11:33:02

No Duplicates.

**Comment 290 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Darcy

Last Name: Quinn

Email Address: Non-web submitted comment

Affiliation:

Subject: A and P Moving, inc.-Bekins

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/751-darcy\\_quinn.pdf](http://www.arb.ca.gov/lists/truckbus08/751-darcy_quinn.pdf)

Original File Name: Darcy Quinn.pdf

Date and Time Comment Was Submitted: 2008-12-09 11:50:45

No Duplicates.

**Comment 291 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Ronals

Last Name: Larson

Email Address: Non-web submitted comment

Affiliation:

Subject: Mother Lode Van & Storage Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/752-ronald\\_larson.pdf](http://www.arb.ca.gov/lists/truckbus08/752-ronald_larson.pdf)

Original File Name: Ronald Larson.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:03:37

No Duplicates.

**Comment 292 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Mike

Last Name: Jenks

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Victorville

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/753-mike\\_jenks.pdf](http://www.arb.ca.gov/lists/truckbus08/753-mike_jenks.pdf)

Original File Name: Mike Jenks.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:09:15

No Duplicates.

**Comment 293 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Perry

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation:

Subject: Blue Star Gas - Coast Co.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/754-perry\\_lewis.pdf](http://www.arb.ca.gov/lists/truckbus08/754-perry_lewis.pdf)

Original File Name: Perry Lewis.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:09:54

No Duplicates.

**Comment 294 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Marsha

Last Name: Foster

Email Address: Non-web submitted comment

Affiliation:

Subject: Foster & Son Trucking, Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/755-marsha\\_foster.pdf](http://www.arb.ca.gov/lists/truckbus08/755-marsha_foster.pdf)

Original File Name: Marsha Foster.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:11:27

No Duplicates.

**Comment 295 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Jon  
Last Name: Heuss  
Email Address: [jheuss@airimprovement.com](mailto:jheuss@airimprovement.com)  
Affiliation: Air Improvement Resource, Inc.

Subject: Comments on health benefits methodology for proposed rule  
Comment:

I respectfully submit the attached comments for your  
consideration.

Jon Heuss  
Principal Scientist  
Air Improvement Resource, Inc.  
586-786-0827

Attachment: [www.arb.ca.gov/lists/truckbus08/756-arb\\_comments\\_12-9-08.doc](http://www.arb.ca.gov/lists/truckbus08/756-arb_comments_12-9-08.doc)

Original File Name: ARB comments 12-9-08.doc

Date and Time Comment Was Submitted: 2008-12-09 12:12:08

No Duplicates.



**Comment 296 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Lee  
Last Name: Hobbs  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Hobbs Trucking Co.  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/757-lee\\_hobbs.pdf](http://www.arb.ca.gov/lists/truckbus08/757-lee_hobbs.pdf)

Original File Name: lee Hobbs.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:15:03

No Duplicates.

**Comment 297 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Brian  
Last Name: Hoiem  
Email Address: blhoien@aol.com  
Affiliation: J&H Drilling Co Inc.

Subject: Proposed regulation impact to our small Corporation  
Comment:

Dear Sirs;

We were one of the first to comply with the ARB Tier III change out of our Drilling rig on deck engines. We spent nearly \$80,000 in equipment and labor costs to do this. We have heard that our competitors are fighting this ruling and many have not even complied as of this date 9 December 2008.

I am afraid if we will be required to make these same changes to our over the road truck engines that our company will not be able to stay in business. If you review our past compliance you will see that we are always up front and willing to comply, especially when there is an environmental impact involved. We do feel however that our drill rigs and related equipment have very little road time when compared to other types of over the road equipment. Most of the equipment's time is spent on site with only the deck engine running. In any particular year we would be hard pressed to put on 5,000 or less miles. Please consider as many states do that well drilling equipment be exempt from these measures.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:15:24

No Duplicates.

**Comment 298 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: David K.

Last Name: Luker

Email Address: Non-web submitted comment

Affiliation:

Subject: Desert Water

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/760-david\\_luker.pdf](http://www.arb.ca.gov/lists/truckbus08/760-david_luker.pdf)

Original File Name: David Luker.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:17:13

No Duplicates.

**Comment 299 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Steve

Last Name: Pilcher

Email Address: Non-web submitted comment

Affiliation:

Subject: Mike Campbell & Associates

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/761-steve\\_pilcher.pdf](http://www.arb.ca.gov/lists/truckbus08/761-steve_pilcher.pdf)

Original File Name: Steve Pilcher.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:18:31

No Duplicates.

**Comment 300 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: William

Last Name: Hall

Email Address: Non-web submitted comment

Affiliation:

Subject: Shasta Forest Products, Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/762-william\\_hall.pdf](http://www.arb.ca.gov/lists/truckbus08/762-william_hall.pdf)

Original File Name: William Hall.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:20:10

No Duplicates.

**Comment 301 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Norman S.

Last Name: Marshall

Email Address: Non-web submitted comment

Affiliation:

Subject: Norman S. Marshall A Law Corporation

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/763-norman\\_s.\\_marshall.pdf](http://www.arb.ca.gov/lists/truckbus08/763-norman_s._marshall.pdf)

Original File Name: Norman S. Marshall.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:21:45

No Duplicates.

**Comment 302 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Charles L.

Last Name: Rea

Email Address: Non-web submitted comment

Affiliation:

Subject: California CIMA

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/764-charles\\_l.\\_rea.pdf](http://www.arb.ca.gov/lists/truckbus08/764-charles_l._rea.pdf)

Original File Name: Charles L. Rea.pdf

Date and Time Comment Was Submitted: 2008-12-09 12:23:22

No Duplicates.

**Comment 303 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: tim  
Last Name: duddie  
Email Address: timd@tcdrilling.com  
Affiliation:

Subject: truckbus08  
Comment:

Gentlemen,

This is to request that you DO NOT adopt the proposed regulations or that you delay the adoption of the new regulations for the on road diesel vehicles. The costs associated with this regulation are simply too much for our busines to absorb or to pass on to our customers. Furthermore, we are no longer able to obtain financing for retro-fitting existing vehicles or to purchase new vehicles to meet the new criteria. More simply, the proposed regulations will bankrupt our company. This round of regulations should be directed at the truck manufacturers for new vehicles and not the existing fleets of private industry. You are directing what amounts to punitive legislation towards private enterprise that simply cannot take on anymore financial burdens in this economy.

Respectfully Submeitted,

Tim Duddie, Vice President  
Tri-County Drilling Inc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:28:42

No Duplicates.



**Comment 304 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John

Last Name: Kratz

Email Address: jfkdriller@yahoo.com

Affiliation: Pres.-elect California Groundwater Assn

Subject: Delay Proposed Statewide regulation Regulation

Comment:

As a member and representative of the membership of the California Groundwater Association, I request a delay in the implementation of the proposed regulation on in-use on-road diesel vehicles (Statewide Truck and Bus Regulation 2008).

I am convinced that regulations for record is not the answer. A comprehensive plan that works toward the goal of regulation with the ability of those that are to be regulated to exist within the scope of that regulation. We as an industry have a long ways to go to be able to exist within the scope of this regulation. I strongly support the Drive toward a Cleaner California (DTCC) position on this and urge you to delay action on this matter until an industry acceptable approach to this can be achieved.

Water is critical to California, supplying the life blood of every individual in this state would be affected by this regulation.

Please, reconsider this and delay action.

John Kratz, President of Groundwater Data, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:40:02

No Duplicates.

**Comment 305 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Sturdevant  
Email Address: twukguy@yahoo.com  
Affiliation:

Subject: On-Road Truck and Bus Rule  
Comment:

I have been in the trucking and transportation industry for 27 years and have never seen it as economically depressed as it is in today. As a parent and concerned citizen I want to clean the air as much as you do. The DTCC alternative proposal gets the long term diesel emission reductions that CARB is striving for but in a realistic timeframe. With 390,000 in-state commercial vehicles affected, it will be nearly impossible to achieve the mandates of the proposed Private Fleet Rule without causing a major portion of the transportation industry to be eliminated. This will not only affect the truckers but the businesses that service the industry. The PFR will affect and/or eliminate more businesses than the 170,000 referred to in the ISOR. Tens of thousands more secondary businesses, lives, and jobs will also be affected or eliminated by the unrealistic timeframe of the PFR as it is written. The DTCC alternative proposal will be difficult to achieve but will be achievable, whereas the PFR will not be achievable without devastating the entire California economy more than we see it devastated today.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:45:49

No Duplicates.

**Comment 306 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Wayne  
Last Name: Woodward  
Email Address: wayne@woodwarddrilling.com  
Affiliation: CGA

Subject: emissions regulations  
Comment:

The CARB is putting me very close to having to close my doors or at best I will have to downsize my fleet. At this time because of the off road engine stipulations and our having to convert our engines to Tier 4 and the economy we will be forced to reduce our staff by 35-45% to which the CARB has turned a deaf ear, relying on the fact that someone will still be in business, which yes will happen, but it will only be big business's driven by investment funds, which like CARB do not care about middle America. which in turn just makes the rich richer.

This last implementation that the CARB proposes will most likely cause us to again (by our projections) to reduce our workforce by another 35-45%, which makes little sense to a rig that is only on the road 2 - 3 hours a day, hardly making it a nuisance, I ask for once that the CARB listen to the little business owner who likes to hire and take care of people, support their local communities, pay their fair taxes. Please consider the California Groundwater Association request for rules.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 13:49:00

No Duplicates.

**Comment 307 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mary

Last Name: Pitto

Email Address: mpitto@rcrcnet.org

Affiliation: Regional Council of Rural Counties

Subject: Proposed Rule for In-Use On-Road Diesel Vehicles

Comment:

Please find attached comments on the Proposed Rule for In-Use On-Road Diesel Vehicles from the Regional Council of Rural Counties. If you have any questions you may call me at (916)447-4806. Thank you, Mary Pitto

Attachment: [www.arb.ca.gov/lists/truckbus08/772-120908\\_ltr\\_arb.pdf](http://www.arb.ca.gov/lists/truckbus08/772-120908_ltr_arb.pdf)

Original File Name: 120908 ltr arb.pdf

Date and Time Comment Was Submitted: 2008-12-09 13:59:04

No Duplicates.

**Comment 308 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ronald  
Last Name: Gonsalves  
Email Address: ronald@americanstagetours.com  
Affiliation: American Stage Tours

Subject: Truck & Bus prposed regulation  
Comment:

Please do not penalize the bus industry. We are removing vehicles from the road. The ruling should allow any bus currently registered in California to continue operating until it is retired or sold out of state. The ruling as poposed is in effect retroactive. Purchases we made as late as two years ago are even effected under the proposed regulation. These coaches were \$425,000 each and our small company purchased two that will need to be replaced before they hit half of their normal life cycle.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:03:05

No Duplicates.

**Comment 309 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gary

Last Name: Jones

Email Address: jones@smetransport.com

Affiliation:

Subject: CARBS

Comment:

During these struggling times in the Transportation Industry, adding additional costs and deadlines is a sure way to add to the closure and bankruptcy woes. We need to continue research and find additional ways to clean up the Air. Though not disagreeing with the plan, I just feel it not timely given the economy. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:21:45

No Duplicates.

**Comment 310 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: GURNELL  
Last Name: WASHINGTON, JR.  
Email Address: G7W10@AOL.COM  
Affiliation: RESPIRATORY THERAPIST

Subject: STBR 2008  
Comment:

Dear Honorable Member of the California Legislative Body,

Today, in our tough economic times, the vehicle of free-enterprise is dependent on mass logistics for a healthy economic environment. However, this dependency on heavy diesel vehicle transport of goods has a surmounting impact on the health of many in and around the urban highways in which this enterprise system uses daily. I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses and I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

California has the worst air quality in the nation and trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives.

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations.

Thank you for your time,  
Gurnell Washington, Jr., RCP/CRT

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:40:17

No Duplicates.

**Comment 311 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: randy  
Last Name: grewal  
Email Address: hermantrans@aol.com  
Affiliation:

Subject: clean truck  
Comment:

where you get all the fund's and economy is so bad you need to  
change it to 4year's from now to think about these new regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:52:39

No Duplicates.



**Comment 312 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rob  
Last Name: Burke  
Email Address: robb@rburkecorporation.com  
Affiliation:

Subject: Statewide bus and truck regs.  
Comment:

Please delay this action.

Although we agree that we will benefit from reduced emissions this measure goes too fast and at a bad time in the economy. With fuel consumption at very low rates around the globe, our air will benefit even without these new constraints. Adding these restrictions at this time will cost contractors jobs and reduce the value of their assets at exactly the worst time possible. Additionally, it will cost the taxpayers even more as rates for equipment go up even higher to compensate for new expenses, and when infrastructure improvements are needed to keep the state economy from falling into an even deeper mess.

Thank you,  
Rob Burke

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:53:56

No Duplicates.

## **Comment 313 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jodi

Last Name: McEdward

Email Address: jmcedward2000@yahoo.com

Affiliation:

Subject: How diesel fumes affect my family. Help us!

Comment:

There's a common saying that when the economy is bad, our environment loses.

With all those powerful voices from lobbyists and businesses, I'm worried that your board will not hear about how diesel fumes really affect our lives. My husband and I have raised our family in the worst air quality of the state. We cannot afford to live anywhere else. It's so expensive in all the other places that have cleaner air. Now, we couldn't move if we wanted to because of the housing mess. We may all be stuck here for years.

Ray and I have watched the number of trucks expand on our local roads. Recently, our newspaper reported that over 12,000 cars and trucks drive through my town every day. I checked with the local Highway Patrol scale office and they told me that they have counted traffic for awhile now. Almost 50% of the traffic on our roads comes from trucks that use diesel. Highway 99 runs right by my house. I can hear the traffic every day and it runs all the time. Diesel trucks are parked in my neighborhood at night and there's a big truck stop about a mile from my house. They come into town from the farms that surround Madera. So everyone tells us that particulate matter and ozone are made worse from diesel fuel. We live in the very thing that hurts us, it's everywhere in Madera County.

The schools my children attended are within a mile of that highway. They played outside everyday in the stuff that was hurting their little lungs. Now, I see the local air quality flags at those schools are almost always orange or yellow. They are never green anymore. Are the flags in your neighborhood always orange or yellow? My kids' asthma and my husband's asthma have been getting gradually worse and I know it's because the air is hurting them. Asthma affects almost every family I know, even the farmers' kids and the farm workers too. So when I hear that you are thinking of letting trucks on farms still be polluters, I need to let you know how this affects us. We don't have money to pay professionals to speak for us.

The cost of asthma medicines keeps going up. We now pay almost three times what we used to, even with insurance, because there are no generic asthma medicines anymore. How much more do we have to pay before someone votes for us? The newspaper said that diesel is a big part of bad air that causes lung cancer or asthma and that we die 14 years earlier than other places. Where do the lobbyists and business leaders live? I bet it's not here. They would say

that it's too dirty and the air is bad.

Please don't change this rule. I have read it on your website. It gives trucking companies and farming companies lots of options and time to fix their polluting trucks. They need to do their part now for the air that's hurting my family. Please don't let them convince you that our economy will tank, it's tanking already. I'm already making sure that my cars don't pollute, don't hurt other people. It costs me plenty to do my part.

As a lifelong Californian, I expect my government to think of little people like us and not just those who live better than we do. My family is the local policeman, the busboy at the Mexican Restaurant, the printer-press assistant at the factory. My family can't afford to wait for cleaner air. I am begging you to consider our side and keep the rule unchanged.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 14:58:21

No Duplicates.

**Comment 314 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: DAVID  
Last Name: DELUCCHI  
Email Address: ddelucchi@godependable.com  
Affiliation: Dependable Highway Express

Subject: PRIVATE FLEET RULE & GREEN HOUSE GAS  
Comment:

California Air Resources  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

December 9, 2008

Dear Members of the California Air Recourses Board,

Currently you are considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted, would have a profound and negative impact on California's overall economy.

Dependable Highway Express is very supportive of reducing particulate matter (PM) and oxides of nitrogen (NOx) emissions from diesel engines. We do not disagree 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business, today, and jeopardizes our future viability in the transpiration industry.

We urge the you to adopt a regulation that allows for flexibility and early incentives, while also achieving significant emission reductions. Driving Toward A Cleaner California Coalition has submitted an alternative proposal to the current ARB proposed regulation. This alternative proposal would achieve the early PM and NOx emissions reductions to improve the state's air quality that you are seeking in the ARB's current proposed rule, while providing much-needed flexibility to comply based on a variety of factors including mileage, type and use of the vehicle, and the best use of the available technology.

This rule comes at a time when California truck owners are struggling to make ends meet in the most severe economic climate we've experienced in decades high diesel prices, record home foreclosures, a 17-year low in housing starts, a credit crisis and the imminent threat of a full-blown recession.

Under the annual emission reduction targets required under the current ARB proposal, many truck owners will be required to first retrofit an engine, only to have to turn around a few years later and replace those trucks.

Many of California's trucking companies have already begun the process of retrofitting or replacing its fleet, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses. Additionally, many of these companies simply do not have the resources or access to capital to retrofit their engines and may be forced to sell off their trucks or shutter the company's doors, ultimately costing jobs and revenue to the state's economy.

We must not forfeit California's economy for the sake of protecting our environment. That's why, as a member of the DTCCC & CTA we're working together, across industry sectors to develop a feasible solution that achieves the state's air quality goals while keeping California's economy moving forward. I ask that you evaluate the coalition's alternative proposal and work with the industries impacted by this rule to adopt a final product that achieves the balance this alternative proposal seeks to find.

We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

Sincerely,

David Delucchi  
Director Fleet Maintenance

Attachment: [www.arb.ca.gov/lists/truckbus08/781-carb\\_letter.doc](http://www.arb.ca.gov/lists/truckbus08/781-carb_letter.doc)

Original File Name: CARB LETTER.doc

Date and Time Comment Was Submitted: 2008-12-09 14:59:02

No Duplicates.

**Comment 315 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: William

Last Name: Batson

Email Address: batsondrilling@sbcglobal.net

Affiliation:

Subject: Regulation inuse on road diesel vehicles

Comment:

I have been in busness 35 years and have built a good reputation. I  
am ready to retire. With the new regs in place, I will have nothing  
to sell. bringing my eguipment up to code is financialy  
impossable. please consider the CGA/DTCC alerrnitive to the air  
problum.

thank you, An old worn out driller

Bill Batson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:04:31

No Duplicates.

**Comment 316 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Piech  
Email Address: David.Piech@Navistar.Com  
Affiliation: Navistar, Inc.

Subject: Comments on Proposed Private Retrofit Rule  
Comment:

Comments and Suggested Clarifications Attached

Attachment: [www.arb.ca.gov/lists/truckbus08/783-privateretrofits.pdf](http://www.arb.ca.gov/lists/truckbus08/783-privateretrofits.pdf)

Original File Name: PrivateRetrofits.PDF

Date and Time Comment Was Submitted: 2008-12-09 15:08:23

No Duplicates.

**Comment 317 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Cecil  
Last Name: Gates  
Email Address: cgates@crownfence.com  
Affiliation:

Subject: Truck & Bus Regulation 2008  
Comment:

I think the proposed diesel regulations should at the very least be postponed for a couple years, until the recession / depression in California has passed, or at least begun to turn around.

No one can expect the average company to be able to replace or modify their current fleet to meet the new requirements in this economic environment. If this current legislation is passed, I believe it will have devastating effects on our economy at this time.

CROWN FENCE CO  
Cecil Gates, President

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:24:03

No Duplicates.



**Comment 318 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Richard  
Last Name: Stevenson  
Email Address: richard\_s\_stevenson@yahoo.com  
Affiliation: Stevenson Transfer Inc

Subject: New On Highway diesel rules  
Comment:

These proposed diesel emission rules will put me out of business. Plain and simple. They are onerous and punitive. I own a 10 year old transfer dump truck with 240,000 miles on the odometer. I will be forced to spend anywhere from \$20k to \$60k to comply with the diesel emission rule milestones. Just the fact that these rules are being proposed has devalued my truck by over 70%. This just does not make any sense to me. This proposal needs to be scrapped.  
Richard Stevenson, Owner  
Stevenson Transfer Inc.

Attachment: [www.arb.ca.gov/lists/truckbus08/786-govswarzletterfinal1.1pg2.docx](http://www.arb.ca.gov/lists/truckbus08/786-govswarzletterfinal1.1pg2.docx)

Original File Name: GovSwarzletterfinal1.1pg2.docx

Date and Time Comment Was Submitted: 2008-12-09 15:26:49

No Duplicates.

**Comment 319 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matt  
Last Name: Panella  
Email Address: panella@pacbell.net  
Affiliation:

Subject: PRIVATE FLEET RULE  
Comment:

Dear Govenor Schwarzenegger or Members of the California State Legislature or CARB, My name is Matt Panella my brother and I Will Panella own and operate B. Panella Drayage Co. established in 1912. We are the fourth generation in our family to carry on in the trucking business and we have enjoyed many years of success, but every year that goes by with more rules and regulations being forced upon business especially trucking, we are seeing less and less profit, and especially in a slow and struggling economy being forced to purchase new trucks would have a devastating effect on our business. We are not so fortunate to be able to pass on all of our expenses to our customers. We totally believe in cleaning up our air quality and keeping California a beautiful State, but I wonder at what expense that should be done. We want to comply with the new rules that are going to take place but we are wondering how we will be able to pay for these proposals. Please keep in mind that there are many small companies like ours that may not be able to survive these changes, and I believe that would be devastating to our economy and all of our lifestyles. Thank You, Matt Panella.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:33:18

No Duplicates.

**Comment 320 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dave

Last Name: Kite

Email Address: dynacon@socal.rr.com

Affiliation:

Subject: Hardship if this regulation passes

Comment:

Hello,I will suffer a good deal of hardship if this regulation passes.I am a small business owner and I cannot afford a newer truck

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:52:36

No Duplicates.

**Comment 321 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast Air Quality Management Dist.

Subject: SCAQMD Staff Comments on Proposed Truck and Bus Regulation

Comment:

Please find attached the South Coast AQMD staff comments on the proposed In-Use On-Road Diesel Vehicles Regulation.

Attachment: [www.arb.ca.gov/lists/truckbus08/789-scaqmd\\_comments\\_-\\_on-road\\_hdv\\_-\\_120908.pdf](http://www.arb.ca.gov/lists/truckbus08/789-scaqmd_comments_-_on-road_hdv_-_120908.pdf)

Original File Name: SCAQMD Comments - On-Road HDV - 120908.pdf

Date and Time Comment Was Submitted: 2008-12-09 15:55:29

No Duplicates.

**Comment 322 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Marie  
Last Name: SARGENT  
Email Address: mariesargent@prodigy.net  
Affiliation:

Subject: Statewide Truck and Bus Regulation 2008

Comment:

I cannot believe that the CARB is still going ahead with this the way it now stands. The people of California and the United States cannot afford this right now. There needs to be concessions on this matter due to the economy.

I work for a small company. There is no freight in California this week, it has been getting worse everyday. To anyone who is not in the trucking industry, translated means NO BODY IS BUYING ANYTHING, NO NEW PRODUCTS GOING TO STORES. THE STORES HAVE NOT DEPLETED THERE STOCK YET.(AT CHRISTMAS TIME NO LESS!)

I totally believe in clean air but not at the cost of my job, my house and food for my son!!!

With everything going on in the US and World right now. I think everybody better take a second look at where we are, before it is too late. This may be the straw that breaks the camel's back.

I hate to be such a naysayer but this economy has me scared that If I loose my job what would I do, who would bail me out. I think this proposal needs to be modified or postponed until the economy settles down.

Americans should stand up to this. It is not a change to really help the people IF it destroys jobs and livelihoods in the process.

Beyond concerned in the Central Valley,  
Marie Sargent  
Ivanhoe, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:13:59

No Duplicates.

**Comment 323 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Don  
Last Name: Scare  
Email Address: don.scare@apria.com  
Affiliation:

Subject: New proposed CARB regulations  
Comment:

Please see attached letter for consideration of this matter.

Attachment: [www.arb.ca.gov/lists/truckbus08/791-scan001.tif](http://www.arb.ca.gov/lists/truckbus08/791-scan001.tif)

Original File Name: Scan001.TIF

Date and Time Comment Was Submitted: 2008-12-09 16:17:37

No Duplicates.

**Comment 324 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom

Last Name: Bowers

Email Address: tbowers@preferredpump.com

Affiliation: CA Groundwater Assoc Member

Subject: Variance Needed For Water Well Professionals

Comment:

I strongly urge the issuance of variances and exemptions to the Water Well contractor operating with a C56 or C57. Because the civil infrastructure is lacking in rural areas, the water well professional fills the void in providing water for Agricultural and domestic purposes, saving the State and taxpayer untold sums.

Because crops and livestock are at stake, water well contractors need to respond quickly to provide water. The cost to the private contractor, is already close to unbearable. Drill rigs, outfits can cost in excess of \$1 mill and a pump pulling rig can cost as much as \$600K, fully outfitted. To be able to provide water to the rural and agricultural customer, the water well contractor cannot possibly bear the estimated \$200K per deck mounted engine to re-power rigs.

Unless the State is willing to provide water to all of its citizens, we will necessarily rely on the water well contractor. For that reason, an exemption from onerous expenses is a must.

Regards,

Tom Bowers

Group Manager

Preferred Pump & Equipment, LP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:34:45

No Duplicates.

**Comment 325 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Debbie

Last Name: lopez

Email Address: dlopez@majesticrealty.com

Affiliation:

Subject: "NO" to the adoption of an on-road diesel truck/bus regulation

Comment:

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:38:09

No Duplicates.



**Comment 326 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Paul  
Last Name: Buttner  
Email Address: pbuttner@calrice.org  
Affiliation:

Subject: Comments on Truck Regulation  
Comment:

Please find the California Rice Commission's comments attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/794-crc-arb\\_truck\\_reg\\_final\\_.pdf](http://www.arb.ca.gov/lists/truckbus08/794-crc-arb_truck_reg_final_.pdf)

Original File Name: CRC-ARB\_Truck\_Reg(Final).pdf

Date and Time Comment Was Submitted: 2008-12-09 16:46:14

No Duplicates.

**Comment 327 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: mark

Last Name: crawley

Email Address: hemsteds@charterinternet.com

Affiliation: hemsteds van & storage

Subject: carb act

Comment:

dear sirs-- i have read the various literature from carb and although i know its well intentioned, i dont think there has been little of any forethought into the financial impact that this will have on every single person in california and beyond, there is not a stitch of clothing, a product of food or any single item that is in the consumer chain that is at some point or another transported by a truck, through attrition many of the older models of trucks will be phased out and manufacturers are already producing new product with more green friendly aspects, if you were to implement all that you propose you will unleash a new rise in cost for every single items one might purchase, is this what we need in these already brutal economic times? logic would dictate that it is not.. think long and hard before you force all these mandates, i fear the upheaval will be tremendous and your tax base will shrink further and your unemployment outlays will rise dramatically.. think pragmatically before you vote..common sense will serve us all well, if we will only listen.

the best

mark

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:48:09

No Duplicates.

**Comment 328 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jim  
Last Name: Morton Trucking  
Email Address: Mortyhaulz@aol.com  
Affiliation: C.D.T.O.A.

Subject: Proposed Regulations  
Comment:

This message is to let this state government know that these proposed regulations are a crock of crap. I have been in the trucking industry since 1981 paying taxes that support the very people [ARB], who are trying to put myself and others out of business, the State of CA is in a total economic shambles with very little work going on. How are we supposed to support ourselves and maintain any kind of life here, if we try to comply with these outrageous proposals in the works. I can just make ends meet with the equipment I have, which will become worthless and unable to sell. Will the State of CA bail me out and fund new equipment that I already can't pay for and provide me housing when I lose my house because I have no income to pay the mortgage and feed my family because there is no money to buy food? Come up with a new plan that would require smoke check at registration like the way Auto's are done. This whole proposal is just unacceptable in this country where we are supposed to be free! This is not some third world state run by dictators [ARB]. I wish I could really say what I think of the ARB but I have more respect of them than they do of us. Jim Morton O/O since 1981.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:50:41

No Duplicates.

**Comment 329 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Randal  
Last Name: Malchow  
Email Address: rwmalchow@pomacos.com  
Affiliation: CIOMA

Subject: CARB New Trucks Regulation  
Comment:

The economic upheavel that the State of California is experiencing today is in part due to unnecessary and untimely government regulations. This will accomplish nothing if the businesses left here cannot afford to make changes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:54:52

No Duplicates.

**Comment 330 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: DR. AL  
Last Name: LANDUCCI  
Email Address: e@DrLanducci.com  
Affiliation: formerly UCSF

Subject: Diesel Truck Exhaust Regulations  
Comment:

Many of us have developed lung cancer, asthma, diesel exhaust sensitivity and chronic lung diseases from over exposure to diesel exhaust. Your regulations should include city, district and state fire trucks, all buses, all garbage trucks and ambulances because that is where we have gotten our excessive diesel exposure. We realize the state and other governments do not have the money to retrofit all these diesel vehicles now but it should be a part of your bill that PUBLICALLY OWNED DIESEL VEHICALS ALSO be compliant but give them 2 to 4 more years to meet the same standards you are considering 12/10. All new diesel publically owned vehicals should immediately be compliant with the least amout of toxic diesel exhaust chemical. We strongly support you pass the regulations on retrofitting or replacing all privately owned diesel trucks on the roads in California. The health of Califorians is the most important. Thank you for trying to lessen our future health costs and allowing us to live longer with good health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:55:39

No Duplicates.

**Comment 331 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Doug  
Last Name: Van Allen  
Email Address: dvanallen@bjsservices.com  
Affiliation: BJ Services Company USA

Subject: Comments on On Highway Truck regulation  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/truckbus08/799-on\\_road\\_diesel\\_comments.doc](http://www.arb.ca.gov/lists/truckbus08/799-on_road_diesel_comments.doc)

Original File Name: On Road Diesel comments.doc

Date and Time Comment Was Submitted: 2008-12-09 17:03:35

No Duplicates.

**Comment 332 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Anna  
Last Name: Sanchez  
Email Address: agarcia@gvhc.org  
Affiliation:

Subject: For the Rule  
Comment:

One month ago today if you asked me "how do you feel about your daughter having asthma?" I'd say "well it's a sickness that the FEDERAL government needs to handle". Little did I know that this issue is at a regional and state level? Little did I know that this issue hasn't been handled for any other reason than MONEY, especially when people's lives are at stake.

This ignoring the pollution has gone on long enough. When I hear "oh the truckers will loose jobs, money, business" I think "well my daughter is loosing her life expectancy, I think well I have to pay for her medicines and hospital visits, I have sleepless nights ESPECIALLY during the winter time this all adds up. As a single mom my daughters personal well being is more then my full time job.

I am sorry to say this but yes a trucker may loose a job, some money, and business but that has vast light contrast compared to my daughter loosing her life, because at the end of the day that trucker can get another job, can learn a new trade.....NO ONE or NOTHING can replace Julianna.

Julianna is potentially one of many whose lungs may have to be replaced in order to live a longer life, and tell me how much that is compared to the price of a truck? Will I have government assistance? Or some grant to pay for this medical bill considering our healthcare system.

Attachment: [www.arb.ca.gov/lists/truckbus08/800-comment.doc](http://www.arb.ca.gov/lists/truckbus08/800-comment.doc)

Original File Name: comment.doc

Date and Time Comment Was Submitted: 2008-12-09 17:05:13

No Duplicates.

**Comment 333 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ginny  
Last Name: Stein  
Email Address: gstein@preferredpump.com  
Affiliation:

Subject: Request for Modification of On-Road Diesel Truck and Bus Regulation  
Comment:

I would like to add my voice and request you make modifications to the proposed On-Road Diesel Truck and Bus Regulation.

While regulations are vital to our environment, water and the safe delivery of it for the millions living in the great state of California are equally if not more important. Without groundwater contractors, many of whom are members of the California Groundwater Association, the safety of our drinking water - let alone our irrigation and food prep from dairy wash down to packing houses - is threatened. Don't legislate these hard working people out of their business and possibly jeopardize one of our most precious and finite resources.

I am attaching a copy of the letter Michael Mortensson, Executive Director of the CGA, sent earlier this week. Please give it your attention. There is not a soul unaffected by this issue.

Kind Regards,

Ginny Stein  
Preferred Pump & Equipment, LP  
Fresno, CA

Attachment: [www.arb.ca.gov/lists/truckbus08/801-cga\\_letter\\_to\\_carb\\_on\\_truck\\_\\_bus\\_regs.doc](http://www.arb.ca.gov/lists/truckbus08/801-cga_letter_to_carb_on_truck__bus_regs.doc)

Original File Name: CGA letter to CARB on truck bus regs.doc

Date and Time Comment Was Submitted: 2008-12-09 17:14:01

No Duplicates.



**Comment 334 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Sandy  
Last Name: Silberstein  
Email Address: rcsaa@rcsaa.com  
Affiliation: Executive Director-RCSAA

Subject: Agenda Item 08-11-3: School Bus Regulations  
Comment:

Please see the attached letter of opposition. A signed original  
can be faxed to you upon request. (Need your fax number.)

Thank you.

Attachment: [www.arb.ca.gov/lists/truckbus08/802-120908\\_arb\\_letter.doc](http://www.arb.ca.gov/lists/truckbus08/802-120908_arb_letter.doc)

Original File Name: 120908 ARB Letter.doc

Date and Time Comment Was Submitted: 2008-12-09 17:16:11

No Duplicates.

**Comment 335 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: cheryl  
Last Name: davis  
Email Address: cheryl@davistruckingsd.com  
Affiliation: owner operator

Subject: on road truck diesel regulation  
Comment:

I am concerned about air quality. I am also concerned about quality of life in the State of California. My husband is an owner operator trucker and has been in the dump truck business in CA for the last 35 years. We have lived through several recessions and are now experiencing the worst construction downturn we have ever seen in Southern California. The only way we made it through previous slowdowns was by having a savings account, having our equipment paid for and not making any major expenditures. Each recession completely depleted our savings but we were able to survive financially because of our extremely low overhead(no truck payments)! There is no way we can afford to buy a 2007(or newer) truck or spend \$15,000 on the unproven retrofitting during this current economic downturn. We just need more time. As "used" compliant trucks become available at reasonable prices truckers will upgrade. Let's try to strike a balance between business and the environment. We can all emerge winners!

Cheryl  
Davis Trucking Inc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:19:12

No Duplicates.

**Comment 336 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom

Last Name: Eaton

Email Address: konanexpress@sbcglobal.net

Affiliation:

Subject: Diesel Trucks and Aero products for trailers

Comment:

I have heard that China puts more pollutants in the air in a week than your project will save over a twenty year period..... so how can you think of putting the financial burden of these proposed regulations on the already struggling trucking industry? Do you really think we can just pull money out of our a\$\$e\$ to accomodate your folly in the name of clean air, OR even more preposterous in the name of craeting more jobs. Your passage of these regulations will force a huge percentage of California's trucking companies into closing their doors. How many jobs will that cost? After they are gone you better hang on to your personal wallets, their will be such a shortage of trucks in California, the shipping rates will certainly rise and add to the consumer's costs in a manner that could make everyone forget what happened when fuel was \$near \$5.00/gallon. The surviving companies will be in the driver's seat..... You environmentalists and your "green" agenda have all but crippled this country. You have made us slaves to OPEC and other oil producing countries with your ban on drilling, and now you want to increase the burden on our citizenry with these regulations in the name of stopping global warming, something that is probably caused by a change in weather patterns more than we humans.

Also, do you really think the out of state carriers will comply? California is already one of the least desireable states for out of state carriers, why would you want to add to it?? I'm thinking if I was an out of state carrier, my trucks would stop at the border and tell California to come get it, or not come to the West Coast at all. .... hmmm maybe that's the answer I'll get out of trucking and build warehouses at the border to cross dock California's goods.... how much will that add to the cost of goods coming in??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:25:13

No Duplicates.

**Comment 337 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: June  
Last Name: Van Wingerden  
Email Address: jbwingerden@hotmail.com  
Affiliation: cut-flower growers

Subject: No additional regulation at this time  
Comment:

If you find any agricultural sector making money (profit) out there then go ahead with your new regulations. In this economy, the proposed regulations will be the final nail in the coffin for some of us. We are struggling to stay solvent. Please postpone any planned new regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:40:25

No Duplicates.

**Comment 338 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Eric

Last Name: Carleson

Email Address: [sactolog@cs.com](mailto:sactolog@cs.com)

Affiliation: Associated California Loggers

Subject: In-Use On Road Diesel Truck Rule

Comment:

Please see letter attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/807-in-useonroaddieselrule.pdf](http://www.arb.ca.gov/lists/truckbus08/807-in-useonroaddieselrule.pdf)

Original File Name: In-UseOnRoadDieselRule.pdf

Date and Time Comment Was Submitted: 2008-12-09 18:09:38

No Duplicates.

**Comment 339 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rachelle  
Last Name: Gill  
Email Address: julienoil@aol.com  
Affiliation:

Subject: "Buy New Trucks"  
Comment:

We as a small business, in the trucking field, we are struggling to stay afloat. We want clean air, we do our smoke test yearly. If we must buy new trucks, replacing trucks that are perfectly good it will shut our doors. I know we are only a small family business, we do have 10 families that rely on us for their livly hood. We have been here for 42 years. We want to keep moving on. In this economy we don't need to put more families on the streets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 19:02:11

No Duplicates.

**Comment 340 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Arthur

Last Name: Fulton

Email Address: dave@diamondwelldrilling.com

Affiliation: California Groundwater Association

Subject: this rule kills us

Comment:

The Statewide Truck and Bus Regulation would put us out of business.

Diamond Well Drilling Company operates 4 drill rigs and several boom trucks. We travel very few miles but more than 7500 per year with each. Most of the time when our equipment is operating the drive engine is either off or idling. As such we contribute very little pollution. But still we are to be subject to the same rule as over the road truck haulers.

What makes this rule so hard on us is that most of the value in our equipment is in the drilling mechanism or the boom truck mechanism. As a result these pieces of equipment are very expensive, much more than a truck or bus would be. A typical drill rig costs \$850,000. Because these equipment are very expensive and very durable they have 20 to 25 year useful lives for us. Replacing all our equipment in the next 1 to three years is just not economically feasible. For one thing none of us can get loans now. We cannot finance new purchases.

Even if we could the economics of our business would change dramatically if the useful life of our equipment is to be reduced to 8 to 10 years. Prices would have to double or triple. Business is already very slow. We cannot raise our prices in this economic environment and expect to get any business.

Perhaps you say that everyone will have to raise their prices so there will be no damage to any individual well driller. This is not so. If the price of drilling goes up the price of construction goes up. People will be discouraged from developing altogether. They just will not build. Everyone gets hurt and for no real reason since our equipment does not drive that much and therefore pollutes very little.

Dave Fulton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 19:39:03

No Duplicates.



**Comment 341 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: smith  
Email Address: patned62@yahoo.com  
Affiliation: Smith Trucking LLC

Subject: ab32  
Comment:

I am absolutely against ab 32. The concept will bankrupt every small Trucking firm in California, especially in this economy. The area of trucking that I have been a part of for 50 years is construction dump trucking. Made up mostly of single truck operators that put less than 75000 miles per year on the road. I, nor my father or brothers that have been in this industry all their lives have ever been diagnosed with lung cancer or any of the other deadly diseases attributed to this industry. Most lung cancers come from smoking and 50% of truck drivers probably smoke. I do not. I own a 1994 tractor that is in top condition and does not smoke. That same truck new would cost 120000.00 or more and the rate system we must live by doesn't offord that kind of expense.

No on AB32.

William N Smith

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 20:12:31

No Duplicates.

**Comment 342 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Joy  
Last Name: Williams  
Email Address: JoyW@environmentalhealth.org  
Affiliation: Environmental Health Coalition

Subject: Support statewide truck and bus regulation 2008  
Comment:

Attached is a letter of support for the statewide truck and bus regulation. EHC supports this rule and urges the ARB Board to adopt the rule. Thank you.

Attachment: [www.arb.ca.gov/lists/truckbus08/814-letter\\_to\\_arb\\_board\\_truck\\_rule.doc](http://www.arb.ca.gov/lists/truckbus08/814-letter_to_arb_board_truck_rule.doc)

Original File Name: letter to ARB Board\_Truck rule.doc

Date and Time Comment Was Submitted: 2008-12-09 20:26:20

No Duplicates.

**Comment 343 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Fletcher  
Email Address: bobefletcher@yahoo.com  
Affiliation:

Subject: truck rule  
Comment:

I have been watching this rule for the last two years and find it hard to follow what you guys are saying. I am 31 years old and have been riding in and around trucks since I was born. I have perfectly healthy lungs. You say truckers are pron to lung cancer due to PM levels but you people dont realize 70% of truckers smoke some 2-3 packs a day. I am a diesel mechanic and you say mechanics are not as vulnerable as drivers , due you think they run the exhaust pipe in the cab of their truck ? How does PM get in the cab when you are driving down the road? your study I believe is a complete joke!!! you are after the trucking industry because it generates revenue! Smoking cigaretes causing lung cancer you idiots and asthma thats medicine 101, second hand smoke causes asthma. a nasty burning car will choke you out before a truck. AB32 says that you want PM levels of 1990 , but all trucks then burned dirty nothing like to 1994 and newer trucks , You people make absolutly no sense . Technology will clean the air as it takes its course. what happens when the trucks burn clean and trucks were not the problem will you credit back all my customers money they spent on your dumb rule? THATS WHAT I THOUGHT this is all about money(STUPID CALIFORNIA)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 20:44:14

No Duplicates.

**Comment 344 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bob  
Last Name: Erickson  
Email Address: bobericksonequipment@yahoo.com  
Affiliation: owner/operator

Subject: Our Success depends on your decision  
Comment:

The success of more than the trucking industry is dependent on this decision. Owner operators, truck fleets and livelihood of Californians is dependent on reasonable thought. I have read comments on here of people that "have to hold their breath when passing diesel trucks on the freeway" because of asthma. Question if you have asthma how can you drive with the window down? Question, if the windows are rolled up how do you ingest fumes? I have a 2001 truck with on 250,000 miles, just barely broke in and barely finished making payments. Now I would have to retrofit a perfectly good truck! Please help everyone including yourselves by making reasonable decisions! This decision is vastly important for the future of all Californians. NO MORE STRINGENT/UNREASONABLE REGULATIONS.

Bob Erickson 209-652-3536

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 21:53:49

No Duplicates.

**Comment 345 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Augie  
Last Name: Guardino  
Email Address: augie@guardinowell.com  
Affiliation: CGA

Subject: Tier Engines  
Comment:

The current emissions standards that you are proposing and the are coming down the line will effectively put our small company out of business. We currently drill the majority of water wells in Santa Clara County. We will not be able to economically come into compliance. How are you going to monitor contractor's coming from out of state?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 22:05:15

No Duplicates.

**Comment 346 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Susan  
Last Name: White  
Email Address: susan@solanoasthma.com  
Affiliation: Solano Asthma Coalition

Subject: Proposed Statewide Truck and Bus Regulation  
Comment:

December 9, 2008

Chairwoman Mary Nichols and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: Proposed Statewide Truck and Bus Regulation

Dear Chairwoman Nichols and Board Members:

The Solano Asthma Coalition is a member of the CAFA network. As asthma advocates, we are very concerned about poor air quality associated with diesel pollution and urge you to approve a strong, health protective regulation.

We recognize the challenging economic times that the state is facing as the Board is presented with this regulation. However, the economic and health costs of doing nothing are apparent. Because California is home to some of the worst air quality in the country, it is not surprising that asthma is a major cause of lost school days and emergency room visits. In California, there are over 14,000 asthma-related hospitalizations a year just for children under the age of 15 with a cost of about \$19,000 per stay.

Furthermore, the November 2008 Jane Hall study found that air pollution in the South Coast and San Joaquin Valley regions alone costs the California economy \$28 billion annually. The swift adoption of a strong regulation is vital to removing the health and economic burdens of unhealthy air and can ensure that California can meet federal air quality standards. However, we ask the Board to consider restricting the proposed exemptions for agricultural trucks and provide a margin of safety for meeting SIP commitments.

We applaud ARB's efforts to move forward with this ground-breaking regulation that will reduce costly public health emergencies and clean our air. Our main concerns with the October 24, 2008 proposed regulations involve the agricultural exemptions. These exemptions are far too broad and compromise the health protections of the regulation for those living or working near the agriculture industry, especially the Central Valley. We suggest reducing the mileage threshold, requiring PM filters, limiting fleet size, and not expanding the definition of agricultural vehicle to include trucks owned by ancillary businesses. This will still provide special consideration to the agriculture industry, but will better

protect public health.

Finally, we hope that CARB will continue vigorous outreach to truck owners to ensure incentive programs are understood and accessible. We will not see benefits from this regulation if owners are unable to comply with the rules. Ensuring owners are aware of the multiple funding sources that can be leveraged to assist individual truck and fleet owners, will maximize compliance with the rule and minimize the economic impact on owners and business.

Sincerely,

Susan White  
Program Director  
Solano Asthma Coalition  
1652 W. Texas St, Suite 102C  
Fairfield, CA 94533  
707-434-9685

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 22:26:24

No Duplicates.

**Comment 347 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tim  
Last Name: Guishard  
Email Address: guishard@sbcglobal.net  
Affiliation:

Subject: proposed carb rules  
Comment:

The proposed rules have and will significantly affect my business. I do not have the money to replace equipment that is working good, just to comply with these rules. The compliance dates should reflect when the equipment is replaced due to major engine failure.

I schedule equipment replacement based on the repair frequency. When the repair costs get to high, I replace the equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 07:19:14

No Duplicates.



**Comment 348 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Peter

Last Name: Heimark

Email Address: peter.heimark@triangle-dist.com

Affiliation:

Subject: Please Consider DTCC Alternative Proposal

Comment:

I urge the ARB to consider the current economic climate and adopt the Driving Toward a Cleaner California (DTCC) coalition's alternative proposal. DTCC's proposal is a balanced solution. It will keep truck and bus companies afloat in this fragile economy, avoid further layoffs and keep goods and services moving in California. The alternative proposal would give companies the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions. In fact, ARB's own analysis of the DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term. Under ARB's current proposal, every diesel truck and bus operating in California would have to be replaced or retrofitted starting in 2010 at a cost of at least \$5.5 billion - at a time when there is little to no access to capital for financing engine retrofits or replacements. Please consider the DTCC proposal carefully and seriously.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 07:34:01

No Duplicates.

**Comment 349 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Max  
Last Name: Hallmann  
Email Address: hallman.m@mccd.edu  
Affiliation:

Subject: Regulate Diesel Vehicles  
Comment:

Dear Board Members:

I urge you to adopt the Statewide Truck and Bus Regulation. As a resident of the Central Valley for 23 years, I know firsthand the negative effects of poor air quality on our region. In my classes, I often contrast Native American political principles with those adopted by governing agencies of the United States government. One of the basic principles of Native American politics is that one should consider the effects on the 7th generation unborn when making political decisions. In Native American thinking seven generations equals about 100 years. I ask you to think about how the air quality in California today compares to the air quality 100 years ago. I also urge you to consider the welfare of future generation in making your decision on this and other regulations. Passing the Statewide Truck and Bus Regulation will represent an important step in making sure that the air breathed by future generation will be as good as, or hopefully even better, than the air we breathe today.

Sincerely,

Max O. Hallman, Ph.D.  
Professor of Philosophy and Humanities  
Merced College

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:02:07

No Duplicates.

## **Comment 350 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Blatt  
Email Address: mblatt@ucmerced.edu  
Affiliation:

Subject: From Merced County: S.O.S.  
Comment:

I'm Michael Blatt, a student from UC Merced, a 12 year native of the central valley, and founder of Public Health Issues Forum ([www.publichealthissues.org](http://www.publichealthissues.org)).

Our organization did an event in West Merced a couple of weeks ago for the Asthma coalition, handing out information on asthma and inhaler holders. Most of my fellow club members didn't expect our booth to be very busy compared to booths held by police and fire fighters.

We were wrong. One after another, people came to our booth for information on asthma. One after another, people told us they were diagnosed with asthma. One after another, people told us they felt helpless in that their inhaler is the life line of their lives. All of these people were born in Merced. Elderly, teenagers, toddlers. All of them came to our booth and told us of their struggles with asthma.

All of these people did not make lifestyle choices that lead to their chronic illness, these people were born into a county that is top 5 in the nation in air pollution. This is not a matter of lifestyle, but of the environment one grows up in.

32 citizens that day signed a petition for Diesel Truck Rules out of 150 attending the event. People were sick and tired of living in an environment that is out of our control. They signed these petitions to take control.

It is time to come together and defeat asthma. To defeat asthma, it begins with decreasing air pollution. With proper rules and regulation, we can make the valley a place where children can grow up and flourish.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:07:03

No Duplicates.



**Comment 351 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: John  
Last Name: Burroughs  
Email Address: jburroughs@commercelp.com  
Affiliation:

Subject: Truckbus08  
Comment:

Please do NOT proceed with this action. This action WILL result in less jobs and will further damage our fragile economy. Your choice to proceed with this action at this time will contribute to financial hardship for many, many Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:07:31

No Duplicates.

## **Comment 352 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ron  
Last Name: Hall  
Email Address: ronh@crengland.com  
Affiliation: C.R. England, Inc.

Subject: C.R. England comments on the Private Fleet Rule and the SmartWay Regulation  
Comment:

December 10, 2008

To: California Air Resources Board

C.R. England comments on the Private Fleet Rule and the SmartWay Regulation

Hello, my name is Ron Hall. I am the Director of Business Strategy for C.R. England, the largest refrigerated carrier in the nation, and Transport Topics 36th largest for-hire carrier. Before providing an opinion, I'd like to mention that C.R. England is currently a SmartWay Certified Partner, with the maximum compliance score of 1.25. We are committed to reviewing and implementing new technologies as a core strategy for fuel efficiency management, as evidenced by our recent purchase of planning optimization software for deadhead reduction and un-tethered trailer tracking and control for reefer fuel management.

Thank you for giving me the opportunity to comment on both the Private Fleet Rule and the Smartway Regulation. As a statement of position, C.R. England is opposed to both regulations. We fully support the written statements submitted by the California Trucking Association on October 3rd and December 4th that challenge CARBs assumptions on both proposed regulations. Of particular concern for us, are the implementation and maintenance costs of the required equipment modifications and the full fleet implementation that will be required for fleets that operate only partially in California.

CARB is assuming that fleets operating occasionally in California will be able to segregate their equipment, both tractor and trailer, and install upgrades to only that subset. That assumption is flawed for several reasons. First, the freight destined for California (because of the size of it's economy) originates out of virtually every part of the nation. To position tractor and trailer equipment with the necessary density and dispersion so equipment is available at origin for California destined loads would require full fleet implementation.

Second, trans-loading at the California border onto certified equipment is not an option, especially with loads consisting of food products, because the seal requirements many customers now have does not allow carriers to open the load until it arrives at destination. Even if seal requirements were not an issue, the

trans-load expense and exposure to claim from temperature variation or damaged cases would make this option unfeasible.

Finally, even if equipment could be positioned in advance, the lack of isolated trailer pools in most one-way trucking applications prohibits reserving certified equipment for California destined loads. In many trailer pool locations, carriers rely on customer loading processes, third party loading services and driver decisions to determine which load ends up on which trailer. Those decisions are often difficult for the carrier to control, resulting in the probability that a portion of the California destined loads will end up on non-certified equipment.

In summary, these regulations, as proposed, have impacts that reach much farther than just California state borders. Fleets with partial activity in California will be faced with full fleet implementations of these requirements if they wish to continue to operate in California. To recover costs, it's feasible that some fleets could start implementing a "California Surcharge" that will result in higher costs of goods to California consumers. We urge CARB to consider the farther reaching impact of these regulations for carriers that operate only partially in California. Again, thank you for giving me the opportunity to comment on behalf of C.R. England.

Sincerely,

Ron E. Hall, Director of Business Strategy  
C.R. England, Inc.  
4701 West 2100 South  
Salt Lake City, Utah 84120

Attachment: [www.arb.ca.gov/lists/truckbus08/831-carb\\_statement.doc](http://www.arb.ca.gov/lists/truckbus08/831-carb_statement.doc)

Original File Name: CARB Statement.doc

Date and Time Comment Was Submitted: 2008-12-10 08:26:53

No Duplicates.

**Comment 353 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Guy  
Last Name: Jones  
Email Address: gjones@commercelp.com  
Affiliation:

Subject: trucksbus08  
Comment:

The regulations are too far sweeping and will cause our troubled economy even further harm. This will hurt too many people and should not be passed. The regulations will not bring global CO2 levels down by any significant level. That process is occurring naturally, and must be given more time. If we allow things to continue on their present course, we will find that there was no need for this particular legislation.

Therefore, I urge patience and recommend shelving the legislation until 2010.

Thanks,  
GSJ

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:32:40

No Duplicates.



**Comment 354 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation: American Trucking Associations

Subject: Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles

Comment:

Comments Attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/833-2008.ata-carb.truckreg.cmts.pdf](http://www.arb.ca.gov/lists/truckbus08/833-2008.ata-carb.truckreg.cmts.pdf)

Original File Name: 2008.ATA-CARB.TruckReg.Cmts.pdf

Date and Time Comment Was Submitted: 2008-12-10 08:44:10

No Duplicates.

**Comment 355 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James

Last Name: Provenzano

Email Address: jjpro@cleanairnow.us

Affiliation: President, Clean Air Now

Subject: Diesel Exhaust Must Be Regulated

Comment:

With the South Coast Air Quality Management District's MATES II and III indicating that over 70% of the risk of contracting cancer from air pollution is due to diesel exhaust, this most harmful emission must be regulated.

We, at Clean Air Now, support your efforts to reducing these "detriment to human health" emissions, making our State healthier, more competitive, and a continued leader to which the world looks to for guidance.

We are in favor of the most stringent reductions that staff proposes. We feel that the industry can and will react to these regulations, ultimately in a positive way. Technologies borne out of these regulations will become the industry norm as they invariably do over time.

Thank you for your continued efforts in making California a place in which we want to live, and a State in which we can be proud. Thank you, James J. Provenzano, President, Clean Air Now, Inc. 1969

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:45:38

No Duplicates.

**Comment 356 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Elizabeth

Last Name: Shull

Email Address: wmpwilson@sbcglobal.net

Affiliation:

Subject: CARB Proposal

Comment:

The current CARB Proposal will have a devastating effect on our company. We are a pump and irrigation company that employees 23 people. We have been in business since 1932. Before the economic downturn the proposal would have created an extreme hardship for us to replace and retrofit our vehicles. Now it is simply impossible. We recently priced new rigs at \$124,000.00 each. I would need 5, 9 other vehicles would also have to be eventually replaced at a cost of approx. \$50,000 each. Last fiscal year our company's financial report indicated that we lost \$90,000.00. This year isn't looking better. More of our customers are unable to pay their bills and yet need water to survive. I attended a local CARB meeting regarding this proposal. I spoke briefly as to how this would impact us, the response was " tough decisions will have to be made" Is this how California feels about its businesses? It pains me to think that my small family business may have to close down because we will be forced to replace working vehicles. Please reconsider.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:50:06

No Duplicates.

**Comment 357 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matthew  
Last Name: Maxcy  
Email Address: mmaxcy@preferredpump.com  
Affiliation:

Subject: Water Well Contractor Exemption  
Comment:

Dear Chairman Nichols,

I am writing today to ask you, and the esteemed members of the Board, to please consider an exemption to the proposed on-road diesel Truck and Bus regulation. I would like to ask you to please consider the modifications outlined in the letter I've attached to you from Mr. J Micheal Mortensson, Executive Director of the CGA.

I would like to bring your attention to the fact that the State of California cannot possibly provide clean drinking water for all of her citizens, and therefore depends greatly upon the private Water Well Contractor to do so. The State's drought conditions and dire forecasts from many experts regarding future water supply issues, combine to provide the the very real potential of a water crisis for our state in the near future. These regulations will add to the water supply problems many more issues than they will solve.

It is my professional opinion, after ten years of being involved in the water well industry, that the cost of the new equipment as currently proposed will be a onerous and extrodinarily burdensome requirement on the water well contractor. It could very well have immense ramifications upon the water well industry's capability of providing clean drinking water.

Thank you very much for your time, please contact me if I can be of any assistance whatsoever.

Respectfully,

Matthew James Maxcy

Attachment: [www.arb.ca.gov/lists/truckbus08/836-cga\\_letter\\_to\\_carb.doc](http://www.arb.ca.gov/lists/truckbus08/836-cga_letter_to_carb.doc)

Original File Name: CGA letter to CARB.doc

Date and Time Comment Was Submitted: 2008-12-10 08:55:24

No Duplicates.

**Comment 358 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Anna  
Last Name: Sanchez  
Email Address: agarcia@gvhc.org  
Affiliation:

Subject: For Diesel Truck  
Comment:

This is a plan that has been in the makings for some time now and I dont think it is quite fair for us to keep putting off something of grand importance. Our air is what is suppose to keep us alive and all its been causing is sickness and mortality. Those of you who think this is ridiculous are living in the NOW and not for the future many of you are probably over the age of 30-40 and think lightly or less of our youth that are growing up in this extremely unhealthy air enviroment. If you have children or grandchildren think of them and their future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:57:17

No Duplicates.

**Comment 359 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Brigid  
Last Name: Ferrari  
Email Address: ferraribrigid@yahoo.com  
Affiliation:

Subject: Clean Air TODAY  
Comment:

Dear Board:

I am writing in support of strong regulations concerning diesel truck emissions. The Central Valley has been home to my family for generations and I hope that it will continue to be for generations to come. I think it is only fair that my grandchildren enjoy the same quality of life and clean air that my grandparents did. Please approve the proposed regulations and help us clean up our air.

Thank you,  
Brigid Ferrari

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:58:56

No Duplicates.

**Comment 360 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert

Last Name: Carter

Email Address: [camping@rvlr.com](mailto:camping@rvlr.com)

Affiliation: Indian Valley Chamber of Commerce

Subject: Plumas County Comments - On Road Rule

Comment:

Indian Valley Chamber of Commerce

Plumas County

Please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/839-ivcc\\_plumas\\_county.pdf](http://www.arb.ca.gov/lists/truckbus08/839-ivcc_plumas_county.pdf)

Original File Name: IVCC Plumas County.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:02:42

No Duplicates.

**Comment 361 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Josh

Last Name: Daughdrill

Email Address: daughdrill@sbcglobal.net

Affiliation:

Subject: Diesel Truck Rule

Comment:

PAass a strong diesel truck rule so my family can breathe clean air. How much more evidence is needed to indicate that the valley needs a strong clean air bill?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:05:02

No Duplicates.



**Comment 362 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Mayra  
Last Name: Campos  
Email Address: mcampos@gvhc.org  
Affiliation:

Subject: Help California Have Clean Air!  
Comment:

All Californias, no matter the age, race, or economic level are  
affected by polluted air! Help them get the clean air they deserve  
to live a healthy life! Support them and work hard on implementing  
and enforcing laws to improve the quality of life for all of  
California!

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:07:04

No Duplicates.

**Comment 363 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Susan  
Last Name: Boykin  
Email Address: sboykin@muhsd.k12.ca.us  
Affiliation:

Subject: Proposed Regulation In-Use On-Road Diesel Vehicles  
Comment:

I support any regulation that will curtail diesel emissions from trucks and buses on our roads. The dangerously poor quality of our Central Valley air demands this. Our children's health and well-being are at stake. As a high school teacher in Merced, California, I am absolutely stunned at the numbers of our students who suffer from asthma. Every year the list we receive from our health office grows. Something must be done.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:08:02

No Duplicates.

**Comment 364 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lydia

Last Name: Bourne

Email Address: lydiabourne@sbcglobal.net

Affiliation:

Subject: Loan Issues - Proposed On road Diesel Vehicles

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/truckbus08/843-loan\\_issues\\_-\\_proposed\\_diesel\\_regulations.doc](http://www.arb.ca.gov/lists/truckbus08/843-loan_issues_-_proposed_diesel_regulations.doc)

Original File Name: Loan Issues - Proposed Diesel Regulations.doc

Date and Time Comment Was Submitted: 2008-12-10 09:13:27

No Duplicates.

**Comment 365 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bill  
Last Name: Moore  
Email Address: bill@roguetruckbody.com  
Affiliation:

Subject: proposed CARB rules  
Comment:

We are a manufacturer of dump truck bodies, with our main customer base in southern California. The proposed CARB rules have already paralyzed prospective truck buyers purchases, as the very strict proposed rules have been compiled. Passage of the proposed CARB rules will devastate the California trucking industry and all related industries (such as ours) for a long period of time.

Now is NOT the time to require such a drastic change to the CARB rules, as the economy is already in shambles, and the proposed CARB rules will be the final nail in the coffin of many independent truckers and small fleet owners.

Please suspend the proposed rules until such a date that the economy and the owner/operators can absorb the costs of compliance.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:15:38

No Duplicates.

**Comment 366 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Dale

Last Name: McCaskill Sr.

Email Address: sweep1@bellsouth.net

Affiliation: North American Power Sweeping Assoc.

Subject: NAPSA - On Road Rule

Comment:

North American Power Sweeping Association

www.napsaonline.com

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/846-napsa\\_national\\_12-8-08.pdf](http://www.arb.ca.gov/lists/truckbus08/846-napsa_national_12-8-08.pdf)

Original File Name: NAPSA National 12-8-08.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:18:09

No Duplicates.

**Comment 367 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kathleen  
Last Name: Brown  
Email Address: kathy@johnsondrilling.com  
Affiliation: CGA

Subject: Reevaluation of proposed truck regulation  
Comment:

With the State of California going broke why is it that you are contemplating regulations that will close the doors of many businesses that are barely hanging on now.

Current and proposed CARB regulations will lead to reduced capability to provide groundwater supplies unless modifications are made. The groundwater industry deals with complex geology and hydrologic conditions throughout the state and must utilize a wide variety of equipment in order to develop groundwater supplies for the state's needs. Much of that equipment is quite specialized and has low or limited usage. Thus the groundwater industry has much equipment that is old (in years) but has had little usage and is still in sound, usable condition. Our drill rigs have very few miles on them. There is not a rapid turnover of equipment in our industry.

We must use a wide variety of equipment which means that groundwater contractors must comply with a number of CARB regulations such as the Portable Equipment Registration Program, the Off Road Diesel Vehicle regulations and now the proposed On-Road Diesel Truck and bus regulation.

We support the alternative proposal from DTCC as a means to provide flexibility in attaining improved air quality. This proposal offers all affected industries a number of ways to reach improved air quality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:20:16

No Duplicates.

**Comment 368 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Osborne  
Email Address: seusshouse@sbcglobal.net  
Affiliation:

Subject: Air needs to be clean.

Comment:

Look here, this is a no brainer, air has no boundaries and if it is not clean then it becomes a human rights issue. I have the right, it is the first priority (making money comes second), to breath clean air!

My question to you is have you tried to breath Merced County air? I invite you to follow these directions.

1. Take a weekend break with your family in San Francisco.
2. Return home taking a detour through Merced County, come down inter state 5 to Paterson cross over to Turlock and down to the City of Merced.
3. Notice the reactions of your family, especially your children.
4. Then pass this bill!

Yours sincerely,

Mark Osborne, diagnosed asthmatic.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:21:53

No Duplicates.

**Comment 369 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Karen  
Last Name: Carlson  
Email Address: kcarlsonz@hotmail.com  
Affiliation: RN

Subject: Diesel Vehicle Regulation  
Comment:

As a person with lung disease, I am writing to express my deep concern about the negative health impacts of diesel pollution from trucks and buses. I have adult-onset asthma. Previously, being stuck in traffic was annoying but not life threatening. Since I developed asthma, if I am behind a diesel vehicle I have to roll up the windows, turn on the recirc air conditioning/heat, and sometimes I have to change routes to avoid an asthma attack. Pollution control is a life and death issue now. I urge the California Air Resources Board to adopt the strongest regulation possible to clean up the top sources of diesel particulate matter in California.

We now know that California has the worst air quality in the nation; trucks and buses are a major contributor to the particulate matter and ozone pollution that causes serious health consequences. Pollution from trucks and buses result in an estimated 1,500 premature deaths and more than 38,000 asthma attacks annually.

Equally important, truck drivers are 1.5 to 2 times as likely as workers not exposed to diesel exhaust to develop lung cancer during their lives. Do we really want to have more early deaths from a preventable cause?

To protect the health of all Californians, I urge the California Air Resources Board to adopt the strongest possible diesel truck regulations. For my sake, for the developing lungs of children, for us all.

Sincerely,

Karen Carlson, RN

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:23:16

No Duplicates.



**Comment 370 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Debbie

Last Name: Jacketta

Email Address: debbie@jackettasweeping.com

Affiliation:

Subject: Diesel Regs

Comment:

While I agree there is a need to keep the earth, water and air clean and healthy for all, it needs to be done in an well thought out and educated way with all the consequences played out. As a small fleet contractor, not operating in your state, who replaces equipment every 5 to 6 years, I haven't been too worried about your crazy regulations. But now I am starting to wonder how we are going to get rid of all this old equipment? Now that the economy is not so good, are we going to be able to get financing for these already expensive pieces of equipment? And if we can't get rid of our old equipment or get financing, we need to make sure these retro-fits are safe.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:27:13

No Duplicates.

**Comment 371 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ron

Last Name: Hedman

Email Address: ron@hedmandrilling.com

Affiliation: California Groundwater Assoc. & NGWA

Subject: Modifications to CARB Regarding DRillers and Pump Workers

Comment:

This industry is not all on the road everyday running emissions. I implore you to re-evaluate and consider instituting a mileage schematic / tiered structure and have the companies that drive their vehicles every day have a greater impact on their engine status - there is a huge amount of us that drive the rig to a job site and that is where it sits for 1 to 2 weeks without movement. Then they come back into the yard and don't move again for a month. This reg will basically put this industry into a graveyard. Please please please, consider alternatives to save the industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:27:24

No Duplicates.

**Comment 372 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Claire  
Last Name: Osborne  
Email Address: seusshouse@sbcglobal.net  
Affiliation:

Subject: Clean air would be nice!

Comment:

I have three boys, all three have medically diagnosed breathing problems! We live here in Merced County which I understand has the worst air quality in Northern California. We have two major County wide truck routes. We have an inversion layer that traps deadly particles!

Please think very carefully, you are being lobbied by the people who can afford to bend your ear, I don't have the luxury of a professional lobbyist instead I send you my husband, I ask you to listen carefully, pass this bill.

Claire Osborne, diagnosed asthmatic.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:30:59

No Duplicates.

**Comment 373 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matthew  
Last Name: Malkan  
Email Address: malkan@astro.ucla.edu  
Affiliation: UCLA

Subject: Scientific Errors in Proposed Diesel Exhaust Regulations  
Comment:

Dear California Air Resources Board Member,

Please find the attached MSWord .doc file I am submitting as a public comment on the proposed Regulation of In-use On-road Diesel Vehicles. It contains a scientific critique of the flawed Final Report on Health Effects of Diesel Exhaust which CARB uses as the basis for these new regulations.

The same .doc file can be obtained from this website:  
[www.astro.ucla.edu/~malkan/CARB.doc](http://www.astro.ucla.edu/~malkan/CARB.doc)

Sincerely,  
Dr. Matthew Malkan,  
Professor of Physics and Astronomy, UCLA

Attachment: [www.arb.ca.gov/lists/truckbus08/853-carb.doc](http://www.arb.ca.gov/lists/truckbus08/853-carb.doc)

Original File Name: CARB.doc

Date and Time Comment Was Submitted: 2008-12-10 09:51:08

No Duplicates.

**Comment 374 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Richard  
Last Name: Laxton  
Email Address: RLAXTON@MURPHYBANK.COM  
Affiliation: MURPHY BANK

Subject: ARB SUPPORT  
Comment:

Cal Cap Truck Program

Attachment: [www.arb.ca.gov/lists/truckbus08/854-carb\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/854-carb_letter.pdf)

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:53:53

No Duplicates.

**Comment 375 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Don  
Last Name: Holmes  
Email Address: donjrrt@hughes.net  
Affiliation:

Subject: TruckBus08 ????  
Comment:

To: ARB Board Members

I have been in the trucking bussiness for 29 years and have not seen such a drastic slow down in work in our industry.

I cannot absorb the cost of retrofitting my truck at \$16,000.00 in this economy, i will have to shut down my company, i cannot qualify for a grant due to the low miles of a construction truck.

Please consider the alternative proposal DTCC Coalition, that would give us a chance to attain emission reductions and would clean up Californias air.

Thank You Don Holmes

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 09:59:48

No Duplicates.

**Comment 376 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: connie  
Last Name: mull  
Email Address: connie.mull@comcast.net  
Affiliation:

**Subject: PASS A STRONG DIESEL TRUCK RULE TO HELP THE PEOPLE LIVING IN THE VALLEY**

**Comment:**

The San Joaquin Valley of CA is now referred to as the Appalachia of California. Just because we are not seen as a positive asset to our state does not mean we deserve to breathe unclean air. We deserve the same clean air to breathe every day as the people living in other regions of California. Would you want your children or family to breathe the air we breathe each day knowing it will cause unrepairable lung damage? No, you would not want that for your family and should not want it for any citizen in our state. Our children and adults suffer with higher rates of asthma, premature births, and chronic lung disease from breathing unclean valley air each day. The majority of the particulate matter we breathe each day in the valley is created by the diesel exhaust from trucks traveling through the valley. Yes, we can move out of the valley to breathe clean air but then who will produce the food you and your family eat each day? We are contributing to the economy of the state of CA each day by being one of the main producers of food for our country. Why would you support a bill that caused the people in the valley who do so much for the economy to live in an unclean air environment? Please consider the results of your action of supporting the Diesel Truck Rule that will continue to prevent our valley air from being cleaner for all of us who live here and support California not only through our tax dollars but through our ongoing support of providing dollars to the economy of California. THANK YOU FOR YOUR CONSIDERATION OF THE AIR WE BREATHE EACH DAY IN THE VALLEY AND THE HEALTH OF THE PEOPLE LIVING IN THE VALLEY.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:01:57

No Duplicates.

**Comment 377 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Josh

Last Name: Osborne

Email Address: ozborne1290@gmail.com

Affiliation:

Subject: Soccer and clean air!

Comment:

I am a high school senior at Gold Valley High School. I am a member of the soccer team and I have Asmha! I believe that the air in Merced needs to be cleaned, PLEASE. pass this bill.

Josh

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:04:07

No Duplicates.



**Comment 378 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Allan

Last Name: Daly

Email Address: [adaly@sierraresearch.com](mailto:adaly@sierraresearch.com)

Affiliation:

Subject: Crane Owners' Comment to In-Use On-Road Rule

Comment:

See attachment.

Attachment: [www.arb.ca.gov/lists/truckbus08/859-on-roadrulecomment.pdf](http://www.arb.ca.gov/lists/truckbus08/859-on-roadrulecomment.pdf)

Original File Name: On-roadRuleComment.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:04:31

No Duplicates.

**Comment 379 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Dan  
Last Name: Kelly  
Email Address: dan@kellymobileservices.com  
Affiliation:

Subject: Old Trucks  
Comment:

I have a 1951 freightliner, I use it when I want, will I no longer  
be able to drive this unit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:17:48

No Duplicates.

**Comment 380 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: MICHAEL  
Last Name: GOTTWALD  
Email Address: GOTTWALD8@AOL.COM  
Affiliation:

Subject: PLEASE APPROVE THIS LEGISLATION  
Comment:

PLEASE APPROVE THIS LEGISLATION

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:23:21

No Duplicates.

**Comment 381 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matthew  
Last Name: Schrap/ CTA  
Email Address: mschrap@caltrux.org  
Affiliation: California Trucking Association

Subject: Statewide Truck and Bus Regulation  
Comment:

Please see attached for comments from the California Trucking Association.

- Eric Sauer, Vice President of Policy Development
- Matthew Schrap, Director Environmental Affairs

Attachment: [www.arb.ca.gov/lists/truckbus08/862-12-10-2008\\_pfr\\_comments\\_final\\_-\\_web.pdf](http://www.arb.ca.gov/lists/truckbus08/862-12-10-2008_pfr_comments_final_-_web.pdf)

Original File Name: 12-10-2008 PFR Comments FINAL - Web.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:23:49

No Duplicates.

**Comment 382 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rene

Last Name: Vercruyssen

Email Address: rene.vercruyssen@kniferiver.com

Affiliation:

Subject: How fast can we afford to go?

Comment:

Everyone is for clean air, including industry. We have made great strides since the 1970's to reduce air pollution and every resident of California is the benefactor. But we can not afford to do it all tomorrow, next week or next year. Protecting the environment is something only practiced in a significant way by societies rich enough to afford to do so. We, thankfully, are the leaders of the world in this regard. But if we choke our economy into stagnation we will no longer be able to afford to implement any programs other than extending unemployment benefits.

Please listen to our business leaders and slow down the implementation of these Draconian measures during a time of true economic crisis. The environment will be better served in the long term if we keep our economy healthy so we can continue to afford the pollution control measures the rest of the world can not.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:24:28

No Duplicates.

**Comment 383 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Joan  
Last Name: Porter  
Email Address: joanp71@gmail.com  
Affiliation: Asthma Coalition

Subject: Diesel Trucks  
Comment:

One in five children in the San Joaquin Valley have been diagnosed with asthma. Asthma is life threatening and very scary to a child. The most significant cause of asthma in this grossley polluted valley is truck emissions. Although it may cost the truckers to retrofit their trucks, it doesn't cost near as much as the medical and hospital costs to treat our children. We cannot afford to ignore this problem any longer. The truckers see this as a financial burden. It is just as much a financial burden to the San Joaquin valley where so much money must be spent in hospitals and emergency rooms because 20% of our children have asthma. We cannot afford to postpone this legislation any longer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:24:37

No Duplicates.

**Comment 384 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Madeline  
Last Name: Roddy  
Email Address: hennbros@aol.com  
Affiliation:

Subject: Request for Modification of On Road Diesel Truck and Bus Regulation  
Comment:

Mary Nichols, Chairman  
California Air Resources Board

I am writing to you with my concerns over this matter. I am the sole owner of a water well drilling business, second generation and hopefully my sons will be able to continue the business for a third generation. After 61 years in the water well industry the most devastating rules and regulations that I can remember are being put into place. These regulations would be cost prohibitive to so many small businesses in this state. California is already struggling with economic woes and this would compound them severely. This industry provides an invaluable service, bringing water, life's blood to everyone. Without the use of groundwater, most of California would be a desert.

Please modify the rules as per the California Groundwater Association requests and allow the drilling industry and its associated businesses to survive in a harsh economy. I want to see our air quality improve for the good of all but there must be a reasonable compromise that will allow our businesses to continue supporting our state.

Sincerely,  
Madeline Roddy  
Hennings Bros. Drilling Co., Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:28:17

No Duplicates.

**Comment 385 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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

Subject: DUMP TRUCKS RECEIVE NO FUNDING  
Comment:

Subject: DUMP TRUCKS RECEIVE NO FUNDING

Comment:

IN PROJECTS IN THE CITY OF LOS ANGELES, PORTS, FREEWAYS REQUIRING 2004 OR NEWER ENGINES... THIS IS A JOKE.. THE NEWEST DUMP TRUCK IS A 2002 IF THAT. GOOD LUCK TO THE STATE IN FINDING 2004 OR NEWER TRUCKS TO DO CONSTRUCTION TRUCKING.

"DUMP TRUCKS" DO NOT, DO NOT, RECEIVE FUNDING FROM THE STATE OF CALIFORNIA SINCE WE DO NOT DRIVE ENOUGH MILES.

DOES ANYONE KNOW THAT OR IS SCHWARZENDEGGER AND HIS GANG AWARE OF THIS?

"INGNORANCE OF LAW IS NO EXCUSE- NEITHER IS THE IGNORANCE OF THE LAWMAKERS"

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:28:22

No Duplicates.



**Comment 386 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gail  
Last Name: Porter  
Email Address: gfp8414@lausd.net  
Affiliation:

Subject: truck rule 08  
Comment:

Please represent the citizens of California who deserve clean air to breathe. Please allow the state to meet federal air quality standards. Don't be pushed around by businesses. Do what is morally, ethically, and legally the job of the Air Resources Board. Please be strong for all of us. Thank you.

A concerned citizen and teacher,  
Gail Porter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:29:36

No Duplicates.

**Comment 387 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Martin  
Last Name: Steinman  
Email Address: MartinS@canalalliance.org  
Affiliation:

Subject: In support of stricter regulations on diesel emissions  
Comment:

I'm writing in support of tightening the limits on emissions from diesel vehicles in California. As you well know, the health effects of particulates on truck drivers and roadside residents alike are well documented -- and then there are the greenhouse gases, which are enough reason in themselves for a tighter emissions standards. Please stand up for the health of Californians and the long-term future of the planet, and consider putting tougher limits on diesel emissions. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:30:59

No Duplicates.

**Comment 388 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Roger M

Last Name: Simon

Email Address: roger@pioneertrailersales.com

Affiliation: Ntl Trailer Dlrs Assn; Calif Trkg Assn

Subject: in-use on-road truck and bus regulation 2008

Comment:

I operate a vehicle dealership selling trailers to the trucking industry and businesses using Diesel tractors and trailers to transport their product over California's highways. After 49 years in business, I am concerned about the viability of our customers and of dealerships in these difficult times. Business will be made more difficult by the recent proposed rules to mandate equipment changes.

Cash is scarce and financing is more difficult to obtain for new equipment purchases or retrofits to existing tractors. Mandating the replacement or retrofitting of Diesel powered trucks and equipment that met all applicable California rules when they were built and sold new will force many operators will retire their existing equipment and not replace it. With the retirement of those tractors, driving jobs will also be retired and the capability to move goods vital to our economy's recovery will be reduced. Those operators able to make these investments will have less money available for other fuel saving investments, such as the voluntary SmartWay program.

While we all support reducing particulate matter and NOx emissions from Diesel engines, we must also be concerned about movement of goods and our state's economy. Please consider other proposals such as Driving Toward a Cleaner California that have similar goals and timetables but which would cause less havoc in the transportation industry.

Thank you for your consideration.

Respectfully,

Roger M Simon  
Pioneer Trailer Sales  
Santa Ana, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:31:12

No Duplicates.



**Comment 389 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Szymczak  
Email Address: markzimzak@yahoo.com  
Affiliation: Citizens with Conscience

Subject: On behalf of the four asthmatics in my household.

Comment:

Dear CARB members.

First, I am grateful for the work and service you provide to CA and the progressive stance you take make it a better place to live.

California is a wonderful place to raise a family. As much as I love Pleasanton, we feel the harmful effects of diesel exhaust (NOx & PM) may have us moving to another state. The asthmatics (age 43, 40, 10 and 8) find it frustrating to need to stay inside this time of year because the smog and PM get thick in the tri-valley area. At the same time, it's not fair in the summer for people in the San Joaquin basin to get all the bad air in the summer when it blows from SF & LA into their basin. Even in the summer, we feel the harmful effects of compression engines since Pleasanton is on the 580 and 680 corridor with many afternoons of bumper to bumper 18 wheelers inching their way over the Altimont pass.

Should we Californians have to bear the burden of bad air quality and unhealthy lungs in the name of commerce and consumption for the whole nation? On behalf of the asthmatics and children throughout CA, the most important way to make CA better for everyone is to improve the air we breathe. PM filter retrofits on all compression engines should become mandatory immediately (2009!).

Yes, there will be a lot of complaints from trucking industries, international shipping organizations and even city governments (mandated to retrofit bus & garbage fleets), but for the sake of our kids....the harmful effects of diesel emissions must go. It's time to take back the quality of our air from those that spew in the name of commerce.

Thank you for reading and doing the work you do.

Mark, Idyll, Luke & Morgan Szymczak  
and all the residents of Pleasanton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:36:08

No Duplicates.

**Comment 390 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Robert  
Last Name: Massman  
Email Address: [bmassman@godependable.com](mailto:bmassman@godependable.com)  
Affiliation:

Subject: Dtcc/CARB  
Comment:

letter attached!

Attachment: [www.arb.ca.gov/lists/truckbus08/871-dtcc.doc](http://www.arb.ca.gov/lists/truckbus08/871-dtcc.doc)

Original File Name: dtcc.doc

Date and Time Comment Was Submitted: 2008-12-10 10:40:17

No Duplicates.

## **Comment 391 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Darling  
Email Address: michaeld@westerntruckschool.com  
Affiliation: Western Truck School

Subject: Affect of ruling

Comment:

It is daunting. As we see it, it will force us to either leave the state to continue to do business or close most of our locations. The overall cost of putting a \$20K filter on a \$15-20K truck and absorbing \$600K in expenses is overwhelming and un-manageable.

That is nearly 25% of our GROSS revenue's in any given year. In this very difficult year of 2008, even more. In California's current economy with a 30% loss in revenue for us in 2008, shouldering the cost of equipment replacement, the higher cost of securing loans for replacement, higher interest rates and the increasing difficulty of selling old equipment in the shadow of these impending rulings, we are faced with a mountain to overcome.

Forced with that much of an impact, we would have no choice but to close locations, lay off people and severely impact the revenues of the business. That means more unemployment, less revenue, less taxes for California. It will be a story repeated often in the coming years with these regs as they read now.

We are a small company with a fleet of 30 trucks in the 89-2000 fleet age range. Our trucks all average about 7500 miles per year and drive just short distances to and from our training yards. Most of our time is spent in the yards backing up. Our trucks do not haul loads, go to ports or traverse the highways more than a few miles per day. Our trucks, by design, are "tortured" by new drivers that don't know HOW to drive a big-rig. It's why they go to school. In the process, these trucks go through high maintenance costs anyway, with frequent clutches and wear and tear. We are fully state approved and participate in CHP BIT inspections and Smoke tests. We are fully compliant with both.

As such, we get as many miles out of our trucks as we possibly can, due to ongoing maintenance costs and necessary cost vs return formulas. The need to have a brand new or near new fleet for our application simply isn't feasible. In fact, to do so would require such a sizable increase in tuition costs to offset that equipment purchase that most students couldn't afford to go to school. As it is, students are having difficulty securing loans in this constricted economy. Either way, we lose as a small business in California.

The other commercial driving schools in the state, which provide drivers for all of the people that were in that auditorium today are in similar situations. It is a critical asset to the California Transportation industry and economy witch will be



further exacerbated by a growing shortage of drivers here.

Your suggestions today that we simply all go out and buy newer \$50-60K+ trucks to replace our fleet is absolutely not feasible in any business model I can generate.

It appears that regardless of what we oppose, a regulation is coming. We have no problem with cleaner air, but the impact on small business in California is going to be devastating. With fuel prices and the economy in the state it is now, many many small California companies simply will not be able to absorb that cost. I point out that while some latitude for "small fleets" of 3 or less has been allowed, fleets of our size, which is not uncommon in California, are going to be severely impacted.

The 3 compliance options that have been introduced certainly do give a bit of headroom, however no model portrayed by CARB allows us latitude on the PM filters by the end of 2010. That cost alone shuts the doors of this 33 year old California based company.

I'd ask that some further consideration for our particular "model" be given, perhaps as either a new classification or under the proposed exclusion for emergency vehicles, military tactical vehicles or personal use motorhomes; all of which put more miles on California's highways annually than any of our training trucks do.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:42:07

No Duplicates.

**Comment 392 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Ron  
Last Name: Sundergill  
Email Address: rsundergill@npca.org  
Affiliation: National Parks Conservation Association

Subject: On-Road Diesel Engine Emission Proposed Rule  
Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/truckbus08/873-12.12\\_carb\\_final\\_truck\\_and\\_bus\\_rule\\_comment.doc](http://www.arb.ca.gov/lists/truckbus08/873-12.12_carb_final_truck_and_bus_rule_comment.doc)

Original File Name: 12.12 CARB Final Truck and Bus Rule Comment.doc

Date and Time Comment Was Submitted: 2008-12-10 10:42:23

No Duplicates.

## **Comment 393 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Matthew

Last Name: Cohen

Email Address: malc385@aol.com

Affiliation: Clean Fuel Resources, Solpower

Subject: Truck Regulation

Comment:

Mary Nichols, Chair  
Members of the Board  
California Air Resources Board

The ARB has steadfastly denied fuel additives a place in the emissions reductions business, although the Technical Support Document (TDS) for the proposed Truck and Bus Regulations does state up to 50% reductions in PM are feasible. Understandably, VDCES are more effective: therefore ARB wrote regulations supporting that industry, a multi-billion dollar bonanza for (out of state) manufacturers of VDECS.

However, ARB has banned aftermarket fuel additives that make emission reduction claims from use in VDECS retrofits. Why? It seems few in the aftermarket fuel additive industry were aware of this component of the law, including the Automotive Specialty Products Association. It isn't mentioned in the TDS. No fuel additive companies show up on the list of companies contacted. I spent years trying to get ARB to consider fuel additives for emission reductions, and was in constant contact with a long list of ARB staff. For years, diesel additives as possible control technologies were put on upcoming workshop agendas, but Gary Yee and others at ARB told me "diesel additives are on the back burner", and not to come to the meetings. Apparently, that was inaccurate. In fact, I only discovered this ban was law in August 2008, when ARB sent out Advisory #379 to inform people on the e-mail list it was now illegal to put an aftermarket fuel additive that makes any performance claim into a VDECS equipped truck. If additives were discussed in one of the many VDECS workshops, it was only discussed with those VDECS stakeholders, since the law also gives them control over the fuel additive industry.

The amount of meticulous research data ARB has amassed to formulate health effects models, estimate premature deaths, estimate costs of medical visits, costs of VDECS, fuel costs, fleet modernization costs, maintenance costs, its mind boggling. I have no doubt that hundreds, if not thousands of ARB scientists, engineers, staff, lawyers, economics experts, outside consultants, etc., have gathered in Sacramento to evolve these hundreds of pages of data, formulating this law. However, I have gone through a dozen documents pertaining to this upcoming VDCES regulation on trucks, including the TDS, and I can't find any studies, data, or reference to fuel additives causing harm to VDECS, such that ARB would need to regulate the industry out of business. Additives are necessary to prevent fuel failures that impact emergency

operations, including first responders. Without fuel additives, there are situations where lives are at stake.

The only mention I can find in the TDS that might be a source of ARB's concern is one brief note of ash being formed by fuel additives, although the TDS then states that the majority of ash that impacts VDECS comes from lubricating oil additive packages, not from fuel additives.

The World Fuel Charter, of which all of the OEM's are signatory to, state no fuel additives that form ash are allowed. The EPA doesn't allow ash-forming inorganic, non-CHONS (Carbon, Hydrogen, Oxygen, Nitrogen, Sulfur) additives in road fuels, and both the EPA and CARB have laws in place that make it illegal to sell or use a fuel additive that can harm emission control equipment or that raise emissions. This new law is redundant, and bans excellent products with decades of safe, effective use, and many companies have solid empirical data to support their claims.

The main body of rules, the Technical Support Document, (TDS) acknowledges fuel additives can lower PM up to 50%. Additives could extend the life of a VDECS, or at least lower the maintenance caused by PM, but simply by stating so makes them illegal. In conversation with ARB staff regarding fuel oxidation, contamination from water and microbial growth, buildup of carbon deposits in the combustion chamber, intake deposits, and injector deposits, all of which are going to exist in VDECS equipped trucks, and all are likely more damaging to VDCES than fuel additives, seems to have been overlooked. At least, there is no evidence in the TDS that it has been considered.

This part of the law is not a well thought out, and needs to be revisited before this law is implemented.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:44:01

No Duplicates.

**Comment 394 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James  
Last Name: Lyons  
Email Address: jlyons@sierraresearch.com  
Affiliation: Sierra Research

Subject: Comments on In-use On-Road Regulation  
Comment:

Please find comments attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/875-sierra\\_research\\_comments.pdf](http://www.arb.ca.gov/lists/truckbus08/875-sierra_research_comments.pdf)

Original File Name: Sierra Research comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:44:53

No Duplicates.

**Comment 395 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Louis  
Last Name: Enriquez  
Email Address: lenriquez@acebev.com  
Affiliation: Ace Beverage Co.

Subject: Truck & Bus Replacement Rule  
Comment:

While we are supportive of reducing particulate matter from diesel engines, CARB's proposed regulations for replacement and/or retrofitting starting in 2010 is too onerous for our company. Companies like ours are being asked to dispose of equipment and assets before their useful life and purchase new equipment before financially feasible. In this tough economic climate, this is an unreasonable proposal.

We ask that ARB adopt the Driving Toward a Cleaner California (DTCC) coalition's alternative proposal, which we consider to be a balanced solution. It would give companies like ours the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions. Also, ARB's own analysis of the DTCC alternative proposal confirms that it would result in similar long term emissions benefits. Our company urges you to support the DTCC alternative - we cannot risk the potential negative economic impact of CARB's original regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:45:31

No Duplicates.

**Comment 396 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Allan  
Last Name: Lind  
Email Address: allanlind@sbcglobal.net  
Affiliation: CCEEB

Subject: CCEEB Comments re: Diesel Vehicle/Engines Proposed Reg  
Comment:

Thank you for accepting comments from the California Council for Environmental and Economic Balance on the Proposed Regulation to Reduce Emissions from In-Use On-Road Heavy-Duty Diesel Vehicles and Amendments to Existing Regulations Affecting Other Diesel Engines.

Copies will be emailed and mailed to those individuals cc'd in our comment letter.

Attachment: [www.arb.ca.gov/lists/truckbus08/878-cceeb\\_truckbusrulecomments\\_12-10-08.pdf](http://www.arb.ca.gov/lists/truckbus08/878-cceeb_truckbusrulecomments_12-10-08.pdf)

Original File Name: CCEEB\_TruckBusRuleComments\_12-10-08.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:48:40

No Duplicates.

**Comment 397 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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



**Comment 398 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gayle  
Last Name: Lopopolo  
Email Address: gaylel@ganduglia.com  
Affiliation:

Subject: Private Fleet Rule  
Comment:

Please see attachment

Attachment: [www.arb.ca.gov/lists/truckbus08/880-carb-a\\_speech.xls](http://www.arb.ca.gov/lists/truckbus08/880-carb-a_speech.xls)

Original File Name: CARB-A Speech.XLS

Date and Time Comment Was Submitted: 2008-12-10 10:50:09

No Duplicates.

## **Comment 399 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Valerie

Last Name: Liese

Email Address: vliese@jttinc.com

Affiliation: Jack Jones Trucking, Inc.

Subject: ARB ruling

Comment:

I have a company that employs 84 people and have been in business for 37 years. My fleet operates in Southern California only. I built my terminal 2 1/2 years ago and have made it "green" in order to be responsible to the health welfare of my employees as well as the public.

Because of the economy, I have 12 trucks parked out of a fleet of 50. I bought 3 new trucks at the beginning of the year and now, my bank will not lend any more money to purchase any other equipment because freight is not moving during this recession.

Trucks from out of state will not be impacted as the California trucks and buses. How does the ARB ensure that all vehicles will be compliant so we may have a level playing field? How will the ARB enforce compliance? We cannot comply if we don't get loans that will even match grand funds. We cannot buy new equipment or retrofit the old if our shippers aren't moving product.

All I ask that the board considers the sign of the times. We cannot comply during a recession. It's as simple as that. When freight is moving, you'll see responsible owners move to get new trucks and retrofit the old. There has already been over 3,000 bankrupt mid to large trucking companies go under already this year. The larger carriers are selling off hundreds of terminals and laying off thousands of workers because they are all losing money. The smaller carriers and owner operators have closed their doors or had their trucks repossessed.

Truckers purchase vehicles from the manufacturers set by the guidelines of the US Government. Now, you want us to shoulder the burden of extra equipment after the fact. Would the general public be willing to do the same with their cars and pickups?

We maintain our fleet with six mechanics in order to maintain safety. Our trucks have annual smoke tests every year; more often than the public has their vehicles smog-tested. We all want cleaner air but the ARB needs to delay their decision until we get out of this recession!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:53:35

No Duplicates.

**Comment 400 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lana  
Last Name: Valladon  
Email Address: www.clearwaterdrilling@yahoo.com  
Affiliation: California Groundwater Association

Subject: Truck & Bus regs.doc (75KB)  
Comment:

As a small business owner in California, I am urging the California Air Resources Board to reevaluate the proposed truck and bus regulation and consider the CGA and Driving Toward a Cleaner California alternatives.

If this passes, it will put me out of business. With the equipment I have and the upgrading that would need to be done. It will be a death sentence. With the current economy we have been having trouble keeping our head above water, but if this passes I will be forced to give up. This would not only affect my family business but all the business we purchase supplies from. It would be a ripple effect. So please reconsider and help keep small business alive!

Thank You,  
Lana Valladon, President  
Clearwater Well Drilling & Pump Service Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:54:40

No Duplicates.

**Comment 401 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Rob  
Last Name: Goliti  
Email Address: robgoliti@earthlink.net  
Affiliation:

Subject: Truck rule  
Comment:

I am President of a 29 year old small trucking company in Fresno. We employ 15 people and have 12 tractors with 16 refrigerated trailers.

My concern with the new rule is unilateral enforcement. I have asked at several meetings how you will enforce this rule on everyone and I have yet to receive an answer that satisfies my concerns.

If the new rule is not aggressively enforced on everyone I and the other companies like us will be at a huge competitive disadvantage. If my competition buys a tractor for \$15,000 and we spend \$125,000 for a tractor, it does not take an accountant to figure out what is going to happen.

We are already dealing with unfair competition with regards to regulations, and with our business being down 25% due to the economy we will not be able to stay in business if this occurs.

Shippers and receivers should be held liable for allowing non-certified equipment into their facilities. State vehicle truck inspection facilities should also check for certified equipment, and I would hope DMV records will be used. DMV records alone will not work because most of the carriers who do not want to comply will license out of state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:56:02

No Duplicates.

**Comment 402 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kathy  
Last Name: Fitzgerald  
Email Address: kathy@fitzgeraldsales.com  
Affiliation:

Subject: Green House Gas Rule  
Comment:

As a California Truck Dealer I am very concerned about this current proposal.

1) The value of my customers trade-ins has already dropped thousands of dollars with just the threat of this regulations, if it passes the used truck market will evaporate in California leaving my customers scrambling to stay in the business.

2) The current economy has already impacted my business and we are currently operating at 50% of our normal business, this regulation will drop that by another 50%

3) The smart way equipment does not have a track record for fuel savings. Over the years the industry has already tried these componets and has discovered the expense of repairing the fiberglass damage inherent with the lower fairing placement FAR OUTWEIGHED any fuel savings realized.

4) I support the coalitions alternative plan.

Thank-you Kathy

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:06:05

No Duplicates.

**Comment 403 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mark  
Last Name: Carter  
Email Address: info@streetsweeper.com  
Affiliation: NAPSA California Chapter

Subject: Street Sweepers will feel the pain times two.  
Comment:

North American Power Sweeping Association  
California Chapter  
www.napsaonline.com/ca  
please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/886-napsa\\_ca\\_comments\\_12-8-08.pdf](http://www.arb.ca.gov/lists/truckbus08/886-napsa_ca_comments_12-8-08.pdf)

Original File Name: NAPSA CA Comments 12-8-08.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:10:00

No Duplicates.

## **Comment 404 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ronald  
Last Name: Overacker  
Email Address: roveracker@socogroup.com  
Affiliation: Truck fleet

Subject: Affects of rule in this form  
Comment:

Let me start in saying that I do believe that what this rule is trying to accomplish I completely agree with and support. The issue that I have:

1) Time frame/Deadlines- We are a a fleet in San diego with 46 onhighway power units. During the next 5 years the requirment of replacing or updating all of these units in these econnomic times is going to have a very significante impact on our bottom line. We have already like most companys had 1 round of layoffs and not looking forward to others. If this rule was spead over along time period to allow to spread out cost Would dastically soften the impact. Our company postion is to replace trucks with new to achieve the fleet average, Instead of throwing alot of monies at older units that would normaly be replaced with in the next 2 or 3 years. The cost of a cab and chassis has go up 9% in 2008 alone.

2)Aftertreatment Devices- As it stands now if one was to keep a older unit, say at 2000 chassis, By 2014 This would require 2 seperate updates in excess of 30k. Instead of rushing into this ahead of proven availble technology, Would one not wait until these manufactures could build and support a devices that is reliable at resumable cost. As it is we the end user have payed for engines over the course of say the last 10 years that are certified by the federal EPA that are not accutual, Now the end user again will be require to buy from some of these same manufactures A "Aftertreatment devices.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:10:56

No Duplicates.



**Comment 405 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Donna  
Last Name: Holmes  
Email Address: donna-holmes@sbcglobal.net  
Affiliation: Holmes & Sons Trucking, Inc. - CDTOA

Subject: Statewide Truck and Bus Regulations  
Comment:

I believe at this time and in this economy it will be devastating to many trucking companies if this proposal were allowed to go into effect.

Our industry has seen quite a few of our members lose their businesses because of high costs and if this proposal is put through many more will follow.

I have been in business for 30 years and this is the worst I have ever seen it. The high fuel prices almost single handedly destroyed the trucking industry. We simply cannot afford to comply at this time. Why not consider the DTCC Coalition?

I agree something has to be done about emissions but right now is not the time to add cost that we cannot afford. The additive in diesel have definitely helped, I do not see many trucks belching black smoke like they used to in times past.

Please consider the people in this industry that are going to be negatively impacted as part of your dialog.

Right now is not the time for more expense.

Thank you,  
Donna Holmes  
Holmes & Sons Trucking, Inc.  
P.O. Box 1030  
San Juan Bautista, CA 95045

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:11:37

No Duplicates.

**Comment 406 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Glenn  
Last Name: Richardson  
Email Address: grichardson@deltatruck.com  
Affiliation:

Subject: Truck Dealers Point of View  
Comment:

I have worked in the truck sales business for over 25 years now and have never seen as much confusion and unfairness in any rule making by the state of California. At this time and for the past year our customers have been on the fence for purchasing new and used equipment due to the pending Statewide Truck and Bus Regulation 2008. This pending regulation has effected used truck values, new truck sales, insurance values, trucking companies and related business revenues ( tax base ) and there net worth. With this said we as California Truck Centers which include six dealerships in California maintain a stock of 600 to 750 used trucks at any given time, if the rule passes we feel that any and all value of most of the used trucks will be Zero \$0 and that coupled with the economic slowdown will make it very hard, to say the least, to stay in business. We employ 100 people per dealership for a total of 600 plus employees that would have to join the growing ranks of the unemployed. With this said I recommend that the state table this regulation on at least adopt the CTA proposed regulation.

Glenn Richardson  
Sales Manager  
Delta Truck Center

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:13:07

No Duplicates.

**Comment 407 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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

## **Comment 408 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Roderick  
Last Name: Webster  
Email Address: rwebster@elite.net  
Affiliation:

Subject: True Cause for Thanks... Clean Air!  
Comment:

What is one of the very first things people gave thanks for two weeks ago at Thanksgiving?- GOOD HEALTH. What is one of the primary wishes we extend to family and friends in the New Year?- GOOD HEALTH. For most of us this is the second most important "quality of life" issue, right behind loving relationships. Why would we not take steps to clean our air - improving the health of all and for some being a literal life saver.

Certainly there is no question that we have the technology and know-how to clean diesel emissions. Economically it is not only feasible, but perhaps even helpful to the flagging California economy. To those who don't see that potential but only a net cost in cleaning diesel emissions from our air- where else is our money better spent? In addition to relief for those who literally gasp for breath, the savings in health costs will be astronomical. Add to that the stats of work and school days lost due to bad air days, and the conclusion is that improving air quality makes sense even to those only looking at the bottom line.

I realize that the users of diesel cannot bear the burden of cost alone. We all benefit, we all should be part of shouldering the expense. Incentives and subsidies must be reasonable to assist in the retrofit of diesel equipment and the replacement of those beyond compliance. If government is going to grease the wheels of the economy, why not do so in an arena with such obvious benefits to all?

Commitments were made with the reluctant adoption of the ozone plan that we would move faster than the 2024 goal if possible. This seems a perfect opportunity to make good on that commitment. I encourage the California Air Resources Board to proceed with aggressiveness and determination to press for clean, healthy air for California citizens to breathe. As the feds soon reconsider California's desire to increase fuel economy standards for passenger cars, our state needs to show initiative and leadership in the area of controlling diesel emissions as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:21:18

No Duplicates.



**Comment 409 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Melissa  
Last Name: Kelly-Ortega  
Email Address: melissakellyortega@yahoo.com  
Affiliation: Merced/Mariposa County Asthma Coalition

**Subject: STRONG SUPPORT FOR THE DIESEL TRUCK RULE!!!**

Comment:

December 10, 2008

Chairwoman Mary Nichols and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: SUPPORT for a STRONG DIESEL TRUCK RULE!!!

Dear Chairwoman Nichols and Board Members:

As a Public Health Agency, you already know it is your job to come up with various ways to clean the air that Californians breathe. Californians appreciate the work you do and want to work with you to make sure all of our friends and families can breathe clean air in our lifetimes.

This board recently passed a rule that would require all construction fleets and operators over time to transition to cleaner equipment. Lynn Terry stated in November 2007, "It's a very important rule from a public health standpoint in terms of diesel particulate and it's also very critical for ozone because the oxides of nitrogen that come out of diesel engines for this [the San Joaquin Valley] region are the most important pollutant to be regulating." This is also why a strong diesel truck rule is so important.

The Diesel Truck Rule has had more public outreach than any rule I have heard about in the last two years. It has more money earmarked to go toward retrofits and engine replacements and more money will be there for this specific rule in the upcoming years. We need this rule to pass.

Save lives, prepare for the future, and pass a strong diesel truck rule!

Passing a STRONG Diesel Truck Rule would save thousands of lives as shown in the November 2008 California State University - Fullerton study as well as assist California in balancing its budget. Let's not be short-sighted. Instead, let's plan for a healthier future by passing a strong diesel truck rule that does NOT include exemptions.

San Joaquin Valley (SJV) residents worked diligently on the 2007 Ozone Plan where we were promised a "fast track" to clean air. A

SJV Ozone SIP Task Force was formed, and we were told that we were going to penny, nickel and dime our emissions so we could breathe clean air before 2024... In fact, after the California Air Resources Board voted to move forward with the diesel truck rule last September in Diamond Bar, Seyed Sadredin (SJV - APCO) noted that the residents of the San Joaquin Valley would be able to breathe clean air before 2018. In a statement dated September 27, 2007, Seyed Sadredin wrote, "We will and we shall achieve clean air as measured by the 1997 NAAQS for low level ozone for SJV before 2018." Signed by Mr. Sadredin, Air Pollution Control District Officer with the San Joaquin Valley Air Pollution Control District and witnessed by Barry Wallerstein. Without a STRONG diesel truck rule, we will not be able to breathe clean air until well after 2024, and the black box truly will become our coffin.

I understand the financial burden that truckers will face. We are all faced with really tough financial choices - now more than ever: paying bills or buying groceries; buying our child's asthma medication or telling ourselves, "She'll be okay" and then hoping she will be. Will CARB, as a Public Health Agency, consider a Relocation Loan Program for those of us who have children / family members with respiratory diseases and need to consider moving out of the polluted area we live in? Our families need to breathe clean air. As Lisa Kayser-Grant has stated, "Mothers carry tremendous guilt raising their children in an area that we know is so polluted."

At the CARB Community Meeting in Merced, November 2007, one person asked if we would go to various agencies (such as DOW Chemical) and ask them to apply a \$0.30 or \$0.50 surcharge that would go toward an engine retrofit. Is this something we could do to offset the costs of this rule for truckers?

Personally, I would be willing to pay more at the pump if that meant my family could breathe clean air sooner!!!

On another issue, I am deeply disappointed to hear that at least one county in California, Mendocino County, passed a resolution to oppose the implementation of any new ARB regulations.

Thank you for doing the right thing and passing a strong diesel truck rule!  
Sincerely,

Melissa J. Kelly-Ortega  
Program Associate  
Merced/Mariposa County Asthma Coalition

Attachment: [www.arb.ca.gov/lists/truckbus08/892-mendocino\\_county\\_resolution\\_against\\_arb\\_regs..tif](http://www.arb.ca.gov/lists/truckbus08/892-mendocino_county_resolution_against_arb_regs..tif)

Original File Name: Mendocino County Resolution AGAINST ARB regs..TIF

Date and Time Comment Was Submitted: 2008-12-10 11:21:41

No Duplicates.

**Comment 410 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Beth  
Last Name: Hernandez  
Email Address: bhernandez3@ucmerced.edu  
Affiliation: UC Merced graduate student

Subject: Educated Students will NOT choose to live in a place with bad air!

Comment:

I am currently in my third year of graduate school at UC Merced. I have seen the impacts of the air quality here on children, which makes me afraid to settle here and raise a family. I would rather live and work somewhere where the combination of a) Diesel truck emissions b) polluted air from the bay area ports and c) the geography of the valley do not contribute to multiple bad air days! I am frustrated as a resident of the Valley (I've lived in Fresno and Merced since I was a child) that lawmakers still have not done their best to protect our air! Obviously car makers and diesel truck makers do NOT have our best interests in mind. PLEASE put the PEOPLE first-- the Central Valley needs to attract an educated workforce, and it's not fair to those who do not have as many choices to force them to breathe polluted air.  
Thank you for your time,  
Beth Hernandez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:36:41

No Duplicates.



**Comment 411 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ed  
Last Name: Walker  
Email Address: robinson110@sbcglobal.net  
Affiliation: Robinson Enterprises, Inc.

Subject: Proposed In Use, On Road Diesel Engine Regulation  
Comment:

Dear Chair,  
Our company runs a fleet of trucks for our logging and hauling business.  
Our operations are largely seasonal, some years we get as few as 5 months of operation with our logging organization, but usually we're a little over 6 months of operation.  
When in operation, we use a large number of our company trucks and owner operator sub-haulers. Most of the trucks are older, ie pre electronic fuel systems.  
We need economical and affordable DPF's that will work on these older trucks. Our understanding is that filters 1) Aren't available for these trucks and 2) And if available, would be very expensive.  
We request a delay in the implementation of these rules until filters are available that are 1) proven to be effective, 2) are affordable, ie very inexpensive to purchase and maintain, 3) Can operate continuously for at least 14 hours per shift without regeneration.  
Sincerely,  
Ed Walker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:39:04

No Duplicates.

**Comment 412 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Richard  
Last Name: Stidham  
Email Address: richards@stidhamtrucking.com  
Affiliation:

Subject: On-road diesel truck and bus regulation  
Comment:

I can not believe that during the worst economic crisis since the Great Depression California is considering this type of a job killer proposal.

Stidham Trucking is very supportive of reducing particulate matter (PM) and NOx emissions from diesel engines. I agree 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes our future viability in the trucking industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation and what little incentive is offered is only to a certain few. Because our company is based North of Sacramento, however we run throughout the state of California, we are not eligible for the monies available to help offset some of the cost of being asked to dispose of equipment and assets before their useful life has been completed. I can not purchase new equipment before it would otherwise be acquired, without a huge negative impact to our company.

I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:39:13

No Duplicates.

**Comment 413 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: University of California, Los Angeles

Subject: Scientific Reasons to Postpone STATEWIDE TRUCK REGULATIONS

Comment:

Please carefully consider my attachment "Scientific Reasons to Postpone Adoption of Proposed STATEWIDE TRUCK AND BUS REGULATIONS".  
Thank you very much.

Attachment: [www.arb.ca.gov/lists/truckbus08/897-carb\\_enstrom\\_comments\\_on\\_statewide\\_truck\\_regulations\\_121008.pdf](http://www.arb.ca.gov/lists/truckbus08/897-carb_enstrom_comments_on_statewide_truck_regulations_121008.pdf)

Original File Name: CARB Enstrom Comments on Statewide Truck Regulations 121008.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:41:30

No Duplicates.

**Comment 414 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: Sandman  
Email Address: bsandman@co.tuolumne.ca.us  
Affiliation: Tuolumne County APCD

Subject: Resolution and Cover Letter to Chairman Nichols  
Comment:

Attached: Resolution and Cover Letter to Chairman Nichols in  
opposition (at this time) to On-Road In-Use Diesel Fueled Vehicle  
Rule

Attachment: [www.arb.ca.gov/lists/truckbus08/898-resolution\\_tc\\_bos\\_on-road\\_hd\\_diesel\\_rule.pdf](http://www.arb.ca.gov/lists/truckbus08/898-resolution_tc_bos_on-road_hd_diesel_rule.pdf)

Original File Name: Resolution TC BOS On-Road HD Diesel Rule.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:41:31

No Duplicates.

## **Comment 415 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Lisa  
Last Name: Kayser-Grant  
Email Address: lkgrant3@earthlink.net  
Affiliation:

Subject: Adopt strongest diesel truck rules  
Comment:

Dear Members of CARB,

Please adopt the strongest rules for reducing smog from all diesel trucks and buses, with no exemptions made for particular uses or classes of trucks. In order to ensure the intended results of the rules you adopt, please include measures that will allow the rules to be enforceable within explicit time limits.

Your own legal commitment to cleaning the air in the smoggiest parts of the state, as well as your commitment to reducing greenhouse gases, depends on strong and decisive action that you must now take.

I love living in the San Joaquin but am struggling to justify staying here now that my husband has developed asthma, and my daughter is growing up here developing the only lungs she'll ever have.

I understand that the strongest rules you can adopt have high financial costs to those who use the polluting vehicles, but we know that everyone breathing polluted air pays even higher costs in terms of money spent on health care, money lost from being sick, and the devastating loss of health and even life. We also know and accept that cleanup costs will be passed on to consumers, who can then make better choices about what to buy once the financial costs of pollution are attached to the items that caused it.

Many of the people driving the trucks oppose the rules based on money, but they are among the ones most affected by this pollution and you are charged with protecting them in spite of their protests.

"Necessity is the mother of invention": technology will follow once the rules are made and the market for it is ensured. Likewise for incentive funding.

We are counting on you to protect our health and our economy by creating and enforcing the best possible rules to clean up diesel pollution in California.

Sincerely,  
Lisa Kayser-Grant  
Merced, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:43:31

No Duplicates.

## **Comment 416 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dennis  
Last Name: Shuler  
Email Address: DennisS@gilton.com  
Affiliation: Gilton Solid Waste Management, Inc.

Subject: Comments on Proposed New Regulations  
Comment:

Date: December 10, 2008  
TO: California Air Resources Board  
From: Dennis Shuler, REHS  
Title: Environmental Affairs Manager  
Company: Gilton Solid Waste Management, Inc.

Subject:

Dear Board Members

I wish to make the following comments for both our companies:  
Gilton Solid Waste Management, Inc. and Gilton Resource Recovery /  
Transfer Facility, Inc.

- We operate fully permitted solid waste collection, recycling, waste transfer and composting businesses
- We are one of 20 companies that was certified for early compliance with the Solid Waste Collection Vehicle rule passed in 2003 so we know about the difficulties of implementation
- Over the past five years we have been only marginally successful in having the jurisdictions we serve recognize the costs of CARB compliance issues in our contracts and rates adjustments
- Despite the Board's intentions and nice letters reminding public officials to treat us fairly on these costs we still have a long way to go on the rule passed five years ago
- This proposed rule appears to be more of the same and based upon our real-world experience we are doubtful that the people we work for will or can embrace the new costs that CARB has planned for us
- As residents of the communities we serve, we have made a commitment to be team players to improve air quality, but we cannot do this alone

Our requests regarding the proposed new rule include:

1. That CARB adopt the DTCC proposal to make our compliance schedule more achievable
2. That CARB include vehicles used to haul recycled organic materials, including compost, in its time extension that is afforded to chemical fertilizer haulers. It seems only fair to us that our "clean green" product made from organic waste that is diverted from landfilling be given the same extension as chemical fertilizers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:44:32

No Duplicates.



**Comment 417 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: curt  
Last Name: hoffman  
Email Address: choff20@aol.com  
Affiliation: california sign assoc.

Subject: proposed arb regulations  
Comment:

I don't know what genius came up with the figures of financial impact, but what is currently proposed will break the backs of small business as a whole! Considering the economic times we all have to deal with at present, we are struggling just to stay alive and do not have the financial resources to implement the changes required at this time or in the near future! We're laying off people, reducing benefits, and generally cutting back just to stay alive. I'm sure if this is implemented your going to see a substantial loss of small business on a wholesale basis. This is not what the State economy nor the people need right now. We can put up with the air a while longer until the economy rebounds and makes this a more practical solution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:46:22

No Duplicates.

**Comment 418 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: University of California, Los Angeles

Subject: Request to Postpone CARB Diesel Regulations

Comment:

Please carefully consider the attached petition "REQUEST TO POSTPONE AND REASSESS CARB DIESEL REGULATIONS." Thank you very much.

Attachment: [www.arb.ca.gov/lists/truckbus08/902-request\\_to\\_postpone\\_and\\_reassess\\_carb\\_diesel\\_regulations\\_120308.pdf](http://www.arb.ca.gov/lists/truckbus08/902-request_to_postpone_and_reassess_carb_diesel_regulations_120308.pdf)

Original File Name: Request to Postpone and Reassess CARB Diesel Regulations 120308.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:47:54

No Duplicates.

**Comment 419 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Dr. John

Last Name: Balbus

Email Address: jbalbus@edf.org

Affiliation: Environmental Defense Fund

Subject: Support for the Statewide Truck Rule and a National Perspective

Comment:

Thank you for the opportunity to submit these comments.

--Dr. John Balbus, MD, MPH

Attachment: [www.arb.ca.gov/lists/truckbus08/903-edf\\_balbus\\_letter\\_12\\_10\\_08.pdf](http://www.arb.ca.gov/lists/truckbus08/903-edf_balbus_letter_12_10_08.pdf)

Original File Name: EDF\_Balbus\_Letter\_12\_10\_08.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:50:17

No Duplicates.

## **Comment 420 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Don

Last Name: Reeve

Email Address: dreeve@reevetrucking.com

Affiliation: Reeve Trucking Company

Subject: Private Fleet Rule

Comment:

I started my business in 1976. I have been one to for the last 32 years, to do my best to support and adopt all regulations be them state or federal that intend to better our industry in regards to safety or the well being of the motoring public. What CARB is attempting with the private fleet rule, I feel is well intended and deserves my support and the efforts of all companies in the trucking industry.

I own 101 trucks. I operate in 11 western states, but 85% of what I do is inside the state of California. I primarily service some extremely specialized areas of the transportation industry. I have been able to purchase 5 2008 power units so far in an effort to get the ball rolling in the right direction in regard to my personal situation.

I am and have been aggressively as possible updating equipment and planning in every way I can to move my fleet in the direction CARB has outlined in the private fleet rule. The issues that exist for me and the problems that I face at the pace set forth by CARB are as follows:

1) The economy in its current state has slowed down my business to the point where I am desperately struggling to continue to fund my employees 401(k) and to maintain their benefits at there current levels going forward. This leaves very little capital to allot to more new equipment at this time or in the foreseeable future.

2) I have tried to obtain grants of various types and have learned that is has been pretty much a waste of time due to the fact that my company doesn't qualify for one reason or another. This being said it is extremely difficult to pass on the additional cost of the newer trucks in any large volume to my customers in the form of rate increases especially in this economy. I have also found it next to impossible to obtain a reasonable interest rate on the equipment I have coming in due to the financial situation that exists in our nation today.

3) One of my biggest obstacles that is unique to my company is the unique spec and unusual configuration of the majority of my power units. To do the kind of work I do properly my normal spec truck is a cabover engine body style with an extremely long wheel base and high horse power engines. This makes my trucks irreplaceable with what's available today in regard to the cab design that I need for the many 80' to 140' loads that I haul on a regular basis. If I were to do away with all of my cabovers and

replace them with the trucks that are available through the manufacturers today at the pace CARB has set forth in their plan I would surely be unable to service the majority of my customers.

4) A huge concern to me is my largest customer; a precast concrete products manufacturer has installed on 30 of my trucks a hydraulic crane for the purpose of off-loading their product at the jobsite. In order to maintain the load space on the truck in addition to having the crane mounted as it is currently would not only be impossible now that the cabover engine truck is unavailable by any supplier, but in addition it would be astronomically expensive to remove these permanently installed cranes and re-install them on new chassis.

5) Another large impact to my operation is going to be the fact that no other state particularly cares what CARB is up to in California and if I'm put into a position to conform and then try to compete with all my competitors out of state that are not burdened with the costs that I am subjected to, I would surely lose that portion of my market share.

6) I've seen no plan on how CARB is planning to tie this program to any effective enforcement policy, leaving me to wonder will it be like so many other regulations that exist in our industry where legitimate companies are burdened with the costs of doing it right while competing with others that don't even come close.

I do not see any way possible that my operation, that I have worked very hard since I was 18 years old to build could possibly survive the transition that I would have to go through to conform to the private fleet rule as it is currently proposed. With all due respect I sincerely ask that CARB and all concerned please take into consideration the many obstacles that they are placing before me and the many companies like mine as they finalize the private fleet rule. I strongly urge that the California Trucking Association alternative is considered as we all try to achieve the goals and good intentions for all of us that live in the State of California, that CARB is trying to accomplish.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:51:59

No Duplicates.

## Comment 421 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.

First Name: Dan  
Last Name: Ruoff  
Email Address: dan@alegretrucking.com  
Affiliation:

Subject: truck rule  
Comment:

Dec. 5, 2008

To Whom It May Concern:

In response to Mary Nichols video release regarding the Private Fleet Rule.

Mary Nichols reminds us that it is the job of ARB to find a solution to clean up the air. Does Mary Nichols, the board, the governor, and the public, not realize the progress already made in this effort? Substantial emission reductions have already been realized and continue to improve as the result of existing regulations mandated by ARB. Critical factors that have enabled the industry to meet these standards are from implementation of:

1. Exhaust Gas Recirculation (EGR)
  2. Common-Rail Fuel Injection
  3. Combustion Chamber Design.
  4. Turbocharging modifications.
  5. Retarded fuel injection timing.
  6. Electronic Engine Controls.
  7. Ultra-Low Sulfur Diesel Fuel. (ULSD)  
(Sulfur content dropped from 300 parts per million (ppm) to 15 ppm. 99% reduction)
  8. Annual Smoke Opacity testing.
  9. Vehicle Idling Reduction Strategies.
  10. Diesel Particulate Filters installed on 2007 model year engines and newer. (DPF)  
(Result in particulate matter reductions of 80 - 90%)
  11. Diesel Oxidation Catalysts. (DOC)
  12. Selective Catalytic Reduction. (SCR)  
(Reduces NOx by 70%)
  13. NOx Reduction Catalyst. (Longview system from Cleaire)  
(Reduces NOx by 25% and PM by 85%)
  14. NOx Absorber Catalyst Technology.  
(Reduces NOx, HC, and CO by 90%)
  15. Crankcase Emission Control.  
(Reduces PM emissions by 25-32% and CO by 14-18%)
- Additional Technology Potential
1. Catalysts included in diesel fuel will reduce NOx up to 10 %, PM up to 33 %, and HC and CO up to 50% during the combustion process.
  2. Water-in-diesel fuel emulsion (PuriNOx) reduces NOx up to 30% and PM up to 65%.

Sources: DieselNet

Association

Manufacturers of Emission Controls

Agency

U.S. Environmental Protection

Mary Nichols says on December 11th and 12th that "Her board is going to take action on this rule". The language here sounds very much like she has her mind made up. Even though this meeting is being held to welcome public comment, it seems to be just another example of swaying the public into believing that the ARB is actually listening to the concerns and suggestions of the trucking industry.

Mary goes on to say that "The rule the board will vote on Dec. 12th reflects the idea's we have heard from the trucking community", "And stays on target to reduce harmful diesel and smog forming emissions". I have a hard time with this statement. Again, is she trying to sway the public into thinking she has taken us into consideration? I have not spoken to nor have I heard from anyone in the trucking community that feels that ARB is taking us into consideration. And again there is no reference to emission reduction efforts already obtained. This gives the message to the general public that nothing has been achieved yet and won't unless this rule is passed.

Mary stresses that "Because of this careful outreach work we think we've struck a good balance". The truth is that the balance was already met years ago. We have gone well above and beyond what the general public would reasonably expect from our industry. We have suffered, endured, and addressed more than our fair share of responsibility for the emissions that everybody produces. There is no more balance left. Anything else required beyond what is already being mandated is extremely insensitive to the needs and efforts of the trucking industry.

Mary says "We look forward to supporting truck owners as they comply with these rules beginning in 2010". Well, I think my point is made. The ARB has no intention of hearing the trucking industry on Dec. 11th and 12th. The ARB simply is not as concerned for the trucking industry as they would lead the public to believe.

Mary states that "To further help the trucking industry the Governor, legislature, and voters together have approved 1 Billion in grants and low-cost loans and will continue to look for ways to make compliance with this rule as painless as possible".

The term "further help" implies that the ARB has been helping the industry all along. The truth is, and the general public should be informed of this, that we have had to pay for all these emissions upgrades from the beginning. We have absorbed these costs all along.

And there is admission on her part by indicating that this is going to be painful for the trucking industry to comply with. This is one statement in which she is correct. The money that is being distributed is not going to benefit the truckers who can't afford the balance of the truck payment. Many truckers are going to suffer because this so-called "help" from the ARB is actually no help at all. So again, the general public is led to believe that this money is going to help. And even the truckers that can qualify for the balance of the loan are not necessarily going to benefit from this so-called "help". There is a list of negative impacts that this ruling is going to have on them that will erase any so-called help money that they will receive. Just to name a few:

1. Trade-in values are diminished.
  2. Anticipated truck life is shortened.
  3. Already budgeted operating costs can no longer be relied on.
  4. Government restrictions on areas of operation. (No out of state hauls)
  5. Government control over normal trade-in cycles. (government micro-managing)
  6. Government selection of which new trucks can be purchased.
  7. Government dictating how long we need to operate the new trucks.
- Etc.....

Mary states that she "Knows this rule is going to cost money but it also gives truck owners and drivers an opportunity to drive newer, cleaner vehicles". In just about every statement she makes, she is careful to counter any words that might indicate this is unfair. For example, she knows this is going to cost money but she immediately counters that fact with something positive like we will all get new trucks. Don't you think we would all like to be driving new trucks? She makes it sound like this rule is something all truckers are anxious to adopt. Just say it the way it is: We aren't all getting new trucks like she wants everyone to believe. We aren't all getting the assistance that she says will help us. We aren't being heard. Our comments will not be taken into consideration. Quit trying to butter this up by suggesting that there is an equal balance. There isn't!

And Mary gets something else right. She realizes our economy is in a slump. But again, immediately, she counters that by saying "She believes our economy will be turned around by the time the industry has to spend any money". Listen, her job, as she so well stated, is to clean up the air. It is not in her scope to predict what the economy is going to do. Nor does she have a crystal ball telling her how many years it will take the trucking industry to recover from this economic depression. She can't say that in 2010, the trucking industry will be fully recovered and ready to take on these additional costs. But again, she wants to sway the public into believing this.

And finally, Mary claims that this rule "is going to save 9,000 California lives over the next decade". Marvelous! I'm sure the public will give her their full support to do whatever it takes to save all these lives. But, has she (or her board) (or the public) read the letter submitted to public comment on the ARB web site on April 2008 from James E. Enstrom, Ph.D., M.P.H., University of California, Los Angeles? In this letter Dr. Enstrom reveals extensive research in direct contradiction to this claim of pre-mature deaths. In addition, he makes comment that the ARB completely disregards his research. This is in direct alignment to our industries claim that the ARB simply doesn't listen. How much other information is being published or verbally spoken by Mary or the ARB that simply isn't accurate? This question needs to be asked.

Let's face it, the ARB has an agenda and Mary Nichols conveyed it clearly today. Her statement and pre-mature decision is intended to please a particular group of people. She wants this group of people to think that it's them against the trucking industry. Just read all the public comments from numerous organizations such as the American Lung Association, the Friends of the Earth, the Nature



Conservancy, and especially from all the school children from Oakland with Asthma. It's all so heart felt. The problem is that it's not us against them. We are all in agreement to clean up the air. The trucking industry is made up of citizens that also have children, elderly parents, and other family members and friends that suffer from the effects of emissions that have accumulated over the years from all types of industry. We want to be heard. We want the public to know how much we care and how much we have already contributed to address this problem. This message needs to be heard. We are all in this together. We should be able to rely on our appointed leaders to take into consideration all the facts, un-biased, and come to a reasonable solution. And the solution is already taking place without further mandates.

Let me remind the ARB of their own mission statement which reads:

... the mission is to promote and protect public health, welfare, and ecological resources through effective reduction of air pollutants while recognizing and considering effects on the economy.

Let me emphasis WHILE RECOGNIZING AND CONSIDERING EFFECTS ON THE ECONOMY.

The economy is not going to benefit from this. This money could be better utilized elsewhere. Inform the public of the improvements your staff has already made over the years in the trucking industry. They will appreciate your accomplishments, and understand why we don't need to spend this kind of money any further in this area.

Dan Ruoff  
Frank C. Alegre Trucking, Inc.  
Lodi, Ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:53:13

No Duplicates.

## **Comment 422 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Mary-Michal  
Last Name: Rawling  
Email Address: mrawling@gvhc.org  
Affiliation: Merced/Mariposa County Asthma Coalition

Subject: Please Pass a Strong Diesel Truck Rule  
Comment:

Greeting Board members!

I am writing to express my strong support for a strong diesel truck rule. This rule is a critical component of achieving the emission reductions outlined in the 2007 8-hour ozone plan for the San Joaquin Valley.

With one in five children in the San Joaquin Valley diagnosed with asthma we are raising a generation of families that are chronically ill with diseases that will cost them thousands of dollars over their lifetime, or perhaps even their lives.

As Valley residents, we worked hard last year to ensure that we would breathe clean air before 2024 and when the Extreme SIP passed we were reassured by our local APCO and a commitment made by your board that we would achieve clean air standards faster - by 2017.

This rule gives us the hope that almost half of the NOx pollution in the Valley along with deadly particulate matter might be cleaned up within our lifetimes. We are now at that pivotal moment where this can become a reality or watch it all fall apart.

That hope is now in your hands.

We are looking to you now for courage, guidance, and leadership to live up to those commitments and make California healthy for all of us.

Diesel pollution from agricultural vehicles is as toxic or more toxic than emissions coming from vehicles passing through the Valley that leave their pollution behind for all of us to breathe. A strong rule does not give an exemption to an industry that imposes disproportionate burden on the most sensitive populations. Agricultural vehicles often operate during the smoggiest time of year and also in close proximity to homes, schools, and people. Residents of the San Joaquin Valley deserve to learn, live, play, and earn a living without worrying about getting sick.

Please DON'T leave the San Joaquin Valley behind. Please pass a strong rule without exemptions to ensure that ALL CALIFORNIANS breathe clean air.

Sincerely,

Mary-Michal Rawling  
Program Manager  
Merced/Mariposa County Asthma Coalition

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:54:23

No Duplicates.

## **Comment 423 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Andy  
Last Name: Katz  
Email Address: andyk@ggbreathe.org  
Affiliation: Breathe California

Subject: Support for Truck and Bus Rule  
Comment:

December 10, 2008

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2815

RE: Strong Support for Truck and Bus Rule

Chair Nichols and ARB Members:

Diesel pollution is a highly toxic carcinogen, causing 24,000 premature deaths annually from particulate matter exposure, including 4,500 annually due to trucks and buses. In addition, diesel truck pollution imposes costs on the California economy - \$28 billion annually in just the South Coast and San Joaquin Valley regions. This regulation is desperately needed to protect public health and ensure that California can meet federal air quality standards.

We recommend amending the regulation (1) to restrict the proposed exemptions for agricultural trucks and (2) to provide a margin of safety for meeting SIP commitments.

The proposed agricultural exemption will still allow for local exposure to unhealthy air. To protect public health as much as possible, we concur with the suggestions to (1) limit fleet size to small fleets of three vehicles or lower, (2) reducing the mileage threshold for delayed PM filter requirements (2015) and delayed 2010 NOx engine standards (2023) to vehicles driving under 10,000 miles a year, (3) not including chemical trucks, and (4) requiring that replacement vehicles must have a PM filter.

This rule is critical to meeting SIP commitments in the San Joaquin Valley and South Coast region, but the commitments are so heavily dependent on the emission standards in this regulation and its enforcement, that there is no margin for error. To ensure compliance, the Board should adopt a rule that will obtain the reductions needed to provide a margin of safety in meeting SIP commitments, including requiring vehicle inspections and third-party evaluations.

This rule will save over 9,000 lives and prevent 150,000 asthma attacks. We urge the Board to adopt this critical rule to protect public health.

Sincerely,

Andy Katz

Attachment: [www.arb.ca.gov/lists/truckbus08/907-12.10.08\\_truck\\_rule.doc](http://www.arb.ca.gov/lists/truckbus08/907-12.10.08_truck_rule.doc)

Original File Name: 12.10.08 Truck Rule.doc

Date and Time Comment Was Submitted: 2008-12-10 11:55:11

No Duplicates.

**Comment 424 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tony  
Last Name: Picarello  
Email Address: [tpicarello@westport.com](mailto:tpicarello@westport.com)  
Affiliation: Westport Fuel Systems Inc.

Subject: Clarification on Westport ISX G LNG Fueled Engines  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/908-carb\\_fleet\\_rule\\_comment\\_dec\\_2008.pdf](http://www.arb.ca.gov/lists/truckbus08/908-carb_fleet_rule_comment_dec_2008.pdf)

Original File Name: CARB Fleet Rule comment DEC 2008.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:55:23

No Duplicates.

**Comment 425 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Nick  
Last Name: Robinson  
Email Address: ndrobinson@gmail.com  
Affiliation: Merced Stop Wal-Mart Action Team

Subject: Strongly support the Diesel Truck Rule  
Comment:

December 10, 2008

Mary Nichols, Chair, Air Resources Board  
Ron Roberts  
Dorene D'Adamo  
Barbara Riordan  
John R. Balmes, MD  
Lydia Kennard  
Sandra Berg  
John Telles, MD  
Ronald O. Loveridge

Re: Strong support for In Use On Road Heavy Duty Truck and Bus Rule

Dear Chair Nichols and California Air Resources Board members,

We are the Merced Stop Wal-Mart Action Team (SWAT): a broad, grassroots coalition of community groups and thousands of Merced residents opposed to the construction of the proposed Wal-Mart distribution center in Southeast Merced. We seek to protect the health and quality of life of our members and future generations of Merced residents.

SWAT strongly supports the In Use On Road Heavy Duty Truck and Bus rule and urges you to adopt it, for all the health and economic benefits identified by ARB staff, without exemptions for agricultural trucks. We live in the midst of an urgent public health crisis, and need strong regulation to clean up diesel pollution in our communities. Merced has extensive agricultural areas and we believe the same protection from diesel truck exhaust should not exclude the residents and workers in these communities.

We have two other comments related to the rule.

Make polluters pay

We are concerned that this rule creates a disproportionate cost burden on small fleet owner-operators. For the rule to be fully implemented on the ground, ARB must ensure that retrofit and replacement grant and loan opportunities are fully funded and available to those truckers who need it most.

The misclassification of "independent contractor"

owner-operators is at the heart of the problem. The business model of retailers like Wal-Mart imports cheap goods from overseas and depends on subcontracting with smaller trucking companies and owner-operators to deliver those goods from the ports to distribution centers and stores. For example, Wal-Mart estimates that if built, 55%-60% of trucks at its Merced distribution center would be non-Wal-Mart trucks, including small fleets and owner-operators. Many of these owner-operators have saved up money in order to buy their own truck and have a more stable income, and yet often work without benefits and for comparatively little pay. Wal-Mart externalizes the costs of new regulations such as the In-Use On-Road Truck Rule and places the burden of paying for new regulation on those who are least able to afford it.

Considering that the state of California is facing a \$14 billion deficit next year and that the bond market has collapsed, we are deeply concerned that adequate taxpayer funding opportunities will not be available in the coming months. We encourage the Board to study implementation of a system of end-user fees that would help pass the costs of this regulation along to the companies who are ultimately responsible for generating and profiting from goods movement. The end-user fee structure could be a part of reporting requirements built into existing funding mechanisms available to truckers; end users would make quarterly payments based on the number of deliveries made and miles driven to California drop off points.

Smart land use alone is not enough

In Southeast Merced, two schools are located approximately 1,000 feet from Highway 99, the most heavily traveled highway west of the Mississippi. Another elementary school is planned less than 500 feet from the as-yet unbuilt Campus Parkway. In addition, off-route truck driving remains unenforced in the neighborhood. The In Use On Road Diesel Truck Rule is absolutely necessary to reduce localized exposure to particulate.

In conclusion, we urge you to pass the strongest possible rule and to examine alternative funding sources that don't allow corporations like Wal-Mart to externalize the costs of state regulations.

Yours truly,  
The Merced Stop Wal-Mart Action Team

swat@mercedstopwalmart.org | (209) 723-9458 | 1735 Canal St. Suite 13, Merced, CA 95340

Attachment: [www.arb.ca.gov/lists/truckbus08/909-truckrulestatement.doc](http://www.arb.ca.gov/lists/truckbus08/909-truckrulestatement.doc)

Original File Name: truckrulestatement.doc

Date and Time Comment Was Submitted: 2008-12-10 11:56:43

No Duplicates.



**Comment 426 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Daniel  
Last Name: Williamson  
Email Address: drwtrk2004@yahoo.com  
Affiliation:

Subject: God Willing You Will make a good Decision.  
Comment:

I pray right now that you are able to read the writing on the wall, and that you choose to employ the dtcc recommendations over your present draft. I hope later on when many people that work for the state and private sector are without jobs, and their families as well as themselves are wondering why this happened they will remember this e-mail and think if we would have had more compassion and understanding on this industries plight with the economy and our proposed regulations, perhaps someone or something would have likewise spared us our jobs. So Take Heed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:56:59

No Duplicates.

**Comment 427 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Grant  
Email Address: deepjohn@earthlink.net  
Affiliation:

Subject: Strong Diesel Truck Rule  
Comment:

Please register my support for a strong diesel truck rule to reduce diesel pollution from all sources as soon as possible. I live in the San Joaquin Valley and have asthma, and can't wait for truckers to decide that anti-pollution features are affordable before getting clean air for everyone's health. Clean jobs do exist too.  
Sincerely,  
John Grant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:59:19

No Duplicates.

**Comment 428 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kevin

Last Name: Sjostrand

Email Address: kevins@roeoil.com

Affiliation:

Subject: Proposed Regulation for In-Use On-Road Diesel Vehicles

Comment:

To the CARB Board.

I am writing on behalf of our business, Roe Oil Company, Inc. to urge the Board to consider an alternative to the Proposed Regulation you will be reviewing for approval on December 12th. We are a small privately owned business with a small fleet of 5 trucks which will be impacted by this regulation. All equipment is owned and has been meticulously maintained over the years to provide long reliable service. Even our oldest truck going back to 1990 model can provide us with many more years of dependable service. We are as concerned as anyone about the quality of our air in the California, and we have always done our part to maintain our trucks to the required standards. We realize that something will need to be done to maintain and improve our air quality for the future. However, the proposed regulation as written will require that we replace all our equipment collectively by 2015 and will indeed place a great financial stress on our business. Our financial planning for the future has been the investment in our current fleet, not to replace all of our equipment in the near future. This proposal will create a financial burden for our company that we may not be able to bear. Another aspect of the proposal as written devalues our equipment with no compensation and prohibits their sale in California. The collective impact from the burden on business statewide is one that we don't believe is being realistically considered. This regulation could be disastrous to California's economy long term. Again, we urge you to please reject the Proposed Regulation as written and consider other options that will have much less impact on businesses and the California economy. Thank you for listening.

Kevin Sjostrand

Roe Oil Company, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:59:49

No Duplicates.

**Comment 429 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: TED

Last Name: HEILMAN

Email Address: theil3325@aol.com

Affiliation:

Subject: CARB VOTE

Comment:

I WOULD JUST LIKE TO SAY THAT FOR A STATE WITH SO MUCH TO OFFER THE WAY WE DEAL WITH OUR AIR POLLUTION IS TENS YEARS BEHIND WHAT ARIZONA IN PHOENIX HAS DONE.THE WAY THIS IS DEALT WITH IN REGARDS TO THE TRUCK RULES AND THE TRU RULES HAS BEEN UNFAIR AND WITH NO REGARD TO THE ACTUAL TECHNOLOGY AVAILIBE WHEN THE RULES ARE MADE AND VOTED ON.THIS WILL PUT THIS STATE IN HARMS WAY.YOUR OWN PEOPLE DO NOT HAVE A GRASP OF WHAT IS ARE THE ACTUAL NUMBERS TO COMPLETE THE TASK AT HAND.ROD HILL HAS NO CLUE AND WHEN ASKED IF HE HAS REPORTED TO THE BOARD THE ISSUES HE CLAIMS THAT NO NEED TO REPORT THE PROBLEMS.THAT KIND OF SUPPORT STAFF IS NOT ALLOWED IN PRIVATE COMPANYS WHY DO YOU ALLOW IT IN PUBLIC AGENCYS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 12:06:10

No Duplicates.

**Comment 430 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: David  
Last Name: Bacchi  
Email Address: dave@aeanda.com  
Affiliation:

Subject: Proposed Regulation  
Comment:

Please see attached message. Thanks.

Attachment: [www.arb.ca.gov/lists/truckbus08/915-letter\\_to\\_gov\\_s.doc](http://www.arb.ca.gov/lists/truckbus08/915-letter_to_gov_s.doc)

Original File Name: Letter to Gov S.doc

Date and Time Comment Was Submitted: 2008-12-10 12:46:08

No Duplicates.

**Comment 431 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Peter

Last Name: Denvir

Email Address: pdenvir@asvl.com

Affiliation:

Subject: Proposed Diesel Truck and Bus Regulation

Comment:

This regulation is wrong and will cripple the small independents trying to survive in this current recessionary period. When we should be encouraging business development, this type of action is the wrong message for the State of California to be delivering. Do not let this regulation pass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 12:53:21

No Duplicates.

**Comment 432 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: frank  
Last Name: smith  
Email Address: fst02@aol.com  
Affiliation:

Subject: Dec 11-12 hearings diesel trucks  
Comment:

I am the owner of a small trucking company trying to survive in the worst economic down turn in my life. these rules if adopted as currently written will drive me out of business and drive the California economy down even farther.

Please look at other options that might not have such a catastrophic effect on all of us.

Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 13:02:18

No Duplicates.

**Comment 433 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Steve  
Last Name: Smiley  
Email Address: steve@inlandplaster.net  
Affiliation: Inland Plaster Inc.

Subject: Carb Laws  
Comment:

As a small company with a few pieces of equipment. The new Diesel engine laws will impact us at a time when we are just trying to stay afloat. I am sure it will have an affect on the entire economy state wide.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 13:07:08

No Duplicates.



**Comment 434 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Ramorino  
Email Address: r.ramorino@roadstartruckinginc.com  
Affiliation:

Subject: Private Fleet Rule hearing  
Comment:

Submitting comments for CARB Board December 11th hearing on PFR

Attachment: [www.arb.ca.gov/lists/truckbus08/919-carb\\_comments\\_on\\_pfr\\_rule.doc](http://www.arb.ca.gov/lists/truckbus08/919-carb_comments_on_pfr_rule.doc)

Original File Name: Carb comments on PFR rule.doc

Date and Time Comment Was Submitted: 2008-12-10 13:17:02

No Duplicates.

**Comment 435 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Lee

Last Name: Brown

Email Address: leebrown@cdtoa.org

Affiliation:

Subject: Written Comment from the California Dump Truck Owners Association (CDTOA)

Comment:

Please see the attached document from CDTOA, expressing our deep concerns with ARB's proposed On-Road Diesel Regulation and stating our support for DTCC's Alternative Proposal.

Attachment: [www.arb.ca.gov/lists/truckbus08/921-cdtoa\\_written\\_comment\\_to\\_arb.12-10-08.doc](http://www.arb.ca.gov/lists/truckbus08/921-cdtoa_written_comment_to_arb.12-10-08.doc)

Original File Name: CDTOA Written Comment to ARB.12-10-08.doc

Date and Time Comment Was Submitted: 2008-12-10 13:17:50

No Duplicates.

**Comment 436 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Bob

Last Name: Berry

Email Address: berrybrostowing@sbcglobal.net

Affiliation: CTTA & CTA member

Subject: Truck Regulations

Comment:

I own a small business in Oakland and I have owned for 35 years to provide service to this community and provide my employees a living wage and benefits. This is all about to change if you adopt your new rules. In order to comply I will have to reduce my staff by 25-35% and reduce my fleet by 50-60%. Benefits my have to be curtailed or eliminated. I strongly agree with your goal but see no way to comply. I think some more work with the trucking industry needs to take place and a compliance program that has the CHP & DMV doing more in insuring that there is a level playing field. I purpose you look at a little more liberal compliance schedule. I think if fleets have 25% of their fleet in compliance by 2012 and then 50% by 2016 75% by 2019 and finally in total compliance by 2022. This is not all you desire but it would be alot more doable on the side of small business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 13:39:40

No Duplicates.

**Comment 437 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: William  
Last Name: Groves Jr  
Email Address: ranchw@aol.com  
Affiliation:

Subject: Legislative nightmare  
Comment:

Please heed the news from industry concerning any new regulations that would apply to buses and diesel trucks. I respectfully ask that your organization consider the dire economic impact this would have on California's economy. Now is not the time to implement any new laws because simply put; California will fall and this could impact neighboring states economies as well. I am for clean air and applaude what has been done in our fine state, but please understand that programs like you are considering must be delayed until California has a better financial base to stand on. Thank you for the opportunity to respond to this issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 14:47:51

No Duplicates.

## **Comment 438 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: steve  
Last Name: lopes  
Email Address: slopes@lubeoil.com  
Affiliation: marketer

Subject: CARB's proposed rule to mandate new trucks  
Comment:

Dear Governor Schwarzenegger:

I am writing this letter to voice my concern regarding the on-road truck and bus regulation being proposed by California Air Resources Board, that if implemented in it's current form would negatively affect my business, but also California's economy, in the middle of a recession that feels like a depression.

My Company, Western States Oil, is supportive of reducing particulate matter and emissions from diesel engines, but now is not the time to mandate such costly compliance standards , given the unprecedented down turn of our economy.

California Air Resources Board is mandating companies like mine, which is a small independently owned family business with 32 employees, to dispose of equipment and assets before their useful life is completed, and purchase new equipment before it is needed.

Many companies have already begun the process of purchasing new equipment or retrofitting their fleets, however the bulk of trucking companies in California is made up of small companies with fleets of 5 or less trucks, which in most cases are the sole assets of a family run business.

However, there is an alternate proposal, created by Driving Towards a Cleaner California Coalition (DTCC) , that would allow small companies like mine to comply in a more reasonable and flexible time frame, while still attaining aggressive emissions reductions.

California Air Resources Board's own analysis of the D.T.C.C. alternative actually indicates it will achieve similar benefits to CARB's proposed regulation in the long term.

For our company it is like a double HIT... Because we are now struggling to find financing to upgrade our gas stations with new CARB EVR and ISD regulations mandated by April , 2009 !

It is incumbent on our state's leaders, and it is their responsibility, to work towards building a strong and vibrant economy while at the same time achieving clean air standards, which I believe is possible using the DTCC alternative.

I urge you to do the right thing...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 14:52:28

No Duplicates.

**Comment 439 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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

## **Comment 440 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Baudendistel  
Email Address: jbaudendistel@gschq.com  
Affiliation: GSC Logistics, Inc

Subject: TruckBus08  
Comment:

Date 12/10/08

Governor Arnold Schwarzenegger  
Members, California Legislature  
California Air Resources Board  
(Address)  
(Address)

Dear Governor Schwarzenegger or  
Members of the California State Legislature or CARB:

The California Air Resources Board (CARB) is currently considering the adoption of an on-road diesel truck and bus regulation that, if implemented as presently drafted would have a profound, negative impact on California's economy.

I want to be clear: GSC Logistics, 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 families, our employees and all Californians. However, in its current form, the Board's proposed regulation places a significant economic risk on our business today, jeopardizes our future viability in the Port Drayage industry, which is already reeling from unprecedented financial turmoil.

CARB is proposing this multi-billion dollar regulation during the worst economic crisis since the Great Depression. California truckers, construction companies and bus operators are struggling to make ends meet in the face of a massive slow down in the construction sector due to falling home prices and home foreclosures, declining consumer confidence and spending and a freeze in the credit markets. Today there is virtually no access to capital for businesses, large and small.

Companies like mine are being asked to dispose of equipment and assets before their useful life has been completed and purchase new equipment before it would otherwise be acquired. A combination of this proposed rule and the state of the economy have left the trade-in or resale value of our equipment worth pennies on the dollar. My company and others like us simply don't have the resources or access to capital to retrofit our engines. Some of us may be forced to sell off our trucks at a loss or shutter our companies' doors, ultimately costing jobs and revenue to the



state's economy.

Many of California's trucking companies have already begun the process of retrofitting or replacing their fleets, whether in the normal course of their business cycle or in anticipation of these regulations. However, the smaller owner/operators - those with fleets of five trucks or less - who make up more than 55 percent of all trucks registered in the state, will be severely hampered by the costs of retrofitting or replacing trucks that, in some cases, are the sole assets of their family-owned businesses.

Given the multi-billion dollar cost of this regulation - and the current volatile economic environment - I urge you to support the alternative proposal proposed by the Driving Toward a Cleaner California (DTCC) Coalition that would give companies like mine the opportunity to comply in the most reasonable timeframe and flexible manner possible while still attaining aggressive emission reductions.

In fact, CARB's own analysis of our DTCC alternative confirms that the DTCC alternative proposal achieves roughly similar emissions benefits to the proposed regulation in the long-term.

We must be careful not to forfeit California's economy and ability to move goods across the state, build construction projects and bus our children to and from school for the sake of protecting our environment. We look forward to working with you, CARB, environmental organizations, the Legislature and other stakeholders to accomplish these goals.

In addition the Private Fleet rules vs the Drayage rules are in conflict. Many owners and owner operators purchased 2004 newer trucks which should qualify up through 2013 based on the Drayage truck rules. The differences in the two rules are in conflict. The Private Fleet rule decreased the time allowed on a 2004 vehicle to operate. This increases the cost to the owner whom purchased under the Drayage rules. A 2004 truck costs in the range of \$45K, which many operators have purchased expecting to be compliant up to 2013. This is now not the case under the Private Fleet rules. Consistency in the rules and the agencies is of paramount importance. Again we urge the adoption of the proposal of the DTCC.

Sincerely,

John Baudendistel  
Controller  
GSC Logistics, Inc.

530 Water St., 5th Floor, Oakland, CA 94607  
Phone: 510.844.3717 FAX: 510.844.3818

Attachment: [www.arb.ca.gov/lists/truckbus08/926-carb\\_letter\\_121080.doc](http://www.arb.ca.gov/lists/truckbus08/926-carb_letter_121080.doc)

Original File Name: CARB letter 121080.doc

Date and Time Comment Was Submitted: 2008-12-10 15:14:43

No Duplicates.

**Comment 441 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Jason  
Last Name: Flores  
Email Address: wizmo16@hotmail.com  
Affiliation: Teacher

Subject: Without a strong rule we will suffer from the health consequences  
Comment:

I feel that the 2008 Ozone Plan needs to be a lot more effective in prohibiting the amount of diesel trucks that emit pollutants here in the Central Valley. With exemptions to agricultural, the Central Valley becomes vulnerable to air pollution because the valley is home to much of the agriculture in the United States. It seems like the Ozone Plan was a token gesture used to shut people up until they forgot about the issue of the air quality in the area. The issue is a concern here in the Central Valley because many of those who are at risk to environmental and health hazards involve children. Living and working in the Central Valley, I have met many children who have respiratory diseases and problems. With the scale of pollution that takes place here and its toll on people's health, it is disappointing to know that we also have an issue with the health care system that is strongly connected to such environmental hazards. Since most people are being effected by pollution without there will and consent, should not there health care problems that stem from these pollution problems be covered by the government and firms that contribute largely to these health issues.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 15:17:29

No Duplicates.

## **Comment 442 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gary

Last Name: Hartmann

Email Address: KVSTruckingInc@Yahoo.com

Affiliation:

Subject: Regarding new regulations for California trucks

Comment:

Everyone wants cleaner air and healthier cities. Trucking companies are no exception. We live and work in California and we want our state to be a healthy, prosperous place.

The plan that CARB is proposing is not going to make California more healthy or more prosperous. It will do just the opposite. CARB's proposals are not supported by the state's own economic analysis data. Even economists whose opinions were solicited by the state in support of the initiative think CARB is putting a "rosy face on a plan that might wreak havoc in the state."

Harvard University's Robert Stavins:

"I have come to the inescapable conclusion that the economic analysis is terribly deficient in critical ways and should not be used by the state government or the public for the purpose of assessing the likely costs of CARB's plans."

CARB should go back and re-study the economic underpinnings of their analysis. Their economic justifications are badly flawed.

The California State Legislative Analyst's Office declared "the plan's evaluation of the costs and savings of some recommended measures is inconsistent and incomplete."

This plan will saddle every business and resident of this state with higher costs and make us, as a whole, that much more uncompetitive with other states and regions. CARB has consistently promulgated severe regulations without considering other viable options, and without calculating the actual costs to the state.

A retrofit of our 12-vehicle fleet will cost our small company, with annual gross revenues of around a million dollars, nearly \$250,000. We have only ever purchased CARB-approved vehicles, but suddenly those investments will be obsolete without a large capital outlay on our part. Meanwhile, there is no way to make up for the cost of this expense in this economy.

Businesses are seeking out cheaper freight, cheaper production, cheaper labor just to survive this trying time. How can we afford to retrofit? I ask you in all sincerity, how?

We are still paying off fuel bills from when diesel soared to more than \$5 a gallon in California this summer. Where are we going to get \$250,000 in the middle of an economic downturn that has been

compared to the great depression? There's been a 40% drop in the volume of freight in California. Lumber is not moving because houses are not being built. People have no money for home renovation because the value of their homes has dropped so precipitously. General merchandise freight has slowed because consumers are worried about overspending.

When I tell you we are struggling just to keep going, I'm not saying that for dramatic emphasis. I'm saying that as a business owner laboring to keep the doors open the past year. We have borrowed, renegotiated loans, tried to patch old equipment to keep it running a while longer, because there is nothing extra in our budget.

Our employees have not had a raise in years. We have office and capital equipment that needs upgrading. We have been dealing with health care cost increases to the tune of 15 to 20% per year for more than a decade. Sales and use taxes have gone up locally and statewide. Almost every expense has gone up because of energy price increases. These fluctuations are huge challenge for any business but especially for a small business with less than 20 employees.

Now the state wants to put another huge burden on our shoulders.

Since deregulation in the early 1990s, the number of transport companies in the state has drastically diminished. Instead, transportation hubs to serve the California market sprung up in Las Vegas, Phoenix, Reno and Eugene, Oregon.

The cost of doing business in those states is much cheaper. Just by moving a company across state lines, you could have a huge competitive advantage. And that is what has happened. Out of state and transnational trucks come into California, move freight around, and leave. Those trucks leave pollution in our state but do not shoulder the costs of it.

Instead, an ever-shrinking number of struggling California freight companies are faced with paying the bill.

If California wants to decrease pollution related to transportation of goods, it should consider levying a tax on every item imported at a port or hauled around by out of state trucks. It should also consider re-regulating trucking rates so that compensation is once again in line with real world costs and California companies have a level playing field. The deregulation of our industry has hurt our state badly. We have seen small and mid size companies, which drive so much of our economic growth, driven out of business completely. The trend is toward ever larger companies, 99% of which are not based in California at all and simply come in and out without having to bear any of the costs of doing business here. We have seen this for ourselves. We are the one of the only remaining small private freight companies left in our country.

But asking trucking companies to pay \$20,000 per truck to retrofit vehicles that met all California requirements only a few years ago is an extraordinary action that will have repercussions for everyone in this state, not least of all the 16 people we employ in Mendocino County.

California trucking companies are not making it in the current business environment. The new CARB action will be the final blow.

There is no logic in the rulemaking and legal process as it now stands. That is why ag vehicles are exempted from air quality rules even in the biggest agricultural valley in the state. That is why California fuel costs more than fuel anywhere else in the nation. Agency's calculate the costs to justify their rulemaking. One cost is calculated but another is ignored, leading to legislative and regulatory equations which are completely out of whack.

Freight will continue to need to be moved in California since there is no other way to get items from Point A to Point B except via large trucks. But those trucks wont be California trucks - and they wont be paying California taxes or abiding by CARB rulings. This rulemaking will put many people out of business. It will also drive up the cost of every good and service in the state of California at a time when people can least afford it.

Gary Hartmann  
President, KVS INC  
Ukiah, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 15:25:22

No Duplicates.

**Comment 443 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael  
Last Name: Lewis  
Email Address: mike@lewisandco.net  
Affiliation: CIAQC

Subject: Proposed Regulation for In-Use On-Road Diesel Vehicles  
Comment:

Please find attached the comments prepared by the Construction Industry Air Quality Coalition (CIAQC) on the Proposed Regulation for In-Use On-Road Diesel Vehicles. The CARB estimated \$1 billion cost of the proposed regulation to the construction industry is more than it can bear.

Attachment: [www.arb.ca.gov/lists/truckbus08/929-on-road\\_truck\\_regulation\\_-\\_ciaqc\\_comments\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/truckbus08/929-on-road_truck_regulation_-_ciaqc_comments_to_carb.pdf)

Original File Name: On-Road Truck Regulation - CIAQC Comments to CARB.pdf

Date and Time Comment Was Submitted: 2008-12-10 16:02:03

No Duplicates.

**Comment 444 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Robert  
Last Name: Rodriguez  
Email Address: rrodriguez@gschq.com  
Affiliation: GSC Logistics, Inc

Subject: Private Fleet Rule  
Comment:

\*\*Hello good afternoon - my name is Robert Rodriguez I am the safety and compliance manager for GSC Logistics of Oakland and been with the company for six years.

And as the compliance manager for GSC Logistics I have always been given the directives from day one to be proactive, take initiative, and use the resources that are available in order to educate and help our valued contracted independent owner operators stay in compliance.

I along with our management team have been working diligently with our owner operators for the last 12 months to meet the upcoming "Drayage Regulations". GSC Logistics along with our 150 partnered Owner Operators were on track to meet the upcoming regulations.

It was no easy task to have our team of Owner Operators buy into the "drayage regulations". And after months of discussion explaining the costs involved form either retrofitting or replacing their equipment, our owner operators have been complying with little or no help from the grant funds that would lock them into a contract.

Now you are telling me that I have to go back to these hard working people which I feel are the most important part of the commerce chain and tell them that the rules have changed again and they will have to spend several more thousand dollars to continue operating their businesses.

How can you tell our industry and the thousands of people involved in this economy to spend more money?

I urge you to withdrawal the added drayage regulations portion from the private fleet rule.

Thank you

Robert L Rodriguez

Attachment:

Original File Name:



Date and Time Comment Was Submitted: 2008-12-10 16:21:10

No Duplicates.

**Comment 445 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Isella  
Last Name: Ramirez  
Email Address: iseyar@gmail.com  
Affiliation: Community Organizer & Concerned Resident

Subject: Adopt proposed State-wide In-Use On-Road Truck & Bus Rule!  
Comment:

Honorable Chairman Mary Nichols & CARB Board members,

I am a life-long resident of the state of California. I grew up in the heavily industrialized and polluted city of Commerce, a few miles southeast of downtown Los Angeles. Today I work with East Yard Communities for Environmental Justice, a community-based organization that works to reduce our community's exposure to harmful pollution. We organize our members to become leaders in their communities and to aid their communities in becoming self advocates.

Today, I urge you to pass the State-wide In-Use On-Road Diesel Vehicles Regulation without delay or weakening of any health protective requirement.

Thanks,

Isella Ramirez  
EYCEJ

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 17:32:42

No Duplicates.

**Comment 446 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Glenn

Last Name: Neal

Email Address: gneal@vacavilletow.com

Affiliation: President, CTTA

Subject: California Tow Truck Association Written Comment  
Comment:

As President of CTTA, I maintain severe concerns with the ARB's  
Proposed On-Road Diesel Rule. Please find attached our written  
comments to the Board.

Attachment: [www.arb.ca.gov/lists/truckbus08/933-ctta.arb.writtencomment.final.doc](http://www.arb.ca.gov/lists/truckbus08/933-ctta.arb.writtencomment.final.doc)

Original File Name: CTTA.ARB.WrittenComment.final.doc

Date and Time Comment Was Submitted: 2008-12-10 17:36:58

No Duplicates.

**Comment 447 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Donald

Last Name: Leeman

Email Address: johncecilranchinc@yahoo.com

Affiliation:

Subject: retrofit for trucks

Comment:

We are a small trucking company in the north Sacramento valley. We have 10 full time drivers, and during our busy season we also employ owner operators. Our trucks run about 60k miles a year. If we were to resrtick our trucks back to miles proposed, we would not be able to keep our trained quality drivers. We do not run the miles to make it cost effective to change out trucks as often as the over the road freight companies. It has been suggested that we can sell our trucks out of state. We use 2 axel trucks and they are not used much out side of agriculture, and there for worthless on the resale market

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 07:35:04

No Duplicates.

**Comment 448 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Karl

Last Name: Aube

Email Address: kaube01@hotmail.com

Affiliation: retired w one diesel truck for RV use

Subject: Regulation doesplace a unreasonable burden on me

Comment:

In 2005 I purchased an F-550 truck with a P/U box to carry a camper only. I have a smaller truck for hauling stuff. The way the regulation is written I must make an unreasonable investment in the 2005 truck to meet the rule should I want to haul a fifth wheel rather than my camper. I purchased this truck with a GVWR of over 14000 because of recreation loads and safer brakes. More leeway is needed in the rule for these types of trucks and uses that are provided to older diesel motor homes / RV's. Too much discrimination exists in the rule for the perception of differences and uses between diesel trucks over 14000 GVWR and those under this rating in the rule. Those trucks under are given a free pass yet the emissions are in essence the same for RV use. The over 14000 GVWR with the same engine is mandated to make a large upgrade cost to comply. I have followed this rule and have tried to get reasonable provisions for my truck and others like me for RV use.

My prior requests for an exception element in the rule have been met with the limits of the DMV registration process. I feel this was a put off and can be incorporated in the rule with an application affidavit approved and carried with the vehicle. Please include a process for RV use of older diesel trucks over 14000 GVWR to be provided an exception or exemption from the rule. You have some smart law types that can write this in.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 12:03:57

No Duplicates.

**Comment 449 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Michael J.  
Last Name: Vlaming  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Crane Owners Association, Inc  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/942-michael\\_j.\\_vlaming.pdf](http://www.arb.ca.gov/lists/truckbus08/942-michael_j._vlaming.pdf)

Original File Name: Michael J. Vlaming.pdf

Date and Time Comment Was Submitted: 2008-12-16 13:16:37

No Duplicates.

## **Comment 450 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Tom  
Last Name: Carroll  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Agenda Item 08-11-3  
Comment:

Shasta Union High School District  
Transportation Department  
2675 Eighth Street, Redding, CA 96001  
Phone: (530) 241-0416 Fax: (530) 225-8470  
E-Mail: tcarroll@suhsd.net  
Director: Tom Carroll

December 10, 2008

Subject: Agenda Item 08-11-3 School Bus Regulations

To Air Resources Board Chair Mary D Nicholas:

First, we would take this opportunity to congratulate the Sacramento Air Quality District for recognizing the severe fiscal difficulties that school districts are currently facing. They made the wise decision to fund the ARB's required 25% district match for the Prop 1B school bus funds out of their own funds. The Sacramento area school districts appreciate that decision. Thank you. Unfortunately the Shasta County Air Quality Management District did not follow their lead.

Our district serves approximately 5,174 high school students in rural Shasta County. Shasta Union High School District covers a geographical area that is almost 1800 square miles or viewed another way slightly larger than the State of Rhode Island. SUHSD buses log double the annual mileage of the average California school bus while traveling this expansive area. Additionally close to 35% of our students qualify for free and reduced meals, the poverty indicator established by the federal government. The real poverty measure is actually higher because many high school students are ashamed to admit that they qualify for the federal program.

Our annual per student funding is approximately \$6,700 and with additional categorical funds provides our District an operational budget of about \$50 million dollars. Approximately 80% of these funds are used for employee salaries and benefits. The balance is used to support the educational program and the infrastructure needs of the District.

Our state approved school transportation budget for 2007-08 was \$1.48 million. This funding does not include sporting events and

field trips. It only includes the approved cost of transporting children to and from school. However, in 2007-08 our district only received \$747,000 from the state to operate our transportation department. Every year, we must take an additional \$750,000 from the classroom to support home-to-school transportation, curricular and sports field trips are an additional expense. In the last seven years SUHSD has been very fortunate to qualify for funding from the Lower Emission School Bus Program. We have used these funds to replace older, less safe buses that produce greater emissions. SUHSD used a significant portion of the money to purchase and operate the largest fleet of natural gas buses in Shasta County. However, the result is still a school transportation fleet that is too old. The Department of Education has estimated that the maximum age for school buses is fifteen years. Unfortunately, over 34% of SUHSD buses exceed that maximum age. We do support the state's attempts to provide additional funds for school bus replacement. We have seen some progress, but not enough.

Almost all school districts are facing a horrendous budget crisis. Even though this year has seen huge increase in fuel prices, our school transportation program had to be reduced because the state budget that was passed in September gave us the same amount of funding as last year, 2007-08. SUHSD has cut service to the bare bones, walking distances of three miles, reduced service in rural areas of our district creating riding times of over an hour and a half, one-way, less funding available for training, supervision and maintenance.

Now, both the Governor's special session proposal and the legislature's alternative is going to make mid-year reductions almost 5% or over \$320 per child or almost \$16 million. These reductions are based on proposed revenue increases. If those increases do not occur, the reductions will double. Your regulations do not take effect until 2010-11; however, the Legislative Analyst in his most recent report has stated that it will be until 2013-14 before the state general fund revenues exceeds the levels in 2007-08. Education is not only facing incredible huge reductions this year that will take us years to recover, but we will continue to face extremely difficult times for the next five years. That is the major problem that we have with your proposed regulations.

Your propose regulations will cost our public schools \$500 million in the next ten years for the trap requirement and for the school bus requirement. \$500 million is the amount that the state or we will have to pay for the mandated traps and for the mandated school buses. Your staff has made cost assumptions, many of which we do not agree with, based on the current value of the school buses. The most important part is that no matter what assumption one uses, our school districts, or the state will have to come up with \$500 million to pay for the cost of the traps and cost of the new school buses. We do not see where these funds are going to come from.

We firmly believe that the requirements your regulations will impose on our public schools are a reimbursable mandate as defined by Article XII B of the State Constitution and under Government code section 17514. That means we will be able to file claims to the State Commission on Mandates and we will eventually be reimbursed by the state. We do not think it is appropriate at this time to worsen the deteriorating fiscal condition of the state by another \$500 million.



Consequently, we would urge the ARB Board to make all their requirements on school buses contingent on available funding. We would work hard with ARB to obtain that funding.

Our second and final issue with the ARB regulations is a long lasting issue. ARB's priority has always been on the requiring diesel retrofits or traps as oppose to the replacement of old pollution school buses. In this regulation, ARB is proposing that all school buses manufactured between 1987 and 2006 be required to have diesel retrofits or traps installed. School buses manufactured prior to 1987 are required to be replaced by 2018. We believe that ARB's priorities are backward. Pre-1987 school buses contain no particulate controls. The replacement of these school buses should be the state's highest priority. Why do we want to have over 120,000 children ride in these school buses for the next ten years?

In regards, to diesel retrofits or traps, we are not opposed to the requirement. However, the state should set up several long-term pilot studies to determine the true cost and the true impact of the traps. Our concern is that the state is being sold a bill of untested goods. The staff report state that the cost of the traps is the only cost. That is totally incorrect. We know the following cost must be included: installation, shipping, cleaning machines, electrical infrastructure, spare cores, taxes, electricity cost, cleaning cost, removing and replacing cost, waste disposal cost, possible engine repair, cost of the bus being out of service, and a possible fuel increase. Many of these costs are not one time cost, but will be regular costs.

We find it particularly distressing that ARB will be imposing traps on very old school buses that were built before 1993. The cost of the traps may exceed the cost of the old school buses. These traps are the so-called active traps that are much more expensive to purchase and to maintain. We are extremely excited about some of the new school bus technology that is currently available or will be available in the very near future. For example, the new hybrid electric school buses may be cost competitive with the CNG school buses. A zero emission school bus will be available in the very near future. This is the direction that California should be moving. Requiring questionable traps on old pre-1993 school buses is the wrong approach. We should be replacing these school buses with the newer exciting technology. ARB should be helping us do it right, we cannot afford to do it wrong. Thank you.

Sincerely yours,

Tom Carroll

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-19 10:41:22

No Duplicates.

**Comment 451 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Michael

Last Name: Murray

Email Address: Non-web submitted comment

Affiliation:

Subject: Board of Supervisors, Glenn County, California

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/944-michael\\_murray.pdf](http://www.arb.ca.gov/lists/truckbus08/944-michael_murray.pdf)

Original File Name: Michael Murray.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:33:33

No Duplicates.

**Comment 452 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Kathleen

Last Name: Labriola

Email Address: Non-web submitted comment

Affiliation:

Subject: Berkely, CA

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/945-kathleen\\_labriola.pdf](http://www.arb.ca.gov/lists/truckbus08/945-kathleen_labriola.pdf)

Original File Name: Kathleen Labriola.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:39:13

No Duplicates.

**Comment 453 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

**Comment 454 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

**Comment 455 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Fort Bragg  
Last Name: City Council  
Email Address: Non-web submitted comment  
Affiliation:

Subject: City of Fort Bragg  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/948-fort\\_bragg\\_city\\_council.pdf](http://www.arb.ca.gov/lists/truckbus08/948-fort_bragg_city_council.pdf)

Original File Name: fort bragg city council.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:44:43

No Duplicates.

**Comment 456 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

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



**Comment 457 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

**Comment 458 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Kevin L.

Last Name: Brunnemer

Email Address: Non-web submitted comment

Affiliation:

Subject: Foothill Ready - Mix Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/951-kevin\\_l.\\_brunnemer.pdf](http://www.arb.ca.gov/lists/truckbus08/951-kevin_l._brunnemer.pdf)

Original File Name: Kevin L. Brunnemer.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:55:36

No Duplicates.

**Comment 459 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Pamela

Last Name: Torliatt

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area AQMD

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/952-pamela\\_torliatt.pdf](http://www.arb.ca.gov/lists/truckbus08/952-pamela_torliatt.pdf)

Original File Name: Pamela Torliatt.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:58:07

No Duplicates.

**Comment 460 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Gary

Last Name: Hartmann

Email Address: Non-web submitted comment

Affiliation:

Subject: KVS Inc

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/953-gary\\_hartmann.pdf](http://www.arb.ca.gov/lists/truckbus08/953-gary_hartmann.pdf)

Original File Name: Gary Hartmann.pdf

Date and Time Comment Was Submitted: 2008-12-20 12:00:58

No Duplicates.

**Comment 461 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Jeanne

Last Name: Cain

Email Address: Non-web submitted comment

Affiliation:

Subject: Driving Toward a Cleaner California

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/954-jeanne\\_cain.pdf](http://www.arb.ca.gov/lists/truckbus08/954-jeanne_cain.pdf)

Original File Name: Jeanne Cain.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:23:48

No Duplicates.

**Comment 462 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: John  
Last Name: Dunlap  
Email Address: Non-web submitted comment  
Affiliation:

Subject: FedEx  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/955-john\\_dunlapp.pdf](http://www.arb.ca.gov/lists/truckbus08/955-john_dunlapp.pdf)

Original File Name: John Dunlapp.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:24:34

No Duplicates.

**Comment 463 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Andrew

Last Name: Jordan

Email Address: Non-web submitted comment

Affiliation:

Subject: A & B Construction

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/956-andrew\\_jordan.pdf](http://www.arb.ca.gov/lists/truckbus08/956-andrew_jordan.pdf)

Original File Name: Amdrew Jordan.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:25:33

No Duplicates.

**Comment 464 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Gary

Last Name: Rohman

Email Address: Non-web submitted comment

Affiliation:

Subject: ECCO Equipment Corporation

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/957-gary\\_rohman.pdf](http://www.arb.ca.gov/lists/truckbus08/957-gary_rohman.pdf)

Original File Name: Gary Rohman.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:26:25

No Duplicates.



**Comment 465 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Sarah

Last Name: Henderson

Email Address: Non-web submitted comment

Affiliation:

Subject: Basic Resources, Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/958-sarah\\_henderson.pdf](http://www.arb.ca.gov/lists/truckbus08/958-sarah_henderson.pdf)

Original File Name: Sarah Henderson.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:27:04

No Duplicates.

**Comment 466 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Kevin

Last Name: Pereira

Email Address: Non-web submitted comment

Affiliation:

Subject: Hat Creek Construction & Materials, Inc

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/959-kevin\\_pereira.pdf](http://www.arb.ca.gov/lists/truckbus08/959-kevin_pereira.pdf)

Original File Name: Kevin Pereira.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:28:11

No Duplicates.

**Comment 467 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: David R.  
Last Name: Hummel  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Lehigh Hanson  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/960-david\\_r.\\_hummel.pdf](http://www.arb.ca.gov/lists/truckbus08/960-david_r._hummel.pdf)

Original File Name: David R. Hummel.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:29:39

No Duplicates.

**Comment 468 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

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

**Comment 469 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Barry

Last Name: Broad

Email Address: Non-web submitted comment

Affiliation:

Subject: California Teamsters Public Affairs Council

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/962-barry\\_broad.pdf](http://www.arb.ca.gov/lists/truckbus08/962-barry_broad.pdf)

Original File Name: Barry Broad.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:35:03

No Duplicates.

**Comment 470 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Luke

Last Name: Middleton

Email Address: Non-web submitted comment

Affiliation:

Subject: Ray's Electric

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/963-luke\\_middleton.pdf](http://www.arb.ca.gov/lists/truckbus08/963-luke_middleton.pdf)

Original File Name: Luke Middleton.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:35:53

No Duplicates.

**Comment 471 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: David L.

Last Name: Walrath

Email Address: Non-web submitted comment

Affiliation:

Subject: Small School Districts' Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/964-david\\_l.\\_walrath.pdf](http://www.arb.ca.gov/lists/truckbus08/964-david_l._walrath.pdf)

Original File Name: David L. Walrath.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:37:48

No Duplicates.

**Comment 472 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: George

Last Name: Runner

Email Address: Non-web submitted comment

Affiliation:

Subject: California State Senate

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/965-george\\_runner.pdf](http://www.arb.ca.gov/lists/truckbus08/965-george_runner.pdf)

Original File Name: George Runner.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:38:47

No Duplicates.



**Comment 473 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Ed

Last Name: Brown

Email Address: Non-web submitted comment

Affiliation:

Subject: Roy E. Lay Trucking

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/966-ed\\_brown.pdf](http://www.arb.ca.gov/lists/truckbus08/966-ed_brown.pdf)

Original File Name: ed brown.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:40:31

No Duplicates.

**Comment 474 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Mike

Last Name: Anderson

Email Address: Non-web submitted comment

Affiliation:

Subject: Anderson Logging Inc

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/968-mike\\_anderson.pdf](http://www.arb.ca.gov/lists/truckbus08/968-mike_anderson.pdf)

Original File Name: Mike Anderson.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:43:10

No Duplicates.

**Comment 475 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Gerry

Last Name: Flynn

Email Address: Non-web submitted comment

Affiliation:

Subject: TCI Leasing/Logistics

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/969-gerry\\_flynn.pdf](http://www.arb.ca.gov/lists/truckbus08/969-gerry_flynn.pdf)

Original File Name: Gerry Flynn.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:45:26

No Duplicates.

**Comment 476 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James

Last Name: Pollack

Email Address: Non-web submitted comment

Affiliation:

Subject: Central Valley Truck Center

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/970-james\\_pollack.pdf](http://www.arb.ca.gov/lists/truckbus08/970-james_pollack.pdf)

Original File Name: james pollack.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:47:53

No Duplicates.

**Comment 477 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Daniel G.

Last Name: Uglade

Email Address: Non-web submitted comment

Affiliation:

Subject: Uglade Trucking Company, Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/971-daniel\\_g.\\_uglade.pdf](http://www.arb.ca.gov/lists/truckbus08/971-daniel_g._uglade.pdf)

Original File Name: Daniel G. Uglade.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:48:53

No Duplicates.

**Comment 478 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Kenneth  
Last Name: Shuemake  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Shuemake Trucking  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/972-kenneth\\_shuemake.pdf](http://www.arb.ca.gov/lists/truckbus08/972-kenneth_shuemake.pdf)

Original File Name: Kenneth Shuemake.pdf

Date and Time Comment Was Submitted: 2008-12-22 09:49:34

No Duplicates.

**Comment 479 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Gerald D.

Last Name: Secundy

Email Address: Non-web submitted comment

Affiliation:

Subject: California Council for Environmental and Economic Balance

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/973-gerald\\_d.\\_secundy.pdf](http://www.arb.ca.gov/lists/truckbus08/973-gerald_d._secundy.pdf)

Original File Name: Gerald D. Secundy.pdf

Date and Time Comment Was Submitted: 2008-12-22 14:06:00

No Duplicates.

**Comment 480 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Becky

Last Name: Bond

Email Address: Non-web submitted comment

Affiliation:

Subject: CREDO action

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/974-becky.pdf](http://www.arb.ca.gov/lists/truckbus08/974-becky.pdf)

Original File Name: Becky.pdf

Date and Time Comment Was Submitted: 2008-12-22 14:16:02

No Duplicates.



**Comment 481 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Felix

Last Name: Velasco

Email Address: Non-web submitted comment

Affiliation:

Subject: Clean Trucks = Clean Air

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1026-felix\\_velasco.pdf](http://www.arb.ca.gov/lists/truckbus08/1026-felix_velasco.pdf)

Original File Name: Felix Velasco.pdf

Date and Time Comment Was Submitted: 2009-01-08 14:10:35

2000 Duplicates.

**Comment 482 for Statewide Truck and Bus Regulation 2008 (truckbus08) -  
45 Day.**

First Name: Esther

Last Name: Chao

Email Address: Non-web submitted comment

Affiliation:

Subject: Cleaner Trucks Now

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1027-esther\\_chao.pdf](http://www.arb.ca.gov/lists/truckbus08/1027-esther_chao.pdf)

Original File Name: Esther Chao.pdf

Date and Time Comment Was Submitted: 2009-01-08 14:16:22

300 Duplicates.

**Comment 483 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Patty

Last Name: Gomez

Email Address: Non-web submitted comment

Affiliation:

Subject: Heavy-duty diesel trucks

Comment:

As a lifelong asthma sufferer, I have experienced first hand the effects of pollution on health. I strongly support the initiative to approve broader rules to force the heavy-duty trucking industry to install filters on their trucks or upgrade their engines. Please vote to approve this measure on December 10.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-10 16:07:13

No Duplicates.

## **Comment 484 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: Ted

Last Name: Honcharik

Email Address: Non-web submitted comment

Affiliation:

Subject: Heavy-Duty Vehicles

Comment:

I am the owner of a petroleum transportation company. I started this company 7 years ago. For the last six years my company has not shown a profit. Every dollar earned has been placed back into the company to purchase new trucks. I now operate 47 power units. Most of these truck are still financed. I never budgeted an extra \$15,000 plus for each truck. Now the state is going to make me pay an additional \$700,000 to stay in business. Where is this money going to come from. For the last 5 years I have financed nothing put the newest engines possible. But the CARB is now saying this is not good enough. Pleas tell me how CARB and the state developes a budget, to then find out later, this business model will not work, because your entry into the market is an additional \$700,000. The people on this board need a lesson in business. I have always hated southern California because of the air. And I am the first person that would like to change it. And if the CARB board would have done their job years ago, all the new engines I have purchase would be clean today. Shame on CARB. It is not the trucking companies fault we have bad air and people are dying, it is CARB's fault! Now to make thing worse we have an economic problem. I do not know of one trucking company that has not seen their business sales drop by 20 to 50%. Wake up people. The air is 20 to 50 percent cleaner now! These trucks are a lot like your house. Their value has dropped down to about 50%. You think it is hard to sell a house, try to sell a truck. On top of that, when you get ready to sell your house, which the value in some place has dropped 50%, I hope some State agency comes along and tells you you need to first spend another 50% to sell it. Why are we wasting our time in Sacramento doing this right now. Build cleaner engines now!!!...problem solved. Sorry, only had five minutes to write this, and send. Rather spend my time working on how I can keep my employees working right now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-10 16:10:41

No Duplicates.

**Comment 1 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

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

**Comment 2 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: John

Last Name: McClelland

Email Address: Non-web submitted comment

Affiliation:

Subject: American Rentals Assoc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/976-john\\_mcclelland.pdf](http://www.arb.ca.gov/lists/truckbus08/976-john_mcclelland.pdf)

Original File Name: John McClelland.pdf

Date and Time Comment Was Submitted: 2008-12-22 16:17:05

No Duplicates.

**Comment 3 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

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



**Comment 4 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

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

**Comment 5 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Oralia

Last Name: Ornelas

Email Address: Non-web submitted comment

Affiliation:

Subject: Juarez Brothers Trucking Inc.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/979-oralia\\_ornelas.pdf](http://www.arb.ca.gov/lists/truckbus08/979-oralia_ornelas.pdf)

Original File Name: Oralia Ornelas.pdf

Date and Time Comment Was Submitted: 2008-12-22 16:23:50

No Duplicates.

**Comment 6 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

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

**Comment 7 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Jim

Last Name: Ganduglia

Email Address: Non-web submitted comment

Affiliation:

Subject: Agrium

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/981-jim\\_ganduglia.pdf](http://www.arb.ca.gov/lists/truckbus08/981-jim_ganduglia.pdf)

Original File Name: Jim Ganduglia.pdf

Date and Time Comment Was Submitted: 2008-12-22 16:28:37

No Duplicates.

**Comment 8 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: David

Last Name: Allen

Email Address: Non-web submitted comment

Affiliation:

Subject: Alenco Consulting Group

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/982-david\\_allen.pdf](http://www.arb.ca.gov/lists/truckbus08/982-david_allen.pdf)

Original File Name: David Allen.pdf

Date and Time Comment Was Submitted: 2008-12-22 16:29:50

No Duplicates.

**Comment 9 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Mathew

Last Name: Cohen

Email Address: Non-web submitted comment

Affiliation:

Subject: Clean Fuel Resources

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/983-mathew\\_cohen.pdf](http://www.arb.ca.gov/lists/truckbus08/983-mathew_cohen.pdf)

Original File Name: Mathew Cohen.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:01:38

No Duplicates.

**Comment 10 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Myles

Last Name: Anderson

Email Address: Non-web submitted comment

Affiliation:

Subject: Anderson Logging Inc

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/984-myles\\_anderson.pdf](http://www.arb.ca.gov/lists/truckbus08/984-myles_anderson.pdf)

Original File Name: Myles Anderson.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:02:24

No Duplicates.

**Comment 11 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Stephen

Last Name: Rhoads

Email Address: Non-web submitted comment

Affiliation:

Subject: School Transportation Coalition

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/985-stephen\\_rhoads.pdf](http://www.arb.ca.gov/lists/truckbus08/985-stephen_rhoads.pdf)

Original File Name: Stephen Rhoads.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:03:32

No Duplicates.



**Comment 12 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Lee

Last Name: McCorkle

Email Address: Non-web submitted comment

Affiliation:

Subject: McCorkle Trucking

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/986-lee\\_mccorkle.pdf](http://www.arb.ca.gov/lists/truckbus08/986-lee_mccorkle.pdf)

Original File Name: Lee McCorkle.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:05:25

No Duplicates.

**Comment 13 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Darlene

Last Name: Din

Email Address: Non-web submitted comment

Affiliation:

Subject: Central Coast Agriculture Assn.

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/987-darlene\\_din.pdf](http://www.arb.ca.gov/lists/truckbus08/987-darlene_din.pdf)

Original File Name: Darlene Din.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:08:52

No Duplicates.

**Comment 14 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Ralph

Last Name: Walsh

Email Address: Non-web submitted comment

Affiliation:

Subject: Ralph Walsh Trucking

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/988-ralph\\_walsh.pdf](http://www.arb.ca.gov/lists/truckbus08/988-ralph_walsh.pdf)

Original File Name: Ralph Walsh.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:09:41

No Duplicates.

**Comment 15 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Lan

Last Name: Danh

Email Address: Non-web submitted comment

Affiliation:

Subject: Southwest Education Support Center

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/989-lan\\_danh.pdf](http://www.arb.ca.gov/lists/truckbus08/989-lan_danh.pdf)

Original File Name: Lan Danh.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:10:44

No Duplicates.

**Comment 16 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Ryan

Last Name: Wiggins

Email Address: Non-web submitted comment

Affiliation:

Subject: Communities for Clean Ports

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/990-ryan\\_wiggins.pdf](http://www.arb.ca.gov/lists/truckbus08/990-ryan_wiggins.pdf)

Original File Name: Ryan Wiggins.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:22:12

No Duplicates.

**Comment 17 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Jim

Last Name: Lyons

Email Address: Non-web submitted comment

Affiliation:

Subject: Comparison of Statewide On-Road HDDV Nox

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/991-jim\\_lyons.pdf](http://www.arb.ca.gov/lists/truckbus08/991-jim_lyons.pdf)

Original File Name: Jim Lyons.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:25:03

No Duplicates.

**Comment 18 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Richard

Last Name: McCann

Email Address: Non-web submitted comment

Affiliation:

Subject: Aspen Environmental Group

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/992-richard\\_mccann.pdf](http://www.arb.ca.gov/lists/truckbus08/992-richard_mccann.pdf)

Original File Name: Richard McCann.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:27:34

No Duplicates.

**Comment 19 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Mark

Last Name: Sisco

Email Address: Non-web submitted comment

Affiliation:

Subject: United States Patent

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/993-mark\\_sisco.pdf](http://www.arb.ca.gov/lists/truckbus08/993-mark_sisco.pdf)

Original File Name: Mark Sisco.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:28:43

No Duplicates.



**Comment 20 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Martin

Last Name: Ward

Email Address: Non-web submitted comment

Affiliation:

Subject: Mid-Placer Public Schools Transportaion Agency

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/994-martin\\_ward.pdf](http://www.arb.ca.gov/lists/truckbus08/994-martin_ward.pdf)

Original File Name: Martin Ward.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:31:04

No Duplicates.

**Comment 21 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Steve  
Last Name: Moore  
Email Address: more1023@aol.com  
Affiliation:

Subject: Pacific Rim Recycling  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/995-steve\\_moore.pdf](http://www.arb.ca.gov/lists/truckbus08/995-steve_moore.pdf)

Original File Name: Steve Moore.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:34:01

No Duplicates.

**Comment 22 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: John

Last Name: Clements

Email Address: Non-web submitted comment

Affiliation:

Subject: Kings Canyon Unified Transportation

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/996-john\\_clements.pdf](http://www.arb.ca.gov/lists/truckbus08/996-john_clements.pdf)

Original File Name: John Clements.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:49:33

No Duplicates.

**Comment 23 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Jason

Last Name: Osborn

Email Address: Non-web submitted comment

Affiliation:

Subject: French Camp

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/997-jason\\_osborn.pdf](http://www.arb.ca.gov/lists/truckbus08/997-jason_osborn.pdf)

Original File Name: Jason Osborn.pdf

Date and Time Comment Was Submitted: 2008-12-23 09:50:42

No Duplicates.

**Comment 24 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Christine

Last Name: Foster

Email Address: Non-web submitted comment

Affiliation:

Subject: Tulare County Asthma Coalition

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/998-christine\\_foster.pdf](http://www.arb.ca.gov/lists/truckbus08/998-christine_foster.pdf)

Original File Name: Christine Foster.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:12:57

No Duplicates.

**Comment 25 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Jill

Last Name: Ratner

Email Address: Non-web submitted comment

Affiliation:

Subject: Rose Foundation

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/999-jill\\_ratner.pdf](http://www.arb.ca.gov/lists/truckbus08/999-jill_ratner.pdf)

Original File Name: Jill Ratner.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:13:44

No Duplicates.

**Comment 26 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Sharon

Last Name: Banks

Email Address: Non-web submitted comment

Affiliation:

Subject: Cascade Sierra Solutions

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1000-sharon\\_banks.pdf](http://www.arb.ca.gov/lists/truckbus08/1000-sharon_banks.pdf)

Original File Name: Sharon Banks.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:20:11

No Duplicates.

**Comment 27 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Paul  
Last Name: Schlenvogt  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Blue Sky Bee  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1001-paul\\_schlenvogt.pdf](http://www.arb.ca.gov/lists/truckbus08/1001-paul_schlenvogt.pdf)

Original File Name: Paul Schlenvogt.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:26:09

No Duplicates.



**Comment 28 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Ricky

Last Name: Tran

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1002-ricky\\_tran.pdf](http://www.arb.ca.gov/lists/truckbus08/1002-ricky_tran.pdf)

Original File Name: Ricky Tran.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:26:50

No Duplicates.

**Comment 29 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Christopher

Last Name: Pulu

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1003-christopher\\_pulu.pdf](http://www.arb.ca.gov/lists/truckbus08/1003-christopher_pulu.pdf)

Original File Name: Christopher Pulu.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:29:29

No Duplicates.

**Comment 30 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: San Ming

Last Name: Mak

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1004-san\\_ming\\_mak.pdf](http://www.arb.ca.gov/lists/truckbus08/1004-san_ming_mak.pdf)

Original File Name: San Ming Mak.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:29:51

No Duplicates.

**Comment 31 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Julis

Last Name: Kho

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1005-julia\\_kho.pdf](http://www.arb.ca.gov/lists/truckbus08/1005-julia_kho.pdf)

Original File Name: Julia Kho.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:39:06

No Duplicates.

**Comment 32 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Nancy

Last Name: Wu

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1006-nancy\\_wu.pdf](http://www.arb.ca.gov/lists/truckbus08/1006-nancy_wu.pdf)

Original File Name: Nancy Wu.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:40:21

No Duplicates.

**Comment 33 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Karen

Last Name: Ko

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1007-karen\\_ko.pdf](http://www.arb.ca.gov/lists/truckbus08/1007-karen_ko.pdf)

Original File Name: Karen Ko.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:40:39

No Duplicates.

**Comment 34 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Annie

Last Name: Huy

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1008-annie\\_huy.pdf](http://www.arb.ca.gov/lists/truckbus08/1008-annie_huy.pdf)

Original File Name: Annie Huy.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:41:01

No Duplicates.

**Comment 35 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Diana

Last Name: Tan

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1009-diana\\_tan.pdf](http://www.arb.ca.gov/lists/truckbus08/1009-diana_tan.pdf)

Original File Name: Diana Tan.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:41:22

No Duplicates.



**Comment 36 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Lawrence

Last Name: Dam

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1010-lawrence\\_dam.pdf](http://www.arb.ca.gov/lists/truckbus08/1010-lawrence_dam.pdf)

Original File Name: Lawrence Dam.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:41:55

No Duplicates.

**Comment 37 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Chris

Last Name: Mak

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1011-chris\\_mak.pdf](http://www.arb.ca.gov/lists/truckbus08/1011-chris_mak.pdf)

Original File Name: Chris Mak.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:42:50

No Duplicates.

**Comment 38 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: V.

Last Name: Lang

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1012-v.\\_lang.pdf](http://www.arb.ca.gov/lists/truckbus08/1012-v._lang.pdf)

Original File Name: V. Lang.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:43:08

No Duplicates.

**Comment 39 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Cindy

Last Name: Lu

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1013-cindy\\_lu.pdf](http://www.arb.ca.gov/lists/truckbus08/1013-cindy_lu.pdf)

Original File Name: Cindy Lu.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:43:51

No Duplicates.

**Comment 40 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Trang

Last Name: Nguyen

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1014-trang\\_nguyen.pdf](http://www.arb.ca.gov/lists/truckbus08/1014-trang_nguyen.pdf)

Original File Name: Trang Nguyen.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:44:16

No Duplicates.

**Comment 41 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Chabeli

Last Name: Huang

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1015-chabeli\\_huang.pdf](http://www.arb.ca.gov/lists/truckbus08/1015-chabeli_huang.pdf)

Original File Name: Chabeli Huang.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:44:42

No Duplicates.

**Comment 42 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Michael

Last Name: Phung

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1016-michael\\_phung.pdf](http://www.arb.ca.gov/lists/truckbus08/1016-michael_phung.pdf)

Original File Name: Michael Phung.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:46:58

No Duplicates.

**Comment 43 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Briceida

Last Name: Burgos

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1017-briceida\\_burgos.pdf](http://www.arb.ca.gov/lists/truckbus08/1017-briceida_burgos.pdf)

Original File Name: Briceida Burgos.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:48:06

No Duplicates.



**Comment 44 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Rocio

Last Name: Briseno

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1018-rocio\\_briseno.pdf](http://www.arb.ca.gov/lists/truckbus08/1018-rocio_briseno.pdf)

Original File Name: Rocio Briseno.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:48:39

No Duplicates.

**Comment 45 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Kenny

Last Name: Le

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1019-kenny\\_le.pdf](http://www.arb.ca.gov/lists/truckbus08/1019-kenny_le.pdf)

Original File Name: Kenny Le.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:49:04

No Duplicates.

**Comment 46 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Raquel

Last Name: Ortega

Email Address: Non-web submitted comment

Affiliation:

Subject: Stop Wal-Mart Action

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1022-raquel\\_ortega.pdf](http://www.arb.ca.gov/lists/truckbus08/1022-raquel_ortega.pdf)

Original File Name: Raquel Ortega.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:57:57

No Duplicates.

**Comment 47 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Linda

Last Name: Weiner

Email Address: Non-web submitted comment

Affiliation:

Subject: American Lung Association of California

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1023-linda\\_weiner.pdf](http://www.arb.ca.gov/lists/truckbus08/1023-linda_weiner.pdf)

Original File Name: Linda Weiner.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:58:32

No Duplicates.

**Comment 48 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Martin

Last Name: Lassen

Email Address: Non-web submitted comment

Affiliation:

Subject: Johnson Matthey

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1024-martin\\_lassen.pdf](http://www.arb.ca.gov/lists/truckbus08/1024-martin_lassen.pdf)

Original File Name: Martin Lassen.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:59:11

No Duplicates.

**Comment 49 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Brent

Last Name: Newell

Email Address: Non-web submitted comment

Affiliation:

Subject: Association of Irritated Residents

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1025-brent\\_newell.pdf](http://www.arb.ca.gov/lists/truckbus08/1025-brent_newell.pdf)

Original File Name: Brent Newell.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:59:55

No Duplicates.

**Comment 50 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Jeanne

Last Name: Cain

Email Address: Non-web submitted comment

Affiliation:

Subject: Driving Toward a Cleaner California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1028-33-jeanne\\_cain.pdf](http://www.arb.ca.gov/lists/truckbus08/1028-33-jeanne_cain.pdf)

Original File Name: 33-jeanne\_cain.pdf

Date and Time Comment Was Submitted: 2009-02-09 15:57:20

No Duplicates.

**Comment 51 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Ken

Last Name: Nichols

Email Address: Non-web submitted comment

Affiliation:

Subject: Western Farm Services

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1029-37-ken\\_nichols.pdf](http://www.arb.ca.gov/lists/truckbus08/1029-37-ken_nichols.pdf)

Original File Name: 37-ken\_nichols.pdf

Date and Time Comment Was Submitted: 2009-02-09 16:27:29

No Duplicates.



**Comment 52 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: George

Last Name: Little

Email Address: Non-web submitted comment

Affiliation:

Subject: DTCC

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1031-38-george\\_little.pdf](http://www.arb.ca.gov/lists/truckbus08/1031-38-george_little.pdf)

Original File Name: 38-george\_little.pdf

Date and Time Comment Was Submitted: 2009-02-10 10:36:11

No Duplicates.

**Comment 53 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Bob

Last Name: Ramorino

Email Address: Non-web submitted comment

Affiliation:

Subject: Roadster Trucking

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1032-41-bob\\_ramorino.pdf](http://www.arb.ca.gov/lists/truckbus08/1032-41-bob_ramorino.pdf)

Original File Name: 41-bob\_ramorino.pdf

Date and Time Comment Was Submitted: 2009-02-10 10:37:12

No Duplicates.

**Comment 54 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Betsey

Last Name: Reifsnider

Email Address: Non-web submitted comment

Affiliation:

Subject: Catholic Charities Diocese of Stockton

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1034-42-betsey\\_reifsnider.pdf](http://www.arb.ca.gov/lists/truckbus08/1034-42-betsey_reifsnider.pdf)

Original File Name: 42-betsey\_reifsnider.pdf

Date and Time Comment Was Submitted: 2009-02-10 10:38:41

No Duplicates.

**Comment 55 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Larry

Last Name: Greene

Email Address: Non-web submitted comment

Affiliation:

Subject: Air Quality Sacramento AQMD

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1035-53-larry\\_greene.pdf](http://www.arb.ca.gov/lists/truckbus08/1035-53-larry_greene.pdf)

Original File Name: 53-larry\_greene.pdf

Date and Time Comment Was Submitted: 2009-02-10 10:40:27

No Duplicates.

**Comment 56 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Allen

Last Name: Lind

Email Address: Non-web submitted comment

Affiliation:

Subject: BP America, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1036-55-allan\\_lind.pdf](http://www.arb.ca.gov/lists/truckbus08/1036-55-allan_lind.pdf)

Original File Name: 55-allan\_lind.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:05:58

No Duplicates.

**Comment 57 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Gloria

Last Name: Thorton

Email Address: Non-web submitted comment

Affiliation:

Subject: S.F. Asthma Task Force

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1037-74-gloria\\_thornton.pdf](http://www.arb.ca.gov/lists/truckbus08/1037-74-gloria_thornton.pdf)

Original File Name: 74-gloria\_thornton.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:08:34

No Duplicates.

**Comment 58 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: James

Last Name: Mangia

Email Address: Non-web submitted comment

Affiliation:

Subject: St. Johns Center

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1038-75-james\\_mangia.pdf](http://www.arb.ca.gov/lists/truckbus08/1038-75-james_mangia.pdf)

Original File Name: 75-james\_mangia.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:09:42

No Duplicates.

**Comment 59 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Matthew

Last Name: Marson

Email Address: Non-web submitted comment

Affiliation:

Subject: Public Health Institute

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1039-76-matthew\\_marsom.pdf](http://www.arb.ca.gov/lists/truckbus08/1039-76-matthew_marsom.pdf)

Original File Name: 76-matthew\_marsom.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:11:59

No Duplicates.



**Comment 60 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Roy

Last Name: Beltz

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1040-78-roy\\_beltz.pdf](http://www.arb.ca.gov/lists/truckbus08/1040-78-roy_beltz.pdf)

Original File Name: 78-roy\_beltz.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:17:21

No Duplicates.

**Comment 61 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Bria

Last Name: Landrum

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1041-79-bria\\_landrum.pdf](http://www.arb.ca.gov/lists/truckbus08/1041-79-bria_landrum.pdf)

Original File Name: 79-bria\_landrum.pdf

Date and Time Comment Was Submitted: 2009-02-10 11:19:45

No Duplicates.

**Comment 62 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Mario

Last Name: Jimenez

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1046-81-mario\\_jimenez.pdf](http://www.arb.ca.gov/lists/truckbus08/1046-81-mario_jimenez.pdf)

Original File Name: 81-mario\_jimenez.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:47:43

No Duplicates.

**Comment 63 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: De'Janae

Last Name: Bates

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1047-82-dejanae\\_bates.pdf](http://www.arb.ca.gov/lists/truckbus08/1047-82-dejanae_bates.pdf)

Original File Name: 82-dejanae\_bates.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:48:27

No Duplicates.

**Comment 64 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Carlos

Last Name: Banuelos

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1048-83-carlos\\_banuelos.pdf](http://www.arb.ca.gov/lists/truckbus08/1048-83-carlos_banuelos.pdf)

Original File Name: 83-carlos\_banuelos.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:48:58

No Duplicates.

**Comment 65 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Todd

Last Name: Landrum

Email Address: Non-web submitted comment

Affiliation:

Subject: Fremont High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1049-84-todd\\_landrum.pdf](http://www.arb.ca.gov/lists/truckbus08/1049-84-todd_landrum.pdf)

Original File Name: 84-todd\_landrum.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:49:28

No Duplicates.

**Comment 66 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Maria

Last Name: Rico

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1050-85-maria\\_rico.pdf](http://www.arb.ca.gov/lists/truckbus08/1050-85-maria_rico.pdf)

Original File Name: 85-maria\_rico.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:55:59

No Duplicates.

**Comment 67 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Ben

Last Name: Moli

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1051-86-ben\\_moli.pdf](http://www.arb.ca.gov/lists/truckbus08/1051-86-ben_moli.pdf)

Original File Name: 86-ben\_moli.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:56:38

No Duplicates.



**Comment 68 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Norma

Last Name: Nunez

Email Address: Non-web submitted comment

Affiliation:

Subject: Fremont Federation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1052-87-norma\\_nunez.pdf](http://www.arb.ca.gov/lists/truckbus08/1052-87-norma_nunez.pdf)

Original File Name: 87-norma\_nunez.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:58:20

No Duplicates.

**Comment 69 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Kalisi P.

Last Name: Toli

Email Address: Non-web submitted comment

Affiliation:

Subject: Mandela High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1053-88-kalisi.pdf](http://www.arb.ca.gov/lists/truckbus08/1053-88-kalisi.pdf)

Original File Name: 88-kalisi.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:58:51

No Duplicates.

**Comment 70 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Alix  
Last Name: Hardy  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Mandela High School  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1054-89-alix\\_hardy.pdf](http://www.arb.ca.gov/lists/truckbus08/1054-89-alix_hardy.pdf)

Original File Name: 89-alix\_hardy.pdf

Date and Time Comment Was Submitted: 2009-02-10 13:59:10

No Duplicates.

**Comment 71 for Statewide Truck and Bus Regulation 2008 (truckbus08). (At Hearing)**

First Name: Isidro

Last Name: Arechiga

Email Address: Non-web submitted comment

Affiliation:

Subject: Oakland High School

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/truckbus08/1058-80-isidro\\_arechiga.pdf](http://www.arb.ca.gov/lists/truckbus08/1058-80-isidro_arechiga.pdf)

Original File Name: 80-isidro\_arechiga.pdf

Date and Time Comment Was Submitted: 2009-02-17 10:02:59

No Duplicates.

**Comment 1 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 2 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 3 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 4 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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



**Comment 5 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 6 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 7 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 8 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 9 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

# **Comment 10 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Steve  
Last Name: Azevedo  
Email Address: steve.azevedo@kniferiver.com  
Affiliation: Knife River Corporation

Subject: Comments on Modified Text for the Truck and Bus Rule  
Comment:

Dear Sir/Madam,

We appreciate this opportunity to comment on the modifications to the Truck and Bus Rule. While we do support many of the changes, we believe that some of the modifications need to be changed or clarifying language inserted.

Our primary concern is the exemption of drayage trucks from this rule. Our company will spend a significant amount of money to upgrade trucks under the drayage truck rule, yet we will get no credit under the truck and bus rule. In fact, if we have to take the drayage trucks out of the fleet averaging or other BACT compliance methods, we will actually be penalized under the truck and bus rule. This is especially troublesome considering the very small amount of time our trucks spend in a port in relation to the amount of time these trucks spend on the road outside of a port. In some months, these trucks may not operate at all in a port and spend the entire time hauling materials that do not go into or out of a port or railyard.

We performed an internal analysis on 6 of our trucks that travel into the Port of Stockton to haul cement. These trucks operate a total 42 hours per day. Out of those 42 hours, the trucks operate approximately 1 hour within the port. This equates to about 225 hours per year of operation within the port, and that is probably over estimating. Considering the fleet makeup, we will be required to replace one truck every two years at approximately \$75,000 to comply with the drayage truck rule. We estimate that the cost will equate to \$333 for every hour the trucks operating in the port. It is understood that this is not a forum to change the drayage truck rule, but considering the small percentage of time those trucks spend in the port versus on the highways, we request that language be inserted into the truck and bus regulation that allows drayage trucks to be part of the fleet for fleet averaging and BACT compliance. Considering the slow economy, this change would help to make retrofitting and replacements more cost effective.

Another part of the rule that language should be added is under the definition of "2008 Baseline". Under the current definition, the 2008 baseline is for trucks that operated 1000 miles in 2008. To be consistent with other parts of the rule (definition of low use), we request that the definition include trucks that also operated over 100 hours during 2008.

Lastly, we appreciate the new provisions for early retirement. We

do however, believe that there should be provisions for trucks that are scrapped or used for parts and not actually sold. Since the goal is to get the older trucks off the road, there should be credit giving to trucks that are taken permanently off the road and scrapped.

Sincerely,

Steve Azevedo  
California Environmental Manager  
Knife River Corporation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-31 09:33:49

No Duplicates.

## **Comment 11 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Karl  
Last Name: Aube  
Email Address: kaube01@hotmail.com  
Affiliation: private owner single vehicle

Subject: Proposed Exemption to Diesel rules # 13  
Comment:

Thank You Staff of ARB!  
I support the Exemption revision # 13 as written and published on the internet.

I understand my 2005 F550 6.0 PSD quad cab qualifies being under 19500 GVWR with an Original Ford Dealer F-350 long bed P/U box installed before delivery.

Karl Aube  
46041 Road 415, # 167  
Coarsegold, CA 93614  
559 683 6323

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-01 13:13:13

No Duplicates.



## **Comment 12 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Chris  
Last Name: Riddington  
Email Address: info@cbabus.com  
Affiliation: California Bus Association

Subject: Comments on Proposed Truck & Bus Regulation 2008

Comment:

Response to Rulemaking 2008-12-11 Notice 15 Day - Truck and Bus Regulation Changes

The California Bus Association (CBA), representing intercity, passenger stage corporations and charter bus companies is hereby responding to the California Air Resources Board Notice of modifications to the regulation.

CBA supports the following 15 Day Notice modifications and expansions of the rule:

It expands the definition of "heavy duty diesel vehicle" to include "motorcoach" in new Section 2025(d)(39).

It modifies the definition of "NOx Exempt Vehicles" to include motorcoaches since they are exempt from the NOx performance requirements until 2017 under Section 2025(d)(56)(E).

Section 2025(g)(2) is added so that fleets that have motorcoaches can comply with a separate NOx percent limit schedule as "MC NOx BACT".

Consistent with the above changes, Section 2025(g) Table 2 (Percent of Total Fleet) option adds a separate compliance path for motorcoaches.

Section 2025(h)(2)(C) provides a definition of the NOx target for motorcoaches in determining the NOx target rate option (fleet averaging option) for motorcoaches in a fleet.

Consistent with Section 2025(h)(2)(C), Table 3 lists the fleet NOx targets for motorcoaches.

A new section 2025(l) has been added to "provide motorcoaches an exemption from the NOx requirements until January 1, 2017...". The new motorcoach NOx values are used for the two options in Table 2 or Table 3.

New section 2025(p)(1)(D) adds motorcoaches to the NOx exempt list until January 1, 2017.

The amendments in this 15 day notice as cited above will materially benefit both the environment and all motorcoach patrons.

Our industry is recognized as a leader in contributing to the reduction of traffic congestion and airbourne criteria pollutants such as NOx, PM, and also CO2.

The continued sustainability of the entire motorcoach industry to serve fixed route and charter demand depends on a regulatory scheme that balances the ability of our industry to remain in business while reducing mobile source emissions.

The changes in the regulation referred to in this response are a positive step in this direction.

Chris Riddington  
President  
California Bus Association

Attachment: [www.arb.ca.gov/lists/truckbus08/1082-the\\_15\\_day\\_notice\\_response\\_8-31-09.pdf](http://www.arb.ca.gov/lists/truckbus08/1082-the_15_day_notice_response_8-31-09.pdf)

Original File Name: The 15 Day Notice Response 8-31-09.pdf

Date and Time Comment Was Submitted: 2009-09-01 16:08:26

No Duplicates.

**Comment 13 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 14 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Steven

Last Name: Brink

Email Address: steveb@foresthealth.org

Affiliation: California Forestry Association

Subject: On-Rd Diesel Engine Emission Rule Modified Text

Comment:

Comments on the August 19, 2009 Notice of Public Availability of Modified Text to the On-Road Diesel Rule are attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1084-090831\\_cfa\\_response\\_to\\_on\\_rd\\_diesel\\_engine\\_emission\\_rule\\_modifications.doc](http://www.arb.ca.gov/lists/truckbus08/1084-090831_cfa_response_to_on_rd_diesel_engine_emission_rule_modifications.doc)

Original File Name: 090831\_CFA\_response\_to\_On\_Rd\_diesel\_engine\_emission\_rule\_modifications.doc

Date and Time Comment Was Submitted: 2009-09-02 15:27:45

No Duplicates.

# **Comment 15 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: ChOuris  
Last Name: Torres  
Email Address: christorres@fandltrucking.com  
Affiliation: F & L Farms Trucking Inc.

Subject: Revisions to rule  
Comment:

To all Honorable board members,

I have been involved in this process for the last 24+ months. I have spent a considerable amount of time away from my business to try and provide my input on this regulation. The revisions are just a formality to make this regulation law. The agricultural provisions need to be further defined as to the "process" in first point of processing.

When I attended the December meeting, when this regulation was approved, there was mention of further study of the economic impacts of implimentation of the rule, has this happened? Will that information change the rule? How accurate are the levels of PM and NOX at our current level of operation?

Our company is 40% down in gross proceeds this year. This equates to 40% less miles operated. Our company is not the only one in this situation. All of the studies that brought this regulation to play were acomplished during the high time of the constrution boom. Should this not be considered now?

We have tried to be proactive in purchasing new equipment. We are struggling to make the payments. This regulation has also brought on a large amount of competative disadvantage with it. The companies that are in nonattainment areas that have large metropolitan air management districts that are able to fund truck replacements (secat) make it difficult for us that are in attainment areas to compete for the same business. These trucks are not used exclusively in the nonattainment areas they are traveling outside and competing against others that don't have the availability of truck replacement.

Can the board reconsider the timeline of implimentation of this rule? I am personally on the fence regarding this part of me says lets go but then part says slow it down. If a delay is possible, some provisions for the folks that were proactive would need to be made. We proactive folks are counting on higher rates, we have not seen them yet. I don't know if we will anytime soon.

Thank you for your time,

Chris Torres,  
President,  
F & L Farms Trucking Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-02 20:17:42

No Duplicates.

**Comment 16 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 17 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Deborah

Last Name: Miley

Email Address: info@nwsa.us

Affiliation: National Wildfire Suppression Associatio

Subject: Association Comments on the Modified Text

Comment:

Attached please find comments submitted by the National Wildfire Suppression Association.

Attachment: [www.arb.ca.gov/lists/truckbus08/1087-air\\_resource\\_board\\_letter.pdf](http://www.arb.ca.gov/lists/truckbus08/1087-air_resource_board_letter.pdf)

Original File Name: Air Resource Board Letter.pdf

Date and Time Comment Was Submitted: 2009-09-03 07:55:23

No Duplicates.



**Comment 18 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Mark

Last Name: Carter

Email Address: info@streetsweeper.com

Affiliation: North American Power Sweeping Assoc.

Subject: Language prevents use of BACT for street sweepers

Comment:

Please see attached comments from the North American Power Sweeping Association - California Chapter

Attachment: [www.arb.ca.gov/lists/truckbus08/1088-napsa\\_carb\\_letter\\_9-3-09.pdf](http://www.arb.ca.gov/lists/truckbus08/1088-napsa_carb_letter_9-3-09.pdf)

Original File Name: NAPSA CARB Letter 9-3-09.pdf

Date and Time Comment Was Submitted: 2009-09-03 11:40:51

No Duplicates.

**Comment 19 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Charles

Last Name: Rea

Email Address: crea@calcima.org

Affiliation:

Subject: On-road diesel - 15 day comments

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/truckbus08/1089-calcimafull090903.pdf](http://www.arb.ca.gov/lists/truckbus08/1089-calcimafull090903.pdf)

Original File Name: calcimafull090903.pdf

Date and Time Comment Was Submitted: 2009-09-03 13:07:06

No Duplicates.

**Comment 20 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: CIAQC Comments on CARB 15-Day Notice - Truck and Bus Regulation

Comment:

Attached are the comments prepared and submitted by the Construction Industry Air Quality Coalition (CIAQC) on the CARB 15-Day Notice of Public Availability of Modified Text for the Truck and Bus Regulation.

Attachment: [www.arb.ca.gov/lists/truckbus08/1090-on-road\\_truck\\_regulation\\_-\\_ciaqc\\_comments\\_on\\_15-day\\_notice\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/truckbus08/1090-on-road_truck_regulation_-_ciaqc_comments_on_15-day_notice_to_carb.pdf)

Original File Name: On-Road Truck Regulation - CIAQC Comments on 15-Day Notice to CARB.pdf

Date and Time Comment Was Submitted: 2009-09-03 13:46:05

No Duplicates.

## **Comment 21 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Bob  
Last Name: Shepherd  
Email Address: bshepherd@quinnpower.com  
Affiliation:

Subject: Private Use Trucks

Comment:

I have spoken to several customers that have personal trucks that are over 19500 GVWR that are used exclusively as a 5th wheel to haul recreational travel trailers and horse trailers.

Much like the motors homes that were excluded because these were typically used by people with fixed incomes, the owners of these vehicles are also on fixed income. Most of them are retired people that have no source of income to set aside for purchase of new vehicles. As you well know the only way to address the NOx for this regulation on older trucks is with replacement of these very expensive vehicles.

These vehicles are not being used for commercial use.

These vehicles need to be excluded from this regulation.

Thank you.

Bob Shepherd

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-03 14:40:50

No Duplicates.

**Comment 22 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Melissa  
Last Name: Hagan  
Email Address: mbhagan@up.com  
Affiliation: Union Pacific

Subject: Comments regarding Regulation of On-Road Heavy Duty Diesel-Fueled Vehicles  
Comment:

Please find attached Union Pacific Railroad Company's comments regarding the Statewide Truck and Bus Regulation

Attachment: [www.arb.ca.gov/lists/truckbus08/1092-2009\\_09\\_03\\_uprr\\_comments\\_re\\_truck\\_and\\_bus\\_rule\\_2008.pdf](http://www.arb.ca.gov/lists/truckbus08/1092-2009_09_03_uprr_comments_re_truck_and_bus_rule_2008.pdf)

Original File Name: 2009\_09\_03\_UPRR Comments re Truck and Bus Rule 2008.pdf

Date and Time Comment Was Submitted: 2009-09-03 15:26:04

No Duplicates.

**Comment 23 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Lee

Last Name: Brown

Email Address: leebrown@cdtoa.org

Affiliation: California Dump Truck Owners Association

Subject: CDTOA Comments on CARB's Truck and Bus Regulation

Comment:

Attached are the comments of the California Dump Truck Owners Association (CDTOA).

Attachment: [www.arb.ca.gov/lists/truckbus08/1093-15-day\\_cdtoa\\_comments\\_to\\_arb.pdf](http://www.arb.ca.gov/lists/truckbus08/1093-15-day_cdtoa_comments_to_arb.pdf)

Original File Name: 15-day CDTOA Comments to ARB.pdf

Date and Time Comment Was Submitted: 2009-09-03 16:22:21

No Duplicates.

**Comment 24 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Jeff  
Last Name: Hunter  
Email Address: [jhunter@ctta.com](mailto:jhunter@ctta.com)  
Affiliation: California Tow Truck Association

Subject: CTTA 15-day Comment on ARB Rule  
Comment:

Please see attached comments from the California Tow Truck Association (CTTA).

Attachment: [www.arb.ca.gov/lists/truckbus08/1094-ctta.arb.writtencomment.15\\_day.pdf](http://www.arb.ca.gov/lists/truckbus08/1094-ctta.arb.writtencomment.15_day.pdf)

Original File Name: CTTA.ARB.WrittenComment.15 day.pdf

Date and Time Comment Was Submitted: 2009-09-03 16:39:41

No Duplicates.

**Comment 25 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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



**Comment 26 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 27 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 28 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Nidia

Last Name: Bautista

Email Address: [nidia@coalitionforcleanair.org](mailto:nidia@coalitionforcleanair.org)

Affiliation: Coalition for Clean Air

Subject: Changes to Statewide Diesel Truck and Bus Rule

Comment:

Comment letter v2

Attachment: [www.arb.ca.gov/lists/truckbus08/1098-letter\\_-\\_proposed\\_truck\\_rule\\_changes\\_v.2\\_9.03.09.pdf](http://www.arb.ca.gov/lists/truckbus08/1098-letter_-_proposed_truck_rule_changes_v.2_9.03.09.pdf)

Original File Name: Letter - Proposed Truck Rule Changes v.2 9.03.09.pdf

Date and Time Comment Was Submitted: 2009-09-03 17:01:00

No Duplicates.

**Comment 29 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

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

**Comment 30 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-1.**

First Name: Cheryl

Last Name: Moore

Email Address: Non-web submitted comment

Affiliation:

Subject: Mendocino

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/1100-cheryl.pdf](http://www.arb.ca.gov/lists/truckbus08/1100-cheryl.pdf)

Original File Name: cheryl.pdf

Date and Time Comment Was Submitted: 2009-09-08 16:28:56

No Duplicates.

## **Comment 1 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: David

Last Name: Norris

Email Address: [dnorris@lakeport.k12.ca.us](mailto:dnorris@lakeport.k12.ca.us)

Affiliation:

Subject: Truck & Bus regulation

Comment:

LAKEPORT UNIFIED SCHOOL DISTRICT  
Transportation Department / From the desk of David Norris /  
Director of Transportation  
2503 Howard Ave, Lakeport, CA 95453  
707/262-3022 Fax 707/262-3034

October 6, 2009

Dear ARB Board Members, Please take into consideration the following issues when making your decisions on the proposed regulation; In-Use Heavy-Duty Diesel-Fueled Vehicles.

- Lake County Air Quality Management District; Exempt all busses that only operate inside of air districts that are in attainment.
- Low-use vehicles exemptions; currently the regulation allows an exemption for busses that accumulate 1,000 miles per year or less. This regulation should be increased to 2,000 miles per year to allow school districts to use these busses as back up busses to fill in when the daily operating busses are out of service for safety inspections and repairs. By adding exhaust retrofit devices the down time for service, inspection and regeneration will be increased.
- Match waivers 20%; Presently the proposal is to allow only 20% of the busses that are funded are eligible for match waivers for air districts that comply totally with air quality standards; Lake County is the only one in the state. Lake County Air Quality District cannot receive AB 923 funds from DMV fees. This means less revenue for all Lake County school districts to comply with lower emissions program. It is imperative that the match waiver be extended to all bus replacements grants.
- Electrical Infrastructure; The regulation allows for \$20,000 to complete each retrofit. Out of the \$20,000 the install is about \$16,000 and \$2,500 for maintenance, which leaves about \$1,500 for electrical infrastructure. LUSD applied for 7 retrofits, which leaves us with \$10,500 for electrical infrastructure. Our proposal came in at \$38,127. Will ARB cover the balance of \$27,627?

· Lake County Air Quality Management District (bus replacement only); Lake County is unique, as it is the only county in the state that is in compliance with state air quality standards. The funds allocated to Lake County should be spent on bus replacements only. Each school district would be able to replace at least 2 busses each, based on the funds allocated. These busses would be on daily runs immediately, and would deliver the best performance (cleaner exhaust, longer range and fuel economy). In addition they would last for the next 20 years. It does not make good sense to spend \$20,000 on a retrofit device on a bus that has used up ½ to 2/3 of its life.

· Lake County Air Quality Management District (exempt all busses or fully fund); Lake County does not have a problem with air quality so either totally exempt or fully fund school busses in Lake County. Reward air districts for meeting state standards.

· Smoke test; Is the smoke necessary to continue after we are in full compliance with the law.

· Declining enrollment; Lakeport Unified School District has been experiencing declining enrollment. As of CBEDS day, we had 59 fewer students enrolled in our district in comparison to last year. This amounts to a projected loss in revenue of approximately \$359,900. However our ridership has continued to rise because of increased gas prices, parents are sending their students to school on busses to save money. The chart below shows our district CBEDS count over the past eight years:

2001-2002	1918
2002-2003	1910
2003-2004	1792
2004-2005	1765
2005-2006	1771
2006-2007	1723
2007-2008	1709
2008-2009	1650

· Transportation funding formula; Our school transportation is severely under funded by the state. The state transportation apportionment for our school population of 1,655 is \$117,400, about \$71.00 per student. A neighboring school district just 10 miles away with a school population 1,789 receives \$442,359, about \$247.00 per student. It is obvious that the states current transportation funding formula is extremely inequitable. This formula has been in place since 1983. This inequity cost our school district over \$10 million since 1983. The encroachment on our general fund for transportation is \$268,850. This is a tremendous burden on the overall operation of our school district, however it is vitally important to transport these students based on inadequate walk paths and unsafe walking conditions in our community.

· Parent-Pay transportation; Other types of revenue such as Parent-Pay transportation is not an option in our school district because 52% of our students qualify for free and reduced lunch so they would not be required to pay for transportation.

· Students depend on school busses; The combination of the rise in fuel costs, the cost to our district for the implementation of the Lower-Emission School Bus Program, and a decrease in capacity on the new school busses, (due to seatbelts), puts the Yellow School

Bus in jeopardy, it would displace students from a safe ride on the school bus, to long and unsafe walks on the streets. A high percentage of our students depend on the school bus to get to and from school because they have no other transportation available to them.

The Yellow School Bus has been an essential part of providing public education to the children of Lakeport. It is part of the fabric of this American institution, the very foundation in how we educate our children. In California we have developed a system that has proven to be the safest form of transportation in the world. We have the strictest regulations relating to the construction and use of the school bus and the education and training of our drivers. Lets not, over under fund this new regulation, which appears to be mandated, to the point that we can't afford to operate them.

Sincerely,

David Norris

Attachment: [www.arb.ca.gov/lists/truckbus08/1101-list\\_for\\_dr.\\_sperling.doc](http://www.arb.ca.gov/lists/truckbus08/1101-list_for_dr._sperling.doc)

Original File Name: List for Dr. Sperling.doc

Date and Time Comment Was Submitted: 2009-10-06 10:34:00

No Duplicates.



## **Comment 2 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: FERNANDO

Last Name: SANTOS

Email Address: FERNANDO@YANDELLTRUCKAWAY.COM

Affiliation:

Subject: TRUCK REGS. AND LENGHT LAW

Comment:

As we are struggling to move forward meeting all the new regulations forced upon us and more than likely drive a lot of us out of business, no one has addressed the problem of making all these components fit into a truck tractor and still be 65' in lenght to meet the Ca. lenght law.

According to all truck manufactures they can not design a class 8 truck that will be able to pull a 53' trailer and meet the 65' lenght.

Can someone please respond to this concern.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-06 11:17:16

No Duplicates.

### **Comment 3 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: David

Last Name: Chidester

Email Address: ccaltrans@aol.com

Affiliation:

Subject: Firm 2010 Drayage Truck Deadline

Comment:

After spending almost 8,000,000.00 upgrading our fleet, I am hearing rumors on putting this deadline off. It is unfair to all of us who have complied, and have been proactive, to possibly have us compete for freight with those who have been on the sidelines, either by choice or other factors doing nothing. All I am asking for is a level playing field for everyone. I should not be now penalized for compliance, just as those who have not complied should not be rewarded by retaining lower operating costs with their old trucks.

Attachment: [www.arb.ca.gov/lists/truckbus08/1103-carb\\_letter\\_10-7-09.doc](http://www.arb.ca.gov/lists/truckbus08/1103-carb_letter_10-7-09.doc)

Original File Name: Carb Letter 10-7-09.doc

Date and Time Comment Was Submitted: 2009-10-07 08:02:49

No Duplicates.

## **Comment 4 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Chris

Last Name: Hutcheson

Email Address: unionpacfc@yahoo.com

Affiliation:

Subject: You are hurting CA bussinesses

Comment:

You are killing off Ca. This is not how Government is supposed to work in a FREE democratic country. You are Hurting The 3rd largest economy in a time when we are damn near a depression. But let I say that your regs say that NAFTA trucks are exempt. I think your efforts would be better received if you actually did help California rebuild. But instead you are helping kill the 3rd largest economy in the world, and potetial cost consumers to bear the blunt of your sword, because afterall when this is all said and done there are going to be fewer companys left and will pass on the expenses of this program onto the consumers. Expect to see higher freight charges and Food prices. I wonder how all you people can sleep at night.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-07 08:41:41

No Duplicates.

## **Comment 5 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Greg

Last Name: Howe

Email Address: greg@dhtransportation.com

Affiliation: D&H Transport Inc.

Subject: Carb Deadlines

Comment:

Dear Carb Board,

I am Greg Howe partner in D&H Transportation Inc. In Yuba City, Ca. I am the third generation in the trucking business in my family, and I may be the last due to this purposed regulation. We are a small trucking company operating 40 trucks mainly in Ca, with some business in 11 western states. Along with the current economic crisis, and the unreasonable time frame you folks have put upon us to replace our equipment we may not be able to continue our business. Believe me I want my children to have CLEAN AIR to breathe, I want our State to be a safe place to live and do business, but these regulations are going to make this a state with NO PEOPLE and NO BUSINESS. If companies like ours are forced out of business, there will be no TAX MONEY generated, and the people will be forced to go to other States that are more Sensable and business friendly. Please let us replace our equipment by normal attrition and we will achieve the same results in the end. Thank You, Greg Howe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-07 08:48:21

No Duplicates.

## **Comment 6 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Robert  
Last Name: Sandor  
Email Address: rsandor@sandors.com  
Affiliation:

Subject: No on proposed diesel regulations  
Comment:

Dear California Air Resources Board,

Please note that our family is totally AGAINST any further emmission controls being forced upon our commercial and residential fleets.

Have we not gone far enough to discourage business in the State of California under the guise of false environmental concerns?

These regulations will do absolutely nothing to better our environment, and indeed will end up harming the environment through reduced mileage standards needed to attempt to filter the particulate matter that you seem concerned about.

Our family is suffering greatly from the adverse economic climate that our State government continues to effect. Please have some consideration for the working families who produce real goods and services and stop hurting us all via these make work projects to justify the existence of CARB.

Sincerely,  
Robert J. Sandor

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-07 15:32:17

No Duplicates.

## **Comment 7 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: TERRY  
Last Name: KLENSKE  
Email Address: TERRY@DALTONTRUCKING.COM  
Affiliation:

Subject: pROPOSED 1-YEAR POSTPONEMENT OF REGULATIONS  
Comment:

I object to CTA's attempting to postpone the effective date for new truck generated air quality standards. Since 2008, we have spent 3.7 million dollars buying new power units. This has increased our monthly expenses by approximately \$65,000 per month.

We are now servicing this new private debt without any government giveaways or grants. I don't believe its fair for companies like Dalton to attempt to comply with widely known new regulations while others are given a pardon due to a tough economy.

We are primarily a construction based trucking company. I know how slow and competitive work is. Yet we have pressed forward with our updating program believing the regulations implemented by CARB must be complied with. Now it appears that we may have been played for patsies.

If CARB gives my competitors a one year free pass, then I want them to make my payment for that year.

Terry Klenske  
Dalton Trucking Inc  
13560 Whittram Ave  
Fontana, CA 92335  
909/823-0663 x 1519

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-09 12:26:59

No Duplicates.

## **Comment 8 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Art  
Last Name: Unger  
Email Address: artunger@att.net  
Affiliation:

Subject: On Road Diesel Trucks and Buses  
Comment:

Please require large decreases in criteria pollutants. Within several years these decreases can be met by using the natural gas that new methods of drilling will make cheaper than natural gas is now. Use of natural gas will also decrease Green House Gas production; California can not tolerate the global warming predicted for us.

Thanks, Art

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-10 20:25:14

No Duplicates.

## **Comment 9 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Bruce

Last Name: Ramsay

Email Address: bruce\_rams@yahoo.com

Affiliation:

Subject: support for tighter diesel regulation

Comment:

As a person who is often in traffic, usually breathing diesel exhaust I support any tightening of emissions regulations.

I note that many of the comments are from those with economic interests to protect. I hope the Board will do what it can to mitigate those economic impacts without compromising our air. The truckers and heavy equipment operators are more likely to get lung cancer than I am, so I hope they will not be too resistant to laws which improve their health and may reduce their bosses medical insurance costs.

I don't believe that businesses will abandon the large market in California just because trucking is slightly more expensive.

I'm surprised that truckers in California aren't more in favor since this should give them some advantage competing against firms that are not prepared to meet California standards.

The automakers managed to meet California standards and never abandoned this market during all the years in which CA has had the tightest standards in the country.

In my mind the worst offense is the fact that trucks have been under regulated for so long.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-12 14:33:39

No Duplicates.



## **Comment 10 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Robbie  
Last Name: Glenn  
Email Address: foxxfirre1@comcast.net  
Affiliation:

Subject: Truck/bus regs  
Comment:

Well, as usual, this agency relies on computer models to determine risks and affects. They explicitly state that they neither measured actual PM or collected actual information on health affects on real people. This raises the question: How can a computer model be devised and calibrated without input from actual statistics based on reality? This type of "virtual" extrapolation is neither science or a valid means of determining policies that promise to cripple the economy. It's amazing that this passes as intelligence. What does this endless stream of "science fair" projects cost us all, not only to produce, but the aftermath of regulations that follow? Is there any form of peer review of these studies?  
(Reprinted from a blog)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-13 21:52:30

No Duplicates.

## **Comment 11 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Tom  
Last Name: McCloskey  
Email Address: tmcclusk@pacbell.net  
Affiliation:

Subject: Is this true?

Comment:

Is this true? Isn't there a way to get more CNG vehicles on the road? This would reduce emissions of all kinds and reduce oil imports. More CNG vehicles would help bring home the troops from the Middle East. Let's get some plans in the works to command additional CNG vehicles...

I am a Director of a Company that has been converting diesel and gasoline engines to run on CNG for more than a decade. I can tell you that the biggest hurdle to adoption of CNG technology in the USA has been the turf war between CARB (the California Air Resources Board) and the US EPA over just who exactly is the overlord of exhaust emissions.

These two agencies' unwillingness to streamline, clarify or adjust regulations for new technology is legendary.

My company currently has the product and capability to convert 85% of existing in use heavy duty diesel engines to run more efficiently (more power, zero PM, 30% less CO<sub>2</sub>, etc) on CNG or LNG than on any form of "clean diesel fuel" for less than \$10,000 per engine, but CARB won't allow it...

In California, thousands of trucking, construction and agricultural diesels must be retro-fitted with Particulate Matter (PM) filtration systems or be moved out of the state by this December. The cost of these systems range from \$8,000-\$25,000 per engine. This ruling will wipeout entire businesses, and thousands of jobs. The retrofitting of these diesel engines actually causes them to use more fuel for the same work, thereby increasing our dependence on foreign oil, and actually increasing Green House Gas production.

CARB will not allow conversion of these very same engines to run on CNG, even though it pays for itself through decreased fuel costs, eliminates PM pollution (the target of all this legislation), and decreases CO<sub>2</sub> and GHG production as dictated by AB32.

Conversion fulfills all the goals, but CARB won't let it happen. HOW are they stopping it?

According to CARB, if you convert an existing in use heavy duty diesel engine to run on CNG or LNG, they consider it a BRAND NEW engine, and the converting party must now Guarantee/Warranty the motor as if new. For on road engines, this means for 500,000 miles, and the engine must meet 2012 exhaust emissions standard. Doesn't matter if the engine is 10, 20 or 50 years old.

Additionally, as a BRAND NEW motor, each model/engine variant must be CARB and EPA certified to pass the 2012 standard at a cost of over \$350,000 per engine per model per year of production.

What if you sell retrofit filters instead? You only have to

warranty your retrofit equipment for two years, and there is no requirement to warranty the motor at all. If your system kills the engine, too bad for the owner...

Certification of these retrofits involves a simple durability testing, and they can be certified across a Family of motors covering many variants and model years with a single certification..

We actually sell the PM filters to other companies here in CA making retrofit kits, but we pulled out of that business ourselves because it is THE WRONG SOLUTION.

If CARB would simply allow CNG conversion to be treated the same as the retrofit kits, we could convert thousands of AG pumps in the Central Valley, and eliminate a large reason why they are a federal "non-attainment" area in terms of clean air. We could convert the entire fleet of container carriers at the Ports of LA and Long Beach, allowing them to expand operations as they would now fall well below the air pollution cap that has held back expansion. This creates JOBS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-19 11:03:37

No Duplicates.

## **Comment 12 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Stephen  
Last Name: Weitekamp  
Email Address: sweitekamp@thecmsa.org  
Affiliation: California Moving & Storage Assn

Subject: Request for Changes to the Existing Regulation  
Comment:

October 19, 2009  
VIA REGULAR MAIL and E-MAIL

Mary D. Nichols  
Chair, California Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812-2815  
mnichols@arb.ca.gov

RE: CMSA Written Comments on the California Air Resources Board's Truck and Bus Regulation (second 15-day Notice of Public Availability of Modified Test to Consider the Adoption of a Diesel Particulate Matter and Oxides of Nitrogen and Greenhouse Gases Control Measure for On-Road Heavy-Duty Diesel-Fueled Vehicles Operating in California)

Dear Ms. Nichols:

My name is Stephen J. Weitekamp and I am the President of the California Moving and Storage Association, located at 10900 E. 183rd St. Ste 300, Cerritos, CA 90703. Our Association represents approximately 430 licensed moving companies and another 130 companies that provide services for the moving industry. These companies provide jobs for approximately 10,000 Californians, but many of our members are struggling to survive in this state's current economic situation and the new CARB law will undoubtedly result in some going out of business or moving out of California. This is a plea for help from an important sector of small California based businesses that need relief from the present provisions of CARB.

The CARB On-road Diesel Engine Regulation will make many local moving trucks illegal after 2010. This will severely impact California-based moving companies and further add to the state's worsening economy.

California's recession is the worst in at least three decades and the unemployment rate was an unheard of 11.5% in May and likely to increase through the remainder of this year. This is the absolute WORST time to enact draconian regulations on any business that owns a diesel powered truck including the moving and storage industry.

During the CARB hearing process, many within our industry hoped that CARB would modify their rule into mileage tiers to accommodate

trucks that run 10,000 - 30,000 miles, 30,001 - 70,000 miles and 70,000 + miles per year. Minimally, we believe CARB should have adopted a two tier rule, at least within the moving and storage industry. In our industry there are two completely different types of diesel trucks utilized - high mileage and low mileage. The high mileage users tend to drive more than 100,000 miles per year and are in industries such as long distance moving, logistics/delivery and freight. Low mileage users tend to drive 30,000 miles or less per year and are in industries such as local moving and delivery. CARB has ignored all requests and suggestions to tier the rule even though it did for the Off-road rule.

It has also recently come to my attention that there is controversy regarding the scientific studies CARB used to justify these regulations and whether or not they were properly peer reviewed. A growing list of prominent scientists disagrees with the regulatory process and one-sided science that is being utilized to take-away our equipment. We need your support to make sure CARB is being responsible for everyone.

Prior to 2009, an efficient market existed for late model used trucks. High mileage industries buy new trucks and after four or five years of use sell them to companies that provides local services. Low mileage industries efficiently utilize these trucks for many years before replacing them. We are the ultimate recyclers and re-users of diesel trucks. There is a huge environmental savings to this reuse that CARB again ignores. My Association and industry is requesting changes to the existing regulations:

1) Provide an exemption to trucks driving 30,000 miles or less per year. This allows for a market to exist for the high mileage users to trade-in/resell/replace their trucks while allowing the low mileage industries to survive and utilize newer more efficient equipment.

2) Push out the start of the regulations for at least two additional years - these regulations should not be enacted until California is deep into an economic recovery.

3) Increase the time period between each truck year replacement date - California's current economic state and the cost of new trucks coupled with the frozen capital markets has made it almost impossible for us to survive this economic crisis without significant risks.

Many CMSA member companies cannot afford to simply purchase new trucks. Even if they could, the credit markets are dysfunctional and they cannot risk large truck payments when business is down significantly. A retrofit solution doesn't exist and even if it did, it only buys a few years before many trucks ultimately become illegal in California. Retrofitting is not a reasonable proposition for the low mileage industry.

Please use this opportunity to make changes to the CARB regulations that are fair, equitable and realistic.  
Sincerely,

Stephen J. Weitekamp  
President

Attachment: [www.arb.ca.gov/lists/truckbus08/1114-ltr\\_to\\_mary\\_nichols\\_10-19-09.pdf](http://www.arb.ca.gov/lists/truckbus08/1114-ltr_to_mary_nichols_10-19-09.pdf)

Original File Name: Ltr to Mary Nichols 10-19-09.pdf

Date and Time Comment Was Submitted: 2009-10-20 09:07:58

No Duplicates.

**Comment 13 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Jeff  
Last Name: Hunter  
Email Address: jhunter@ctta.com  
Affiliation: California Tow Truck Association

Subject: CTTA's Comments on ARB Rule  
Comment:

Attached are the updated comments from the California Tow Truck Association (CTTA) .

Attachment: [www.arb.ca.gov/lists/truckbus08/1116-ctta.arb.writtencomment.second\\_15\\_day.pdf](http://www.arb.ca.gov/lists/truckbus08/1116-ctta.arb.writtencomment.second_15_day.pdf)

Original File Name: CTTA.ARB.WrittenComment.Second 15 day.pdf

Date and Time Comment Was Submitted: 2009-10-20 16:49:48

No Duplicates.

**Comment 14 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Lee

Last Name: Brown

Email Address: leebrown@cdtoa.org

Affiliation: California Dump Truck Owners Association

Subject: CDTOA Comments on CARB's Truck and Bus Regulation

Comment:

Attached are the written comments of the California Dump Truck Owners Association (CDTOA).

Attachment: [www.arb.ca.gov/lists/truckbus08/1117-second\\_15-day\\_cdtoa\\_comments\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/truckbus08/1117-second_15-day_cdtoa_comments_to_carb.pdf)

Original File Name: Second 15-day CDTOA Comments to CARB.pdf

Date and Time Comment Was Submitted: 2009-10-21 11:34:52

No Duplicates.



**Comment 15 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Matthew

Last Name: Schrap

Email Address: mschrap@caltrux.org

Affiliation: California Trucking Association

Subject: Find Comments Attached

Comment:

Notice of Public Availability of Modified Text and Availability of Additional Documents and Information for the Adoption of a Proposed Regulation Diesel Particulate Matter and Oxides of Nitrogen and Greenhouse Gases Control Measure for On-Road Heavy-Duty Diesel-Fueled Vehicles Operating in CA

Attachment: [www.arb.ca.gov/lists/truckbus08/1119-10-21-2009\\_carb\\_econ\\_database\\_comments.pdf](http://www.arb.ca.gov/lists/truckbus08/1119-10-21-2009_carb_econ_database_comments.pdf)

Original File Name: 10-21-2009 CARB Econ Database Comments.pdf

Date and Time Comment Was Submitted: 2009-10-21 14:39:14

No Duplicates.

**Comment 16 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: Norman  
Last Name: Brown  
Email Address: skipbrown@deltaconstr.com  
Affiliation:

Subject: Suspend CARB Diesel Regulations  
Comment:

Please read, post and respond to the attached letter.

Attachment: [www.arb.ca.gov/lists/truckbus08/1120-delta\\_letter\\_to\\_carb\\_unethical\\_conduct\\_102109.pdf](http://www.arb.ca.gov/lists/truckbus08/1120-delta_letter_to_carb_unethical_conduct_102109.pdf)

Original File Name: Delta Letter to CARB unethical conduct 102109.pdf

Date and Time Comment Was Submitted: 2009-10-21 15:10:02

No Duplicates.

## **Comment 17 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 15-2.**

First Name: elizabeth  
Last Name: booth  
Email Address: ebdigger@roadrunner.com  
Affiliation:

Subject: personal recreational vehicles over 19,500 gvwr  
Comment:

I myself am an owner of a truck and trailer that is more than 19,500 gvwr used for horse shows. It is a Living quarters trailer. (combination living space and horse trailer). The living quarters are integral to the trailer being pulled. This vehicle is used entirely for hobby and would be impossible to replace as it would not only be costly, but unreasonable.

These vehicles are not being used for commercial use.

These vehicles need to be excluded from this regulation

Thank you  
Elizabeth Booth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-21 16:42:31

No Duplicates.