

## **Comment 1 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim

Last Name: Fuller

Email Address: Jamflrjr@aol.com

Affiliation:

Subject: Filter

Comment:

I own one truck it is a ten wheel dump truck it has a mecanacal motor they do not make a filter for this truck. I work in construscton. I have been doing this work for fifty years. There is not enough money in it to buy new truck.soo. We drive old truck. The guys with one truck let us work we will start saving to buy a new one down the road we have to pay cash. Iam in the C T program works fine for me thank you Jim fuller

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-07 06:52:58

No Duplicates.

## **Comment 2 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Paulette

Last Name: Waters

Email Address: waterspw@aol.com

Affiliation:

Subject: Trucks exemption and rules changes

Comment:

While I can appreciate what changes have been made we are seriously in trouble.

We employ 50 to 75 employees locally in the bay area, for almost 40 years. We are a small business. Husband and wife owned and family run. We have upgraded some of our fleet. But to still have to replace 5 tractors (costing \$50,000.00 to 150,000. each) and 4 bobtail trucks (costing \$30,000.00 to \$55,000.00) is a hardship we cannot endure. How can we pass on the costs to our customers??? In this still very troubled economy. We are in the moving industry, household goods and office moves, locally and in the state of California. Very little out of state. in our fleet of 23 power trucks total mileage for 2013 was 220,510! That was for all TRUCKS in our fleet. (I have GPS in all my equipment) If there was a way to extend the mileage exemption to 30,000 per year we could keep replacing our trucks in a more cost friendly maner.

Please help us to stay in business we are doing everything we can to stay compliant and grow our business to keep our 50+ working.

There is no assistance, no breaks for mid-sized companies.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-07 17:48:05

No Duplicates.

### **Comment 3 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: allen

Last Name: forsyth

Email Address: animalinstinct@sbcglobal.net

Affiliation:

Subject: going broke

Comment:

just wondering how many small companys like mine are gona go out of business trying to comply.my pay check comes from the loads i run i now have a new truck payment and higher insurance because california said my 2001 truck which has passed all my bits and scale legal plus was checked by the air pollution control at the scales can't be run thats the thanks for being in business for 35 years.so yes i thing we need more time to comply its a matter of dollars and cents for us small guys feel free to contact me at 310 503 6259 thanks allen

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-07 20:50:20

No Duplicates.

## **Comment 4 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: pat

Last Name: fitzgerald

Email Address: fitz1@adninternet.com

Affiliation:

Subject: new emission trucks and mandates

Comment:

On the new trucks I see at least 20 or more 2010 to 2014 all makes of trucks setting along side the Highways every trip to CA. Either waiting for a Service truck or Tow truck it is all from the new emission's on the trucks. I have taken the time and asked the people who work on all the trucks they all say the same thing it is not working the cost is 30 percent higher to own and the do not last. Engine failer any where from 240,000 to as low as 123,000 miles. Salesmen of all makes have told me a single truck operator will go broke not because anything they do wrong it is the trucks the down time will Bankrupt them. Most of all the rates are not high enough to afford a new truck and NO ONE WANTS TO TAKE A CHANCE ON A 07 TO 2014. The CEO's of the trucking manufactures say everything is OK it isn't. We are fine with New tech. coming out but mandating it is wrong and as the Supreme Court said No local or State Government can mandate or regulate or put a undue financial burden on motor carriers. State's it in the Constitution of the United States. We stand by that let it come in like all new emission on cars have the old will leave the new will take over in time As of now the new is not working it needs time to find out why.this type has been proven wrong in large truck engine's before

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-08 06:42:07

No Duplicates.

## **Comment 5 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Laura

Last Name: Beltran

Email Address: mshollister831@gmail.com

Affiliation:

Subject: Owners operators More time to complie

Comment:

Small owner operators should get more time since they may not have the capital like big companies do. That would hurt the economy, and that will force them out of buisness. Since my Dad is owner operator of a small buisness also I want to help him to get a new truck. If by any chance you can extend the deadline to upgrade his truck and other small buisness that would be great. Because if he does not get to upgrade his truck he will not get work and cannot help support me and my brothers or my mother.

Sincerely, Laura Beltran

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-08 09:31:04

No Duplicates.

## **Comment 6 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Damon

Last Name: Hollis

Email Address: rollouttransport@gmail.com

Affiliation:

Subject: truck/bus rules for O/O based outside of California

Comment:

I'm a Georgia based auto carrier that transports vehicles to and from California once a month. When I'm in California I can easily do a thousand miles dropping my load and picking up another load to leave. So the thousand mile exemption would cut into my business drastically and the retrofit would seem unfair and costly being that it would only be required once a month. It would mean I could only travel to California once a year and the exemption would be over. Now, I'm on board with cleaner air and all that but a lot of owner operators feel its unfair to require that there truck be retrofitted just to do business in California for the thousand or so miles that might be traveled. And then there are the ones who either don't have the capital, or the credit worthiness required to do the retrofit. I would like to know if the ARB could start a loan program or something like it to help owner operators who are based outside of California to become compliant or raise the in California mileage exemption to 7500 miles a year allowing non California based owner operators to continue to do business in California for the short time that they are there.

Damon Hollis

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-08 09:01:13

No Duplicates.

## **Comment 7 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Max

Last Name: Dron

Email Address: mdron65303@aol.com

Affiliation:

Subject: My comment

Comment:

Hi.I am Max Dron ,owner of a small fleet trucking company.We have new trucks and some older trucks.Old trucks ran very good,and we are replacing them as time comes,and when funds are available.Please do not create any deadlines to buy new trucks.We all know,that there is an end to old staff,and time will come,when all of us will have clean trucks and reefers. Thanks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-08 11:28:31

No Duplicates.

## **Comment 8 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Anthony

Last Name: Gibson

Email Address: reelfootexpress@gmail.com

Affiliation:

Subject: carb truck regs

Comment:

you know your so called good faith is a joke!! 1st of all your web site says the trucks cause less than 20% of pollution to your state...why are you pushing so hard for us to change instead of enforcing public transit for city dwellers? 2nd on the low mileage usage....what my truck does outside of californias borders is ABSOLUTELY NO CONCERN of CARB!! im concerned about our air quality as well as you but it seems you are putting the sole responsibility on diesel powered equipment and mainly on out of state companies!!! i used to run california alot and loved it but YOU (CARB) has made me despise coming to your state!! we truckers make up about 1/3 of traffic in your state and their is know way possible we can be causing as much air quality issues as you say!! everyone knows that California's gov't can't stand the trucks being out there!! we are treated like outcasts, hooligans ,outlaws, and scum by the law enforcement and the citizens of your state!! its been known for years we are hated!!

all your outfit(CARB) is looking for is money!! why else would so many techers have been layed off just to fund another state level crime cindicate!! the founder of carb was and still is a liar and it has been proven but yet you people kept pushing and in a time when our economy was at its worst in years!! thats what makes me believe its all about money for your agency!!!

i hate this for my family that lives there but i don't care if i ever travel through your miserable, stuck up,CONTROLLING state ever again and highly wish california would become its own country and stop draining the rest of us with your bullshit!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-08 11:43:30

No Duplicates.



## **Comment 9 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joseph  
Last Name: Flesch  
Email Address: ca2nc2007@yahoo.com  
Affiliation:

Subject: DME fuel  
Comment:

I urge you to include DME as an alternative fuel & consider the benefits:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-truckbus14-UjYGBQRgUFwCKVUK.htm'

Original File Name: DME - 21st Century Energy.htm

Date and Time Comment Was Submitted: 2014-03-09 08:54:46

No Duplicates.

## **Comment 10 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: James

Last Name: McDonald

Email Address: jimkatemcd@gmail.com

Affiliation:

Subject: CARB

Comment:

I have been an Owner/Operator for over 25 years and have lived most of my life in California.

I own a 2001 Freightliner FLD with a C-12 Caterpillar motor.

Every tech I have contacted has cautioned me against installing the particulate filter on my motor. The general consensus is that C-12 Caterpillar motors do not operate well with the filter.

I have about 3 years left before retirement and have no plans to retrofit or replace current equipment.

CARB has crossed the line by interfering in interstate commerce as specifically prohibited in the Commerce Clause of the U.S.

Constitution. CARB may be able to force intrastate carriers into bankruptcy but have stepped outside the lines on interstate carriers.

I sincerely hope that officials in the department come to their senses and repeal much of this regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-09 13:14:17

No Duplicates.

## **Comment 11 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Andy

Last Name: Smith

Email Address: andysmith379@gmail.com

Affiliation: Smith Trucking LLC

Subject: Ideas for regulation change

Comment:

I will be discussing only road construction trucks as that is our area. First I would like to make a suggestion for a added regulation. A exemption for trucks that are pre 2007 and are not retrofitted. Make a ruling that the truck, regardless as to the Air Quailty District they are based in, are only allowed to work in that area. For years I watch dump trucks leave my area to go 60+ miles to work because a company has under bid a job in the fore mentioned area. So you have 2 sets of trucks going to work in each others districts simply based on the lowest bidder. This is more then doubling emissions. require that contractors and brokers only use trucks from their Air District. If you want to work out of your area then you must comply with these regulations.

Second: Make a grandfather ruling for people with pre 2007 trucks. Require them to comply with a smoke test at a state approved facility every year to assure they are complying with their emissions standards for the year of engine they have BEFORE they are able to get their registration. This would put hundreds of Californians to work, they would work at the smog stations, have to go to classes to get certified which would employ teachers not to mention all of these expenses would be going to the state of California and getting hundreds of Californians off of government aide. Sound familiar? This is the same regulation that applies to older cars. You never required car owners to replace a 5 year old car just that they continue to comply with that years regulation and if they purchase a new car then it must have the latest technology.

Now on to my questions and comments.

First, as a broker. How do you expect us to keep up with and enforce these regulations? With the new proposals, you have regulation dates on top of regulation dates and "if he did this then they don't need to do that". Its too much. Every time I contact CARB I can not get a direct answer to my question. This clearly tells me that the reps on the other side of the email accounts don't understand these regulations either.

Why has northern San Bernardino County been removed from the proposed NOx area exemption list? This is a area that is largely open and under inhabited. This is also a area that is subject to high winds almost weekly. While dust is not the same as particulate matter it does cause damage to the air. Not to mention all the wind helps keep the air in the area clear.

As I stated in the beginning I am concentrating on road construction dump trucks. The state of California's infrastructure

or roads is in terrible repair in most areas. If you mandate that LOCAL construction trucks that travel more than 20000 miles a year update or retro fit you are going to have 2 problems. Problem 1: You will create a dump truck shortage which we are already on the verge of now. This will in turn drive the price of trucking road base and asphalt through the roof. Not to mention the price of the materials will go through the roof. To make asphalt you need oil. Oil comes on a truck. The oil trucks increase their pricing. Then you need aggregate that is delivered on trucks. the aggregate trucks raise their prices. All of this adds up to the State of California paying higher cost to repair roads. This means less roads can be repaired which leads to a public safety issue. 20000 miles is not enough to keep California's roads in good repair. Raise the amount of miles for Bottom Dumps, transfers, Strong Arms, etc. to at least 50000 miles a year. Problem 2: Forcing people to purchase new trucks or retro fit trucks will again require then to raise their cost of transportation.

While there seems to be some success with the retro fit filters on trucks that travel on the highway for a extended period of time there have been multiple problems with trucks that have retro fitted and work in a small radius as dump trucks do. Working in a small radius does not allow the engine to build enough heat to keep the filter clean. This causes multiple problems. One is that the truck can have a malfunction causing costly repairs and a lower supply of trucks. Next if a driver realizes that the filter is getting plugged they have been told by filter installers to get on the freeway and drive approximately 60 miles in one direction and back to clean out the filter. That a extra 120 miles per week that trucks are having to drive that is putting pm into the air not to mention wasting fuel. Keep in mind that this is on retro fitted trucks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-09 22:11:37

No Duplicates.

## **Comment 12 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tom

Last Name: Curee

Email Address: tcuree@rwitrans.com

Affiliation:

Subject: Truck and Bus Proposed Changes

Comment:

First, I would like to say I'm encouraged to see that CARB is making an effort to help Owner Operator to comply with the regulations in place. We had a number of Owner Operators who could not comply who we have lost from our fleet and we're hoping some of these changes will keep us from losing more.

In the compliance extension for owners that cannot comply, the only piece that I struggle with is that the truck must be in the fleet in 1/1/2012. I can understand why CARB is selecting that date, but we have Owner Operators who were unfamiliar with CARB so when they purchased their equipment they did not consider the regulations. We have 2 individuals specifically who have tried to get into a newer truck but can not qualify to do so because of their credit situation. I think some flexibility on the date of 1/1/2012 would be beneficial for the Owner Operators who fall past that date.

Thanks for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 07:28:36

No Duplicates.

## **Comment 13 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Pauletta

Last Name: McKamey

Email Address: uglydogtrucking@gmail.com

Affiliation: Owner Operator

Subject: CARB Requirements

Comment:

To whom it may concern,

First I would like to thank you for the extended deadlines and the ability to report and get waivers to remain compliant. We have taken every opportunity we are aware of to remain compliant and right now we are on a waiver because we were turned down twice for financing a new filter last year, so we are legal until July of this year.

My husband, David, and I are owner operators, he drives, I dispatch. We have one truck, a 48' flatbed and live in Idaho.

This truck provides for our family. We work hard; load to load, repair to repair and hope every day that we get a payment before we get another repair.

This truck feeds our family and puts a roof over our heads. I find loads for my husband and try to get the best rate or find partials to add onto loads and spend a lot of time trying to maximize my husband's time away from our family.

We have an autistic son who requires a lot of additional therapies. Finding and booking our loads and doing our paperwork allows me to make the most out of the miles my husband drives, as well as provides with with semi-flexibility to take my autistic son to his additional appointments and be available to drop what I'm doing and be right there for him whenever I am needed.

We love to run in California because it allows us to keep David close enough to home that we get to see him a couple times a month. Our favorite routes are between Salt Lake City Utah and Bakersfield California or California up to Billings Montana because it allows us to go see him for a day or 2 when he is in Salt Lake or he can stop at home on his way through to Montana. He doesn't get home very often at all.

Driving California also allows us to keep him out of the bad winter weather in the northern areas. We only have the one truck, so we are exceptionally cautious and try to stay in the safest areas we can because if we have an accident that puts our truck out of operation, we will go under.

I am afraid of what is going to happen to our business in July when we are no longer allowed to run in California. I am afraid that David will have to spend more and more time further away from our family in order to bring in the amount of money we need to operate

our truck.

I am afraid that not being able to operate in California is going to cost us our business and, even worse, our family.

I would love the opportunity to continue running our truck in California until it no longer runs and at that point replacing it with a newer truck that is compliant. We do our best to do any required maintenance and lots of preventive maintenance to ensure that our truck runs as clean and efficient as possible. If it burns extra fuel, it costs us money so we try to take every precaution to keep it in top-running condition.

Thank you so much for your time in listening to my concern. I know this is a concern for others, as well, as this really does affect small companies and has the potential to put many of us out of business.

Sincerely,  
Pauletta Mckamey  
Ugly Dog Enterprises  
(208)251-7995

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 08:11:16

No Duplicates.

## **Comment 14 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Gary

Last Name: Galindo

Email Address: gdgalindo@petersonpower.com

Affiliation: Peterson Trucks/ Peterson caterpillar

Subject: Upset about the possibility of extending phase in of NON Compliant on-highway trucks

Comment:

I am reading that CARB is considering extending the dates for people that are still non compliant. That is not only unfair to the Truckers that have paid attention and worked hard to be compliant, but you are placing installers in a very difficult position also. First off we have been trying to keep these folks current with all the changes that have been going on, and explaining to them in good conscience we can only tell them what is current today. When CARB changed the mileage for Low Use Construction vehicles I had 4 people cancel there orders, and I had product on the shelf and paid for waiting to get them installed. Now I have product that we have purchased and need to find a home for. Then to add one more point to that thought, back in Dec when a customer called to cancel he told me that he was told by someone at CARB that I should have told him, and implied that I was taking advantage of him. Now with the implementation of the Good Faith Agreement I have a large number of these DPF's waiting for people to get installed, how many of those people do I expect to cancel as well. This latest issue only confirms ALL the speculation that CARB could not get this done to start with, and that is why people have done nothing. The economy is only part of the issue, the non commitment from staff is the other issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 10:01:52

No Duplicates.



## **Comment 15 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Raymond

Last Name: Fry

Email Address: Raymond.fry@verizon.net

Affiliation:

Subject: Small fleet lighter trucks

Comment:

These changes seem to apply to the heavier trucks only. I'm classified as a small fleet but under the GVW of 26,000 lbs. Based on the year of my trucks I am going to be required to upgrade both of my trucks to 2010 engines starting Jan1,2015. Do any of these changes help me? Lighter weight truck owners are in just as much of a financial bind as the heavier truck owners. What are my options for extensions or help if I can't get financing? Is there extensions I can get on compliance to upgrade one truck and then the next the following year?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 17:27:15

No Duplicates.

## **Comment 16 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dennis

Last Name: Kirwan

Email Address: dennis@geoagg.net

Affiliation:

Subject: Recommendations

Comment:

I understand the driving force behind the new regulations. Time and money are the two major factors that make it impractical to comply even for companies like ours that has made every effort possible to comply. With all the economic slowdown and increased regulation coming from business owners from every angle, the financial resources are not there to do what is being asked. My recommendation is more time than what is even being proposed. This will get the filter manufacturers more time to continue to debug their products, and truck owners to more time to integrate their fleets financially.

The current generation of filters are not reliable and our burning more fuel as well as reducing engine power. The down time and shop time is crazy. The manufacturers are not ready no matter what they say.

We run a very clean operation with 12 trucks currently. We have gotten rid of all the trucks and off-road tractors we possibly can to still function, but there is just no way we can spend 14k to 20k per truck to get a few more years. We have used Moyer \$ and have purchased as late a model trucks as we can financially pencil out. Replacing trucks at a minimum of 200k/truck is just not in financial cards either.

There is a lot of unintended consequences with these regulations being so aggressive.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 17:25:10

No Duplicates.

## **Comment 17 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltrucking.com

Affiliation: F & L Farms Trucking Inc.

Subject: Changes to the rule

Comment:

To Members of California Air Recourses board.

I disagree with parts of your modifications to the Truck and Bus rule.

The allowing of individuals/companies that cannot qualify for loans for new trucks or filters is unfair to those who took the initiative to comply with the rule. These individuals are the ones that keep pricing down for the balance of industry. They do that by not having the initial investment into the industry. They run without payments and owner operators do not pay workers comprehensive insurance. They run substandard equipment that is unsafe for the highway. I believe that these operators are approximately 20-25% of the industry.

Why should these operators get a pass when the majority of the industry, (75%) has spent hard earned money on updated equipment?

This is unacceptable! These people are protesting when they should have been involved years ago! They knew this was coming, they should have planned ahead. Do you really think they will save money for a truck purchase? I doubt it, they live paycheck to paycheck. Their inability to plan for the future should not affect those who have.

It is too late to do this type of change to the rule. This has been a large mistake from the beginning. This will make it worse. Enforcement is where the focus should be. How will you enforce this? I can make my company not qualify for a loan if I want. So can anyone else.

If modifications to the timeline are changed, owners who purchased trucks/filtered units, should be able to operate them for a longer period. The 2023 end date for 07-09' engine model year trucks should be extended. These trucks last for at least 20 years those units should be able to have a useful life of that time period. Why should those who put filters on get more time and people who purchased the first generation filtered trucks be not be given more time. Many operators have purchased those units or will be able to purchase those to come into compliance. Why make the market for purchasing compliant trucks smaller?

Here is everything in a nutshell. If you haven't complied or on a path to compliance, you will never comply.

Chris Torres,

President,  
F & L Farms Trucking Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-10 20:54:20

No Duplicates.

## **Comment 18 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jesse

Last Name: Alcaraz

Email Address: jesse@alcaraztransportation.com

Affiliation:

Subject: Proposed Amendments

Comment:

Esteemed members, Please consider the impact that the Emission Reduction Regulation has caused small companies like mine. I had to sell two perfectly working trucks for peanuts to follow the existing deadlines and be in compliance. One of those said trucks had just had a complete engine overhaul that cost more than I was able to sell it for. I was forced to go out and get into debt by buying two trucks that met the requirements set forth by your decisions. Said trucks are 2010 models with 2009 engines that according to your rules will only be good until 2023. I looked everywhere for 2011 trucks with 2010 engines that would be in full compliance without time limits but lack of inventory and funds did not allow for that. I was not able to get any grants to help with my purchases so I had to flip the bill alone. I settled for the best available option under the circumstances. This I did in a time when the economy is still not yet recovered, therefore risking going out of business and even possibly bankruptcy. So to hear that now more changes are being considered that would delay compliance, is a slap in the face to people like me that followed the rules and sacrificed so much to comply. If you change the rules of the game again, you will be sending a message that tells people that if they procrastinate and ignore rules and regulations, they can be rewarded for doing so. You made the laws, you gave people time to comply, you said "If you want to play you have to pay", now stick to those decisions and let the chips fall where they may. I am bitter that I did what I was supposed to at a very high price, and others will get to continue to stay in the game because they ignored your warnings. I do not need to be recognized for complying on time, as your proposed actions state, I want you to follow through and stop waffling about this once and for all. This is people's livelihoods that you are messing with. Please be respectful of that. Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-11 09:08:54

No Duplicates.

## **Comment 19 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jeff

Last Name: Hartman

Email Address: jeffh@dieselexhaust.us

Affiliation: Diesel Exhaust & Emissions, LLC

Subject: On road Compliance/Good faith Extension

Comment:

We are an installer of DPF system and have been doing so for over 7 years. We assisted many owner operators getting their Good faith Extension by making deposits and committing to installing a DPF with us.

Now that ARB appears to be "Back Peddling" everyone is wanting their deposit back, cancelling their order and not showing up for scheduled installs. We have over \$500,000 filters in stock and more on order. Owner operators are saying they don't have to comply because of financing, low miles, or just that they feel this is never going to be enforced so why spend any money. CARB needs to act now and clarify the rules and enforce them.

Regards,

Jeff

VP Sales

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-11 15:41:58

No Duplicates.

## **Comment 20 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Daniel

Last Name: Palmer

Email Address: Dan@danpalmertrucking.com

Affiliation: Dan Palmer Trucking Inc

Subject: changes to ruling

Comment:

Members of the board.

For the last four years we have planned for this carb ruling, now your telling me this is all in vain, I had a fleet of well maintained trucks that I have had to sell out of state to comply with this carb ruling. I never have believed in this ruling but I complied with it and now I have a Company heavy in debt that had no debt. As a broker your telling me I can't work trucks that have not complied now what are you telling me? I realize that your job is not to worry about the health of the trucking Industry ,but to those of us that had stood up to the plate and did what they they had to do are the very ones your going hurt if you extend the ruling.

Dan Palmer

Owner/President

Dan Palmer Trucking Inc

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 07:29:43

No Duplicates.

## **Comment 21 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Timothy

Last Name: Brown

Email Address: brntrkg@gmail.com

Affiliation:

Subject: Proposed admendments to CARB Truck and Bus Regulations

Comment:

Hello C.A.R.B., First of all let me say I am very disappointed in the way CARB has handle the Truck and Bus Regulation. As you well know the business climate in CA. has been dismal the last 6 or 7 years, and as a single heavy truck owner its been tough going, but wanting to comply with the new regs, I was reluctantly willing to my part. So in Dec. 2013 I had a DPF installed at a cost of over 20K. Also there was no funding available in my air district even though it continues to remain a Nox restricted area, so the install was all out pocket for my business. My complaint with CARB is that you keep extending compliance deadlines and changing the regs and many truck owners taking advantage of this and not putting there equipment in compliance while I have, putting me at a financial disadvantage and try to compete for business! Your proposed changes says that CARB is planning to give credits for early compliance giving truck owners till 1/01/2023 for final compliance, well hello! your not giving me anything as I took the small fleet option for single truck owners and I already have till 2023 for final compliance! How about giving some of the cost of filter back to the small fleets so we can stay in business! If CARB does go through with the new changes I plan to join a class action lawsuit against CARB for financial degregation to my business which hundreds of truckers statewide have already signed on to.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 09:47:26

No Duplicates.



## **Comment 22 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Adam

Last Name: Doss

Email Address: adam@dosstrucking.com

Affiliation: Rich Doss, Inc.

Subject: Market Correction Looming. Freight Down Costs Up

Comment:

Our company has spent over \$6m in equipment (\$600k from CARB) in the last 4 years to be compliant. Currently due to the new costs our margins are as tight as they have ever been and they will get worse if the economy turns.

In the General Transportation market, increasing volume since 2009 has made the CARB program work for the most part. But at some point the economy will adjust, we believe this is beginning. If the rules are less punitive or extended, companies who did what was required WILL be forced out of business.

What a shame it would be if companies that followed the program went bankrupt and those who waited until the last minute or pushed the non-compliance route were able to get compliant equipment on the cheap.

We believe in this program because we are young owners (35-39), we have children and we want California to be a better place. But we believe that the market will only be stabilized and competitive if everyone follows the same rules. To accomplish this goal - CARB needs to follow its original agenda and not change anything except up enforcement.

Thank you,

Adam R. Doss

adam@dosstrucking.com

800-654-7200 &#8729; 707-584-0952 Fax

707-584-9500 &#8729; 707-974-3006 Cell

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 11:21:32

No Duplicates.

## **Comment 23 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Terry  
Last Name: Klenske  
Email Address: terry@daltontrucking.com  
Affiliation: Dalton Trucking, Inc.

Subject: Out of State Use  
Comment:

We have received CARB grants for 50 trucks. When we originally purchased these trucks we believed that we could operate them 100% in California. Changes in our business mix are now forcing us to run these units up to 30% out of state (Las Vegas/Phoenix). We need the new business to keep our drivers busy and make those \$2,200 monthly truck payments.

We are asking that 25% interstate miles or 30% interstate loads be accepted on CARB grant trucks. Could you please address this issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 16:27:33

No Duplicates.

## **Comment 24 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron  
Last Name: Landsburg  
Email Address: landsburgs@gmail.com  
Affiliation:

Subject: On-Road Diesel Proposed Amendment  
Comment:

Comments:  
Section (d) Definitions Item #5 Agriculture Operations  
Sub-Section B Appendix A-4

The last sentence should be deleted or reworded for the following reasons.

The trees harvested before someone decides to convert that area to another use have been a farm crop for as old as the trees are at time of harvest. The forest operations are simply the harvesting of the last crop I agree anything "after" the tree harvest & CalFire slash clean-up is not part of the farm operation. Up to that point, is in my opinion, an agriculture operation and should be defined as such.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 18:39:15

No Duplicates.

## **Comment 25 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron  
Last Name: Landsburg  
Email Address: landsburgs@gmail.com  
Affiliation:

Subject: On-Road Diesel Proposed Amendment  
Comment:

Comments: Section (d) Definitions

Item 6 Agriculture Vehicle

Sub-item (D) Page Appendix 5

THIRD SENTENCE should read:

It also includes water trucks "OR" (not and) trucks designed or modified to be used exclusively for the dusting, spraying, fertilizing, or seeding of crops.

Supporting clauses include:

(1) Section (d) definitions Item (26) Farm Sub-Item (A)  
Page Appendix A8 Specifically states forestry is Farm

(2) Section (d) Definitions Item (40) "Low-use Vehicle"  
Sub-Section (B) Page Appendix A-11

Very few water trucks in farming or (forestry) operate over 5,000 miles.

(3) Section (d) Definitions Item (55) "specialty agriculture vehicle" Sub-Section C page Appendix A-13

This should read: A truck equipped with a water tank owned by a farmer or his contractor, not operated for uses with compensation coming from non agriculture operations that provides dust suppression on dirt roads providing access to agriculture operations OR (not and) for the transportation of water for croop or tree irrigation or for livestock.

As a side note, Calif. rural dirt roads contain various amounts of serpentine road base rock that when not watered to abate dust can cause airborne cancer causing asbestos air pollution. That in itself to me is an incentive to encourage their use even if some diesel particulate is released. Who can say for any specific person which pollution is more deadly.

PLEASE INCLUDE WATER TRUCKS IN FORESTRY & FARMING AS LOW USE EXEMPT VEHICLES IF OPERATED LESS THAN 5,000 MILES PER YEAR.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-12 18:39:15

No Duplicates.

## **Comment 26 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Northwest Excavating, Inc

Subject: Appendix A Concerns and Suggestions

Comment:

Please open the attachment to read my comments regarding the On Road Diesel Proposals.

Thank you

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-truckbus14-BWRSJANyU2UGbgdj.pdf'

Original File Name: Appendix A Online Comment.pdf

Date and Time Comment Was Submitted: 2014-03-13 06:16:48

No Duplicates.

## **Comment 27 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: jim

Last Name: r

Email Address: NETTYJIM99@YAHOO.COM

Affiliation:

Subject: enforce

Comment:

HEY EVERYONE I UPGRADED TO A 2013 TRUCK WITH A BK ON MY CREDIT SO  
DONT TELL ME YOU CANT QUALIFY THE PEOPLE WHO DON'T UPGRADE THERE  
EQUIPMENT KEEP ALL ARE RATES DOWN THATS WHY WE NEED THE OLDER  
TRUCKS GONE SO WE CAN START CHARGING MORE WHAT WERE WORTH SO PLEASE  
DONT GIVE ANY MORE EXTENSIONS

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-15 21:18:46

No Duplicates.

## **Comment 28 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dennis

Last Name: Elings

Email Address: Nobleagleinc@aol.com

Affiliation:

Subject: PM filter requirement

Comment:

I have been turned down for a loan on a PM filter and am trying to get the money saved up to buy one and have been working with a dealer to purchase one. If this proposal would pass and allow me to save this money from buying the PM Filter now I could purchase a newer truck in a couple years or so. I have had to rebuilt the engine in my truck and still working that off, so not having to buy the PM Filter right now, that would be close to 20,000 more toward a new truck. I dont run into California on a regular route as probably most of the older trucks do. Thank you for your consideration in the matter.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-16 18:22:14

No Duplicates.

## **Comment 29 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Steve

Last Name: Grenon

Email Address: steve@nemove.com

Affiliation: Stevens Worldwide Van Lines

Subject: Carb requirements

Comment:

I have 9 tractors and 15 trailers a small moving and storage agent for Stevens Worldwide Van Lines. I have 2009 Carb compliant ,2007 Volvo with 400,000 miles not compliant,2 2005 Volvos with 500,000miles not compliant,2004 Freightliner with 700,000miles a 2001 with 750,000miles 2 2000 with 750,000miles. My agency is in the Boston Ma.area I would only think of sending my 2009,2007,and 2005's tractors across the country to your state. I think if there was a mileage on the tractor or a larger annual mileage number in your state. My small agency would be able to do more work in the state of California.Thank-You for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-17 15:56:29

No Duplicates.



## **Comment 30 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: frank

Last Name: roche

Email Address: courtney@rocheoil.com

Affiliation:

Subject: retro fit and factory installed PM Filters

Comment:

We have encountered many problems with PM Filters on a retrofit Purifilter installed on our 2002 Kenworth. Once a month we have to have it taken down and do the bake. It's not free. Our 2010 Kenworth has to be taken down about every other month. We purchased a 2014 truck in September 2013. We would like to see an extension of the deadlines because we will be burdrned by heavy debt due to these regs. We have been in business since 1963 and WE DO NOT WANT TO CLOSE BECAUSE OF THE REGULATIONS.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-18 10:03:16

No Duplicates.

## **Comment 31 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Brett

Last Name: Flonnoy

Email Address: brettflonnoytrucking@gmail.com

Affiliation:

Subject: Proposed changes

Comment:

To whom it may concern:

We all need more time to comply to the new rules not just the rural areas. If you make the new phase in rules for all California trucks that would give all time to meet the requirements. This, I feel, would show your concern not only for the environment but also the citizens and small business owners of California trying to feed their families. Please consider expanding your proposed changes to include all areas. We are trying our best to meet your requirements.

Thank you. Brett Flonnoy

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-18 11:40:31

No Duplicates.

## **Comment 32 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: willard

Last Name: Schoellerman

Email Address: w.schoellerman@forestlakechristian.org

Affiliation:

Subject: amendment to CARB regulations

Comment:

I support the proposed amendment to the regulation to reduce emissions for diesel trucks and buses in Nevada County. Nevada County is rural and lightly populated in the Sierra Nevada foothills that has not recovered economically from the recession.

I operate a private Christian school in Nevada County and we operate four bus routes which travel an average of ten thousand miles per school year to pick up students. Because of the recession, our enrollment has dropped from 730 students to 420 students. Due to the age of our bus fleet, they do not qualify for the allowed retrofits to our engines. Because of the economic hardships we are experiencing, it would be impossible for us to upgrade our buses under the present regulations. Therefore I urge the support of this amendment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-19 09:01:40

No Duplicates.

## **Comment 33 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: James  
Last Name: Enstrom  
Email Address: jenstrom@ucla.edu  
Affiliation: University of California, Los Angeles

Subject: Scientific Misconduct Invalidates Truck and Bus Regulation  
Comment:

March 19, 2014

Dear CARB Members,

Please read my attached document "Scientific Misconduct in Fine Particulate Matter Epidemiology by Dr. C. Arden Pope, III, in Collaboration with Drs. Daniel Krewski, Michael Jerrett, and Richard Burnett, with the Complete Cooperation of the American Cancer Society." This detailed evidence of research misconduct by CARB Scientific Advisor C. Arden Pope, III, invalidates CARB's public health justification for the Truck and Bus Regulation. The currently proposed amendments are insufficient and temporary. The entire Truck and Bus Regulation should be suspended, unless Dr. Pope can refute my evidence of scientific misconduct.

Thank you very much for your consideration.

James E. Enstrom, Ph.D., M.P.H.  
UCLA School of Public Health and  
Scientific Integrity Institute  
jenstrom@ucla.edu

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-truckbus14-ViUCZwZuUmQHb1Qg.pdf'

Original File Name: Scientific Misconduct by Pope re PM2.5 Epidemiology 111513.pdf

Date and Time Comment Was Submitted: 2014-03-19 13:18:32

No Duplicates.

## **Comment 34 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Steven

Last Name: Bell

Email Address: oceanswest50@yahoo.com

Affiliation:

Subject: extention for trucking companies with bad credit?

Comment:

Hello,

I own a trucking company and I have a problem with you thinking about extending the length of time for trucking companies that have bad credit or can not get a newer truck due to poor credit. I have been in this industry for a very long time. If these trucking companies have bad credit there is a reason for this. I have seen during the economic boom many owners of companies go out and buy two three and maybe four homes. When their housing prices went down so did they, they walked out and gave them back to the banks. They lost their credit due to the collapse of the housing boom. It's called greed. So why should you extend them credit do to there negligence on handling money? My business is on the line here now due to you changing your mines it seems on a daily basics.

Really, you say one thing, I do it, then two weeks or even months you change your minds, so I just through all that money out the window. Do you really have any idea on what you are doing to the small companies when you change your minds all the time on your rules and regulations? I mean, really!!! I am in compliant and I plan to take more money due to the new regulations, but with you extending their credit or even extending the time limit for people who knew of this change years ago, like I, you punish me for complying with your laws, Why? For example the APU's do you know what you did to me when you passed that law? I went out and bought one, an APU, for over 15000 installed. Now I can not use it do to it being outdated. Wow, that was a lot of money for a small business to be throwing out the window, but do you really care? I don't think so. You stated to pass out money for people who wanted to buy new trucks or even update their trucks. What happened to that program I ask? I'll tell you where that money went to. Here is one great example of your mismanagement, I know one company who said that he did most of his traveling in CA to be approved for a grant. Meaning he lied on his ifta miles to the state. Well he did not lie to ifta, he just changed the numbers for you, and you believed his numbers. I seen his lies because he was telling me how to do it to you. Now he goes everywhere in the country and does not do most of his miles in CA... Wow! and you did not even check to see if he had lied or not. He received 45000.00 from the Paul moyer grant. Who funded that? you? Now he has a newer truck than I that you paid for and he is laughing all the way to the bank due to your negligence on giving him money... I'm sorry, I am just a little mad at your decision to even remotely help these people who have bad credit with a bank. There is a reason for that, you think? If you can not do your job right let the people who can do the job right. Leave it to the banks on their credit, and don't give them credit for nothing. Seriously. Any problems with the things I am talking about here Please feel free to call me I can

give you all the documentation you need to show that I am not telling lie here.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-19 19:18:10

No Duplicates.

## **Comment 35 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: tony

Last Name: lopez

Email Address: tonylopez760@gmail.com

Affiliation:

Subject: new amendments

Comment:

The amendments are unfair to all of us that are being complaint in 2014 i own a small fleet and installed a filter in dec 2013, this january i got underbided for a job i did last year by a couple of noncompliant small fleet owners both havent done anything to comply with carb they have older trucks and got an extension untill july 3014 to install filters, they charged 100.dlls less per load , so its unfair to me because i am compliant and there not .and thats how they are hurting the truckers that comply

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-20 05:38:03

No Duplicates.

## **Comment 36 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: David

Last Name: Jackson

Email Address: djteach@prodigy.net

Affiliation:

Subject: CARB Regulations

Comment:

My wife and I have been in business for 25 years, and we own 5 Heavy-Duty trucks and employ 14 people. We only operate 10% of our miles in CA, but because we are a CA corporation, we have to comply with these regulations. This means we had to replace our entire fleet with newer trucks, without getting any trade-in credit. Also, we are regulated by our contractee, in IN, so we were not eligible for financial assistance to make the changeover. In addition, the speed at which the transition was required did not give truck manufacturers time to develop quality products. My trucks are in the shop for emissions related problems monthly. My repair costs have almost tripled. Your regulations along with the state increase in Workman's Comp, will probably put us out of business in the very near future. This business is (was) our retirement, but these regulations just robbed us of \$500,000. We are all for clean air, and are very concerned about climate change, but this program is a total disaster when it comes to implementation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-20 13:45:37

No Duplicates.



## **Comment 37 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: curtis

Last Name: mitchell

Email Address: curtis23569@gmail.com

Affiliation: 1 truck owner operator

Subject: proposed rule changes

Comment:

I am against any rule changes this late in the game. Everyone in this business, owner operators like my self or large carriers have known about these regulations for some time now. After spending \$18,000 retro fitting my truck carb is going to allow others to continue to operate without upgrading there equipment. How will that help the air quality? If they can't qualify for loans or pay for the upgrades, how can they maintain there equipment. Let the rules stand. No more extensions. no more grants. Enforce the rules. If the rules change, does that mean I can remove my dpf?? Im sure the answer is NO! So how is that fair? I have been in this business since 1975 and have seen a lot of changes. On your next commute, look at the trucks this rule change will help. They belch smoke everytime the throttle is applied. Then look at the condition of the equipment. Do you want your family behind or beside that truck? Think about it. Let the rules stand and start enforcement!! I am complaint. ...trucrs id 25498

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-20 19:30:46

No Duplicates.

## **Comment 38 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Norma

Last Name: Contreras

Email Address: Normacontreras92@gmail.com

Affiliation:

Subject: important

Comment:

As a California citizen it is important to me to see, smell, and feel less pollution in our cities. But i also know that many people rely on the sevicees and jobs most diesel vehicles give. I personally had relied many years on the work my father has as a truck driver. And i am not the only child with parents in that sort of business. So i beleive some type of extention is a fair for all those families that cant afford to change their trucks just yet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-21 19:03:41

No Duplicates.

## **Comment 39 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bill

Last Name: Brandenburg

Email Address: bill@melolandcattle.com

Affiliation: California Cattlemen's Assoc.

Subject: Livestock Truck Exemption

Comment:

I support the exemptions being proposed for livestock haulers especially the removal of the 2500 limit for the ag specialty vehicles. There are many out of state haulers that will not come into California due to our diesel rule. We have a dire situation in Imperial County with the impending closure of National Beef and the loss of our processing capacity that will require us to send cattle to Texas or Kansas. There are not enough trucks to haul the volume of cattle that will be needed so we need out of state truckers to help.

This exemption will also greatly help the many seasonal haulers in California that cannot afford to make the upgrade due to the limited mileage they use their trucks each year.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-22 05:55:20

No Duplicates.

## **Comment 40 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Nancy

Last Name: Williams

Email Address: gwilliamsranch@aol.com

Affiliation: Williams Livestock

Subject: Diesel Trucks. Truckbus14.

Comment:

We are a ranching family trying to make a living . We have one truck to haul our cattle to pasture and auction yard. We can not operate with the Truck and Bus regulation. Please consider the new proposed amendment for Livestock Haulers in the ARB Diesel Truck and Bus Regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-22 09:28:42

No Duplicates.

## **Comment 41 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Kazoua

Last Name: Cha

Email Address: kazoua@aol.com

Affiliation: Grinestaff & Cha, APC

Subject: Adoption of Amendments to Truck and Bus Regulation(s)

Comment:

Please see attached letter. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-truckbus14-WzdVfgdlBzVWIgFj.pdf'

Original File Name: I-CARB.3.21.14.pdf

Date and Time Comment Was Submitted: 2014-03-22 13:25:09

No Duplicates.

## **Comment 42 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: John

Last Name: Hay

Email Address: johnhay223@yahoo.com

Affiliation: Hay Brothers Sheep Co.

Subject: Proposed amendment to the diesell emission regulations

Comment:

This extension of the diesel emissions regulation is incredibly important to livestock producers who own and operate a small number of trucks to aid in the moving of their livestock especially sheep. With this extension it will allow sufficient time to fully depreciate existing trucks and allow for recapitalization of newer units in a more timely manner. This extension also has a huge benefit on a drought year where producers are moving more livestock based on limited forage and trying to retain as many producing females as possible. With the drought in mind and many producers having to sell off large percentages of their cow herds, it would be incredibly hard to reinvest in a truck when they will have to reinvest in their herds.

John Hay

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-24 07:17:49

No Duplicates.

## **Comment 43 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: nina

Last Name: fike

Email Address: nina.fike@yahoo.com

Affiliation: truckers wife

Subject: retrofit filters

Comment:

I am having a very hard time believing that the arb laws have changed now. We are a single owner operator that went in debt purchasing a \$16,000.00 filter before the jan. 1, 2014 deadline. Now we are hearing that there has been an extension & we went in debt for nothing. I call Bull s---!!!!!! We are all feeling extremely violated. Just because we were able to qualify for a loan because we pay our bills doesn't mean we wanted to go into debt for something that the next guy, still running the same roads as those of us are, isn't effected by. It makes me want to sit down and cry. We feel like we have been scammed out of money that isn't easy to come by these days. SHAME ON YOU ARB!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-24 22:12:45

No Duplicates.

## **Comment 44 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Stewart

Last Name: Jabbusch

Email Address: stujab@yahoo.com

Affiliation:

Subject: Proposed New CARB Regulations

Comment:

Hello. As a single owner operator with a 2006 engine from Vancouver BC, I am very happy to read about the new regulations. I am 100% behind cleaner air. I began traveling to your state in 1985 and do remember the smog. But being from out of state, that does not allow me to qualify for any Grants to upgrade my truck. My truck only has around 450000 miles on it and is kept in excellent condition so that I can get the maximum fuel efficiency from it. I also have a APS installed to be able to idle and be compliant. The new proposal will allow me to save up a higher down payment for a new truck. I cannot qualify for a loan due to my bad credit, a result from a divorce and the down turn in the economy. The proposal would allow me to keep operating for my long time customers. It is well known that the new trucks cost a lot more to operate with all the clean air technology. But I do have a question. Why isn't my truck allowed on a Port ? It makes no sense that my truck is compliant for the entire State, but not in a Port. Will this change ?

Thank you for the opportunity to comment on this.

Regards

Stewart Jabbusch

S Jabbusch Transport Ltd

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 10:41:00

No Duplicates.



## **Comment 45 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Larry

Last Name: Brown

Email Address: trading\_hands@Yahoo.com

Affiliation:

Subject: Plasma Generator-CARB approved

Comment:

Greetings. Yes I would like to put this CARB approved device on my 2000 12.7liter diesel engine powered class 8 truck, to meet the California emissions requirement. These devices are about \$9,000(not installed), and manufactured in Washington state. They can be installed at a "Certified" location in Livermore,Ca.for additional costs. This device is proven to greatly reduce emissions while improving fuel mileage in class 8 trucks. I'm sure CARB is aware of the statistics of this product. I would like to know if CARB will force me to install any other device ie,(emissions covertor/emissions muffler etc.), for the additional cost of \$15,000 to 19,000. Which, by the way has an added cost associated with it in yearly,(if not sooner),device issues. The Plasma Generator does not have any similar issues associated with it's functioning. Please let me know if you need additional info. on this generator that I'm speaking of. I will give you their address.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 11:37:21

No Duplicates.

## **Comment 46 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Debbie

Last Name: Ferrari

Email Address: dferrari@magtrucking.com

Affiliation:

Subject: CARB New Proposed Rules

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-truckbus14-WzhSNVQnVmcEXQBu.docx'

Original File Name: carb new propsed rules.docx

Date and Time Comment Was Submitted: 2014-03-25 14:24:20

No Duplicates.

## **Comment 47 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joe

Last Name: Stafford

Email Address: nvtruckdriver@gmail.com

Affiliation:

Subject: Carb rules end me traveling to California!

Comment:

I would like to make a quick comment to the people who run the CARB rules in California. I own a pre 2007 truck that I paid \$60,000.00 for. I run flatbed freight and would run in California around 4 or 5 times a year. Your rules have ended any trucking into California for me. This ends any fuel purchases and ifta tax, any purchases to any truck stops, any meals, any tips, any type of spending CASH in your state. I did not know California was so well off that they don't need outside business. You people act like we are all Millionaires out here. We are NOT! My truck is Legal to the year model built, and your rules tells me it isn't! This is Unconstitutional! You go ahead and keep your Commie rules, I have torn your crummy state out of my map, and will never go there again! Remember NOT ONE CENT MORE SPENT BY ME in your state!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 15:11:39

No Duplicates.

## **Comment 48 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Leo

Last Name: Nizynski

Email Address: elsexpress@hotmail.com

Affiliation:

Subject: Really Again

Comment:

I'm getting sick and tired of these extensions, companies are buying not CARB compliant trucks cheap and going into your state. I invested my money to be CARB compliant and traded in my truck that was fine just to be legal and you pull this stuff. If there will be a extension and this JOKE called CARB doesn't stick with there rules no body will take you serious. I will be watching and listening what happens, START HANDING OUT FINES and the people will upgrade there truck, Don't be threatened into there will be a shortage of trucks. Any questions call me I will talk and know where most of the illegal trucks hang out. Since they laugh at me that I changed my truck to your rules that CARB doesn't uphold. Thank you for having me throw \$145000 in the garbage.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 15:39:45

No Duplicates.

## **Comment 49 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: darrel

Last Name: hohenberger

Email Address: dhohenberger1@yahoo.com

Affiliation: owner operator

Subject: please reverse these extremely burdensome rules about emmissions

Comment:

I grew up in Cali, my whole family is in Cali and I like hauling produce out of Cali. With these new rules about emissions I have been forced to stay away from my family and stop hauling the produce I love. My truck gets 8.2 Mpg avg. It is kenworth 2006. If I put an after treatment on it it will kill my stellar mpg and kill performance. Fuel economy is paramount to me since I pay for my own fuel. This truck burns very clean, no soot out of the stacks no matter how I push on the throttle. I will not put an aftreatment on my truck. Period. I will remain out of state until this requirement is changed. I must say, I don't miss the roads in Cali they are horrendous compared to the rest of the country, FYI. The Cali economy will be sad without people like me.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 16:51:58

No Duplicates.

## **Comment 50 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: lynne

Last Name: welsh

Email Address: lawelsh64@yahoo.com

Affiliation: owner operator

Subject: this will kill the california economy

Comment:

I haul everything from produce to electronics out of California. I have not been back since the beginning of this year since my truck has been "deemed" an exesive polluter based only on the model year. That is ludacris. I maintain my truck perfectly and have no soot come out of my pipe, even when its cold. California is in a sad state of affairs and this isn't helping the situation at all. It just seems like the rich are trying to push out the poor by raising the price on all the goods since everything will end up costing more at the store because only a select few trucks can cross your state lines ,i used to run over 10k a year in your state,not anymore, change your rules, please. Seems like politics as uaual. The system is broken. Its very clear. Remember grapes of wrath? Truckers are now the farmworker that were being treated unfairly in that book. California is no longer the proletariat. Its is the oppressor.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 17:07:52

No Duplicates.

## **Comment 51 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Christopher

Last Name: Scott

Email Address: Westernheavyhaul@gmail.com

Affiliation:

Subject: Proposed rule changes

Comment:

Thank you for this new proposed rule that gives Small fleet a chance at survival. I have a small fleet of 3 trucks. I did replace 1 truck last year to stay in compliance, but with the slow economy I can't figure how I can afford to take on a second new truck payment by years end and still stay somewhat profitable in business. Down sizing would put my contract in jeopardy by not being able to fulfill my customers demand as well as put one of my drivers out of a job. I am a California based carrier but predominately run freight out of CA to the Midwest and back . That being said there are no programs that I am qualified for to receive any grants for truck replacement or retrofits . This proposed rule change alleviates a lot of pressure and gives me ( a small business guy) a chance to stay compliant , in business and not jump in debt over my head to fast. Clean air is in mines and hopefully everyone's best interest. Please keep in mind while the decision is made to enforce the new proposed rule small businesses are a driving force of the economy and in order to compete with large fleets, we need added help keeping up with compliance of the new carb rule.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 21:45:37

No Duplicates.

## **Comment 52 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Brian

Last Name: Jordan

Email Address: Bejordantrucking@aol.com

Affiliation:

Subject: Carb Proposed rule change

Comment:

I would like to take this time to say Thank You for the new proposed rules. As a small fleet owner with two trucks the new rules will still allow me to provide for my family and save up to do the retrofit and to be able to provide uninterrupted service to my customers. I have a California based business whose fleet travel out of the state. I do not qualify for any grants for the retrofit nor can I afford to purchase another truck in order to stay in compliance with the current rule. So please hear me when I say that this new proposed rule will allow all small fleet business to keep up with the new carb rule while still trying to provide for their families. The retro fit is not cheap nor is financing a new truck, but adding an extra year to phase in will allow room for savings for the retro and /or a new truck.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 22:37:56

No Duplicates.



## **Comment 53 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: charles

Last Name: donelson

Email Address: charlie.donelson2@gmail.com

Affiliation: C and S Donelson Trucking

Subject: Ca.Carb rule

Comment:

I was denied a permit to run to the Bakersfield area which I have been doing for the last 12 years. I do this run taking NUTS back to the Southeast and it was pretty good for me. I never applied for a loan for a filter that gets over 1200 degrees and sits right beside my fuel tank for obvious reasons. That being obvious, I don't feel I need to put a filter that would be a financial burden on my ONE truck Company just to come into the state. I will be dropping my permits to Ca. in July with my tag renewal. I`m also hoping that with so many of us dropping Ca. that our taxes also don't go to Ca. for road repairs, etc....I feel that all of us have a Right To Work and that if Ca. considers themselves too SPECIAL for the working class people now that I cn find WORK in other areas..Charlie D.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 05:35:31

No Duplicates.

## **Comment 54 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: David

Last Name: Grande

Email Address: materialtransportinc@gmail.com

Affiliation:

Subject: Truck and Bus Extension

Comment:

Ladies and Gentlemen.

My comment is directed to the possible 2018 Truck and Bus extension for individuals that were denied credit for the purchase of a new/used replacement vehicles or DEF systems.

Many owner operators and fleets have already taken a financial risk by upgrading trucks, or purchasing filters to be in compliance by the deadline already in place. I am a owner operator that took advantage of grant funding to replace my truck two years before the deadline, with the assistance of a SCAQMD grant I was able to also qualify for the state financing program that was available for early compliance. Of course, many of us are paying absorbent interest rates on new equipment financing or we too would not have been approved. One of the decision factors for purchasing new equipment was the potential increase in demand for operators in compliance, an advantage in order to afford the new trucks. If the decision is made to grant a extension to 2018 for those who waited til the 11th hour for CARB to bend the rule, they will now have the competitive advantage. Those of us with the \$2-\$3K per month truck payment per vehicle will be at an unfair disadvantage for complying to the CARB rulings as defined. Enforce the rules CARB has mandated or rescind them completely.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 08:55:54

No Duplicates.

## **Comment 55 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tina

Last Name: Pastore

Email Address: treagle@chipmancorp.com

Affiliation:

Subject: Proposed change to the CARB rule affective Jan 1, 2014

Comment:

How many drivers who really couldn't afford to buy a newer truck went out and bought one, when they could've waited til maybe they were in a better financial position. And these newer tractors, 2008-2011 not only do the drivers have a monthly payment for them, but they are having monthly or maybe even weekly repairs on them due to the filters installed not working properly. It appears that not all of the problems that the installed PM filters are causing were worked out before the tractors started being sold. Is there any compensation to these drivers. How many drivers decided to quit trucking because of this law. Why is this proposal happening now and not before the end of the year. Why wasn't all the ramifications thought of when the millions of dollars were spent to start this whole process. It isn't really even being enforced, certainly not at any scales or port of entrys. Drivers could've just kept their older tractors and have no problem getting in to CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 11:10:27

No Duplicates.

## **Comment 56 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: scott

Last Name: geertsen

Email Address: scottagitruking@gmail.com

Affiliation:

Subject: carb

Comment:

I can understand the need to clean the air. i try to do this best possible way i can i do not idle i keep truck in the best of shape. I own one truck one trailor and there is no way i can swing a newer truck now rates have been down fuel prices high and dose not seem to be improving. With all the maintance problems of the newer trucks it would just be a matter of time before i lost the truck. Over the years i have spent a fair amount of money in cail. seems to always be some good deals on trucking equipment that i will miss but realy the only option i have is to by pass the state that will make me sad ( best truck wash ) in usa. your web page is great i have recived anwsers to my questions in one day that i did apperiate. one last thought my kw gets 4.9 mpg at 55 mph always in low gear at 65 mph i get 5.7 higher gear this dose change with different loads that is average. any way hope things work out like the state wants and thanks for the time to rant a little scott

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 13:49:12

No Duplicates.

## **Comment 57 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Brad

Last Name: Reader

Email Address: boebrad@sbcglobal.net

Affiliation: Owner/operator

Subject: Putting me out of business!!!

Comment:

Very simply, these CARB regulations will put me out of business. I am running only one truck and that is a 1988 Pete. I work in the construction industry hauling any kind of equipment and building products I can. As it stands, I can not make my truck compliant due to its age. I can not afford to repower my truck. I can not afford to buy a compliant truck. Unless CARB backs off the requirement for my truck to be compliant by 2015, I will be out of business. I will be back in foreclosure on my house (already filed Ch. 7 two years ago to save my house) and probably loose it, ending up with my wife and I on the streets homeless. We are struggling to get by now, between the high cost of fuel, insurance and repairs to keep my truck rolling and the lack of work, thanks to even tighter building regulations in California, I am running out of options. Please help!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 14:56:10

No Duplicates.

## **Comment 58 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mark

Last Name: Cash

Email Address: dccarriersnc@aol.com

Affiliation:

Subject: Proposed Changes to Regulations

Comment:

I am a single truck owner operator that enjoys coming to your state a few times a year. The low use 1000 mile exemption just isn't enough to continue doing business in California. You have a large state and it doesn't take long to travel that many miles. When we are in your state we spend our hard earned money which I am sure helps to stimulate your economy. As an owner/operator our profit margins are not extremely high. The cost to retrofit or purchase a newer truck just doesn't make good business since. My truck gets very good fuel milage and even though it is a 2001 model I believe it is efficient as far as emmisions. I would hope you will consider raising the 1000 mile to 5000 or possibly 7500 miles.

I understand it could not be done for everyone but if you looked at allowing single truck operations only it would be helping lower the emmisions and still let the small business owner feed his family. Thanks, for the opportunity to comment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 17:32:42

No Duplicates.

## **Comment 59 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: William

Last Name: Wade

Email Address: lighthousecarriers@gmail.com

Affiliation: Owner Operator

Subject: Carb Waivers

Comment:

I'm an Owner Operator from Wisconsin who's been hauling Onions out of California for 35 years. I serve accounts in Boston, Detroit, Pittsburgh and Bronx, NY. I had been averaging 3500 miles per year in California which really doesn't justify a \$20,000 filter. I work on 10 year trade cycles, this truck is due to be traded in 2017. If you talk to any heavy duty towing company they'll tell you that these new engines aren't very reliable. The shop foreman say's the new engines have "issues" but they're "headed in the right direction" because warranty claims are down 40%. My new truck salesman John Shingen from Wisconsin Kenworth also stated that he didn't want to sell me a new truck without the extended warranty (500,000 miles@\$8500) because of these potential problems. As an Owner Operator I don't need a \$150,000 truck sitting in the shop with "issues". I've been in the produce buisness my entire life. When it's time to harvest you don't want to lose a single load because you can't get enough trucks. Let us buy some sort of temporary CARB sticker to cover the harvest. Thanks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 18:32:55

No Duplicates.

## **Comment 60 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: URSULA

Last Name: SOEMAKER

Email Address: ushoemaker@yahoo.com

Affiliation:

Subject: carb in the north state

Comment:

PLEASE CONSIDER THE DAMAGE YOUR REGULATIONS ARE DOING TO OUR ENVIRONMENT AND ECONOMY. MY BUSINESS IS SMALL, WE PRODUCE CHIPS FOR ENERGY, A PRODUCT THAT USED TO BE WASTED AND BURNED EVERY YEAR, SENDING SMOKE INTO THE ATMOSPHERE. THE PRICES WE ARE GETTING PAID ARE THE SAME PRICES PAID IN 1985, YET THE COSTS ARE 2014 COSTS, NOT 1985. NOW YOU ARE PROPOSING FORCING US TO PURCHASE NEW TRUCKS AND GETTING RID OF THE ONES THAT ARE SERVING OUR INDUSTRY VERY WELL. HOW MANY WAYS CAN MY GOVERNMENT KILL THE GOOSE THAT LAID THE GOLDEN EGG? IF IT IS REALLY A MATTER OF CUTTING EMISSIONS STATE WIDE, THEN PENALIZE THE SUV DRIVERS IN THE SOUTH WHO POLLUTE MORE THAN THE WORKING MAN UP IN THE NORTH STATE THANKS FOR YOUR TIME, IF YOU BOTHERED TO READ THIS

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 10:17:06

No Duplicates.



## **Comment 61 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Michael  
Last Name: Andreyka  
Email Address: tqmike@sbcglobal.net  
Affiliation: Tight Quarters Inc

Subject: Low milage construction trucks  
Comment:

While I like the proposed amendment to the low mileage construction truck program, I would like top see the mileage increased from 20,000 per year to 30,000.

Most dump trucks operate in this range, it would really help out companies like ours that are not only working hard to comply with this regulation, but also working on upgrading our fleet of heavy equipment.

Thanks, Mike Andreyka  
Tight Quarters Inc

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-28 06:11:42

No Duplicates.

## **Comment 62 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Robert  
Last Name: MacMullin  
Email Address: logmac@suddenlinkmail.com  
Affiliation: Associated California Loggers

Subject: On -Road Diesel Truck Rule and the New Amendments  
Comment:

Dear California Air Resources Board,

In rural California smoke exhaust from a proper and good running logging, dump truck, and or low bed truck is very minimal.

If the truck engine will pass the annual smoke test the engine emissions have minimal to no effect on our rural environment.

When the engine does not pass the smoke test, yes the engine is in need of repair or replacement.

We can plan for and achieve engine repair and or replacement. We cannot replace an entire clean burning truck. We don't have the money. Our logging and hauling season is so short the cash flow is not available to support the loan. Additionally there is no certainty the driver will be available next season.

The Carl Moyer money is not a solution.

The new amendments to your scheme do not address this issue.

Getting rid of my non polluting quality trucks because you say so, puts me out of business. This is not acceptable.

The new amendments provide no meaningful relief to your unfounded autocratic rulemaking.  
Sincerely,

Robert MacMullin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-28 11:24:38

No Duplicates.

## **Comment 63 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jesse

Last Name: Katz

Email Address: jesse@cruxstudio.com

Affiliation:

Subject: no exemption for non-commercial use?

Comment:

There should an exemption for vehicles that are not used commercially.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-29 13:04:26

No Duplicates.

## **Comment 64 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Larry

Last Name: De Jong

Email Address: dejongtrkinc@aol.com

Affiliation:

Subject: Proposed changes

Comment:

Give the small guys a break, they are the last people to here about grants and changes. Even if they were to get a grant to purchase new equipment, they can not get a loan, it will raise there operating expenses so they are unable to make a profit.

These programs wiped my equity out, I went from 17 employees to one. These little guys do not put the miles on and burn the fuel like the bigger fleets do.

Respectfully  
Larry De Jong

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 09:31:56

No Duplicates.

## **Comment 65 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron

Last Name: Smith

Email Address: smitty1957@cox.net

Affiliation:

Subject: Truck/bus rule

Comment:

I live in California but all of my miles are ran out of state. The 1000 mile exemption rule is a joke. If I was allowed 5000 mile in the state I can live with that. Myself or anyone else cannot even imagine adding a 20 thousand dollar filter to an older truck. I can't afford that, and living in this expensive state and wife with no job and three kids. My credit is ruined from a recent chapter 13 on top. Get real, people. If a small business owner runs solely out of California why not give us a life or death break !!!This is my livelihood. No truck, I don't know what I can do at todays economy to survive. Is 5000 mile or less really going to matter? What about the dirty Chinese ships coming into port daily? Do they need and upgrade too? I'm all for clean air but I can't see how 5000 miles or less versus 1000 mile is going to clean up AMERICAS air. This is all about CARB. Another government agency we can live without

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:18:06

No Duplicates.

## **Comment 66 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bill  
Last Name: Newell  
Email Address: dkliewer@fireserve.net  
Affiliation: owner

Subject: CARB law  
Comment:

I would like to comment on the CARB law that makes it illegal to operate older trucks in California.

We operate a 1996 log truck with an electronic engine. We live about 10 miles north of the Oregon/California border. While our miles operated in California vary from year to year, we generally do not run too many miles in California. From July 1, 2012 to June 30, 2013, we ran less than 3000 miles in California. We do not operate in California enough to justify installing a PM filter and certainly not enough to justify buying a newer truck.

We only operate in Modoc, Siskiyou and Del Norte counties, the three which border Oregon. We have been licensed for California ever since we bought our first truck in 1993. We think it is very unfair that after operating trucks in California for over 20 years that we are no longer welcome solely because of the model year of our truck.

We don't expect you to change the rules for us, but we would hope that you would create an exception or permit for those of us that operate only in the counties that border Oregon. These three counties are all sparsely populated and they have no pollution problems that we are aware of.

Thank you for your time,

Sincerely,

Bill Newell  
Bill and Sherry Newell and Sons  
4678 Cross Road  
Klamath Falls, OR 97603  
phone: 541 892-0455

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:18:12

No Duplicates.

## **Comment 67 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Richard

Last Name: Balch

Email Address: Bhrnch@yahoo.com

Affiliation:

Subject: Low use exemption

Comment:

I am an owner operator water truck driver and have been in the business for twenty eight years. I believe there should be a 500 hour limit as well as the 5000 mile mileage limit on water trucks. Most water trucks are retired full size class eight highway trucks running large high horsepower engines. The majority of theses trucks operate full time from eight to twelve hours a day. A few of these trucks are small dust control trucks and operate intermintantly. I burn between 40 and 70 gallons of diesel a day in my current water truck. I am upgrading to a new truck this year and if I can do it others can to. It's a financial burden but can be done. It just means no new boat or motor home for a few years. A 500 hour limit would protect those contractors that are truly useing there trucks intermintantly for dust control as well as enforce the flavor of CARB requirments for those who run large trucks on a full time basis. Attached is a photo of a 4000 gallon construction water truck.  
Thank you Richard Balch

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-truckbus14-WzJTOFMzUmZXNAYo.jpg'

Original File Name: image.jpg

Date and Time Comment Was Submitted: 2014-04-01 08:17:56

No Duplicates.

## **Comment 68 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Eli

Last Name: Amezcua

Email Address: eamezcua@magtrucking.com

Affiliation:

Subject: Proposed Changes

Comment:

I think that is not a fair policy for the people that went out and did the right thing thinking that everyone will have to obey the same rules, for working in California, but now you are changing all the rules and regulations, it's like they are getting punished with the Filter and New truck payments for doing the right thing while the other truckers were waiting for this to happen.

At least give the guys that complied with the requirements that you mandated a break by extending the expiration date for a truck with filter until they are ready to change to a new truck.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 10:13:59

No Duplicates.



## **Comment 69 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim

Last Name: Whitworth

Email Address: hbequip@yahoo.com

Affiliation: H&BEquipment Co Inc

Subject: Fairness to all trucking companies in California

Comment:

When setting the rules that we must all follow, it seems to me that total fleet yearly hours should be taken instead of mileage. I have a fleet of 15 trucks and we only run a total mileage of around 300,000 miles per year for the whole fleet. We work supporting the oilfields. All engine mfg. tell you to service your engines based on hours not mileage. Half of our miles are empty miles which uses less fuel. Our trucks are older but have fewer miles per year which means we burn less fuel, but we are held to the same standards as trucks running 150,000 miles a year each. I think it could be done a little fairer to the lower mileage fleets. Thank You for listening!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 17:12:13

No Duplicates.

## **Comment 70 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim

Last Name: Fuller

Email Address: Jamflrjr@aol.com

Affiliation:

Subject: One truck owner

Comment:

We can not afford to by new truck. I have been in the consrtruion trade for fifty years I have a ten wheel dump truck. I work on site about seven month out of year.soo let us little guy's alone.thank you Jim fuller

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 07:53:27

No Duplicates.

## **Comment 71 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mark

Last Name: Sturdevant

Email Address: msturdevant@lafreightliner.com

Affiliation: Los Angeles Freightliner

Subject: CARB Proposed Good faith loan denial extension

Comment:

Please be advised that we have had dozens of small fleets and owner operators come into our dealerships in the last few months asking for loan denial lettters. When told they need to try to buy a truck first they respond across the board "I have no intention in buying a newer truck, I just want the letter so I can get an extension".

Unless the carrier went through the finance credit approval process with our company we turned them away. There were many dealerships and lenders though that did give the fraudulent letters. There is major fraud involved with that extension provision and it will be more prevelant should you give them a 3 year additional extension beyond July as proposed. I have been told by out of state carriers that there are "finance brokers" offering loan denial letters for a cash fee, should you give that extension until 2018. You cannot allow this to pass. There are many carriers that have upgraded their trucks and would be put at a competetive disadvantage due to the increased payment liability as compared to a non-compliant carrier that recieved such an extension with their old, polluting truck. Mark Sturdevant

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 16:40:06

No Duplicates.

## **Comment 72 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Timothy  
Last Name: Trotter  
Email Address: tgtrotter@gmail.com  
Affiliation:

Subject: NPRM Changes to Truck/Bus 4-21-2014  
Comment:

Dear Board,

Attached is a small excerpt of a change to private utility vehicle involving PUC defined gas, water, and electric utility service vehicles. I would like you to add Household Goods Movers in the text. Household Goods Movers in California by order of the State Legislator are a vital need to the public and such services are to be regulated by the California Public Utilities Commission. Movers are less advantaged in representation and economic impact than other PUC regulated utilities in the Truck Bus rules. The majority of over the road movers are single truck sole proprietors. Movers travel far less miles and frequency compared to general freight trucking.

I hope you will continue your trend for the small guy on this one and listen and include PUC Regulated HHG in the changes. At the very least issue a moratorium.

Regards,

Timothy G. Trotter

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-truckbus14-BWZWMVAjUGEHXgV1.txt>'

Original File Name: carb puc.txt

Date and Time Comment Was Submitted: 2014-04-03 11:02:14

No Duplicates.

## **Comment 73 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Rod

Last Name: Tankerson

Email Address: rod.tankerson@riversidetrucksales.com

Affiliation:

Subject: Amendments

Comment:

As a pre-owned truck specialist. the CARB initiatives are wreaking havoc on our business. One problem is finding used trucks that qualify without the expensive add-on expenses derived from adding particulate filters to unqualified trucks. In used truck years we are approaching the time period 2008-2011 where new truck sales were at a low. This is all driving up prices tremendously and people are frustrated.

There are two areas I would like to see allowances. Anything under 26,000 gvwr should just be exempt until 2030. Anyone in any industry driving fewer than 10,000 miles with any gvwr should be exempt. I have a construction company now who drives 10,000 miles per year with a truck built with special equipment. it goes to a site and sits 85% of the time. They are having to spend \$70k on a used truck and another \$20k just to transfer the body over. In the meantime, their old truck has done a great job for them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 11:25:04

No Duplicates.

## **Comment 74 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim  
Last Name: Ehoff  
Email Address: jim.ehoff@yahoo.com  
Affiliation: Triple E Trucking

Subject: Proposed Regulation of Cleaire Longmile  
Comment:

The Cleaire Longmile Proposed Regulation

In the mad rush to get clean air products on the market and in use, proper testing in this case was seriously over looked and underdone. It seems the first few to comply were the unknowing test subjects elected to discover which products worked and which products did not.

In many cases the unknowing and assuredly unwilling participants paid for this privilege with their own money. I am one of those, one who did not receive any grants or incentive money of any kind. We did the retro fitting early and at great expense in 2011. Soon after, the Cleaire Longmile was discovered to be a catastrophic failure and was recalled. Cleaire ceased operations, January 18, 2013, and since has gone bankrupt leaving us and many other holding the (empty) bag.

Now I have discovered that the proposed regulation for the Cleaire test subjects is to reduce the compliance date to (5) years from the recall date. This date would fall in 2017. THIS IS COMPLETELY UNEXCEPTABLE!

To put this in proper perspective consider this:

1. We did our retrofitting very early.
2. We paid out of pocket, no grants.
3. A portion of my tax dollars helped pay for other's retrofits. Those that received grants or other incentive monies.
4. Now you propose to graciously give us (5) years from the recall date or, as you drive the last few feet of the dagger in our backs, we get the privilege to pay again.

While on the other hand:

1. Other companies got later compliance dates and did nothing to comply.
2. Then were given another year extension to comply and many still did nothing.
3. When and if, they did comply, were given the benefit of more proven products. We who retro fitted early, had paid to test and eliminate inferior designed PM Filters.
4. Some, with the help of my tax dollars, received grants and incentive money to pay for their retro fits.
5. As it is written in one of your proposed regulations.  
(Additional time and a lower cost route for ALL SMALL FLEET OWNERS to meet their PM compliance requirements, while reopening

opportunities for THESE FLEETOWNERS to apply for and receive Public Incentive Funding.

6. Last but not least, to allow the few that did get their trucks retro fitted, (many of whom received grants,) before 2014 to be compliant until 2023.

It seems to me there is always enough money to pay for PM Retro fits for those who have done nothing.

It also seems that there is plenty of time to give extensions to those fleets to comply. Apparently, these trucks do not pollute, it is only the ones that had the Cleaire Longmile that do.

This is what the Board should approve in regards to the Longmile Fraud:

All Longmiles that were paid for with no grants or incentives should be replaced free of charge. If the Board can't find funding for this then see the enough money statement above and you will find it.

If funding is not made available they should be afforded the same time and compliance that other retro fitted trucks are given. If retrofitted before 2014 they are compliant until 2023.

Mistakes were made and a wrong has happened. The Board has the power to make these things right. You as members of the Board have been given virtually unlimited power in the decision making process concerning air quality. In a very popular movie a single statement rings truer now than ever before.

With great power comes great responsibility. It is your ethical responsibility to right this wrong and as members of the California Air Resources Board, it is your duty, your obligation to preserve the integrity of the office by doing what is right. Do not close your eyes and turn your backs to those of us who tried and are still trying. The State and the Country is watching. In previous proposals a phrase (GOOD FAITH EFFORT) was used. What better Good Faith Effort is there than actually doing it as we have done?

So now show all of us your Good Faith Effort and make things right or simply stamp your approval on this proposal and lose any integrity you may have also eliminating all faith any of us have in the Air Resources Board all together.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-truckbus14-AXMAYwdyVncCawZg.docx>'

Original File Name: Retrofit Letter 04-02-14.docx

Date and Time Comment Was Submitted: 2014-04-03 11:32:48

No Duplicates.

## **Comment 75 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Timothy  
Last Name: Trotter  
Email Address: tgtrotter@gmail.com  
Affiliation:

Subject: Changes to Truck/Bus Rule 4-21-2014  
Comment:

Dear Board,

I do not understand how a truck owner who cannot afford or acquire financing for a retrofit filter would be able to sign an agreement to purchase a new vehicle within two years. Change to the written regulations should include funding for sole proprietor single truck owners ONLY. Grant monies funded the big guys now how about CARB mandated funding of the little guys.

Please include in your changes that retrofit deadlines will be extended to those 1-3 truck owners seeking future grant funding. And writing mandating CARB seek funding avenues for those truck owners.

Sincerely,

Timothy G. Trotter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 11:50:24

No Duplicates.



## **Comment 76 for Truck and Bus Regulation (truckbus14) - 45 Day.**

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

## **Comment 77 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Steve

Last Name: Chamblin

Email Address: Non-web submitted comment

Affiliation: County of Tehama APCD

Subject: Tehama County APCD Truck Bus Comments

Comment:

Please see attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-truckbus14-UiZUIAN3BDQLZIU3.pdf'

Original File Name: truckbus14-Tehama APCD.pdf

Date and Time Comment Was Submitted: 2014-04-04 09:34:47

No Duplicates.

## **Comment 78 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim

Last Name: Ehoff

Email Address: jim.ehoff@yahoo.com

Affiliation:

Subject: The Amendment regarding the scraping of retired trucks

Comment:

The Amendment regarding the scraping of retired trucks

I would like for the Board to consider an amendment regarding scraping of retired trucks.

As it stands now a company must turn in its retired truck to an approved recycler in order to qualify and receive incentive funding for a new replacement truck.

The approved recycler must then cut the frame in half behind the cab and cut a hole in the engine block. This is to assure that the engine can never be reused again.

My problem with this is that there are still hundreds of usable parts left on the now inoperable truck. These parts do not pollute. However, they can and will help to reduce pollution. Now you're wondering how this could be possible. How can a simple switch, gauge, mirror or any one of the hundreds of other parts possibly reduce pollution? The answer is simply to leave the inoperable retired truck with the owner if he elects to keep it. The frame is still cut, the engine is still destroyed just leave the truck with the company.

Pollution would be reduced in several ways:

1. The Dismantler doesn't have to send out a tow truck or lowbed (both of which pollute) to pick up the retired truck. Fewer pollutants in the air. WIN!
2. The company now can get good parts off of these inoperable retired trucks. This will reduce the need for a delivery truck to bring a new part out for the company. Fewer pollutants in the air. WIN!
3. If the parts supplier doesn't deliver the new part it will in turn reduce the need of a larger delivery truck from the parts warehouse to replenish the parts suppliers' inventory. Fewer pollutants in the air. WIN!
4. The warehouse now will reduce orders from parts manufacturers that deliver to them. Fewer pollutants in the air. WIN!
5. The company already has and owns the inoperable trucks. All the parts are readily, available and free for the taking. This cuts costs and now the company can invest more money in less time to purchase new clean air trucks. Instead of new parts for older

trucks. This simple step will have a huge impact and with zero cost and zero effort. This step alone puts NO pollutants in the air and with new clean trucks keeps future pollutants to near zero. That's a double WIN!

The last but by no means the least important impact will be that it shows trucking companies the California Air Resources Board is willing to implement real world solutions to this real world problem. This in turn will help to change the perception of the Board from one of being the biggest bully on the block, to one of a team member interested and willing to work together and solve a problem that affects us all.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-truckbus14-BnRdPIEkACEAaQZg.docx>'

Original File Name: Retrofit Letter 04-03-14.docx

Date and Time Comment Was Submitted: 2014-04-04 14:01:19

No Duplicates.

## **Comment 79 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Martin

Last Name: Chin

Email Address: martychin@hotmail.com

Affiliation: Sam Wong and Son, Inc

Subject: Carb extension

Comment:

You can't waffle on your rules at the last minute because of a lack of planning by individuals not planning on doing anything anyway. I'm a out of state owner who runs 60 percent of my miles in your state and I have to comply and I am. I'm upset that you did not allow me to qualify for at least 60 percent grant money when you were passing out grant money and I still have to purchase compliant trucks or make them compliant. I have to compete for the same business against those that got grants and now those that are not going to do a thing no matter what until they are caught and fined. Fair trucking rates are not going to go up to meet the cost of running the newer trucks until the playing field is leveled and everyone understands the excessive cost of running the newer trucks. If you don't believe that just look at the volume of trucks at your dealership for repairs. Don't let the rate cutters continue to run their junk.

Sincerely,

Martin Chin

nephew of CA Supreme Court Justice, The Honorable Ming W. Chin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 20:02:53

No Duplicates.

## **Comment 80 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: TONY

Last Name: FOLCHI

Email Address: FOLCHIS@AOL.COM

Affiliation: Folchi Logging & Construction Inc

Subject: Proposed Changes to Truck and Bus Regulations

Comment:

I urge the board to adopt the Proposed Regulatory Changes to the Truck and Bus Regulation. As a very small business located in an area of diminishing economic opportunity (Plumas County) this added time will allow us to comply with the law, stay in business and allow our employees to keep their jobs and benefits.

Tony Folchi

Folchi Logging & Construction

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 09:08:30

No Duplicates.

## **Comment 81 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Alice

Last Name: Palkow

Email Address: pdiamondbar@yahoo.com

Affiliation:

Subject: Small Fleet Owner/ Operators

Comment:

I want to express my concern over the current regulations for small fleet, I believe that you will seriously hurt the single owner operator by forcing them out of California due to your regulations requiring PM filters. Most trucks that are owner operator owned are well cared for. I can't afford a new truck and I would be forced to stop hauling in California. We generally haul Hay to your dairies and bring various commodities back. I know of at least 10 owner operators that are directly affected by this new law. Please consider some thing for the owner operator allowing the people from other states to continue to haul into and out of CA. We do not house our truck in CA and should not be held to CA laws.  
Sincerely, Alice Palkow

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 09:14:04

No Duplicates.

## **Comment 82 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Shellie

Last Name: Archer

Email Address: truckmom1331@gmail.com

Affiliation: Archer Trucking, Inc Ukiah & Marysville

Subject: MILLIONS to comply... and now WE'RE the Bad Guys!

Comment:

Dear Members of the Air Resource Board,

Some of you may remember me, Shellie Archer, or my Company, Archer Trucking, Inc., because I was ACTIVELY involved in going to meetings to protest the regulations that were ultimately adopted concerning trucks. I wrote letters, and drove many miles attending several hearings and meetings to make my voice heard about the difficulties that we would have (along with other construction truckers) to meet your time lines. I asked for a more lenient time line to allow for us to use the good trucks we had until they wore out, etc. I was instrumental in the meeting of Lake and Mendocino County Truck Brokers to discuss the (then) Proposed Rule with Tony Brasl, who came to Ukiah for said meeting. I spoke at the Capitol representing small business trucking companies! I did everything in my power to try and PREVENT the hurried time-line that was ultimately adopted, begging for a more reasonable schedule.

I am happy to say that my Company was directly involved in getting the Construction Truck mileage exemption that is in place now added to the rules. Believe me when I remind you of the anxiety and effort to open up our Company financial records to you to PROVE the need for that assistance. I drove from Mendocino County to Sacramento to bring you those records, and trusted they would be kept confidential, and used appropriately. They were, and I am grateful for the Construction Truck exemption.

I still wish that the CARB had NOT created the schedule/rule that was voted in way back, but you DID, and many trucking companies have stepped up to be in compliance at GREAT EXPENSE!

My husband and I are now 56, and in the last few years we have purchased 24 new trucks and installed several filters WITH NO HELP FROM THE STATE. We have added millions of dollars in debt to our business at a time of life when we should be DOWNSIZING if anything, not PURCHASING brand new trucks and spending money on filters for older trucks!

We were very fortunate and blessed to have excellent credit, and enough work in our future to take the leap of faith that THE RATES WOULD COME UP TO HELP PAY FOR THESE TRUCKS BECAUSE EVERYONE WOULD BE SPENDING MONEY TO MEET THE ARB COMPLIANCE SCHEDULE!

Surprise, surprise, several of my competitors are not complying, and NOW THEY MAY GET REWARDED FOR NOT COMPLYING! Don't you understand that every truck that I have that is compliant has a HUGE expense that the non-compliant trucker is not bearing? If you issue these extensions now, the company which did NOT comply and now has more time is able to work for far less per hour that we can and still break even or make a profit. Do any of you remember telling all of us that of course the rates would increase to cover these expenses? It has NOT happened, and WILL NOT happen, until ALL



TRUCKERS ARE IN COMPLIANCE, LEVELING THE PLAYING FIELD!

There are people in the industry who no longer want to talk to me about the CARB problems, because now I am "THE ENEMY" because I am compliant. They don't come right out and say it, they just don't answer or return phone calls and don't let me know about upcoming CARB events any more. I'm the villain... because I'm compliant. It is so frustrating. Ask others who are in compliance, and I believe you will hear the same thing: those NOT in compliance are still working together to fight CARB, and the rest of us are not appreciated very much.

IT IS THE ULTIMATE INSULT THAT THE CARB WOULD EVEN BE CONSIDERING THESE EXTENSIONS INSTEAD OF ENFORCING THEIR OWN RULES! Believe me when I tell you that because of the money I have spent and the millions in debt, I cannot accept the CARB changing things now. I WILL JOIN OTHERS AND WE WILL SUE YOU FOR CAUSING DIRECT FINANCIAL PROBLEMS FOR OUR COMPANIES AND OUR INDUSTRY. I never thought I'd be against extension, but I never dreamed of spending so much money and THEN having others get rewarded for their non-compliance. What a slap in the face.

I have more to say, but on a slightly different part of this, so I will submit a separate comment. PLEASE, PLEASE, PLEASE, consider what message you are sending out with these proposed extensions and new rules. Please do not pass them without considering carefully what the results may b.

Thank you,

Shellie A. Archer  
President  
Archer Trucking, Inc.  
707-485-4500

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 09:50:41

No Duplicates.

## **Comment 83 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Shellie

Last Name: Archer

Email Address: truckmom1331@gmail.com

Affiliation: Archer Trucking, Inc Ukiah & Marysville

Subject: Brokers forced to be BIG BROTHER for CARB Compliance!

Comment:

Dear Board,

One of the parts of the existing Rule is that truck Brokers in California must insure that Subhaulers working through their Company are in compliance with the CARB rules and requirements, or face paying the fines for said truckers if they are caught.

As a result, there are several Brokers doing their best to make sure they have documentation to protect themselves from being fined due to the NON Compliance of their Subhaulers.

If you implement the new proposed changes to the rule, WHAT BROKER WILL BE ABLE TO DETERMINE IF A TRUCKER IS COMPLIANT OR NOT, AND WHY SHOULD WE HAVE TO BE THE ONES FIGURING IT OUT?

Please put Compliance and Fines squarely on the shoulders of the INDIVIDUAL TRUCKER OR TRUCKING COMPANY, and take it off of the Broker's list of "stuff" we have to track. Think about it; you have created a system that FORCES the Brokers to be BIG BROTHER for you. Not good.

The easiest way for force compliance tracking for CARB is to require a Certificate of Compliance to be shown each time one registers a truck at DMV, just like showing the Form 2290 to prove taxes have been paid. This was suggested years ago... please take the compliance enforcement AWAY from the Brokers! We already have enough regulations to keep us busy, and this one is too much.

Thank you,

Shellie A. Archer

President

Archer Trucking, Inc.

707-485-4500

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 11:08:45

No Duplicates.

## **Comment 84 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tim  
Last Name: Trotter  
Email Address: tgtrotter@gmail.com  
Affiliation:

Subject: Comment  
Comment:

Dear CARB,

Mr. Ehoff writes a very compelling letter and good argument as to why CARB should not allow any changes. All of us in trucking are in the business for economic gain. Unfortunatley for Mr. Ehoff he got stuck with the Clearaire Long mile and likewise I would be upset too. I agree with Mr Ehoff. Clearaire customers should be compensated. However CARB is not back pedalling when trying to "improve" the rules resulting in more compliance of air quality regulations.

There are comments from instsallers claiming large inventory and cancelled orders. If that's the case they would lower their prices. They too are in it for economic gain. The entire trucking community is aghast at the Truck and Bus rule. Sure there are gross polluters which I believe the majority of us despise. But to all of us from an operational standpoint this rule is less about air quality and more about staying in business (please do not take that statement out of context. Trucking IS pro clean air and vehicle by virtue of the posted comments), and because you implemented it, it is your responsibility to make compliance feasible for ALL of trucking.

We believe it is a tangled web. Could you believe that DPF retrofit is uncalled for in the majority of trucks? Can CARB single out gross polluters by focusing on individual roadside enforcement? Those are not the points of your proposed rule change. It is for you to bring ALL truck owners into legal status.

Sincerely,

Tim Trotter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 12:01:38

No Duplicates.

## **Comment 85 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: John

Last Name: Edwards

Email Address: jttransport2296@gmail.com

Affiliation: J&T Transport LLC

Subject: requirement to retrofit 2005 heavy duty diesel truck engine

Comment:

My name is John C Edwards born and raised in California. I am an owner/operator of a one truck and trailer operation \_ J&T Transport LLC based in La Mesa California. My primary operation is interstate heavy haul leased to Combined Transport INC based in Central Point Oregon. 85% of my business is conducted outside the state of California.

I purchased a 2005 Freightliner in November of 2010 which complied with California regulatory requirements. Being an environmentally conscious operator I replaced the engine with a new Detroit Diesel factory engine to ensure all of the equipment was operated as intended at a cost of \$28000.00. In addition I have installed an auxiliary power unit to reduce idling time to practically 0 at a cost of \$9000.00.

The proposed retrofitting with a particulate filter would be more than my business could sustain and has cut me off from my home base.

Exceptions have been made for operators who essentially conduct all their business in California and operate their business in and out of California ports.

When compared with these operators and the amount of particulates emitted within the state of California, their operation vs mine, my operation would have a far far less deleterious effect on the California environment.

As a California tax paying resident operating a California based tax paying business I am asking to be included in these exceptions so that I may remain in business while being able to come home occasionally.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-06 06:15:25

No Duplicates.

## **Comment 86 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Debbie

Last Name: Ferrari

Email Address: dferrari@magtrucking.com

Affiliation:

Subject: See attachment

Comment:

See Attachment

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-truckbus14-VjVcOwZ1U2JSC1Ix.docx'

Original File Name: carb cannot get a loan extension.docx

Date and Time Comment Was Submitted: 2014-04-07 12:29:38

No Duplicates.

## **Comment 87 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron

Last Name: Yadon

Email Address: ronyadon@sbcglobal.net

Affiliation:

Subject: filter requirements / owner operator about to loose it all

Comment:

I am a 15 year owner operator of one only one truck in the construction industry, the construction industry has still not completely rebounded from the recession, my work load is down by half, profits are down by half with the rising cost of fuel, insurance, DMV fees, and overall all expenses its hard enough just to make ends meet. There is zero profit left over at the end of the month, I have put myself into serious debt just to make it thru the on-going recession and keep my business and home, that is gonna take awhile to get out of. The added cost of a filter or even a new truck is just not in my budget right now. I paid off my truck 18 months ago and as most owner/operators know once you have paid off your equipment you hope to put some money back into your pocket well I am hoping with the extra money if any I have at the end of the month I can use it to send my 2 sons to college and that doesn't look very promising either. Please think about the little one man show just trying to make an honest living for himself and his family. Sincerely Ron Yadon @ Ron Yadon Transp.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 21:29:52

No Duplicates.

## **Comment 88 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bill

Last Name: Visser

Email Address: plvisser2@sbcglobal.net

Affiliation: Bubbas Trucking and CCTA

Subject: On Road truck and bus Ruling

Comment:

My name is Bill Visser ,I am a California Native. I have enjoyed living a very good life in the SoCal. I came into the construction trucking business in 1987. In 1988 I bought a 1985 Peterbilt a truck I planned to work as long as I did. I still own that same truck today. I maintain the truck myself. I belong to every program the state mandates. I am the chapter chair for the San Fernando Valley of the California Construction Trucking Assoc. I have complied with CARBs requirements as much as I can due to the age of my truck. My truck runs less than 20,000 miles per year it gets about 8.5 miles to the gallon. About 40% better than the same new trucks. My situation is similar to quite a few other construction truckers I personally know. We want to keep our trucks, we cant afford new ones due to the economy, we cant afford the inherent problems with retrofitting older trucks[the filters are not designed for us]. I have the 20,000 mile const. truck exemption, what I would like CARB to consider would be an extension of the low mileage construction truck exemption on a policy that the truck stay with its original owner and may not be tranfered or retitled in the state of California. Every trucking operation is different, your consideration for the construction truck exemption would be appreciated. Sincerely Bill Visser, bubbas Trucking CA 33520

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 16:23:25

No Duplicates.



## **Comment 89 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Douglas

Last Name: Pfeiler

Email Address: djpbus@gmail.com

Affiliation: DJP Enterprises LLC

Subject: Low Use Vehicle mileage

Comment:

I am a one bus operator from Salem, OR who transports college athletes for a small private university. Our conference athletic schedule dictates that we need to travel to California for games.

As my bus is a 1989 model, no filtering options are possible and a 2010 engine simply will not fit due to its physical length.

My average miles in California the last 10 years has been 2046 miles.

My understanding is that there is a possibility that the low use exemption will be raised from 1000 miles to 5000 miles, but for total vehicle miles, not just those traveled in California.

My request is that exemption should be for miles traveled in California. It should not matter to CARB what mileage vehicles travel in other jurisdictions.

Respectfully submitted,  
Douglas Pfeiler  
DJP Enterprises LLC

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 08:38:45

No Duplicates.

## **Comment 90 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dave

Last Name: Grande

Email Address: Materialtransportinc@gmail.com

Affiliation:

Subject: CARB Proposed Changes

Comment:

I find it interesting that the staff now appears to feel it is necessary to extend the deadline for compliance to the naysayers. Prior to the so-called final CARB regulation, industry associations and business owners practically begged the staff to delay implementation due to the economic recession in the State. All that fell on the deaf ears of the CARB staff and they forged ahead with the regulation. Many small businesses have already been sacrificed with this regulation, Lois Henry stated it best, and displayed complete disrespect when she classified the owner operator and small fleet owners as "bottom feeders". Reading through this comment section not too many, if any, are large fleet owners. Why? They were given the majority of the grant funding. Now the staff is concerned about the little guy?? Too little too late now, many of us are buried deep in loans we apparently didn't need to get. Sold off equipment that lost all it's value because of these regulations. The least the staff can do now is enforce it. Did someone mention law suit?? I'm in.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 09:31:02

No Duplicates.

## **Comment 91 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: bruce

Last Name: bidnick

Email Address: bruce.ssiexp@sbcglobal.net

Affiliation: SSI Express Inc

Subject: CARB Proposed Amendments

Comment:

I think this is a bad idea. CARB has already laid down the law as to what us carriers are supposed to do to be compliant. So we spend a lot of money and time as well as resources to pull this off, and you decide to extend the rules out to very people who ignored your regulations. They are not going to ever get compliant. Now, those of us that followed the rules and became compliant, are not going to be able to raise our rates that were going to pay for the investment we had to do to be compliant with the new CARB regulations. Our economy is based on supply and demand, and with the new CARB regulations, this would create a supply issue that would allow us to raise our rates to pay for your rules. Now I won't be able to raise my rates and pay for all of this new technology you made us get. You go thru with this decision, and the very people that complied may go out of business trying to make the payments on this new equipment. We qualify for four new trucks under the Prop 1B funding program, and now I can't afford to do it because you are going to change your rules to accommodate the very people that ignored your regulations in the first place. I will now not be going thru with my four new trucks thru Prop 1B now because you are going to let these people continue to operate. I won't be able to raise my rates to pay for this new equipment. I simply will not be able to afford to stick my financial neck out there, and run myself out of business. This is defeating the purpose and direction of which CARB intended it to be. It simply makes no sense. I feel like I am a yo-yo on a string and CARB is the head yo-yo in charge that is making these absurd decisions. Make up your mind people and stick with a program. If I ran my business the way you run yours, I would have been out of business by now. I wish common sense was more common in your industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 09:36:12

No Duplicates.

## **Comment 92 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Randy

Last Name: Ladd

Email Address: RWLADD@AOL.COM

Affiliation: Wizard Express LLC.

Subject: Rules

Comment:

Our company can only afford 1 truck at this point and time. We do heavy haul and our tractors require a certified 4th axle for California. The cost for a new truck for our needs is \$220,000.00 We can not absorb that kind of cost. So what will happen is we plan to shut down operations in 1 year. Thank you Randy Ladd President of Wizard Express LLC.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-07 17:08:03

No Duplicates.

## **Comment 93 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Debbie

Last Name: Ferrari

Email Address: dferrari@magtrucking.com

Affiliation:

Subject: PROPOSED NEW CARB RULES

Comment:

If Air Resources board was uncertain and this is a work in progress they should not have imposed a law and told brokers specifically and directly that we would be responsible for compliance or to face stiff penalties. It's too late to take that back.

Responsible brokers have worked very hard to get small truck owners to comply with the law based on the information given. These small fleet or single truck owners have put out every effort, leveraging their future based on demands by ARB that it was a requirement, to meet the prior schedule.

Brokers such as our firm were given the task to spread the word on behalf of ARB and require compliance, or else we would face stiff penalties. We were told this not just once or twice but many, many times over a long period. When single truck owners would say "I heard there will be an extension" We checked with ARB. ARB assured us that this would not be the case. The proposed new changes look so watered down that I don't see how compliance is even possible.

Based on improvements made, these small fleets and single truck owners expected that pricing would increase so that they can pay for the loans that they have received from various entities. With the proposed extensions and watering down of the law, especially the one where all you have to do is prove that you cannot get a loan, these people are now going to face financial hardship. They will now be getting penalized for trying to comply with the law. No more will the projected escalation of pricing be viable since any truck will do after all. What do we as brokers, the enforcers, as appointed by ARB say to those that have given up everything just to get that new truck and filter, while they look at other truckers who didn't bother to make an attempt and now will be rewarded.

Please re read paragraph 1.

And on a separate note, the proposed changes give a further extension for those that have a filter on by January of 2014. However the law clearly stated that, as long as the filter was ordered in 2013 it did not have to be installed as of that date. This proposed extension for those that have gone through the expense to get these filters needs to be amended to allow for the proven order date rather than installation date. Once again, to avoid penalizing those that have followed the rules.

Debbie Ferrari

Estimator/Supervisor

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 13:17:59

No Duplicates.

## **Comment 94 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dave

Last Name: Grande

Email Address: materialtransportinc@gmail.com

Affiliation:

Subject: CARB Extension

Comment:

In the event the staff does grant an extension to those that were denied credit. I would like to offer the following suggestions to tighten the qualification. Yes, qualification...

1. GOOD FAITH. Must have applied and been denied credit prior to the compliance deadline for their engine year.

2. Original sealed Letter from the lender to CARB explaining the reason for being denied credit. A. If the denial reason was Credit based, the applicant must enroll in credit counseling to repair bad credit prior to being granted a extension. If they do not attempt to pay bills on time and pay off any collection accounts, then extending them time will do nothing but allow them to operate unfairly. B. If the denial was financial, the applicant must provide a business plan as to how he/she will generate additional monies. No, cutting rates and working cheap is not a business plan.

3. Shorten the time period. No extension should be beyond the already mandated last engine year deadline of 2016. (1994/1995 engine years)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 17:29:13

No Duplicates.

## **Comment 95 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: josie

Last Name: martinez

Email Address: martinezjosie77@yahoo.com

Affiliation:

Subject: EXTENSION FOR DENIAL OF LOANS!

Comment:

I WOULD LIKE TO KINDLY REQUEST AN EXTENSION FOR ALL OF US WHO HAVE DONE OUR VERY BEST TO COMPLY BUT WERE DENIED A LOAN. WE ARE AWARE THAT MANY SAY THAT IT IS NOT FAIR AND DEFIANT THAT MANY HAVE NOT COMPLIED. OF COURSE WE HAVE DONE OUR BEST TO COMPLY BUT MANY OWNER OPERATORS FROM SMALL BUSINESSES HAVE BEEN DENIED LOANS. AND WE ARE NOT TALKING ABOUT HUNDREDS OF DOLLARS FOR SMALL BUSINESSES WHO ONLY OWN 1 TRUCK OR 2 IT IS SIMPLY NOT THAT EASY TO INVEST THOUSANDS OF DOLLARS. THE MONEY IS SIMPLY NOT THERE, SMALL COMPANIES WIHT ONLY ONE TRUCK WORK VERY HARD TO KEEP A BUSINESS RUNNING. THEREFORE WE ASK THAT YOU PLEASE, CAREFULLY CONSIDER EXTENDING THE DEADLINE, WE NEED TIME TO GATHER THE MONEY AND RESOURCES NECESSARY TO KEEP RUNNING OUR SMALL BUSINESS AND TO KEEP OUR JOBS THAT WE HAVE WORKED SO HARD IN AND INVESTED ALL THAT WE HAVE.

SINCERELY,

1 TRUCK COMPANY  
JOSIE MARTINEZ

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-08 20:06:26

No Duplicates.



## **Comment 96 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Greg

Last Name: Howe

Email Address: greg@dhtransportation.com

Affiliation: D&H Transportation Inc

Subject: Carb Changes

Comment:

Once again a SLAP to the face to those of us who stepped up and went into debt to comply!!! We have all known that these regulations would pose a HUGE hardship on our industry, but CARB has held strong to the regulation. Now late in the game they decide to relax??? Criminal!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-09 14:20:29

No Duplicates.

## **Comment 97 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jim

Last Name: Wagoner

Email Address: [jwagoner@bcaqmd.org](mailto:jwagoner@bcaqmd.org)

Affiliation: Butte County AQMD

Subject: Governing Board Comments

Comment:

Please refer to the attached comment letter from the Governing Board of the Butte County Air Quality Management District.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-truckbus14-Am9cBVY5VW8GY1I6.pdf>'

Original File Name: M NICHOLS 3-27-14.pdf

Date and Time Comment Was Submitted: 2014-04-10 07:52:50

No Duplicates.

## **Comment 98 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bernardo

Last Name: Trujillo

Email Address: Trujillo\_bernard@sbcglobal.net

Affiliation:

Subject: CARB REGULATIONS DESTROYING THE ECONOMY

Comment:

I am disappointed by the CARB regulations because it is harming our economy. Lots of corruption by government. California is going to have a lots people in welfare collecting food stamps in section 8 good for me I am first in list just for stupid politic people make in stupid bills god bless this state truckers

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-10 22:34:36

No Duplicates.

## **Comment 99 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: julian

Last Name: lopez

Email Address: shop@jettharvest.com

Affiliation: jett transport

Subject: unfair amendments

Comment:

I hauled grapes in san Joaquin valley this past year 2013,in 2014 I will not ,the pay rates are so cheap,i saw a lot of small fleet owners and spoke to some of them ,and they told me they were waiting for an extension ,because they had no intention to be in compliance with C A R B anytime soon, So come dec 2013 I installed a filter 15.000 (small engine) and in January of 2014 I got underbidded by a non compliant small fleet owner for a job I previously had for 2 years they were able to charge 200.00 dollars less per load , it is not fair what has happened ,giving more extensions and trying to change the law.i spent on some credit cards to comply with C A R B ,while others are hurting the trucking industry by charging cheap rates,you cant possible save any money for anything because the rates are very low!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 04:46:32

No Duplicates.

## **Comment 100 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Roy

Last Name: Marson

Email Address: fwest@earthlink.net

Affiliation:

Subject: my `2001 Peterbilt

Comment:

You have excluded my Peterbilt from California. I live and work here.

You are putting me out of business!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 09:57:55

No Duplicates.

## **Comment 101 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: joe

Last Name: adivari

Email Address: jadivari@ca.rr.com

Affiliation:

Subject: what a joke!!!!

Comment:

these proposed amendments look good, I do hope it goes through it will help us small fleets with 3 or more trucks?? to comply, with your regulations... but I think you guys are forgetting that this is a deregulated state and people ( 1 truck owners )are cutting the rates down to 1980 prices and with todays prices to operate as a small fleet it is impossible to stay in business with the demands of retrofitting or upgrading to newer equipment. no one is here to help us like P U C was years ago so we can raise our prices to maintain equipment for the state demands !!!!!!! just if you haven't figured it out yet I talking about the construction ( dirt hauling ) industry that helps make you build your cozy office !!!!. so instead of worrying about who's dying of diesel fumes ( nobody is ) try helping someone staying in business by regulating this state instead of putting hard working struggling small fleets out of business. chew on that !!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 13:27:07

No Duplicates.

## **Comment 102 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: joe

Last Name: adivari

Email Address: jadivari@ca.rr.com

Affiliation:

Subject: no money

Comment:

need more money

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 13:50:36

No Duplicates.

## **Comment 103 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron

Last Name: Taylor

Email Address: ron413273@yahoo.com

Affiliation:

Subject: Low-Mileage Use Exemption

Comment:

This Low-mileage use exemption for 1000 miles is so low that it is or can be used up in just one or two trips into the state. We have a 2005 International but do not have the financing to get the filter on the truck but have customers we deal with in the El Centro and San Diego areas for but due to the regulations now we have lost those customers. If this was increased I believe it would help out many of us drivers that are not able to financially upgrade our trucks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 15:40:32

No Duplicates.



## **Comment 104 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Virendra  
Last Name: Kumar  
Email Address: vkumar@eswgroup.com  
Affiliation: 610 613 0729

Subject: ESW Response to Proposed Change  
Comment:

Please see attached

Best Regards, -VK

Virendra Kumar  
Chief Commercial Officer  
ESW Group

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-truckbus14-VzIHclAmAw9XMIU6.pdf>'

Original File Name: ESW Comments\_ Diesel Fueled Vehicles Amendments.pdf

Date and Time Comment Was Submitted: 2014-04-11 16:52:25

No Duplicates.

## **Comment 105 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joanna

Last Name: de Graaf

Email Address: JCOWTRUCKS@aol.com

Affiliation:

Subject: Proposed Exemption for Livestock Haulers

Comment:

In response to the amended proposal for CARB to make Livestock Trucks Exempt until 2023. Until just recently (March 6th 2014) almost all of us in the Livestock Hauling industry didn't even know about this. It was a Facebook Post that angered all of us about new proposed regulations for Livestock Haulers. We and many others have been working since 2003 to meet CARB guidelines. We bought new equipment and worked our way up the ladder to now be fully Compliant with 2 Trucks that burn DEF. We have had 10 years to do so. Right now in California there are over 150+ Compliant trucks that haul livestock. HR and Harris Ranch have over 50 just themselves. The other 100+ are owner operators and small fleets. For example: De Graaf Ranch Trucking, Van Dyk Trucking, Rocha Valley Enterprises, Devries Transport, De Boer and Son Trucking, Dark Horse Trucking, Duane Martin, and Hegoas and Son. Single owner operators with 1 power unit are Bray Livestock, Medina Transportation, Kevin Rocha and many more. Almost all of us run over 90% California miles. Funny that none of us ever heard from Tim Koopman CCA, Michael Bettencourt CCA or Justin Oldfield CCA. Wouldn't the proposal be stronger if all of the 150+ compliant trucks were involved with this movement? Like I said most of us heard this on Facebook. Us compliant trucks have spent millions of dollars to meet the 2014 deadline and have sat back waiting patiently for your enforcement. The CCA says they need Out of State Trucks to move Livestock in and out of California cause we cant meet the demand. They can Call Gurney Trucking or LW Miller to haul they have over 130+ compliant trucks that haul livestock in and out of California. First of all the 2 biggest people trying to push this Is Abbie Battetae (Owner Operator) and Michael Bettencourt (Jess Trucking & Chapter President CCA) They are not livestock only trucks. (See attached photos) They haul Hay and Freight. Most of us haul other things, not just livestock. The only exemptions should be for Truck and Trailers and Cattle Ranchers who own a single truck to haul their own livestock, not hauling for hire!! Anyone with a 2 or 3 axle truck can hook up to any kind of trailer including freight. All those trucks had to comply. You CARB are not making this an even playing field to do business in California when it comes to rates per mile. All of us compliant trucks are rewarded with new equipment and higher operating costs. These non-compliant trucks laughed at us all for 10 years as we spent our hard earned money jumping through your hoops and 150+ of us made it. They need to be forced to comply with this same regulations. There is no such thing as "An exclusive livestock only truck." They all had and still have the opportunity to apply for Grants or to put Particulate Filters. If it detaches from a trailer it can haul anything. Dont let the CCA pull the wool over your eyes because it will be the same story from these same people in 2023 when they

come back to CARB and ask for another 10 years. They already got 10 years. Its time to comply 2014 is here!!

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-truckbus14-UDNWMQd0UmMDWlAg.jpg'

Original File Name: Carb Pic 6.jpg

Date and Time Comment Was Submitted: 2014-04-12 17:39:16

No Duplicates.

## **Comment 106 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: William

Last Name: Callahan

Email Address: Director@arcbac.org

Affiliation: Associated Roofing Contractors

Subject: Proposed Amendments to Truck & Bus Regulation: SUPPORT

Comment:

See the attached letter of support.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-truckbus14-UWNQZIJiBWILPQYy.pdf'

Original File Name: 20140414085306047.pdf

Date and Time Comment Was Submitted: 2014-04-14 08:54:59

No Duplicates.

## **Comment 107 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Blain  
Last Name: Stumpf  
Email Address: Blain@bstrock.com  
Affiliation: BST Rock, Sand & Gravel

Subject: Proposed amendments  
Comment:

About us;  
20 dump truck fleet. In business since 1983. Always utilized previous over the road trucks to convert to local dump truck use. Purchase prices in the \$20,000-\$30,000 range. Frequently purchased out-of-pocket.

Now;  
Purchasing compliant equipment with grant funding through SECAT. Average grant amount \$40,000. Average new truck price \$135,000. The difference is financed.

Our debt load is higher then ever in an economy that is the worst since beginning this business.

We have managed to stay compliant and have long range plans to continue to purchase new replacements without grant funding.

However we continue to see AND COMPETE WITH non-compliant operators and/or operators without the burden of the high cost of compliant equipment.

Proposals to extend compliance dates will punish businesses that made the investment in new equipment while giving operators utilizing old equipment a "Free ride".

This is the equivalent of "Moving the goal posts" in the big game.

Those who stuck their head in the sand hoping for this rule to go away are getting rewarded.

I urge the board to not adopt these proposals.

Sincerely,  
Blain Stumpf  
Blain Stumpf Rock, Sand & Gravel

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-14 09:45:40

No Duplicates.

## **Comment 108 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Benjamin L.

Last Name: Higgins

Email Address: Non-web submitted comment

Affiliation:

Subject: Support for Proposed Livestock Revisions to TruckBus14

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-truckbus14-USVTJwRwADAEaQZk.pdf'

Original File Name: truckbus14 Hearst Ranches.pdf

Date and Time Comment Was Submitted: 2014-04-14 13:11:56

No Duplicates.

## **Comment 109 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Louise

Last Name: Azevedo

Email Address: Non-web submitted comment

Affiliation:

Subject: Support for TruckBus14

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-truckbus14-VyMBdQZyAjJSPwhq.pdf'

Original File Name: truckbus14 Louie Azevedo.pdf

Date and Time Comment Was Submitted: 2014-04-14 13:13:44

No Duplicates.



## **Comment 110 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tim

Last Name: Hanson

Email Address: tim@interiorwooddesign.com

Affiliation: Parkside Church of the Nazarene

Subject: Church bus

Comment:

Greetings,

My name is Tim Hanson. I am the director of bus ministries at Parkside Church of the Nazarene in Auburn, Ca. We are located in Placer County approximately 5 miles south of the Nevada County border.

- 3885 Richardson Dr.
- Auburn Ca. 95602
- o 530 888-7707

Our church owns a full scale 1991 MCI 102A3 touring coach with a 6V92 Detroit diesel that we use for our church ministries. Our bus is maintained in pristine condition and runs perfectly, receiving accolades from our CHP Motor Carrier terminal inspection officer. It is our only commercial vehicle and is a valuable and powerful tool for our church ministries. Additionally our bus is made available to other churches and non-profit organizations in our community using our certified drivers. Our bus travels an average of 6,000 - 8,000 miles per year.

Sadly our bus ministry to the church and community will be destroyed unless we are able to have some reprieve or exemption from CARB's new regulations. To my knowledge there is no particulate filter available for our bus and a new engine that meets requirements will not physically fit in the engine space provided. The only remaining solution is to replace our bus. As a non-profit church organization it is financially a virtual impossibility to update or replace our bus with one that meets regulations.

As a volunteer lay minister at my church, I am not a professional in the Trucking Industry and do not know all the avenues that could be available to me on behalf of our church bus program. Based on the low miles our bus travels, our close proximity to already exempt Nevada County, the excellent care our bus receives, its perfect running order, its service to the community, the physical limitations that prevents our ability to comply and the financial impossibility for our non-profit church to replace or bring our bus into compliance, I am seeking exemption or reprieve from the Truck and Bus Diesel Regulations.

I appreciate your time and attention on our behalf.

Thank you.

Have a blessed day.

Tim Hanson  
Dir. Bus Ministries  
Parkside Church of the Nazarene

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-truckbus14-WytcO1ckBDwAdQBp.jpg'

Original File Name: Parkside bus 1.jpg

Date and Time Comment Was Submitted: 2014-04-14 13:19:36

No Duplicates.

## **Comment 111 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jeffrey  
Last Name: Hansen  
Email Address: conspec.lh@gmail.com  
Affiliation:

Subject: Extension to Inyo & Mono Counties- Truck & Bus Regulation  
Comment:

April 10, 2014

California Air Resources Board

RE: Proposed Changes to Truck & Bus Regulation for Inyo & Mono Counties

Dear Board Members:

I am writing in total support of you 1) amending the regulation to expand the number of regions to include Inyo and Mono counties and 2) giving those small fleet contractor longer phase-in time to comply to the compliance regulations.

There are few diesel trucks based here and allowing us more time to re-tool and operate only in these two counties would make a lot of sense; logically, economically and environmentally. We certainly have no pollution problems caused by diesel engines.

Additionally, most diesel trucks operating in these areas are small fleets and coming off of a 3 year drought our economy is severely suffering and we simply cannot afford these crushing compliance dates. The current compliance dates along with the upcoming Off-Road Diesel regulation (DOORS) compliance dates could put many of us rural area/low population contractors and other businesses out of business.

Thank you for your understanding and for allowing me to continue in the business I've been in for over 45 years.

Sincerely,

CONSPEC INC.

Jeffery P. Hansen  
President

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-14 13:13:58

No Duplicates.

## **Comment 112 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: California Tow Truck  
Last Name: (CTTA)  
Email Address: lobby@ellisonwilson.com  
Affiliation:

Subject: CTTA's Comments on the Low-Use Vehicle Exemption  
Comment:

Attached are CTTA's Written Comments on the California Air Resources Board's Proposed Amendments to the Low-use Vehicle Exemption in the Truck and Bus Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-truckbus14-VDdTIVQhBDYELAJj.pdf'

Original File Name: CTTA.ARB Written Comments.4-11-14.pdf

Date and Time Comment Was Submitted: 2014-04-14 14:30:52

No Duplicates.

## **Comment 113 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: JOE

Last Name: KROENING

Email Address: JOEKROENING@ANDYSTRANSFER.COM

Affiliation: ANDY'S TRANSFER & STORAGE

Subject: CARB COMPLIANCE

Comment:

I, LIKE I AM SURE MANY OTHER FLEET OPERATORS, WOULD LIKE TO COMPLY WITH THE CARB RULES AS I AM SURE THAT ALL OF US CAN SEE THE BENEFITS OF CLEAN AIR. AND MOST EVERYONE I KNOW WOULD LIKE TO HAVE A FLEET OF VEHICLES THAT ARE NEW FOR NOT ONLY CARB COMPLIANCE BUT FOR HIGHER MPG AND MORE RELIABILITY. HOWEVER THE ECONOMIC REALITY MAKES THIS A VERY TOUGH GOAL TO ACCOMPLISH. WE ARE JUST EXITING WHAT HAS BEEN A VERY PROLONGED DEPRESSION, EXPENSES ARE HIGH AND RATES REMAIN DEPRESSED. BANKS HAVE TIGHTENED THEIR LENDING RULES FOR NEW EQUIPMENT. MOST OF OUR VEHICLES ARE LOW MILEAGE BECAUSE AS A HHG MOVER MUCH OF OUR TIME IS SPENT LOADING AND UNLOADING. I WOULD LIKE TO SEE A LONGER PHASE TIME ALLOWANCE OF AN ADDITIONAL TWO TO THREE YEARS.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-14 14:56:11

No Duplicates.

## **Comment 114 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bob

Last Name: Button

Email Address: bob@buttontrans.com

Affiliation: Button Trans. Inc.

Subject: Bad Science Bad Law Bad decision

Comment:

There are those of us in the transportation industry who would like to envision a future in which our children could continue to make this business a viable career option. To that end we have worked diligently to adhere to the CARB's regulations and those laws that govern us.

Compliance required us to change some of our established practices at the expense of hard earned equity in our businesses. These losses came in the form of replacing perfectly good '06 and prior equipment, in favor of '07 trucks that are not nearly as practical for the work we do, but are compliant.

Now, after those of us who went to great financial pains to meet your requirements, you desire to entertain the idea of significantly loosening those regulations? For the few that made a business decision to defy compliance at the risk of suffering the agreed consequence, we are now discussing waiving any consequence? These scofflaws commonly have no maintenance or safety departments to speak of, and commonly run the dirtiest engines and boast the worst safety records. But these are the ones we are now considering for relief?

In an incredibly competitive industry making proposed changes that relieves or forgives anyone would be unfair, and take an already uneven playing field, and simply make it more so! We do not ask for preferential treatment at this late stage, but perhaps allowing those professing ignorance of the industry's laws and regulations should be sufficient evidence to warrant that they should not be in the industry in the first place!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-14 15:38:07

No Duplicates.

## **Comment 115 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Craig  
Last Name: Phillips  
Email Address: cphillips@ironmanparts.com  
Affiliation: President

Subject: Comments from Ironman regarding proposed amendments  
Comment:

April 14, 2014

As a leading California retrofit installer and emissions compliance company, Ironman works with many fleets and independent owner operators seeking CARB compliance.

In the past year, Ironman has experienced a significant increase of Owner Operators seeking compliance due to the December 31st, 2013 deadline and also now the Good Faith Extension July 1st deadline.

Due to the volume of Owner Operators seeking compliance, and the majority of these drivers also needing compliance information and financial assistance, Ironman needed to staff up quickly. Thereby, Ironman has staffed up an entire department in order to assist the IOOs with applying via lenders, helping with the documentation and communication process, and assisting with the lender approval process.

However, with CARB's proposed amendment to the regulation, to "defer compliance with the PM filter requirements for up to 3 vehicles for any owner that cannot get financing to comply" there is serious concern that now Owner Operators are more motivated to be declined by a lender than to actually seek CARB compliance.

There are already unintended consequences cropping up in the industry as a result of the good intentions by CARB to offer flexibility. The motivating factor for Owner Operators is to simply obtain a decline letter from either the most conservative lender or even fraudulent lenders.

For those Owner Operators that are truly in a dire situation and have genuinely been declined, the proposed CARB extension will allow these truck owners to meet compliance through a more flexible path. However many Owner Operators have trucks exclusively dedicated to a single large fleet and operation, thereby some financial assistance could possibly be sought from the mother fleet.

Ironman proposes that CARB employ a methodology in order to weed out any suspect denial letters from the genuine ones by requiring the credit score to be provided with the denial letter.

\*Generally IOOs that are under 575 credit score will truly have a difficult time being approved by lenders.

\*IOOs with a credit score higher than 575 may also be genuinely



declined, but there is higher chance of fraudulent reporting in this category. CARB should take a different approach with anyone claiming to be denied that has 575+ credit score and ask one of the CARB approved lenders to re-qualify the applicant.

Another methodology CARB could consider is requiring Owner Operators to produce three denial letters, one being from a CARB backed lender in order to validate the claim of financing declination. This would significantly eliminate the possibility of fraudulent lenders handing out denial letters.

To put some cause for concern of anyone possibly submitting fraudulent information, CARB may consider adding the following language to the documents required for submitting denial information "I certify under penalty of perjury under the laws of the State of California that the information on this document is true and correct."

Many small fleets (and large) have gone through the complete compliance process having faith that industry compliance was fair and all fleets alike were on their path to compliance. However, the possibility of any fraudulent-based extensions will give way to unfair competition, resentment from those that "did the right thing" and sought compliance, and another blow to CARB and industry compliance efforts.

Ironman respectfully requests CARB to reconsider offering retrofit grants to small fleets as a means of assisting many that cannot afford to comply with the regulation, whether its retrofit expense or even new truck replacement.

Some fleets with dedicated Owner Operators have taken the step to support their network of drivers and offered financial support. Ironman applauds this effort and encourages CARB and fleets alike to consider this as an avenue for industry compliance.

Attachment: "

Original File Name: CARB letter - Ironman comments re amendments.pdf

Date and Time Comment Was Submitted: 2014-04-14 16:27:44

No Duplicates.

## **Comment 116 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ajay  
Last Name: Joshi  
Email Address: Ajay.Joshi@jmus.com  
Affiliation: Johnson Matthey

Subject: Proposed Ammendments to T&B Regulation  
Comment:

Please see our comments attached.

Ajay Joshi  
Johnson Matthey

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-truckbus14-UjhUPwBeUmIFYlcl.pdf'

Original File Name: JM CARB TB comments.pdf

Date and Time Comment Was Submitted: 2014-04-15 08:43:17

No Duplicates.

## **Comment 117 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Steven

Last Name: Brink

Email Address: steveb@calforests.org

Affiliation: 916-444-6592

Subject: On-Road Diesel Amendments before ARB on April 24, 2014

Comment:

Comments are attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-truckbus14-BTRRYwAxVzcHMwYy.doc'

Original File Name: 140324\_cfa\_comments\_on\_On-Road\_Diesel\_amendments.doc

Date and Time Comment Was Submitted: 2014-04-15 10:04:30

No Duplicates.

## **Comment 118 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Pamela

Last Name: Doiron

Email Address: doiron@spanishranch.net

Affiliation:

Subject: Support Truck and Bus14

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-truckbus14-USVUIAZyU2MAbQRm.pdf'

Original File Name: truckbus14 Rancho Espanol.pdf

Date and Time Comment Was Submitted: 2014-04-15 14:12:27

No Duplicates.

## **Comment 119 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Geoffrey

Last Name: Mauch

Email Address: GMTrucking@aol.com

Affiliation: CTA

Subject: Your putting me out of business

Comment:

I feel that Carb does not care what they are doing to the small business & Small Fleets of 10 and under in trucking of goods and other services (Construction & Heavy Haul) in California. Carb's short term rules of making me change 90% of my fleet that has taken 24 years of blood sweat & tears. CARB is going about this all wrong. How can we comply with the rules when we apply for grants And are given grants by written letter and on the day of ordering the new truck's. Then receive a phone call from the Air District informing me that all of a sudden they have changed their criteria and I no longer meet it. Then the following year I was given a grant for a filter in Dec of 2013 and then was told I no longer met the criteria again as of 1/1/2014. So I have tried to be compliant only to have it taken away. I have spent & borrowed every penny I can. I have ruined my credit with so many loans. How do I tell my 17 year old Daughter who has worked so hard to go to Cal Poly that THE CARB IS PUTTING ME OUT OF BUSINESS AND can not afford to help her with her dream of becoming an Electrical Engineer  
P.S All my trucks pass the smoke Test Every Year I have 1 2010 & Just bought a 2014 on my own. and need to retrofit 2 by July and replace 3 by 2015 Again you are putting me out of business  
CARB Needs to slow down and give us a better Phase in over a longer time

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-15 15:00:43

No Duplicates.

## **Comment 120 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Francisco

Last Name: Ramirez

Email Address: ciscotrucking@att.net

Affiliation:

Subject: TRUCKBUS14

Comment:

I'm a long-haul owner-operator, I drive a perfectly good working '06 Volvo Truck that you guys want me to practically give away just to comply with these new regulations. In addition to that, upgrading to newer equipment is not as easy as it may seem to you. It will be a great financial burden for a lot of us that do not have the resources big companies do, with rates ridiculously and sometimes offensively low that some brokers practically want you to haul freight for free and higher maintenance costs. Some colleagues that went through a lot just to comply are also frustrated because they think we are being rewarded for ignoring the regulations, but it is not that we are simply ignoring them we are trying to comply but we need more time, at least a couple more years. We all know that eventually we all have to get newer equipment, the time will come. The State of California will also lose a lot of revenue from people and businesses that would not be able to renew their registration because they are not in compliance by July 1, 2014. We would lose our jobs/businesses and be forced to take public assistance & I do not want that. I do not want to be dependent on the government.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-16 03:11:15

No Duplicates.

## **Comment 121 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Myle

Last Name: Anderson

Email Address: myles@andersonlogging.com

Affiliation: Anderson Logging Inc

Subject: 2014 Ammendments

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/137-truckbus14-U2EBN1ZmAGcAWQZl.pdf'

Original File Name: 2014 CARB Ammendments Comments.pdf

Date and Time Comment Was Submitted: 2014-04-16 08:09:27

No Duplicates.

## **Comment 122 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joe

Last Name: Matlen

Email Address: jmatlen@vftrans.com

Affiliation:

Subject: Proposed Amendments

Comment:

Being a company that has a fleet of 140 trucks and has been compliant with ARB regulations from the beginning, it is very disappointing to see a bevy of carve-outs, exceptions and extensions for those who were never compliant and had no intention of ever becoming compliant. Those operators have tried public pressure, legislative manipulation, false reporting, and good old-fashioned whining to try and put a hold on the Truck and Bus Regulation. There is no doubt that the regulation was forced down the throat of industry with little foresight and little understanding of the real issues that California trucker's experience. But once the legislation was in place and passed initial court challenges, it became the law of the land, and flawed as it may be, truckers had the choice to either follow the rules or take their chances on some sort of 11th hour reprieve.

Now, the irresponsible may be getting their way. And those who stayed compliant throughout, even though it meant losing business because of their increased expenses, are slapped in the face. The biggest problem with the proposed modifications, besides the unfair playing field it creates, are the extensions to report or apply. Those who completely ignored the law now have another chance to follow the rules on a schedule more favorable to them than to their compliant competitors. In some ways, though, it is not surprising that flawed legislation is modified with flawed amendments.

There is also the possibility that the state could be sued for unfair business practices, by creating this uneven playing field. Compliant carriers have millions invested, so they will have to carefully consider their options. If they were to unite and bring legal action, you can bet it would be a pretty strong case. Philosophically, the only amendments this board should consider are those that help carriers who have already taken the early and painful steps to become compliant. Those who missed the train are still at the station - don't turn the train around now.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-16 09:55:58

No Duplicates.



## **Comment 123 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: K  
Last Name: Hartmann  
Email Address: kvs@pacific.net  
Affiliation:

Subject: Truck and Bus Rule Amendments - April 2014  
Comment:

Please see the attached PDF for our comments.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-truckbus14-B2RXMFMgBDUFXFUh.pdf'

Original File Name: CARB\_TruckBus.pdf

Date and Time Comment Was Submitted: 2014-04-16 10:00:16

No Duplicates.

## **Comment 124 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Timothy

Last Name: Jones

Email Address: tjones@wjhattorneys.com

Affiliation:

Subject: Comments on behalf of John R. Lawson Rock & Oil, Inc.

Comment:

Please see attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-truckbus14-UDFWIIQ3Ag5VMAIm.pdf'

Original File Name: ARB Comment Letter - Truck and Bus (00465903).PDF

Date and Time Comment Was Submitted: 2014-04-16 11:04:13

No Duplicates.

## **Comment 125 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tim

Last Name: Smith

Email Address: tim4429@sbcglobal.net

Affiliation: Central Sierra Mining Association

Subject: Exemptions from NOx emission standards for rural counties

Comment:

We have passed a Resolution in the Central Sierra Mining Association in opposition to the CARB including the Counties of Nevada, Amador, Calaveras, Tuolumne, Mariposa, Mono, Inyo and Kern in the new NOx emission standards . Please see our resolution attached.

Tim Smith

President and Director, Central Sierra Mining Association (CSMA)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/141-truckbus14-VSEBdVImBTUFaAJr.pdf>'

Original File Name: trucking resolution signed.pdf

Date and Time Comment Was Submitted: 2014-04-16 11:01:11

No Duplicates.

## **Comment 126 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: cindy

Last Name: alvarez

Email Address: calvarez10@socal.rr.com

Affiliation:

Subject: pmi filters

Comment:

we own one 18-wheeler, 2007 with a 2006 engine. how can this rule be passed to make a truck owner be required to spend \$20,000 for a pm filter or else risk a fine? where is the help from the state of california in the form of a grant or voucher? in today's economy, people are barely paying their truck payments and house payments. we pay enough income tax, heavy use tax, dmv registration fees, and major insurance. how can the state just expect the small mom and pop organizations or one-man owner/operators to cough up another \$20,000? the hardship is next to impossible! we complied with the december 2013 deadline by putting a down payment on a filter. my parents loaned us the money! we cannot get a loan for anymore money. we can't be the only owner/operators in california that this is happening to. if CARB wants this filter in place, they should make it possible for all of us to comply. we need help...

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-16 15:00:21

No Duplicates.

## **Comment 127 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Frank

Last Name: Vaine

Email Address: franksfirewood@pacific.net

Affiliation: Frank Vaine Logging & Firewood

Subject: New exemption proposal in clean air attainment areas

Comment:

In regards to the hearing on exempting trucks that are non compliant to current air quality regulations that are in rural areas that don't have air pollution issues, I can agree with this.

However, as in my case, I just spent over \$120,000 for a new 2014 firewood truck which I didn't need, in order to comply with your new regulations as of Jan. 1, 2014. There was nothing wrong with my 1996 FL80 with a 1996 cummins engine. But because of your threat of huge fines for not complying, I felt I had no choice if I was to stay in business.

However if my competitors are to "play in my backyard", they should play by the same rules as you've forced me to play by. I now have an added cost to re-coup the expense of this truck that they will no longer need to purchase. I think that some sort of tax credit for those of us who have complied would be in order to level the playing field against those who haven't complied and now may be exempt in doing so.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-17 06:06:34

No Duplicates.

## **Comment 128 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mike

Last Name: Cook

Email Address: mcook@aareadymix.com

Affiliation: A&A Ready Mixed Concrete Inc.

Subject: Cleaire Longmile VDECS

Comment:

Dear CARB,

I wish to express our concerns with the proposal to solve the Cleaire Longmile VDECS (verified diesel exhaust control system) problem.

We currently have added DPFs to 154 vehicles. We took advantage of the early retrofit credit on 139 vehicles at a cost of over \$2,000,000.00. This was done at a time that the economy and in particular construction was crushed in California.

We had previously given testimony and sent letters advising CARB that the technology to retrofit concrete trucks that do not create sustained exhaust was not available. Almost every DPF requires 260 degrees Celsius 25% - 40% of the time. The Cleaire Longmile only requires temperatures of 260 degrees Celsius 7% of the time. These retrofits worked well for us. I have heard countless number of horror stories from others in our industry about problems that they had with other brands of DPFs.

There were fires related to engines with higher horse power that used the Cleaire Longmile. This prompted a "voluntary recall" of the existing metal filters. They were supposed to be replaced with a certified silicon carbide core. Cleaire Muffler Modules were installed temporarily.

Cleaire went out of business and ESW CleanTech Inc. acquired the assets of Cleaire. When ESW CleanTech contacted me to remove the remaining metal filters I said that they are working fine and I did not want to remove them. I was told that if we did not allow them to remove the metal filters we would not be eligible to have the silicon carbide core installed when they become available. That doesn't sound like a voluntary recall to me.

In the CARB Mail-Out #MSC 13-04 the CA Air Resources Board stated that they "will be working closely with fleets, dealers, and parts suppliers to minimize the impact of the Cleaire closure." We have never heard from them since then regarding the Cleaire Longmile.

CARB verified these systems. They had to have a five year warranty. Cleaire stated in their letter dated 11/20/12 that "In the past 12 years, Cleaire has delivered over 18,000 compliant systems, many still in operation long after the 5 year warranty period. With that said we are not satisfied with the CARB's proposal to have to replace these filters 5 years after the recall notice. This means that after six years we have a 100% replacement

rate of the entire system.

CARB should stand behind the systems that they verified. If there are costs related to replace the core or the entire system CARB should pay those costs. We purchased these retrofits knowing that we would be running these trucks until 2022. We cannot purchase 120 new trucks five years early at an additional cost of over \$25,000,000.00. This cannot be done and still meet all of the other many CARB requirements that we face both on and off road.

Sincerely,

Mike Cook  
Purchasing/Fleet Manager

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/144-truckbus14-Uj5XNAF0VXIBYgh6.doc>'

Original File Name: Letter to CARB 4-16-14.doc

Date and Time Comment Was Submitted: 2014-04-17 07:46:04

No Duplicates.

## **Comment 129 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Karen

Last Name: Cabron

Email Address: karen.cabron@solanosdoitbest.com

Affiliation: Controller

Subject: PM Filter Requirement NOX Exempt Area

Comment:

Our company has done our best to comply with regulations that keep changing constantly. We have had to deal with fines when we thought we were compliant. We recently purchased a PM Filter Upgrade for one of our trucks at the end of the 2013 year, so that we would be compliant on the January 2014 deadline date and not incur an additional fine. Then we come to find out, one week after we spent \$15,000 on that filter, taking out a loan to be able to do it, that the requirement was changed and it will now be January 2015. Or maybe even January 2016?? Depending on what the Air Resources Board decides at the upcoming meeting next week. We wanted to send company representatives to this meeting and have been watching the Board website to try to find out when the meeting was to be held, but could find nothing until just recently.

It puts financial hardships on small companies such as ours, when the rules are constantly changing and we are not always notified in a timely manner. It would take a dedicated full time person to follow all of the requirements and changes that just your state organization imposes on the businesses of California.

Please consider making your decisions in a timely manner and sticking to those decisions, so that businesses owners are not confused as to how to comply with the regulations. Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-17 09:52:04

No Duplicates.



## **Comment 130 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Liz

Last Name: Sanchez

Email Address: liz.sanchez@firstgroup.com

Affiliation:

Subject: Comment on Truck & Bus Rule (re School Buses)

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/146-truckbus14-UDMGB1Q4UG5WNQFv.pdf'

Original File Name: Comments on Proposed Revisions to Truck and Bus Rule.pdf

Date and Time Comment Was Submitted: 2014-04-17 10:52:09

No Duplicates.

## **Comment 131 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation: California Trucking Association

Subject: Truck and Bus

Comment:

Please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/147-truckbus14-UWNRZwMzUTYKU1Qg.pdf'

Original File Name: 2014 Truck and Bus Rule ISOR final.pdf

Date and Time Comment Was Submitted: 2014-04-17 15:14:06

No Duplicates.

## **Comment 132 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Robert  
Last Name: Van Dyke  
Email Address: rsvd@succeed.net  
Affiliation:

Subject: amendments  
Comment:

It is not fair to change mandatory programs after the deadlines are up. I complained to ARB about the impact this would have on the one and two truck sub-haulers(contract carriers), two years ago that pull for us, most would not be able to up date their trucks, let alone install after market filters on them. I stated that it would hurt the trucking of ag products and there would be a transportation shortage. The response was that there would be fewer trucks on the road helping the environment and those remaining would be able to raise trucking rates to pay for new equipment. We are a small company but have still spent over one million dollars on new equipment to be in compliant with ARB and Drayage truck regulations. A majority of our sub-haulers have also gone deep into debt , even borrowing against the houses to update their equipment. These changes are not right. I never want to see a business go under, we need all the employers and jobs we can justify, but why should we reward those who procrastinate and proclaim ignorance to a mandated change that was implemented years ago. Thank you, Bob Van Dyke , VA Farms.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-17 15:15:29

No Duplicates.

## **Comment 133 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: kenny

Last Name: de koning

Email Address: cietrucking@msn.com

Affiliation:

Subject: filters

Comment:

i dont think there should any changes i have already up dated my fleet and it cost me a lot money to do this so its not fair for any changes

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 06:53:12

No Duplicates.

## **Comment 134 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: curt

Last Name: dekonig

Email Address: cietrucking@msn.com

Affiliation:

Subject: dpf filters

Comment:

there shouldnt be any extension because if a small fleet cant get a loan. that means there rates are low so they are hurting the companys that are already complied. i had to save and spend my savings to comply so there should be NO CHANGES AT ALL

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 07:04:16

No Duplicates.

## **Comment 135 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Colby

Last Name: Bell

Email Address: cbell@starlitetrucking.com

Affiliation:

Subject: Proposed Amendments to Truck and Bus Rules

Comment:

Dear ARB Representatives,

It is my position as CEO of Starlite Trucking that any further amendments to the Truck and Bus rules would be negligent and punitive towards those that have already complied.

We alone have invested hundreds of thousands of dollars to gain compliance while we watch our competition wait for further amendment and undercut market rates significantly. Further extension of the regulations for small operators creates the opportunity for them to gain competitive advantage in the local market, and it undermines the credibility of the Air Resource Board.

We are also seeing the creation of "umbrella" carriers, where a 3 tractor operator is working with a group of 3 tractor sub-haulers....though illegal, ARB has now way to enforce this as they all run separate books and have no direct physical interaction. What this does is allows a small operator to operate as a large fleet at significantly lower rates.

I understand the financial predicament this puts some carriers in, but this has been a known escalation for many years with many opportunities for public funds. Extending these regulations at this point would be catastrophic to the compliant carriers within the state.

I further wish to state I support the California Truckers Association comment issued by Eric Sauer earlier this month.

I look forward to seeing you at the hearing.

Regards,  
Colby Bell

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 07:54:48

No Duplicates.



## **Comment 136 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Janes

Last Name: Ortega

Email Address: Avtruck@sbcglobal.net

Affiliation:

Subject: Truck and bus rule

Comment:

For those truck owners that have complied with the truck and bus rule need to receive a tax credit for the financial burden they have incurred and for the contribution they have given to the LA county air quality. This came up at one of the meetings that ARB hosted. They said we (truckers) would have to write to the federal govt. I ask that CTA lobby for us truckers. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 08:00:54

No Duplicates.



## **Comment 137 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mike

Last Name: Konanz

Email Address: mkonanz@kampspropane.com

Affiliation: Maintenance Director

Subject: Manufactures delay dead line

Comment:

We have had on order with Freightliner 11 (S2G class 7) propane chassis, since June of 2013.

we are now advised that these units wont be shipped until September 2014.

the dead line for the manufactures delay is next month.

Once these show up, it will take the 4-6 weeks per unit to reconfigure, removing the tank and installing on the new chassis.

Pacific Truck, our fabrication company can only do 2 at a time which will put us into 2015 before we can come into compliance.

Not sure how to approach CARB on this issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 09:27:01

No Duplicates.

## **Comment 138 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ed

Last Name: Gamache

Email Address: egamache@ozarkinc.com

Affiliation: Ozark trucking and Raley's

Subject: TRU extension

Comment:

I would like consideration to extend the 7 year life for TRU's. We have well over 100 units that compliance will expire 12-31-2015. These units will have used less the 50% of their useful lifecycle. The only viable option for the future is complete unit replacement. Replacement engines no longer qualify, Exhaust retrofits have performance issues and Tier 4 final engines do not fit in older units. The new unit cost will be between \$24,000-\$25,000 per unit. This means a minimum of 2.5 million dollars to replace 7 year old engines that have not utilized half their life cycle. Because we set our TRU's to operate only when necessary, we have effectively reduced the emissions much below most other users. i would like to see considerstion to extend the 7 year compliance deadline so it is relative to the emissions we have been able to reduce through smart operation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 09:28:52

No Duplicates.

## **Comment 139 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mike

Last Name: Anderson

Email Address: mike@andersonlogging.com

Affiliation:

Subject: On-Road Diese Rule Amendments

Comment:

Richard Corey

Executive Director California Air Resource Board

Re: On-Road Diesel Rule Amendments

Dear Mr. Corey,

These amendments being considered are a very good starting point. Much more needs to be done for the rural counties that have the cleanest air in the nation but lack the wherewithal to pay the bill associated with these rules.

In a previous hearing, Chair Mary Nichols stated in regard to rural California's issues with the diesel rule package "it's nothing that money can't solve". Unfortunately that was the case back then and is still the situation faced by rural fleets. The following are the issues:

- Short operating seasons result in an inability to service loans necessary to purchase new trucks.
- Banks rightfully will not loan the money as there is no way for the truckers to make their payments.
- There is a demand for all the same trucks in rural California as there is in the urban areas; but there is no opportunity to work them enough to afford to replace low use trucks with new.
- A minimum of 50% of the heavy duty trucks in rural California are mechanically fuel injected trucks (the dirtiest of the bunch) as a result of this rule these trucks that were worth \$20,000 - \$30,000 are now worth \$5,000 to \$10,000. There are no PM filters available that will work on this group of trucks in rural California!
- All the Prop 1B money went to the transportation corridor trucks, virtually none to rural California. The transportation corridor trucks operate 150,000 miles a year and update their trucks every 5-7 years, this rule has no impact on them; in-fact it created a windfall. Rural California trucks operate 20,000 to 60,000 miles per year their business models require them to keep a truck 15-20 years. They did not receive any 1B money and are being put out of business by this rule!

The amendments are a good starting point, in order that this Diesel Rule does not completely destroy trucking jobs in rural California more needs to be done. A new heavy duty trucks costs about \$150,000, bottom line rural businesses cannot afford this, so back to Chair Mary Nichols comment "it's nothing that money can't solve". The following are some possible considerations.

- This is a rule all Californians benefit from, all Californians should subsidize these businesses rather than destroy them. Vouchers in the range of \$60,000 to \$100,000 are a reasonable consideration. The money generated by the purchase of Carbon Credits should fund these vouchers!
- There is a tremendous PM reduction when updating from a mechanically fuel injected engine to an electronically fuel injected engine. Consideration should be given to allowing NOx exempt counties to upgrade to this technology rather than going all the way to PM filters and 2010 engines. These trucks are readily available and relatively affordable and could minimize job losses in rural California.
- Consideration needs to be given to allow very low use specialty vehicles (10,000 miles and less) in the NOx exempt counties to operate beyond 2023.

If not further amended, the cost of compliance with the Diesel Rule in rural California will be paid by the local communities in lost jobs, tremendously inflated prices and the destruction of our fragile rural economy.

Mike Anderson  
Fort Bragg

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 10:05:07

No Duplicates.

## **Comment 140 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Steve

Last Name: Benninghoff

Email Address: sbenninghoff@kkwtrucks.com

Affiliation:

Subject: CARB Hearing

Comment:

To Whom It May Concern:

Amending the final rules at this point would severely punish those carriers, both large and small that have made the sacrifices and financial investment to comply and rewards those that ignored the rules and deadlines. Competition for freight is often determined by as little as \$.01 per mile. Those that made the investment to comply would be put at an enormous competitive disadvantage at the worse time possible. We MUST recover our investment in the technologies mandated by AQMD/CARB , this will not be possible if we are competing with carriers that have a lower cost point operating older, non-compliant equipment.

Carriers both large and small not only were forced by the regulations to purchase newer more expensive equipment but were also required to sell off non-compliant equipment at what resulted to be "Fire Sale", wholesale prices. By amending the mandated regulations you will be forcing the compliant carriers towards bankruptcy and those that chose to ignore the rules, hoping for extensions into the power position.

We as a complaint carriers implore the board to stay the course. It's too late to do anything else.

Who can't NOT qualify for loan ?

Respectfully Submitted,

Steve Benninghoff

COO

Direct# (909) 869-1296

Cell# (909) 208 4198

sbenninghoff@kkwtrucks.com

www.kkwtrucks.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 10:45:52

No Duplicates.

## **Comment 141 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ron

Last Name: Faulkner

Email Address: ron@faulknertrucking.com

Affiliation: Faulkner Trucking Inc

Subject: Comments 4/21/14 Amendments

Comment:

Faulkner Trucking is against any modification in the current regulations for 1 to 3 truck companies. The original regulations provided for an extended time frame to allow these companies an opportunity to comply. All other company's accepted the added financial burden and spent the necessary capital to comply with the knowledge that the 1 to 3 truck companies were also being compelled to comply. The extended time frame has created an unlevel playing which has squeezed margins for compliant companies. Noncompliant companies with a lower cost operation have been able keep lower freight rates in place for far too long.

At Faulkner Trucking we have complied with the regulations since day 1. The cost of compliance has been steep. First we retrofitted 10 early to get an additional 10 trucks in compliance. The cost was \$150,000 for the retrofits. These retrofits reduced fuel mileage, damaged several motors and required extra maintenance. The reduced fuel mileage amounted to \$11,000 per vehicle. The required extra maintenance caused the trucks additional time which decreased the annual truck revenue by \$10,000 per year. The 3 damaged motors caused by sub par engineering of the retrofits Cost \$15,000 per motor.

Secondly the company spent \$608,000 for new trucks and \$650,000 for compliant used trucks. To achieve compliance until 1/1/17 the company had to be refinanced over 10 years. The extra refinancing burden on the company puts Faulkner Trucking "at risk" of closing doors its "any day" for the next 10 years simply because we complied with the current regulations. Faulkner Trucking employs around 60 people whose life would be disrupted by this type of event. Many of our employees are older workers that would find it impossible to find the same type of job.

For the ARB to grant extensions would be unfair to the companies that invested in compliance. The small operators knew that they had extended time to comply and are now trying to have the rules changed for their gain at the expense of the companies who have put their entire company's on the line to comply.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 10:44:15

No Duplicates.



## **Comment 142 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Rasto

Last Name: Brezny

Email Address: rbrezny@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on Proposed Truck and Bus Amendments

Comment:

Please find attached MECA comments on the proposal to amend the in-use truck and bus regulation. If you have any questions please let me know.

Rasto Brezny  
MECA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/158-truckbus14-VThcPwZkWWsFXFc0.pdf'

Original File Name: MECA Comments on 2014 Truck & Bus Amend 042414 final.pdf

Date and Time Comment Was Submitted: 2014-04-18 10:39:09

No Duplicates.

## **Comment 143 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Alan

Last Name: Osofsky

Email Address: alano@rodgerstrucking.com

Affiliation: California Trucking Association

Subject: Compliance for a PM Filter Retrofit that is Recalled

Comment:

Please consider using the date that Cleaire ceased doing business 01/18/2013 as the date to use for the 5 year extension. The date of recall on the Longmile DPF was 08/17/2012. My reason is that Cleaire could have come up with a solution prior to closing its business. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 10:55:59

No Duplicates.

## **Comment 144 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Eric  
Last Name: Carleson  
Email Address: ecarleson@calog.com  
Affiliation: Associated California Loggers

Subject: Comments on Proposed Amendments to Diesel Truck and Bus Rule  
Comment:

Comment letter attached.

Sincerely,

Eric Carleson  
Executive Director  
Associated California Loggers

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/160-truckbus14-VTIRMIUgAiVWNVQm.doc'

Original File Name: lettercommentcarbodieseltruckamendments414.doc

Date and Time Comment Was Submitted: 2014-04-18 11:10:00

No Duplicates.

## **Comment 145 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ed

Last Name: Rocha

Email Address: office@rvetrucking.com

Affiliation:

Subject: Livestock Hauler Compliance

Comment:

As a livestock carrier since 1935, we have been in compliance to all State & Federal mandates as they come into effect. We were all given proper time to comply with CARB's rules. We have spent approximately \$1,500,000 with no help to comply. Some units were replaced before the scheduled time.

We are not against a cattleman that owns his own truck, not for hire, to be exempt for a certain lengthen of time in the future. There is not a shortage of trucks. The cattleman need to schedule ahead of time and spread out their shipments.

As for out of state trucks, the majority of the fleets are CARB compliant and the puller is doing the same.

I believe if the CARB rules are not followed and the non-compliant trucks are exempt they are going to undermine the financial security of the companies that have complied. The vast majority of livestock carriers have complied.

I hope these comments from the oldest livestock carrier in CA will help you make your decision so we can continue being in business.

Thank you,  
Ed Rocha

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 12:55:29

No Duplicates.

## **Comment 146 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: CIAQC Recommendations for the Truck & Bus Regulation

Comment:

Please find attached the recommendations from the Construction Industry Air Quality Coalition (CIAQC) to improve the Truck and Bus Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/162-truckbus14-UycFcQF1UGAKZ1AP.pdf'

Original File Name: Truck & Bus Regulation - CIAQC Comments 4-17-14.pdf

Date and Time Comment Was Submitted: 2014-04-18 13:16:16

No Duplicates.

## **Comment 147 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: pedro

Last Name: cardona

Email Address: cardonapedro4@yahoo.com

Affiliation:

Subject: Amend 14

Comment:

I Believe the law should be the same for everybody. There should be no more extensions, It's not fair for the ones who already bought a new truck and are compliant to have clean air. If further extensions are made more pollution there is and if the law is not applying to everyone then their should not be one to begin with.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 12:46:40

No Duplicates.

## **Comment 148 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Michael

Last Name: Rea

Email Address: mikerea-wcta@juno.com

Affiliation: CASTO (School Bus)

Subject: Request Consideration of Low Mileage Exemption for School Bus  
Comment:

I am attaching a formal letter that details our position and request.

The California Association of School Transportation Officials (CASTO) represents all school transportation Professionals in California.

We respectfully request consideration that the low mileage exemption accrue to School Buses: From 1,000 miles to 5,000 miles until 2020.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/164-truckbus14-BWYGYQNwBDUBWFun.pdf'

Original File Name: CARB request for consideration 4-18-14.pdf

Date and Time Comment Was Submitted: 2014-04-18 14:25:11

No Duplicates.

## **Comment 149 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinnpower.com

Affiliation:

Subject: Extension Now Requires Reporting?

Comment:

I have read over the 2025(f)(2) and 2025(g)(4) and the way it seems to be worded it would suggest that in order to get any extension for any vehicle retrofit done before 1/1/14, all the vehicles in the fleet would need to be reported. Under the original BACT, reporting was not required to get the extension to 2020 for retrofitted vehicles > 26,000# GVWR and engines between 1996 and 2006. If you are now making reporting of all vehicles a requirement to get the extension to 2023, I believe this is really penalizing those that did the right thing under BACT before 1/1/14 to have them now be required to report. If this is the intention, then I would perhaps make this suggestion:

1. No reporting necessary if the PM filter is installed before 1/1/14 and they want to keep the original 1/1/2020 deadline.
2. Reporting of their entire fleet would only be required if they wanted the extra 3 years.

While the extension to 2023 would sound great to those that complied or did more effort than they should have by 1/1/14, the disincentive of reporting now to get any extension far outweighs any elation.

The regulation needs to stick to the original concept of no reporting if the BACT path is utilized.

Thank you.

Bob Shepherd

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 15:24:54

No Duplicates.



## **Comment 150 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: DAMANJIT

Last Name: MAHAL

Email Address: DMKATHGARH@YAHOO.COM

Affiliation:

Subject: EXTENSION FOR COMPLIANCE DEADLINE

Comment:

Hello Sir/Mam,

I am a owner operator with a single truck. I have not been able to apply for any grant due to not having my truck registered and insured for the last 2 years. This is one of the main criteria in order to be able to apply for grant.

I have owned this truck for a number of years. I had been out of the country for more then one year. For this reason I don't meet the criteria. I Got back to USA in March of 2013 and have had the truck registered and insured since then.

I spoke to the local Air resource management people but they have said that I do not qualify for a grant for a replacement of my truck due to not meeting the criteria mentioned above.

In these recent years the bad economy has really hit hard and the work has been slow. I am the only earning member in my household. I also support my parents along with my wife and kid. In this time of hardship I am certainly not able to afford a new or a used higher model truck. My truck being a 1994 model with a 1993 engine, cannot have any DPF filter either.

I would like for you to consider these issues, so in future I am able to get a grant and be able to afford a replacement and for you to allow for more flexibility in regards to the time deadlines for replacement especially for single truck owner operators who have been hit hard in these lean period of bad national economy.

Thanking you,

Damanjit S Mahal

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 15:16:48

No Duplicates.

## **Comment 151 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Devilla

Last Name: Ervin

Email Address: devilla.ervin@gmail.com

Affiliation: New Voices Are Rising

Subject: DO NOT DELAY IMPLEMENTATION

Comment:

My name is Devilla Ervin and I am strongly in favor of Implementing the diesel truck rules IMMEDIATELY. I am a firm believer that every resident in California deserves the right to clean air and it is Your responsibility to protect the residents of California. DO THE RIGHT THING ACT NOW!!!!!! PLEASE stand strong!!!

Thanks!

Devilla

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:25:26

No Duplicates.

## **Comment 152 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Woody

Last Name: Hastings

Email Address: woody@climateprotection.org

Affiliation: Climate Protection Campaign

Subject: Diesel Truck & Bus Regulation - Support

Comment:

Dear ARB,

Please fully implement the CA Diesel Truck and Bus Regulation as it was passed in 2008. Exposure to diesel is probably what triggered my most serious allergy episodes.

Please remember your mandate and defend our right to breathe clean air.

Sincerely,

Woody Hastings

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:32:15

No Duplicates.

## **Comment 153 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: paloma

Last Name: pavel

Email Address: palomapavel@yahoo.com

Affiliation:

Subject: support for california diesel truck regulation. now

Comment:

Now more than ever it is important to stand strong in the face of pressure to reduce regulations. There is one air. This is the air we breathe. This is a public health issue. Implement the rule - it is a great rule. we appreciate your rule and want you to stand behind it. Paloma Pavel, PhD  
Vice President - WCCC League of Women Voters  
El Cerrito Environmental quality commission

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:38:10

No Duplicates.

## **Comment 154 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Andreas

Last Name: Karelas

Email Address: andreas@re-volv.org

Affiliation:

Subject: Diesel Truck & Bus Regulation - Support

Comment:

Dear Members of the California Air Resources Board,

I am writing to you to support immediate and full implementation of the California Diesel Truck and Bus Regulation in California as it was passed in 2008.

Sincerely,  
Andreas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:46:21

No Duplicates.

## **Comment 155 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: David

Last Name: Anthes

Email Address: blastreach@sbcglobal.net

Affiliation:

Subject: California Diesel Truck and Bus regulation in California

Comment:

Please consider this a comment to implement the California Diesel Truck and Bus regulation in California. It was passed some time ago, let's implement it. It will do much to clean up dirty air.

Thanks,

David

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:50:43

No Duplicates.

## **Comment 156 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Charles

Last Name: Fleeman

Email Address: easy-goer@yahoo.com

Affiliation:

Subject: Diesel Truck & Bus Regulation - Support

Comment:

I support the diesel truck rule! This important rules saves lives and keeps children out of California hospitals. I applaud the leadership the board showed when they passed the rule and now urge you to implement it statewide without delay.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 17:56:02

No Duplicates.

## **Comment 157 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Michael

Last Name: Green

Email Address: michael@ceh.org

Affiliation: Center for Environmental Health

Subject: please protect the health of our children

Comment:

We need you to stand strong to protect public health. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 18:00:54

No Duplicates.



## **Comment 158 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: denny

Last Name: rosatti

Email Address: denny@conservationaction.org

Affiliation:

Subject: diesel truck and bus regulation

Comment:

support immediate and full implementation of the CA Diesel Truck  
and Bus Regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 18:08:08

No Duplicates.

## **Comment 159 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Susie

Last Name: Marcus

Email Address: susie94544@yahoo.com

Affiliation:

Subject: Diesel Truck Rule

Comment:

I support any initiative to clean up the air. Stand strong on the Diesel Truck Rule.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 18:16:24

No Duplicates.

## **Comment 160 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: pedro

Last Name: cardona

Email Address: cardonapedro4@yahoo.com

Affiliation: owner operator

Subject: amened 14

Comment:

I Believe the law should be the same for everybody. There should be no more extensions, It's not fair for the ones who already bought a new truck and are compliant to have clean air. If further extensions are made more pollution there is and if the law is not applying to everyone then their should not be one to begin with.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 20:18:27

No Duplicates.

## **Comment 161 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Kim & Sherman  
Last Name: Bradshaw  
Email Address: kimbrad39@hotmail.com  
Affiliation: S&K Trucking

Subject: PROPOSED AMENDMENTS  
Comment:

To whom this may concern,  
We are writing on behalf to of our trucking company, and the proposed amendments that are being considered.

We completed agree with CLEAN AIR not only here in California, but for the planet earth. However why does California and the people who live and work in this state have to sacrifice our lively hood for the entire world. Why do we have to worry about our financial future just because we choose to own a business, more specifically a trucking company?

Can you at least put yourselves in our shoes? I assume your jobs are safe from layoffs, safe from any government agency putting you out of business. How would you feel if you were forced to purchase a very expensive vehicle or a very expensive retrofit to stay in business?

We unfortunately could not afford to purchase a new truck. Sure, there was funding to help us with said purchase, but we were not in a financial position to do so. The 2nd option was to purchase a retrofit for our truck. We made many phone calls looking for funding, but no one could help us. We questioned if there was truly funding for retrofits. I have yet to hear of ANYONE getting funding.

As a business owner, if by law you are required to abide by a regulation, if you want to stay in business with a good, and honest reputation, you must comply. So in November of 2013, we were looking for funding, or grants one last time. We were left with the options of going out of business, or getting a loan. In 3 years we will pay a total of \$21,780.60, with an interest rate of 17.190%. We feel since we complied when we were required to, and you amend this regulation, it's only fair to provide us a "GOOD FAITH" effort by giving us credit/or funding toward our retrofit. If we had the luxury of waiting it out as some of the business owners apparently did, we no doubt would have been in a better financial position to abide by this.

Why was this amendment not addressed in 2011? 2012? 2013? A little to late for I believe most of the businesses who did the right thing.

Finally, we appreciate this opportunity to provide our input, and hope you consider the big picture. This is our livelihood, just because we choose to own a trucking company in California, why is our industry the only ones that seem to be carrying the weight of

clean air for the entire world.

Sincerely

Sherman & Kim Bradshaw  
S&K Trucking

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-18 21:23:08

No Duplicates.

## **Comment 162 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Alicia

Last Name: Guitron

Email Address: sraalicia@hotmail.com

Affiliation:

Subject: DPF Filters

Comment:

We have 4 tractors which last year to stay in compliance, had to get 2 DPF filters(32,000)We could not get loan so we had to use retirement fund from my 401k plan. We are doing everything we can to stay in business, but we have had nothing but problems in our 2007 Volvo it has been in shop several times \$and now it has been shop for more than 3 weeks, Due to the DPF filter there not sure if it engine it not accepting the filter. We have Volvo dealer and Holt of California doing all sorts of diagnostic test and no answer yet. This has really been a hardship for our company and drivers. Any suggestions on what we can do??? Desperate owners.... Also 2 years ago we put a new engine...(33,000) Ever since we put the filter this has been going on. Who should be involved in getting this truck working????? Since I am doing all that I am asked to do to keep in Compliance...

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 05:08:04

No Duplicates.

## **Comment 163 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: S. Stanley  
Last Name: Young  
Email Address: young@niss.org  
Affiliation:

Subject: Truckbus14  
Comment:

File 00 Young comments on truckbus14 gives a short description of the remaining 5 files.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/181-truckbus14-UShcNVcjAz4EZQBf.zip'

Original File Name: Young CARB truckbus14.zip

Date and Time Comment Was Submitted: 2014-04-19 10:48:27

No Duplicates.

## **Comment 164 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Chris

Last Name: Medina

Email Address: Chrismedinatrans@aol.com

Affiliation: Owner operator

Subject: Livestock proposal

Comment:

I have been an owner operator for more than 20 yrs. I haul livestock only . This last year I jumped thru all the hoops of getting carb compliment . I think if most of us did it we should all have to comply. I think that the new proposal should not pass.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 11:32:03

No Duplicates.



## **Comment 165 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Lisa

Last Name: Ananian Krause

Email Address: lisa@anianiantrucking.com

Affiliation:

Subject: Don't extend compliance dates!

Comment:

Ananian Trucking does not agree with extending the regulation in place in regards to the 1 to 3 truck companies. Original regulations provided these companies adequate time to comply. Compliant company's accepted the added financial burden and spent the necessary capital to comply with the understanding that the 1 to 3 truck companies would also be compelled to comply. Noncompliant companies with lower operational costs have been able keep lower freight rates. The extended time frame has created an unlevel playing field in the Industry which has squeezed margins for companies who spend the money to become compliant with the law.

At Ananian Trucking we have complied with the regulations. We sold 3 non compliant trucks to out of state operators, these were perfectly good running trucks. Additionally, we purchased three compliant trucks without grant money. This has put a significant burden on our businesses cash flow. The extra financial burden on the company puts Ananian Trucking "at risk" of closing doors its "any day" simply because we complied with the current regulations.

Secondly, this new compliant equipment is less reliable and has cost us tens of thousands of additional repair costs and is much less reliable. Our old non-compliant equipment was much more durable and reliable with significantly less repair costs.

Industry rates have not increased to offset these additional costs to comply, largely due to the other non-compliant operators. These are both those you have failed to catch and the small fleet operators you have chosen to hold to a different standard.

For the ARB to grant extensions to some operators, would be unfair to the companies that invested to comply and would be wrong! The small operators knew that they had extended time to comply and are now trying to have the rules changed for their gain, at the expense of those companies who have put their businesses at risk to comply.

Lisa Ananian Krause  
President  
Ananian Trucking, LLC  
PH# 559-528-6911  
FAX#559-528-6223

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 15:59:00

No Duplicates.

## **Comment 166 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: John

Last Name: Van Dyk

Email Address: vandyktrucking@gmail.com

Affiliation:

Subject: Proposed Livestock Amendment

Comment:

Dear ARB Board Members,

As the owner of Van Dyk Trucking, a small, Livestock Hauling only, family owned business, I strongly oppose the amendment to make all Livestock Carriers exempt thru 2023 !

I have been in business, based in San Joaquin County, for over 36 years. Through all these years, there has never been a shortage of cattle trucks, and there is no proof that there will be one in the future. The backers of this proposal have said the existing rules have depleted their ability to move livestock in the state. Believe me, if there was a need for more trucks, myself and the other compliant livestock only haulers, would add more trucks to meet the demand. As for the argument that out of state haulers won't come to California, maybe there will be a few, but most larger livestock carriers have already upgraded to be compliant, and many of the small fleets and owner-operators have, or will soon.

We have known about these ARB compliancy laws for years. I started early, so as to spread my higher costs over more years, I had to, you said if I didn't I would be put out of business. This is all I have, all I do, I had no choice. Competing with non-compliant trucking companies is very difficult. I do it on a daily basis. They have a much lower cost per mile to operate, especially a company that isn't based in California, and the higher costs related to that. It would be like a punishment to those of us who followed the rules, who have been paying the higher costs associated with compliancy. We did all this knowing some day everyone else would be doing it too, and we would be on an even playing field.

To extend non-compliancy thru 2023 would be devastating to the financial well being of many California family owned companies, even forcing some out of business.

The backers of this proposal are not trucking companies looking for a break, they are consumers looking to keep their costs for livestock hauling low by allowing non-compliant, air polluting, trucks to continue to operate in California for many more years. With all the steps forward, you at the ARB have made, in the last ten years, you're not taking a step back, your falling down the stairs if you pass this amendment!

I extend an invitation to you Mary Nichols, or any of the other board members, to contact me, or come see my company and how it works. I could explain to you how a full time livestock only trucking company works. I don't do this part time, I'm not a rancher , I don't have a truck as a hobby. This is my LIFE!

Thank You for reading.

John Van Dyk

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 16:30:23

No Duplicates.

## **Comment 167 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dave

Last Name: Vierra

Email Address: vierrabros@hotmail.com

Affiliation:

Subject: Livestock Hauling Compliance

Comment:

I am a single-truck owner and only haul livestock, mostly during the peak seasons when ranchers are moving their livestock to and from grazing areas. When you passed your original ruling in 2008, I made adjustments to my business knowing I would need to become compliant to the ARB, and made the necessary, albeit expensive transition to a new truck even when my older model truck was still fairly new, at only 8 years old. I have complied with California's ARB. I do not understand why you would penalize your faithful California businessmen who have complied with the Regulation in favor of all non-compliant truckers. While we do feel that Not-For-Hire cattle haulers should remain exempt, those of us who haul cattle for the Ranchers and Dairymen of California feel all trucks need to be compliant.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 16:39:10

No Duplicates.

## **Comment 168 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltrucking.com

Affiliation: Trucking Company

Subject: Truck and bus rule modifications

Comment:

To Board and Staff,

I feel allowing the trucks that installed filters early, the ability to operate for more time is good. The problem is it does not address the 2007-2009 technology trucks. There are many of those out on the road currently. Many companies purchased those trucks to get into compliance. That was during the time which the Truck and Bus rule was approved. Those trucks have a useful life of a minimum 20 years. There is nothing wrong with those trucks. They have a factory filter installed and operate relatively well. Not to say they are trouble free, but they are filtered and cleaning up the air. Currently those trucks sunset in 2023, which is only 15 yrs. Not long enough in a Heavy duty trucks life. If you were to allow those trucks to operate until 2029, those units could go to the operators that are unable to purchase new trucks. This would go a long way toward helping the one owner /operators get into compliance. Maybe better than modifying the rule as proposed.

I see nothing in these modifications that deal any further with enforcement. I, as many I align with, feel that enforcement is critical and lacking. On any day, I can drive down the freeway and notice multiple non filtered trucks. I feel we are lacking in a mechanism to help enforcement. I have been told that involving the DMV is unattainable. I find this hard to believe. I have to provide my 2290 (heavy use tax) that is paid to the federal government in order to license my trucks. On that form are the vehicle ID numbers of each one of my trucks. There is a form that we fill out when registering our trucks in the truck and bus rule each year. That form recognizes our trucks by their vehicle ID numbers also. Would it be that difficult to match up the numbers on the 2290 and the print out from the registration into the Truck and Bus rule? The lack of enforcement is negligent and counterproductive to the overall program.

If we go through all of this time and effort to make changes to this rule and have no enforcement, what good is any of this?

Chris Torres,  
President,  
F & L Farms Trucking Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 19:36:45

No Duplicates.

## **Comment 169 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Scott

Last Name: Violini

Email Address: violinicattle@gmail.com

Affiliation:

Subject: California Cattlemens Truck Rule change for Ranchers

Comment:

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

Dear Chair Nichols,

As a California beef producer I am writing to voice my strong support for your staff's proposed revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles. The proposed provisions will ensure ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

Livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provisions currently included in the rule. The movement of cattle in California is generally seasonal, taking place in the spring and fall, and miles traveled by livestock haulers typically occur in rural areas. Unfortunately, California ranchers are already subject to a shortage of livestock haulers and depend on both in-state and out-of-state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the amount of truckers who are willing to continue to operate their vehicles in California and resulted in a complete disinterest by most out-of-state haulers to operate in California any longer. A majority of California Beef Cattle leave the state when sold because we no longer have the feeding nor slaughter facilities to process these cattle for the California Consumer due to other erroneous regulations.

Some Ranchers own one truck to transport their own cattle from one ranch to another, saving multiple trips with smaller trailers pulled by pickups. These are the ones that really get hurt financially.

Many livestock haulers and ranchers with trucks are also not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the goods movement corridor as required by Proposition 1B and drive too few miles in mostly rural air districts and are not competitive for funding under the cost formula generated for the Carl Moyer Program. Unfortunately, some truckers have voiced their opposition to staff's proposed livestock provision. I would be interested to know how many of these truckers actually haul livestock? While it is



very important to provide further forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done at the expense of the proposed livestock provision. Bottom line, this provision helps alleviate the economic suffering that is currently taking place for many ranchers and is good for the overall health of California's beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state - including many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,

Scott Violini

4th Generation Monterey County Beef Cattle producer

559 Corral de Tierra

Salinas Ca 93908

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-19 20:57:48

No Duplicates.

## **Comment 170 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Monte

Last Name: Eberhardt

Email Address: tommystopgun@wildblue.net

Affiliation:

Subject: Truck & Bus Regulation

Comment:

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

Dear Chair Nichols,

As a California beef producer and livestock hauler I am writing to voice my strong support for your staff's proposed revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles. The proposed provisions will ensure ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

Livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provisions currently included in the rule. The movement of cattle in California is generally seasonal, taking place in the spring and fall, and miles traveled by livestock haulers typically occur in rural areas. Unfortunately, California ranchers are already subject to a shortage of livestock haulers and depend on both in-state and out-of-state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the amount of truckers who are willing to continue to operate their vehicles in California and resulted in a complete disinterest by most out-of-state haulers to operate in California any longer.

Our ability to break even at the end of any given fiscal year is subject to the whim of evolving market conditions, weather and rising input costs. Ranching is not a job but a lifestyle. The economic returns associated with cattle ranching are small, but the risk is huge. For example, this year has been especially devastating to beef producers as California enters the third year of the worst drought in our history. Many ranchers have already been forced to liquidate their herds due to the lack of feed and many others are struggling to survive by feeding hay that has doubled, and for some varieties, tripled in price.

Many livestock haulers and ranchers with trucks are also not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the goods movement corridor as required by Proposition 1B and drive too few miles in mostly rural air districts and are not competitive for funding under the cost formula generated for the Carl Moyer Program.

Unfortunately, some truckers have voiced their opposition to staff's proposed livestock provision. While it is very important to provide further forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done at the expense of the proposed livestock provision. Bottom line, this provision helps alleviate the economic suffering that is currently taking place for many ranchers and is good for the overall health of California's beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state - including many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,

Monte Eberhardt  
Eberhardt Livestock  
Wheatland, CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 08:10:22

No Duplicates.

## **Comment 171 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Albert

Last Name: Batteate

Email Address: batteatelivestock@hotmail.com

Affiliation:

Subject: livestock truck exemption

Comment:

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

Dear Chair Nichols,

As a California beef producer I am writing to voice my strong support for your staff's proposed revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles. The proposed revision will ensure ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

Livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provision currently included in the rule. The movement of cattle in California is generally seasonal, taking place in the spring and fall, the miles traveled by livestock haulers typically occur in rural areas. Unfortunately, California ranchers are already subject to a shortage of livestock haulers and depend on both in state and out of state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the amount of truckers who are willing to continue to operate their vehicles in California and resulting in a complete disinterest by most out of state haulers to operate in California any longer.

Our ability to break even at the end of any given fiscal year is subject to the whim of evolving market conditions, weather and rising input costs. Ranching is not a job but lifestyle. The economic returns associated with cattle ranching are small, but risk is huge. For example, this year has been especially devastating to beef producers as California enters the third year of the worst drought in our history. Many ranchers have already been forced to liquidate their herds due to the lack of feed and many others are struggling to survive by feeding hay that has doubled, and some varieties, tripled in price.

Many livestock haulers and ranchers with trucks are also not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the goods movement corridor as required by Proposition 1B and drive too few miles in mostly rural air districts and are not competitive for funding under the cost formula generated for the Carl Moyer Program.

Unfortunately, some truckers have voice their opposition to staff's proposed livestock provision. While it is very important to provide future forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done at the expense of the proposed livestock provision. Bottom line, this provision alleviates the economic suffering that is currently taking place for many ranchers and is good for the overall health of California beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state/including many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

It is my personal view on the matter that there have been a lot of new trucks repossessed since this matter started and time will tell as to how many of the new livestock trucks will continue to be owned and a lot of those owner do other things with their trucks (flatbed, reefers, end dumps, etc.). My personal livestock truck only is operated only around 30,000 miles a year and only hauls livestock during the spring and fall. Occasionally a few loads will be hauled to the livestock yards.

With such few miles it is economically impossible to buy a new truck.

Sincerely,

Albert Andrew Batteate  
Flyin' ~A~ Ranches  
5600 Collier Canyon Rd.  
Livermore, CA 94551

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 08:30:18

No Duplicates.

## **Comment 172 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Donald  
Last Name: Neher  
Email Address: bbrinker57@yahoo.com  
Affiliation:

Subject: Public Hearing on Truck and Bus Regulation - April 24, 2014  
Comment:

Thank you for the opportunity to express my concern with the "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles", (Truck and Bus regulation), title 13, California Code of Regulations (CCR), section 2015.

I have lived and worked in Butte County my entire life. I am an owner-operator of a 1989 Kenworth Logging truck which has a Caterpillar B-Model engine that is not compatible to the PM requirements. The product I haul is logs, which you may or may not be aware is a seasonal profession. Under the existing rule I am allowed to work in NOx Exempt areas until January 1, 2015, at which time I would be forced to buy a newer truck if I wanted to continue working. While I do appreciate the proposed revision to allow the extension of a single truck to operate until January 1, 2017 and the expansion of NOx Exempt areas it still does not change the fact that I would be forced to buy a newer truck if I wanted to continue working.

As the owner of a single truck I have had to comply with all the same regulations that large fleet owners do but under this regulation I as a single owner have to comply before the large fleet owner; this seems ridiculous and makes entirely no sense.

The requirements this regulations places on me will make it impossible for me to continue working and force me into early retirement; shouldn't I have the right to determine how much longer I want to work? This is just another example of the government having too much authority over the lives of it's taxpayers.

Again, thank you for the opportunity to express my concerns and urge you to consider all the facts when determining whether to pass the proposed revisions to the "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles".

Sincerely,

Donald P. Neher  
296 Incline Ave  
Oroville, CA 95966  
(530) 533-8302

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 09:38:22

No Duplicates.

## **Comment 173 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Douglas

Last Name: Myovich

Email Address: myovich@hotmail.com

Affiliation:

Subject: Proposed amendments to the Truck & Bus Rule

Comment:

Our company has been compliant with CARB. In order to be compliant we have replaced 91% of our 45 truck fleet over the last 4-years. We along with every other trucking company in this state knew we had to have a plan to reach compliance. We in good faith believed we would be able to compete in the market place as long as everyone in the industry had to become compliant at the same time. We never qualified for Prop. 1B money in this process. Every purchase transaction between Trade-In value and purchase price of a new vehicle cost us an additional \$25,000.00 per transaction. This is an additional cost that can only be recovered through rate increases. The reality is that a rate increase is not based on a unilateral decision on our part. We can only increase rates as the market will bear and giving others an extension will only put further pressure to hold rates down. This will ultimately have the effect of putting compliant companies out of business and enabling those who did not comply a free pass into our share of the market when rates are able to increase. Please do not allow those who are not compliant be allowed to have any extension through any further delays. That puts every compliant company at risk.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 10:28:12

No Duplicates.



## **Comment 174 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joshua

Last Name: Blumenkopf

Email Address: jblumenkopf@gmail.com

Affiliation:

Subject: Reject Proposed Amendments

Comment:

These regulations are crucial to reducing overall pollution, and delaying the benefits of these regulations, whose implementation has already been delayed is unacceptable. The regulations were approved in 2008 and there is no need to further coddle small fleet owners from following necessary standards.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 18:28:48

No Duplicates.

## **Comment 175 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tom

Last Name: Bowen

Email Address: liane.bowen@century21.com

Affiliation: Independent Owner/Operator

Subject: Affect of PM Filter Phase in on Independent Owner Operator's  
Comment:

My name is Tom Bowen. I have been a truck driver since 1972 and an Independent Owner Operator Truck Driver since 1989. I have my own authority and have the ability to haul anything, anywhere, anytime.

I own a 2001 Peterbilt Class 8 Vehicle. Before I purchase this vehicle in 2008, I called CARB to inquire as to whether it made sense for me to purchase this vehicle considering the CARB regulations coming up at the time. A person named Chris told me, that this truck would not have to have anything done to it until 2026. I purchased the vehicle based on that information. One year later, in 2009 I was bared from GOING IN TO the Port areas anywhere in the state of CA and a short time later I was bared from hauling sea containers or anything THAT CAME OUT OF the port areas on my flatbed trailer. The Port loads were one of my staples, especially in the wintertime. Now, all of a sudden the rules got changed again and because of the age of my truck, unless I buy a new truck or spend 20K for a PM filter, I will be out of business come the middle of this year.

I will be 60 years old this summer and given the state of the economy I do not have the ability to spend 20K for a filter and it is absolutely out of the question for me to purchase a replacement truck for the same reason. In these times, when fuel is \$4 plus per gallon, there is absolutely no way that I can afford ANY of this. The financial hardship that this would place on my family and me would be insurmountable. At my age, with my medical history, nobody is going to hire me. At the present time, as an Independent Owner Operator I am one of the guys that have the ability to work when there is work and stay home when the economy slows down because I do not have a monthly truck/equipment payment of \$2500-3500 plus the added expense of the Insurance.

I have tried on 3 different occasions to get a grant for a PM filter. I've been to Caterpillar in Sacramento twice and tried once on my own. I have gotten as far as having the data logger put on 3 times and met all of the requirements to get a grant and each and every time I called up on the day that the doors were open for the funding and was told the money was already gone! 3 X's! Now, I hear that CARB is spending millions of dollars to fund a dynamometer facility at the Sacramento Army Depot (BT Collins) to have the ability to smoke check trucks. I am wondering if this is where the grant money went to fund guys like myself to get PM filters that we're being required to put on our trucks at a very high cost.

I'm hoping that someone there will realize and understand that by changing the rules again, and enforcing this July deadline, you people at CARB will be personally responsible for the financial hardship that you will be placing on the Independent Owner Operators and their families. Tom Bowen

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-20 21:21:01

No Duplicates.

## **Comment 176 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tim  
Last Name: Renner  
Email Address: tim9300@aol.com  
Affiliation:

Subject: Truck and Buse Rules  
Comment:

The only way CARB will help the small fleet owner in Northern Calif. who operate entirely in the north is to exempt them from these rules. Ag, Log and construction Trucks operating in the northern mountain areas of Calif. that work seasonal shouldn't be included in regulations that are intended to improve air quality in the southern portion of the state.

Forcing fleet owners who's trucks travel less than 50,000 miles a year to comply to these regulations is unreasonable. they are already reducing their emissions by two thirds or more of what trucks traveling the interstate Highways do.

It is not financially possible to replace trucks with new trucks that cost \$150,000 when they are used for such short operating seasons. Used trucks that will comply with the regulations are not available and the cost of filters can be as much as many of these trucks are worth.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 06:04:05

No Duplicates.

## **Comment 177 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Scott

Last Name: Daniel

Email Address: sdaniel@yctinc.com

Affiliation:

Subject: Truck and Bus Rule

Comment:

I am opposed to any changes to the Truck and Bus rule as it currently stands today. The rule is currently very poorly understood and if allowed to be changed once again will prove to be even more confusing.

Specifically, the Loan Denial extension should not be allowed to go forward. This provision will be impossible to enforce. Legitimate denials will be impossible to differentiate from illegal manufactured documents.

All compliance with the Truck and Bus rule has come with a belief that shippers will partner with trucking companies to raise rates and make whole those that are complying with the law. To change the law now, sends the message that shippers as well as early complying fleets were naive and should not have done so. Non complying fleets will now have an economic advantage and will undercut efforts to professionalize and comply with regulations.

While hard to enforce, these current regulation were brought about because of a real need, cleaner air. Let's not go backwards now by changing the rules once again, losing credibility, and ignoring the end result of cleaner air that we started with.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 07:08:07

No Duplicates.

## **Comment 178 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tom

Last Name: Bowen

Email Address: liane.bowen@century21.com

Affiliation: Independent Owner/Operator

Subject: Upset at wrong people

Comment:

Addendum to my previous comment:

I can understand why people are upset about an extension for non-compliant trucks, but in a lot of cases they are mad at the wrong people. When I purchased my truck in 2008 I did my homework and I WAS in compliance until 2026 based on a conversation that I had with a carb rep named Chris and the rules that were published by carb at the time. The rules have changed 4-5 times since I bought my truck!

The other point that I would like to make at this time is the fact that the President of the United States stated publicly within the last 2 months that he was directing the EPA to come up with a set of rules & guidelines that all states would have to comply with. Why would anybody in their right mind spend any money at this point in time when it seems as though the Federal Government (EPA) will be coming up with their own set of rules that everybody in every state will have to comply with? It just doesn't make sense. Can somebody answer that question for me?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 07:56:20

No Duplicates.

## **Comment 179 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Darrell

Last Name: Delerio

Email Address: pdelerio@yahoo.com

Affiliation:

Subject: Extending compliancy to Livestock Hauling

Comment:

As an owner operator of a livestock truck, At the age of 62 my wife and I had to decide in December if we we're going to stay in business or retire from driving. We decided I would like to work a few more years so we invested in complying with this law. We had waited until the last moment to comply thinking maybe there would be an extension and at my age I really only wanted to work a few more year. Now to offer an extension until 2023 does not seem right for all the companies that have been working on complying the last few years and had to take there resources to fund these filters or purchase new trucks. This is not a fair playing field when now we have to pay for all these upgrades and trucks and a few can cut the rate and reap the benefit.

We also have livestock of our own and belong to this organization that is asking for this amendment. We do not agree with them on this. They are thinking of there own benefits not the livestock haulers there are plenty of trucks around to haul the cattle so we strongly oppose this amendment.

Thank you for your time and consideration  
Darrell & Patt Delerio

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 09:03:07

No Duplicates.

## **Comment 180 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Richard  
Last Name: Macauley  
Email Address: rich@macauleyconstruction.com  
Affiliation: Associated loggers, Cal Dump Trk Owners

Subject: truck/bus diesel regulations 14  
Comment:

Hello,

I have been a small contractor/logging/trucking company here in California since out of high school. I take great pride in the fact that I have made my own way without a help from anyone. I have made jobs for up to 25 families here in Calif. before the recession.

I along with others have been hanging on by a thread and we need some reprieve from any more regulations at this time. I am all in for clean air but at this time we need to give the small companies a break. Even if the break is time!  
With all these regulations, record keeping, vehicle retro, payroll taxes, high workers compensation rates, having to compete against homeowners/non legal businesses' that pay NO Taxes or Fee's( and are getting away with no diesel regulations etc. can go on and on.

Please give us a break on complying. I propose for up to 30K miles on a construction truck, additional years to comply so we can rotate out the older equipment with new.

How on earth could I possibly start out this business again with these rules in place. I couldn't. Its going to kill anyone trying to get going unless they come from money!!! Not everyone can start with new 200K+ equipment.

Thanks for listening

Rich Macauley

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 09:37:52

No Duplicates.



## **Comment 181 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Kevin

Last Name: Brown

Email Address: kbrown@cdti.com

Affiliation: CDTi

Subject: CDTi Comment on Proposed Truck & Bus Amendments

Comment:

See attached comment

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-truckbus14-VjUAYlInWGIDWghr.pdf'

Original File Name: CDTi Comment Truck Bus Rule 21Apr2014.pdf

Date and Time Comment Was Submitted: 2014-04-21 09:59:46

No Duplicates.

## **Comment 182 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Diesel Truck

Last Name: Rule Advocates

Email Address: dieseltruckruleadvocates@outlook.com

Affiliation:

Subject: Maintaining Strong Diesel Truck & Bus Rule

Comment:

Please see attached comments from a coalition of organizations around the state that support maintaining a strong truck and bus rule.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/204-truckbus14-Wy8AdAF1ADAAbQRm.pdf'

Original File Name: TruckBusRuleComments for 4-24-2014.FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-21 10:12:19

No Duplicates.

## **Comment 183 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: University of California, Los Angeles

Subject: Air Pollution Control District Letters Opposing Truck Regulation

Comment:

Attached is a compilation of letters previously submitted to CARB by numerous Air Pollution Control Districts within California expressing strong opposition to the Truck and Bus Regulation. All CARB members must read all of these letters and must give them serious consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/205-truckbus14-BWZcO1QKBDYAdgBj.pdf'

Original File Name: CA APCD Letters to CARB Opposing Truck Regulation 100813.pdf

Date and Time Comment Was Submitted: 2014-04-21 10:01:27

No Duplicates.

## **Comment 184 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joe

Last Name: Sostaric

Email Address: jsostaric@reliabletrucking.com

Affiliation: Reliable Trucking

Subject: Proposed Ammendments

Comment:

I am writing to voice my displeasure with the proposed amendments to the Truck & Bus Regulations.

Reliable Trucking has suffered with the business downturn like many other trucking companies across the State of California. Our business has been saddled with low or non-existent margins brought on to some degree by trucking companies that have failed to invest in the proper equipment but rely on low prices to generate work. This lack of profitability in the business has caused the upper management to question why we continue to operate this business as the current economics do not justify continued investment in the business.

When CARB announced the regulations to reduce emissions, Reliable Trucking and its parent company made many decisions to proactively comply. Older equipment was retired, diesel particulate filters were installed, and new trucks were purchased. Our fleet was registered with CARB using one of the phase-in methods and we are proud to announce that we are well ahead of the compliance timeline allowed under the rule. The cost of this is in the millions of dollars with no economic benefit. Reliable made this investment not based on current economic conditions but on the belief that CARB regulations would cause some trucking companies that run poor operations to either invest significantly in their equipment or leave the business.

Now CARB is contemplating to allow trucking companies additional time to comply. Many of the companies given this extra time have made no effort to come in compliance. Furthermore, the low mileage exemptions will be difficult to enforce. I would venture that some of the more unscrupulous trucking companies will attempt to manipulate this loophole to claim they are in compliance when in fact they are not.

In closing, Reliable has made significant investment in equipment at a time when it could least afford to do so. Now these changes proposed make that investment appear foolhardy. Our maintenance costs have skyrocketed as the DPF filters have proven to be troublesome from the day they were installed. How is CARB planning to compensate all the trucking companies that played by the rules and now appear to be penalized for doing so?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 09:39:43

No Duplicates.

## **Comment 185 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Lindamar

Last Name: Mirassou Morehouse

Email Address: glsupply@verizon.net

Affiliation:

Subject: Changes to Truck and Bus Regulations

Comment:

PLEASE SEE ATTACHMENT FOR COMMENTS

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/207-truckbus14-BmUGYQNwADECW1Mw.docx'

Original File Name: CARB Comments by Lindamar Mirassou Morehouse.docx

Date and Time Comment Was Submitted: 2014-04-21 10:35:50

No Duplicates.

## **Comment 186 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Norman

Last Name: Brown

Email Address: skipbrown@deltaconstr.com

Affiliation:

Subject: Diesel PM Regulations: A Call for Some Common Sense

Comment:

See Attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/208-truckbus14-UTVXNFU4ACcFYgZZ.pdf'

Original File Name: Delta Letter A Call for some Common Sense.pdf

Date and Time Comment Was Submitted: 2014-04-21 10:35:56

No Duplicates.

## **Comment 187 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Donald

Last Name: Wise

Email Address: donwise66@gmail.com

Affiliation: None, Just a concerned California Citize

Subject: Truckers Seeking More Time to Comply With Diesel Emission Rules

Comment:

To the Members of the California Air Resources Board:

I saw a story in today's "Los Angeles Times" that small truckers and independent operators are seeking ANOTHER delay in the final implementation of these rules. If I understand this, these interests got an extension in 2010 due to the recession. Now, FOUR YEARS LATER, in the midst of a rather robust economic recovery, they want ANOTHER extension.

I urge you to say not only NO, but HELL NO. These people and companies place money above the health, welfare and the very lives of the citizens of California and they should not be afforded any opportunity to continue to foul our any any longer. If you give them this extension, they will just come back and ask for yet another extension. PLEASE SAY NO AND DO YOUR JOB OF PROTECTING THE AIR THAT THE CITIZENS OF CALIFORNIA BREATHE.

THANK YOU.

Don Wise

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 10:30:03

No Duplicates.



## **Comment 188 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tom

Last Name: Santoro

Email Address: T.santoro@santorotrans.com

Affiliation: CCTA

Subject: New CARB Regulation

Comment:

I have been struggling to be in compliance and stay in compliance with all of the regulations. I have spent millions of dollars to comply by the given deadlines and now you are trying to reward the ones who are not in compliance by giving them more time. I already lost jobs to the truckers not in compliance because they can run cheaper. If you pass this new regulation and extend time to those not in compliance it will put me out of business. Their are truckers out there that are requesting from their banks a loan denial just so they can have more time and run their older trucks. We have already experienced this from one of our subhaulers who knows he can keep running with this letter and the new regulation for another 3+ years. He will now go direct to my customers at a cheaper rate. I will lose my customers. When it was time for me to be in compliance I did so or I would of had to shut down or run my trucks out of compliance. I am in compliance because this is my business I was expecting all other truckers to be doing the same and that way keep an even playing field. This new regulation will change the playing field and give the edge to the ones that chose to ignore the laws, thereby causing me to lose my customers and my lively hood.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 11:05:57

No Duplicates.

## Comment 189 for Truck and Bus Regulation (truckbus14) - 45 Day.

First Name: Robert  
Last Name: Turner  
Email Address: rtaaa@aol.com  
Affiliation: Teamsters

Subject: PROPOSED REGULATION ORDER  
Comment:

Title 13, California Code of Regulations  
Division 3: Air Resources Board  
Chapter 1: Motor Vehicle Pollution Control Devices  
Amend title 13, California Code of Regulations, section 2025, to read as follows:  
NOTE: Set forth below are proposed amendments to title 13, of the California Code of Regulations.

Article 4.5.  
§ 2025. Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles.

(40) "Low-use Vehicle" means: a vehicle that will be operated fewer than 1,000 miles in California in any compliance year. If that vehicle has an engine that powers other equipment that can only be used while stationary, the engine or power take off (PTO) must also operate less than 100 hours in any compliance year. The hour limitation does not apply for vehicles where the engine is used to power an auxiliary mechanism that strictly loads and unloads cargo from the vehicle (examples include, but are not limited to, dump trucks, cement powder trucks, or trucks with attached lift devices).

(A) A vehicle that is operated fewer than 1,000 miles within the borders of California in the compliance year, or

(B) Until January 1, 2020, a vehicle that is operated fewer than 5,000 total miles, regardless of where it is operated, in the compliance year.

(1) Beginning January 1, 2011 through January 1, 2017, any vehicle meeting the definition of an agricultural vehicle, as defined in section 2025(d)(6)(5), that remains below the annual mileage limits in Table 6 below are exempt from the requirements of section 2025(f) and (g).

Table 6: Agricultural Vehicle Annual Mileage Limits

Engine Model	Year Annual limits
--------------	--------------------

1995 and earlier	15,000 miles
1996-2005	20,000 miles
2006 or newer	25,000 miles

We have 6 Tractor Trailers in Southern CA. We should be granted a similar status as Agricultural Vehicles. Our Teamsters Show Trucks are used for disaster relief, taking food and supplies to out of

work Union members, Parades, and other humanitarian endeavors.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 11:38:13

No Duplicates.

## **Comment 190 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Galo

Last Name: Martinez

Email Address: galo@cox.net

Affiliation:

Subject: Proposed optional compliance schedule for small fleets(1-3 trucks)

Comment:

I am an owner operator of 1 truck. The year of my truck is 1990, and it does NOT qualify for an installation of a smog filter. The truck still runs really good. From 2010 to 2012 I was out of work and truck was not operating during that time period. I was able to find work and continued on since September 2012. Now my situation is that, I cannot afford to purchase a newer truck. I will be turning 65 in June 2014 and it would be a hardship to live off social security. Thank you. My name is Galo Martinez; CA#46630 (1987-2010) and CA#431214 (Sept 2012-present)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 11:17:39

No Duplicates.

## **Comment 191 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mark L.

Last Name: Richmond

Email Address: Non-web submitted comment

Affiliation:

Subject: TruckBus14 Comment

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/213-truckbus14-UiZdKQZyVmYFaAlr.pdf'

Original File Name: TruckBus14 MarkRichmond.pdf

Date and Time Comment Was Submitted: 2014-04-21 12:05:35

No Duplicates.

## **Comment 192 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dave

Last Name: Wilson

Email Address: drwtrk2004@yahoo.com

Affiliation:

Subject: what are the emissions readings while the truck does regeneration

Comment:

can you please provide the emissions readings during the regeneration process on all on road diesel trucks with DPF. We have to have these numbers, because its been brought to our attention that these numbers might be high, in all areas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 12:16:29

No Duplicates.

## **Comment 193 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Dan  
Last Name: Corriea  
Email Address: Dan@weststar-inc.com  
Affiliation: Weststar Trucking

Subject: change in regulations Unfair  
Comment:

I followed through with the commitment I made of purchasing new trucks. I now have 2 million of debt I didn't have before these regulation! I don't believe it is fair to those of us that followed the rules, to let other get out of this because they are finding it hard now!

Trucker companies or individuals that do not follow the rules have an unfair competitive advantage over us, because they have no debt. I have heard owner operators say they will not stop their trucks until they are pulled off the road. what makes you think they will stop 2 years from now??

Dan Corriea  
President

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 12:13:14

No Duplicates.

## **Comment 194 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: James  
Last Name: Enstrom  
Email Address: jenstrom@ucla.edu  
Affiliation: University of California, Los Angeles

Subject: Five Reasons to Immediately Suspend Truck and Bus Regulation  
Comment:

April 21, 2014

Dear CARB Members,

Please read and evaluate my attached statement presenting five reasons for immediate suspension of the Truck and Bus Regulation. This statement is based in large part upon the extensive evidence presented in my March 19, 2014 public comment to truckbus14.

Thank you very much for your consideration.

James E. Enstrom, Ph.D., M.P.H.  
UCLA and Scientific Integrity Institute  
jenstrom@ucla.edu

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/216-truckbus14-UzYFbVQmVnFSJIU6.pdf'

Original File Name: Enstrom Statement Requesting Suspension of CARB Truck Rule 042114.pdf

Date and Time Comment Was Submitted: 2014-04-21 12:07:03

No Duplicates.



## **Comment 195 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mike

Last Name: Thomas

Email Address: mike@thomasrefuse.com

Affiliation:

Subject: CARB amendment

Comment:

To who it may concern,

All of the amendments to the Truck and Buss Rules need to be passed to insure the financial well being of the California trucking industry. The poor economy has stricken many of these businesses and any relief will help those who have not already gone out of business or moved from this state.

Mike Thomas

Thomas Refuse Service, Inc.

Sierra Waste Transfer, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 12:37:02

No Duplicates.

## **Comment 196 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Arthur

Last Name: deGraaf

Email Address: JCOWTRUCKS@aol.com

Affiliation:

Subject: Proposed Exemption for Livestock Haulers

Comment:

In regards to the livestock exemption I feel Ranchers who haul there own livestock(not for hire)should get an exemption for themselves. I own 2 CARB compliant trucks and have supported a family of 6. This has been going on for 10 years and non compliant trucks should be forced to comply. There are more compliant cattle trucks than not here in California and most out of state livestock haulers have complied.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:16:06

No Duplicates.

## **Comment 197 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Paul  
Last Name: Wilkinson  
Email Address: pauljwilkinson@att.net  
Affiliation:

Subject: Proposed Amendments  
Comment:

I find it absolutely unbelievable and a slap in the face that CARB at this time is reconsidering their policies.

As one of many that have played by the rules and to the tune of \$17500 I have complied with CARB requirements.

How can you people legally and ethically changed the rules after having already set a deadline?  
You are potentially creating a situation in which those of us that have incurred the cost of updating or retrofitting our equipment cannot compete financially and our cost of operating is much higher than the non compliers which could benefit from your action. I would in fact call it discriminatory.

With regard to the proposed amendment extending into 2016 or 2018 and replacing current engines to 2010 engine or newer as a way to circumvent cost is terribly unfair. If I had this option available to me a few months would have waited it out, took advantage of the proposal and sold the truck out of state in 2016. This is what I suspect most people will do if passed anyways.

For a state which prides itself on fairness and equality I find the proposed amendments anything but fair.

You can rest assured that if this proposal passes that I will take part in any class action law suit or otherwise which might arise out of this irresponsible action.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:18:18

No Duplicates.

## **Comment 198 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Robert

Last Name: Tennies

Email Address: rtennies@wtpe.com

Affiliation: California Truck Association

Subject: opposed to small fleet extensions and confusion set by CARB

Comment:

First I would like to share my concern about what CARB is doing and their role in confusing the regulation even more. Since the rule was rolled out we have tried to be a sound board for our customers, trying to explain and help our customer base understand and do what was deemed necessary to get and stay in compliance. Part of this was explaining that with time, by getting into compliance early they would relieve undue stress and the pressure by CARB to meet these regulations. Now with consideration of extensions for small fleets additional pressure is being put on guys who have already extended themselves financially to comply. In addition it is giving an uneven playing field to large out of state companies competing in California, with these large companies hiring small non compliant companies, with extensions, to haul goods at reduce rates against carriers that have been responsible and complied.

CARB made amendments to the regulations in the beginning, in an effort to relieve pressure faced by the down economy. Everyone testified to this fact, shared this concern and was relieved knowing then that they were getting additional time.

Now that time has run out and it is time to make decision about upgrading, they again are pleading for additional time. These same few will again be back in the room pleading for more time, if new extensions are developed for compliance down the road.

I support the California Trucking Association position opposing further extensions to the small fleet provisions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:23:09

No Duplicates.

## **Comment 199 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Mary

Last Name: Pitto

Email Address: mpitto@rcrcnet.org

Affiliation: Rural County Representatives of Californ

Subject: Proposed Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter,Oxi

Comment:

Attached please find our comments on the Proposed Amendments to the Truck and Bus Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/223-truckbus14-Wi5WIIYiAjJSP1IN.pdf'

Original File Name: Truck\_Bus\_Regulation\_Ltr\_to\_ARB\_04212014.pdf

Date and Time Comment Was Submitted: 2014-04-21 13:52:12

No Duplicates.

## **Comment 200 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jenming

Last Name: Gee

Email Address: geefarms@succeed.net

Affiliation: Gee Agri Transport, Inc.

Subject: Truck Bus 2014

Comment:

Honorable members of the California Air Resources Board:  
Thank you for allowing us to comment. However, It has become unbearable for myself to sit back and not say anything. Rules were placed upon truck fleets and owner operators to become compliant or face the consequences;like many, we unhappily did what was asked of us. For ourselves, that meant we had to get rid of perfectly good(low mileage)trucks, retrofit and purchase new equipment. This took time and valuable resources. Yes, we are guilty of receiving grant money for one truck,utilizing exemptions that were offered, and even had to use "Good Faith" on one vehicle to meet compliance, but WE GOT IT DONE. Many truckers have gone out on a limb to become compliant; and sadly, I have seen some good operators simply give up and change careers. I call it the COST OF DOING BUSINESS.Yet there are some that do not think that your rules apply to them. They simply believe that if they sit on their hands long enough, someone else will come along and lift them up! Why did we spend so much money and time to become compliant? Because we are in the business of trucking. We are dedicated to our customers and employees.We plan on operating for many years to come.Thanks for allowing me to rant.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:08:40

No Duplicates.

## **Comment 201 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Michael

Last Name: Staples

Email Address: mike@hammertruckinginc.com

Affiliation:

Subject: CARB

Comment:

As a small business owner with less than 4 trucks, it is becoming increasingly difficult to continue to be regulated by an industry or industries that are seemingly trying their best to do what is right for our air & our planet. While I agree these are important topics, I am just one of many truckers who are self employed & just trying to get by. I employ myself, 3 drivers & my wife does our books. We are truly an "old school" small business just trying to survive & keep some very honest & decent people employed. With the new CARB rules for small fleets, it is almost impossible to keep all my trucks on the road & keep my drivers employed due to these CARB regulations. My wife & myself find it hard to believe the data that is being used to implement these new rules is the data that was allegedly written by one man who got his fake PHD by purchasing it on the internet. (killcarb.org) Hien T. Tran is the name of the man who submitted his data & findings to the board for these new regulations. Yet he has a fake PHD.???

This information is confusing & very serious if true. Real people are being hurt by this data. Real families are being put out of business. Real people are selling their equipment & going on welfare. That is not the American way! The American way is to work hard & provide for your family. Why does this man still work for CARB in any capacity? We are very concerned for the future of our business & I know many other truckers feel the same way. Please consider postponing the deadline for small fleets due to our sluggish economy & radically high fuel prices. Please consider the findings on killcarb.org if you have not already & please get to the bottom of it. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:07:55

No Duplicates.

## **Comment 202 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: GREG

Last Name: LYON

Email Address: plyon@charter.net

Affiliation: GREG LYON TRUCKING

Subject: CARB RULES

Comment:

I have been in the trucking since 1968, plus drove for someone else a couple of years before that. I am 66 years old. I can't afford to retire at this time, and sure can't afford to retro fit my trucks with the new carb devices. You are going to put so many people out of business with these new rules. Plus it will affect the State of California in such a negative way, from the consumer, the wholesalers, the retailers right on down the line. What are you people thinking? We all want clean air, but I hate to think you are going to ruin our state, and bankrupt so many of it's citizens.

There has to be a better way. Maybe new regulations when you replace a truck, when it is the right time for your business. For my business the last few years have been really rough, I'm just getting by. There is no way I can replace trucks at this time, or the new emission device. However, I have always passed all my bit checks, and smoke test with the trucks I have, which are a 1995 & 1998 Peterbilts. Everything we touch in our every day lives, is moved in a truck, by many small business owners, such as myself. What's going to happen when our state does not or cannot keep up with demand of supplies for our citizens? Will we all have to move out of state to just buy a loaf of bread or a gallon of milk? Think about it, and how far reaching this will effect us.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:16:37

No Duplicates.



## **Comment 203 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joanna

Last Name: De Graaf

Email Address: Jcowtrucks@aol. com

Affiliation:

Subject: Proposed livestock exemption

Comment:

I don't agree with the new proposed regulation exempting livestock trucks. Every trucking company will try to use this to their advantage. Most of us livestock haulers haul other commodities like hay and general freight. You do what you have to do to pay the bills and so will the other seasonal livestock haulers. Most of them already do!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 14:10:11

No Duplicates.

## **Comment 204 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jenming

Last Name: Gee

Email Address: geefarms@succeed.net

Affiliation: Gee Agri Transport, Inc.

Subject: Re:Previous Comments

Comment:

In reference to my previous comments: I was not trying to generalize about non compliance. Not every situation is the same;there are genuine cases of hardship that cause difficulty in attaining set goals, etc.

Kudos to everyone that has complied or have made a genuine effort to comply. Thumbs down to the few that make it bad for the industry. Get with it or get over it.

Jenming Gee

President,  
Gee Agri Transport, Inc.  
Calorwa Leasing

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 14:13:56

No Duplicates.

## **Comment 205 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: William

Last Name: Ritts

Email Address: rittsranch@wampa-one.com

Affiliation:

Subject: Many cattle trucks are highly specialized

Comment:

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

Dear Chair Nichols,

As a California beef producer I am writing to voice my strong support for your staff's proposed revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles. The proposed provisions will ensure ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

Livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provisions currently included in the rule. For example, mileage limitations by CARB going retroactive for 3 years has knocked many of us out of compliance for what would have otherwise seen us through 2023. Rural areas for us means Ranches or mountain allotments that are on rough, steep, dirt roads often going over river crossings. Newer large semis cannot make the turns required to reach these remote spots. We have invested extensive time and money modifying our existing trucks and trailers so that they are able to manipulate the turns and have appropriate ground clearance to get in and out of areas where new off the line factory built haulers cannot even dream of going. This again emphasizes the "specialty" of livestock hauling vehicles. We are hauling livestock, which is a lot different from tomatoes. We need to get deep into remote ranch sites and remote mountain allotment sites in all kinds of weather at all times of the year. Muddy, steep dirt roads, washed out roads, and snow-covered roads are obstacles that we face to get the cattle out of their summer ranges. We indeed are a specialty unit that cannot be linked to hauling on the highway routes or linked to hauling produce. These are live animals with specified time limits to either forest service allotments grazing, or time limited sale weights. Often the time limits are in place to meet environmental regulations. We have a significant investment in these specialized trucks that we cannot possibly replace in this short notice. There are no manufacturers who sell trucks designed for the off road experience that we face on a daily basis. A loss of our specialized cattle hauler for these mountain roads would be devastating. The movement of cattle in California is generally seasonal, taking place in the spring and fall, and miles traveled by livestock haulers typically

occur in rural areas. Unfortunately, California ranchers are already subject to a shortage of livestock haulers and depend on both in-state and out-of-state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the amount of truckers who are willing to continue to operate their vehicles in California and resulted in a complete disinterest by most out-of-state haulers to operate in California any longer.

Our ability to break even at the end of any given fiscal year is subject to the whim of evolving market conditions, weather and rising input costs. Ranching is not a job but a lifestyle. The economic returns associated with cattle ranching are small, but the risk is huge. For example, this year has been especially devastating to beef producers as California enters the third year of the worst drought in our history. Many ranchers have already been forced to liquidate their herds due to the lack of feed and many others are struggling to survive by feeding hay that has doubled, and for some varieties, tripled in price.

Many livestock haulers and ranchers with trucks are also not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the goods movement corridor as required by Proposition 1B and drive too few miles in mostly rural air districts and are not competitive for funding under the cost formula generated for the Carl Moyer Program.

Unfortunately, some truckers have voiced their opposition to staff's proposed livestock provision. While it is very important to provide further forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done at the expense of the proposed livestock provision. Bottom line, this provision helps alleviate the economic suffering that is currently taking place for many ranchers and is good for the overall health of California's beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state - including many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,

Gayle and Willie Ritts  
Ritts Ranch  
15105 Wards Ferry Rd.  
Sonora, CA 95370  
209.982.4949

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 13:47:38

No Duplicates.

## **Comment 206 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Doug

Last Name: Britton

Email Address: brtntrk@hotmail.com

Affiliation:

Subject: Truck and Bus Rule Amendments

Comment:

To: California Air Resources Board

I'm a little fired up

Close to 30 years ago, I bought the trucking operations from my family and went out on my own. I had many weeks where the payroll sheet said don't pay Doug. I didn't receive paychecks many times and employees made more than me many years so that I could get my business off the ground.

In 2006, I heard about the truck and bus regulation. It scared the pants off me so much that I sold some of my trailers to reduce my debt.

In the fall of 2008, I was debt free.

In the spring of 2009, I was back to my maximum debt when I bought 4 trucks(2009 models with grant money)to begin complying with the truck and bus rule. I had to try to spread the debt load out over a period of time.

I bought another truck in 2010(2010 model).

In the fall of 2011, I was debt free again.

In the fall of 2012, I purchased 5 more trucks through grants(2012 models). My debt load is now over two and a half times what my maximum ever has been in my lifetime.

I would be in a position of almost zero debt if this ruling were not in place.

I went to apply for my TWIC card in Stockton in February. There was a non compliant truck loading fertilizer while I had compliant trucks parked in my yard. In March, there was a driver with a non compliant truck inside the Port of Stockton gate when I picked up my TWIC card. Yes, I had compliant trucks in my yard parked again.

I've heard of people asking dealers to deny them loans so that they could get the good faith extensions. I've heard of 12 truck fleets becoming 4-3 truck fleets to get around the ruling. I've had carriers tell me they will keep running until they get caught and then do the upgrades.

It is nonsense for people to say that they just heard about this truck and bus regulation in the last six months.

We have had some improvements in the air quality partly because of the thousand's of carriers like me who are complying.

Now, I have come full circle thanks to this ruling. I am back to don't pay Doug to get my business through this hard time. I can't afford to go borrow more money and refinance again to follow your rules if you allow the extensions to others who will have a competitive advantage. It's like you want me to finance their extensions.

They had as much time to prepare for this rule as me.

You bet I'm fired up.

Douglas Britton  
President  
Britton Trucking Co., Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 14:16:41

No Duplicates.

## **Comment 207 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Vladimir  
Last Name: Butuc  
Email Address: vladimirbutuc@gmail.com  
Affiliation: Orit Inc

Subject: Extend compliance extension.  
Comment:

I order a car hauler new truck and it will be ready in the six months. But with the old 2001 year truck I can only work to July. Please I need another extension to get it all ready. I was planning to put filter, and was waiting for all that, but most recently I find out that it will cost me 25K. Truck is to old to spend that much money and one of my friend start to have problems with the truck after he put the system. That makes me change my mind and order a new truck. I am looking for a extension to be able to work on my old truck for few more months after July. Please!! I don't want to lose my job. My roads are only WA, OR, CA.

I have a proof of ordered new truck.

Please let me know if there is a way for me and many others like me to have my job and to be able to feed my Family.

Thank you for your time.

Will wait for good news from this meeting.

Vladimir Butuc  
Orit INC  
TRUCRS ID 93876

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 14:38:07

No Duplicates.

## **Comment 208 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Christopher

Last Name: Miller

Email Address: cmiller@ajw-inc.com

Affiliation: Advanced Engine Systems Institute

Subject: Truck and Bus Rule revisions

Comment:

Please find attached a document explaining why the Advanced Engine Systems Institute, a non-profit trade association composed of manufacturers of efficiency and emissions control technologies, urges the ARB to be stay the course on achieving reductions from heavy duty diesel vehicles.

thanks,

Christopher Miller, Executive Director

Advanced Engines Systems Institute

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/232-truckbus14-BTRSYFdmUDdVYgM2.pdf>'

Original File Name: 140415 Truck & Bus 1 pg.pdf

Date and Time Comment Was Submitted: 2014-04-21 15:27:18

No Duplicates.



## **Comment 209 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Gary

Last Name: Simons

Email Address: gary.simons@donaldson.com

Affiliation: Donaldson Co. Inc.

Subject: Proposed Changes to Truck and Bus Rule

Comment:

Comments on Attachment

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/233-truckbus14-UjNTJ1c0UFwLegl7.pdf'

Original File Name: ARB\_written\_comment\_042414.pdf

Date and Time Comment Was Submitted: 2014-04-21 15:38:31

No Duplicates.

## **Comment 210 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Manuel

Last Name: Mendez

Email Address: Mendezcrete@aol.com

Affiliation: Mendez concrete

Subject: Truck modification

Comment:

We are a small construction business located in Ventura county we have been established here since 1976 .As a fact the economy has not rebounded since the Great Recession our firm has losses since the recess ion started and continues to struggle. Our continued succes is de pendant on our equiptment .at present we have no resources to upgrade by inforciing us to to comply you will only be forcing us out of business is really what you want? We are not alone I know of at least 5 firms that have opted out be cause they could not afford to be in compliance.Please reconsider if not we will be forced out , currently we travel locally with no more than 5000 combined miles your reconsideration will be a positive step closer to helping us in the construction industry through these very difficult times

Manuel Mendez

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:14:22

No Duplicates.

## **Comment 211 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Pam

Last Name: Nuttall

Email Address: sntrucking@cox.net

Affiliation:

Subject: CARB date extensions

Comment:

Our company has played by the rules all along - we installed a filter early, so that our 87 could have a couple of more years. We installed a filter every year to stay compliant. Spent alot of \$ that could have easily paid other bills to help us out. Its just not fair that we played/paid by the rules and others who didn't are getting a free ride - because they didn't play/pay by the rules... We saved and planned and budgeted like crazy to by compliant. No extensions.....

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:47:40

No Duplicates.

## **Comment 212 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Valerie

Last Name: Liese

Email Address: vliese@jjtinc.com

Affiliation: Jack Jones Trucking, Inc.

Subject: Truck & Bus ruling

Comment:

To Whom It May Concern,

I wish to lend my voice that once CARB ruled that trucks and buses comply with your initial ruling, you better stick to your original mandate.

I am president of an LTL company that strictly operates in Southern California. My sister and I run the company that was started by our father in 1971. We have almost 100 employees and we've all had to work hard to be compliant by dealing with reduced pay, no raises, less benefits and the company had to stop matching our employees 401k plans. My employees and I had to make a lot of sacrifices to be compliant.

We've had to scrimp and save and do our best to be complaint. Dealing with the recession and becoming compliant is not easy, especially to a family-run company. Yes, I have applied and was granted Prop. 1B funds, to which, I thank you. Please remember, small fleets and owner-operators also were given that opportunity.

I don't think it fair when my competitor who uses owner-operators, hasn't raised his rates in over a decade and refuses to raise their rates or help their owner-operators become compliant. How is this fair to those companies that have complied with regulation? Companies like this are going to stay under the radar while the rest of us comply. CARB has given everyone the same amount of time to comply and you have given everyone an opportunity to apply for funding. You shouldn't give any extensions to those that have ignored California law.

Sincerely,

Valerie Liese, President  
Jack Jones Trucking, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:30:28

No Duplicates.



## **Comment 213 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Anke

Last Name: Raue

Email Address: ankerawe@verizon.net

Affiliation:

Subject: no relaxing of diesel emissions

Comment:

Please, do not consider relaxing the hard fought requirements for diesel trucks!

Although my husband and I understand this might be a hardship for smaller operators, in our view this can be remedied by giving them financial incentive for a limited time!

Think of subsidies for solar panels or buying a new low energy appliance!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:50:03

No Duplicates.

## **Comment 214 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Richard J  
Last Name: Rukstalis II  
Email Address: LandStar414311@GMail.com  
Affiliation: LandStar

Subject: Commets to Truck and Bus Rules  
Comment:

To members of C.A.R.B.

First may i say thank you for taking the time to have this meeting with the concerned parties and for listening to our views on the subject of the truck and bus rule for emissions. My name is Richard J Rukstalis II. I reside in Santa Maria CA. In 2005 i bought a brand new Kenworth tractor with a Caterpillar motor. In 2005 i was legal for Ca emissions. Up to 2010 i hauled produce back east to places like Ohio, NJ and Boston Mass. In 2011 i changed to hauling things like store fixtures, trade shows, and other specialty freight. I have been trucking 18 years running coast to coast but with the rules that C.A.R.B. wants to enforce you are forcing me to either move out of the great state of Ca or to buy a new piece of equipment. I own my own dry van trailer and i have made sure i have low rolling resistance tires and aerodynamic skirts. My issue as it is with others is that those of us with older equipment #1 can't afford to replace our equipment and #2 like myself don't want to replace equipment that is reliable and has nothing wrong with it. Trucks like mine aren't designed for the aftermarket filters as they cause more back pressure to the motor and then the truck loses fuel mileage.

Now heres the issue at hand also. In todays economy and Californias' economy we as people of the state can't afford to lose revenue. In the past year i have hauled loads from companies who have decided to move out of california because of the emissions levied by C.A.R.B. two have gone to Mississippi and one to Ohio. Also the other issue is there is not enough 2008 and newer trucks on the market to replenish the older trucks on the road. See from 2004 to 2007 truck manufactures flooded the market with trucks because they knew no one would buy 2008 trucks and that those trucks weren't reliable. I ask you to go to any truck dealer and look at the trucks in the shops they are 2008-2012 trucks. These trucks have many issues with Egr valves and particulate filters. This causes downtime that can take from 3 days to 2 weeks and this is revenue that isn't covered by warranties and is lost that can't be recuperated. I myself will not buy an unreliable truck because of the things i haul. My customers such as Dell, Microsoft, American heart association, ESPN, amongst others would not understand if i was late with their tradeshow or Tv equipment contracts would be lost. Also new trucks are priced very high at anywhere from \$140,000 to \$165,000 and since i live in Santa Barbra country a NoX exempt county i am not eligible for any grants from the state. Same goes

for those in other counties that are NoX exempt but yet because we aren't eligible for these grants C.A.R.B. all to have these filters at a cost from \$14,000 to \$22,000. That is an out of pocket expense and why would i put \$22,000 into a truck thats worth only \$25,000. In my eyes its a poor business decision for all operators in and out of state.

I have many friends who live in other parts of the country and they have totally stopped running californias because of the rules that C.A.R.B. has set in place. In todays economy we as operators can't afford these new trucks. And without trucks companies in californias cannot move their goods. I live on 300 acres and my family grows strawberries ,raspberries and broccoli. On any given day in Santa maria you see trucks hauling out of the produce sheds and most are older trucks, but with the new rules in place less and less trucks are hauling produce which in turn hurts californias economy. As we know californias is an agriculture state. We rely on farmers to grow produce and trucks to haul the produce out of state but with less trucks that aren't compliant it puts a stranglehold on the agriculture industry. Farmers will pick less, grow less and produce shippers will ship less because lack of compliant trucks. In turn what happens is farmers and produce sheds have to lay off workers and in todays economy and with unemployment at all time highs we as californians are going backwards in time not forward. The rules applied by C.A.R.B also is setting the trucking industry backwards not forwards. If the rules don't change or get relieved some you will see costs go thru the roof in californias. Things in the grocery store, clothing store, homes, everything we buy will go very high as companies will pass the costs onto the consumer. Also you will be putting small businesses out of business. President Obama and even our own governor Jerry Brown support small business but C.A.R.B. apparently doesn't as you want to force the small trucking companies out of business or buy equipment they cannot afford. My truck gets 6.2 miles per gallon on fuel but these new trucks are getting less fuel milage have more issues and thats loss in revenue.

I understand clean air and i am for clean air but in the diesel regs enforced is hurting all industries. I want you to remember that 97% of the trucks on the road are owned and operated by companies that are 100 trucks or less and thats considered by most as a small business. Problem i have is that C.A.R.B wants to come after diesel trucks but yet in the smog areas at hand like Los angeles, San Fransisco and the central valley there is mass transit but yet everyone drives their car they put out more emissions than trucks do. People don't use mass transit like they do in other cities like Seattle, Chicago, New york city, Boston or Washington D.C. also these cities have trees and that takes carbon monoxide and carbon dioxide out of the air and replenish it with clean oxygen. Los angeles has issues because #1 everyone drives they think its their right but its a privilege #2 they don't use mass transit #3 lack of trees and #4 it sits in a valley surrounded by mountain ranges and so thats why theres smog in these area and same goes for San francisco.

In closing i ask that instead of forcing these rules onto the trucking industry i ask C.A.R.B to come together with us owner operators, small trucking companies, and small business and ask us what can be done to have clean air but not at high costs. I ask my industry to help C.A.R.B understand the costs of the industry and the costs of the new unreliable equipment and the loss of profit when trucks lose revenue because of issues with P.M filters. I also



ask C.A.R.B to come across the isle and help relieve some of these rules as i feel its hurting not only the trucking industry but californias economy and the economy of the United states as these rules affect the country also.I thank you for your time and for reading my letter. i will leave my phone number and if you would like to discuss this or have questions for me that i can answer i would be more than happy to discuss this.again I stress i understand clean air but i also need to protect my small business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:49:48

No Duplicates.

## **Comment 215 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Tim  
Last Name: Trotter  
Email Address: tgtrotter@gmail.com  
Affiliation:

Subject: Moving Forward  
Comment:

Dear CARB,

I feel you are moving forward with your implementation by virtue of your own staffs recommendations.

There is no predatory rate cutting as posters would like you to believe. If rate cutting by non compliant 1-3 truck operators having lower costs was true, the fleets would not historically sell off their older equipment.

No one fleet is in total compliance. Those large fleets and others who have BEGUN to comply have done so but I'm sure the incentives and grants hurried them. Most of them are able to replace equipment at a faster pace than 1-3 truck fleets.

One to three trucks ARE compliant by being registered in TRUCRS. Efforts are being made. I for one have spent \$7,000.00 this March 2014 on engine repairs to bring my equipment into operating parameters of installing a filter. The DPF will be detrimental if your turbo, cam, cooling system etc. is not good. That point is conveniently overlooked when the cost of a filter is calculated. We are not a bunch of outlaws.

One to three truck operators are not ignoring you. We need the same opportunities you granted others.

Sincerely,

Tim Trotter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:24:16

No Duplicates.

## **Comment 216 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: ron

Last Name: heuvel

Email Address: bullwagon1@yahoo.com

Affiliation: Duane Martin Livestock

Subject: Carb Compliance

Comment:

I work for a large cattle operation. My employer has spent a considerable amount of money to have his companies eight trucks carb compliant in California. For being in compliance the company has the right to move cattle in and out of this state. If cattlemen who want to move there own cattle and have there own trucks, NOT FOR HIRE let them be exempt. All others, should do what is right and be in compliance, otherwise this is a slap in the face and not fair to those that have complied already.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:43:19

No Duplicates.

## **Comment 217 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Joe  
Last Name: Rajkovacz  
Email Address: joe@calcontrk.org  
Affiliation: CCTA

Subject: Amendments: Truck and Bus  
Comment:

Please see attached comments from California Construction Trucking Association

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-truckbus14-UDNVMFEkAzFSC1Q3.pdf'

Original File Name: CCTA CARB Comments L 4-19\_Add1\_Add2.pdf

Date and Time Comment Was Submitted: 2014-04-21 16:16:14

No Duplicates.

## **Comment 218 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Myesha

Last Name: Williams

Email Address: mwilliams@rosefdn.org

Affiliation: Rose Foundation's New Voices Are Rising

Subject: TruckBus14

Comment:

To the California Air Resources Board and Staff,

The following are comments collected by New Voices Are Rising staff Myesha Williams and Jill Ratner from high school students and their teacher at Fremont High School in Oakland, California.

Dear Air Resources Board,

I think it is important to change things as soon as possible because a lot of little kids are getting sick and that's unfair mostly because most of them are low-income. Just because we are low-income doesn't mean we are the ones that supposed to be getting sick.

Patricia B.

Dear Air Resources Board and Staff,

It's important to clean up truck pollution because the more we wait the more people would be affected and likely to get asthma. Keeping California healthy and strong would keep more people out of hospitals etc.

Sincerely, Natalie R.

Dear ARB,

It's important to clean truck pollution because we need cleaner air so people won't have health problems. It's not okay to wait to get trucks cleaned up because the longer you wait the more chance people would have to get sick.

Joe from Fremont High

Dear ARB,

It is important to clean up truck pollution so that our people can stop getting sick from asthma. It is not okay to wait because too many people are getting sick and that needs to stop NOW!

Juan Miguel - Fremont High

Dear ARB,

It is important to clean up truck pollution because people inhale these gases and it affects their health. No we should not wait.

This is a serious situation and people's safety and health is important!

Sincerely,  
Zion Shields

Dear Air Resources Board and Staff,  
You should clean up truck pollution because it's good for mother earth, and you should enforce this rule because it affects our community badly.

From, AJ

Dear ARB.

It's important to clean up the truck pollution because it's affecting us. It's giving us less chance in our future to be healthy. A lot of kids are developing asthma and other people are trying to develop new gasoline that won't affect us that much.

Sincerely,  
Eduardo Romirei - Fremont High School

Dear ARB,

I think it's ok to clean truck pollution, but it's ok to wait because some people can't afford it right now.

Sincerely,  
Tevita O.

Dear ARB,

I feel that cleaning up truck pollution is important because it causes health issues. The clean up doesn't have to be immediate but it is required for healthier living.

Sincerely,  
D.C.

Dear Air Resources Board,

It's important to stop truck pollution because it causes innocent people to get asthma. It's not ok to wait to enforce this rule because more people will get asthma but government should take control to help get filters for the trucks.

Fehoka Faotusia

Dear Air Resources Board,

I can't wait for clean air. I have asthma. Every day even though I don't know it can bring the possibility of a flare up. An asthma flare up means a burning sensation in my body that hurts me or anyone who has asthma for that matter. I want people to understand that pollution is no joke so we need to have clean air not just for me but for future children.

Williams Varner - Fremont High School

Dear Air Resources Board,

I live very close to truck routes and I think it's unfair that my people have to suffer from the polluted air due to moving trucks. We need clean air please.

Sincerely,  
Su'e Taugajua

Dear Air Resources Board,

Well apparently my mother and little brother have asthma. In my perspective we need clean air for other families not to suffer this problem.

Sincerely,  
Jari Morales

Dear Air Resources Board,

My name is Johnson Vo. I am a 12th grader at Fremont High School. I live around the 880 freeway and I do notice the diesel pollution coming from the trucks. I would want the area where I live to not have truck that is contributing to the pollution more than it is now. If these trucks emit less or close to none that would be a huge help for me & the community. I want this proposal to be pushed into a law. Do not push this back anymore then it needs to be.

Sincerely,  
Johnson Vo - 12th/Fremont High

Dear Air Resources Board,

We want clean air for everyone. I know many people that live near the 880 and have family members with asthma and I want clean air for everyone because that could be one of my family members! EVERYONE deserves the equal right to clean air.

Sincerely,  
Jaqueline Embriz-Fremont High School

Dear Air Resources Board,

I can't wait for clean air. I live near the 880 freeway and I can smell diesel truck pollution and I also see trucks passing by my avenue. There's no more time for excuses or delays. It's time for trucks to stop polluting all over California.

Sincerely,  
Jennifer Zarate - Fremont High School

Dear Air Resources Board,

I work near the 880 freeway and while i'm working I smell the air not knowing it's dirty air. I don't want to develop asthma nor do I want anyone else to get it. Please, I want to have clean air!

Sincerely,  
Griselds Ch.

Dear Air Resources Board,

Please don't delay! We want clean air today! Don't neglect the

health of the folks who suffer daily from this problem...keep up  
CA's diesel truck & Bus Rule!

Sincerely,  
John Villanueva Nepomuceno, MA - Fremont High School- Oakland CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:45:06

No Duplicates.



## **Comment 219 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Kevin

Last Name: Rocha

Email Address: cstanford@edgesales.com

Affiliation: K. Rocha Trucking

Subject: ARB BOARD MEMEBERS/ LIVESTOCK HAULING COMPLIANCE

Comment:

As the owner of K.Rocha Trucking,a small,Livestock Hauling and family owned business of my wife and I. I strongly oppose the amendment to make all Livestock Carriers exempt thru 2023.

I have been in business,based in San Joaquin County for over 5 years. I have lived in Merced County for 51 year. Being a tax payer and upstanding citizen, when the ARB BOARD advised me that I had to become complaint in 2013 I did. I purchased a new 2014 Peterbilt for my Cattle Hauling Business. I'm a single running truck operation and this is my livelihood. I was forced to comply with California laws and ARB regulations to keep my business going. It is not right or fair to reverse these regulations for Livestock Carriers. Every Livestock Carrier I know has already complied with the New ARB Compliance Laws in California. My cattle hauling business brings revenue to California. My customer's are based in California. To extend non-com pliancy thru 2023 would be devastating to the financial well being of many California family owned companies, even forcing some out of business. HOW AMERICAN IS THAT. I am sure you are very aware that owning a business in California has greater expenses then other states. But I chose to live here and support California. NOW CALIFORNIA NEEDS TO SUPPORT EVERY LIVESTOCK HAULING BUSINESS THAT SUPPORTED THEM WHEN THEY COMPLIED TO THEIR NEW ARB LAWS.

Sincerely,

Kevin Rocha

DBA:K.Rocha Trucking

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 15:46:41

No Duplicates.

## **Comment 220 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Justin

Last Name: Oldfield

Email Address: justin@calcattlemen.org

Affiliation: California Cattlemen's Association

Subject: Proposed Amendments to Diesel Truck & Bus Regulation

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/245-truckbus14-VjVRNARkWVUGY1Q7.pdf'

Original File Name: CCA Comments on Proposed Changes to Diesel Truck Rule.pdf

Date and Time Comment Was Submitted: 2014-04-21 16:40:32

No Duplicates.

## **Comment 221 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Loren

Last Name: Hutnick

Email Address: HandHExcavation@Yahoo.com

Affiliation: H&H Excavation Gen. Eng.

Subject: Truck and Bus Rule

Comment:

As I said in previous public comments, I feel that the proposed "Truck and Bus Rule" is not only illegal, but unconstitutional. All diesel engines that have been working in California have a stamp on them that says, "This engine meets and or exceeds the emissions for the date that it was build and is accepted by the California Air Resource Board and the Federal Environmental Protection Agency." If that is the case, then the state of California and the California Air Resource Board cannot change these laws to mandate these trucks with diesel engines be removed from our roads or place strict guidelines on them. This would be like the California Franchise Tax Board going out and saying, "California needs money, so we are going to change all the tax laws back 50 years and now everyone owes back taxes!" CARB's "Truck and Bus Rule" has been researched by many truckers, community groups and taxpayer organizations. The general consensus is that this rule a violation our Constitutional Rights, in both California and the United States of America. We have the right to own and work, however CARB is trying to make hard-working Americans legal for one day and then with a stroke of a pen it is illegal the next.

It is our right to travel where we want to be cause or pleasure or business. Everyone here in California and in The United states has that Constitutional Right under the Constitution of the United States that was granted to us by our Fore Fathers. In other research I do believe that there are violations of several Commerce Acts and the Federal Highway Acts.

The California Air Resource Board has over reached and abused their power that they have been appointed too. There has been a lot of destruction to the California's Trucking Community. With a financial burden of replacement of the trucks families that have been lost there income from a or a few trucks, destruction of good trucks that should not be sold out of state or destroyed to satisfy the Truck and Bus Rule. With these Mandates and Rules that are proposed buy CARB there will be a huge financial drain on the already fragile economy of California. The coast of the corner store will be so expensive because of the coast of transportation of goods into and out of California. There has already been a spike in the commodities at the situation of CARB's mandates. These burdens will fall on the people of California and are just unfounded.

These Current mandates and rules have been such a burden and there cost has gone beyond the California boarders. There are so many people that have sold their home and left the state of California. Is this right "NO". There has been so many good people of California that no longer can come back to the state of California because the 1000 mile rules does not work for them and the forced

to not come home to see their loved ones be in there home that they have supported with and paid the taxes for their family of and in California. The reason that these people cannot come home or cannot drive their trucks across the California state line is because there truck dose not conform to the CARB Rules when it come to the Truck and Bus Rule is that right. As far as I'm concerned if the truck has a license for the state of California. Also there has been a study done that has shown there are 44,000 trucks that are deemed to come off the road at the end of 2014 well each of those trucks pay \$2300.00 in Registration to the DMV of California. That is over \$100 million dollars out of the California Coffor. Also that is not including the tax base for fuel and other supplies that are bought in the state. Keep in mind that will be also 44,000 men and women that are put on the unemployment Line.

I have sat and read a lot of the Data that CARB is basing their findings on, I'm sorry there are a lot of holes in this Data. CARBs data has been filled with a lot of speculation, fraud, and cover ups. Just not that the abuse of the financial fines have been unfounded to the public. As it sets the cost for Diesel Particular Filter (DPF) is so expensive and out reaching of these cost. The DPF has been plagued with so many problems and has speculation of several truck fires. We have also seen and rising coast of operation of the truck do to these DPF units. From the time spend in the shop for repairs to the cost of the fuel because the fuel consumption has gone up and Miles per Gallon has gone down. Again these will be cost that will be a burden to the owners of trucks and then somehow will need transferred to the general public.

I'm sorry in just the resent months everyone from the founders of several environmental groups and even the Federal Environmental Protection Agency has said that they cannot support and denounced the Truck and Bus Rules and Regulation for this state.

In all together the Truck and Bus rule has a bad issue with it, and that is bad for the Californians Truck Driver and the Small and Lager Business of California. I encourage the California Air Resource Board to find a better way to implement the Truck and bus rule.  
Mr. Loren M. Hutnick

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 16:43:38

No Duplicates.

## **Comment 222 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Jill

Last Name: Ratner

Email Address: jratner@rosefdn.org

Affiliation: Rose Foundtion for Communities & the Env

Subject: Keep the Diesel Truck Rule Strong

Comment:

Dear Chairman Nichols and members of the Board:

On behalf of the Rose Foundation for Communities and the Environment and our New Voices Are Rising Project, I write to express strong support for the current on-road diesel vehicle rules, and urge the continued timely implementation of the diesel truck and bus rule.

The diesel truck rules are tremendously important. They are already keeping children out of the hospital and saving lives. Here in Oakland, a 2012 UC Berkeley study found that significant pollution reductions had been achieved in a matter of months from implementation of the port truck rule. Those pollution reductions will have real health benefits for the community.

Every community in California deserves clean air. Implementation of all of the diesel risk reduction rules is critical to every Californian's health. It's time to move ahead without any additional delay and implement the diesel truck and bus rules.

Sincerely,  
Jill Ratner

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 16:38:22

No Duplicates.

## **Comment 223 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Bob  
Last Name: Brennan  
Email Address: bsbrennan@mlode.com  
Affiliation:

Subject: Truck regulations  
Comment:

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

Dear Chair Nichols,

As a California beef producer I am writing to voice my strong support for your staff's proposed revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles. The proposed provisions will ensure ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

Livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provisions currently included in the rule. The movement of cattle in California is generally seasonal, taking place in the spring and fall, and miles traveled by livestock haulers typically occur in rural areas. Unfortunately, California ranchers are already subject to a shortage of livestock haulers and depend on both in-state and out-of-state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the amount of truckers who are willing to continue to operate their vehicles in California and resulted in a complete disinterest by most out-of-state haulers to operate in California any longer.

I am livestock producer in Tuolumne Co. that seasonally move our cattle to USFS grazing permits. These permits are located where the roads are very narrow, steep and no longer maintained by the USFS.

Trucks to move these cattle is a big problem as there is a limited amount of trucks that can haul on these roads. Most trucking fleets in the valley will not and can not haul on these roads because of length will not haul on the rocky roads. On the Stanislaus NF there are several thousand cattle that can only be moved by cab over truck and trailer only because of the narrow and windy roads.

This week alone there is a shortage of trucks with early cattle moving because of the drought.

I've attached photos to narrow roads that typical cattle semi's can't travel on.

Our ability to break even at the end of any given fiscal year is subject to the whim of evolving market conditions, weather and rising input costs. Ranching is not a job but a lifestyle. The economic returns associated with cattle ranching are small, but the risk is huge. For example, this year has been especially devastating to beef producers as California enters the third year of the worst drought in our history. Many ranchers have already been forced to liquidate their herds due to the lack of feed and many others are struggling to survive by feeding hay that has doubled, and for some varieties, tripled in price.

Many livestock haulers and ranchers with trucks are also not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the goods movement corridor as required by Proposition 1B and drive too few miles in mostly rural air districts and are not competitive for funding under the cost formula generated for the Carl Moyer Program.

Unfortunately, some truckers have voiced their opposition to staff's proposed livestock provision. While it is very important to provide further forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done at the expense of the proposed livestock provision. Bottom line, this provision helps alleviate the economic suffering that is currently taking place for many ranchers and is good for the overall health of California's beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state - including many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,  
Signature

Bob Brennan  
Brennan Ranch  
20540 Shangra La  
Sonora, ca 95370

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-truckbus14-WjMGbQQZgAg5QZAM2.jpg>'

Original File Name: IMG\_2524.jpg

Date and Time Comment Was Submitted: 2014-04-21 16:30:46

No Duplicates.

## **Comment 224 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Sean

Last Name: Edgar

Email Address: Sean@CleanFleets.net

Affiliation: CleanFleets.net

Subject: Comments by CleanFleets.net

Comment:

Please evaluate the attached. Thanks. Sean Edgar

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/250-truckbus14-WzgAagRgBzUKYglv.pdf'

Original File Name: CleanFleetsSEdgarCommentsfor4-24-14TruckBus.pdf

Date and Time Comment Was Submitted: 2014-04-21 16:32:09

No Duplicates.



## **Comment 225 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Ivan

Last Name: Salcido

Email Address: Ivansalcido01@gmail.com

Affiliation:

Subject: Hurting trucking industry.

Comment:

I am writting to the CARB people with all respect and ask to consider their tough laws that are hurting not only the trucking industry but also the states economy, example, friends of mine up graded their trucks and now are behind on their mortgages cause of the new truck payment so whats next another mortgage crisis? Please reconsider and leave the trucking industry alone.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 16:37:57

No Duplicates.

## **Comment 226 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Myesha  
Last Name: Williams  
Email Address: mwilliams@rosefdn.org  
Affiliation: Rose Foundation's New Voices Are Rising

Subject: TruckBus14  
Comment:

To the California Air Resources Board and Staff,

The following are comments collected by New Voices Are Rising staff Myesha Williams and Jill Ratner from concerned residents.

We are too young and we cannot keep being hospitalized. Keep our air clean!

Angel from Oakland

I live near truck routes and my siblings have asthma, just learning from this I learned how big of an impact they make. I can't wait for the day when we have clean air. I think it's time to make change for the future and for the better of future children.

Ian Castillano - Oakland, California

Medical bills are expensive. We cannot afford to send our friends, kids and siblings to the hospital. Keep the rule!

-Margie from Oakland

Dear Members of the California Air Resources Board,

Please support implementation of the CA. Diesel truck and bus regulation. Diesel pollution is particularly toxic and contributes to greenhouse gas emissions.

Sincerely,  
Tina Stevens

Dear Members of the California Air Resources Board,

I think the "California Diesel Truck & Bus Regulation" passed in 2008 was a great rule with important, vital impacts on health-especially children's health. Please defend and implement this rule for the citizens of the state! Thank You!

Brian Hicks -Oakland, CA 94602

Dear Members of the California Air Resources Board,

Protect public health. Keep the Diesel Rule strong!

Nancy Berlin - Los Angeles, CA 90039

Dear Members of the California Air Resources Board,

CARB-no se rajen- you can do it! Step up for all of us, not just industry. Pardon the pun, pero dale gas!

Jose Gonzales - Modesto, 95355

Dear Members of the California Air Resources Board,

Please remember your mission and do the right and logical thing! Protect the air, protect the families that need it. it will pay.  
Analisa - Modesto, CA

Dear Members of the California Air Resources Board,

I am writing to ask for your immediate and full implementation of the California Diesel Truck and Bus Regulation. The truck industry has had enough time and now it is time-finally-to have clean, healthy air.

Sincerely,  
Kyle Livie - Oakland, CA

Dear Members of the California Air Resources Board,

I am writing to express support for full implementation of the California Diesel Truck and Bus Regulation (2008). It is important and vital to clean up California's air. Please defend this rule.

John Trinkle  
SF, CA 94554

Dear Members of the California Air Resources Board,

Our world is a better place because of the regulation passed in 2008 to clean up dirty diesel trucks. Defend this rule!

Sincerely,  
Kathleen F.

Dear Members of the California Air Resources Board,

Let us breathe clean air please! Implement the California Diesel Truck and Bus Regs passed in 2008.

Dale Rudesill  
Chico, CA 95928

Dear Members of the California Air Resources Board,

Every morning I bike to a school garden in South San Francisco to teach youth how to grow their own food. I bike for 30 minutes behind large trucks heavily polluting the air only to arrive to a garden surrounded by even more pollution. Please save my lungs and my good!

Ileana

Dear Members of the California Air Resources Board,

I am writing to urge you to adopt the full implementation of the California Diesel Truck and Bus Regulation. Stop the delay.

Sincerely,  
Juliette Anthony

Lastly, 19 people individually signed onto the following comment postcard:

Dear Members of the California Air Resources Board,

I am writing to you to support immediate and full implementation of the California Diesel Truck and Bus Regulation in California as it was passed in 2008. It is one of the biggest steps to date in the effort to clean up California's dirty air and protect public health.

The diesel truck industry has already received several extensions to implement this rule, leaving communities to battle diesel pollution linked to heart and lung disease, asthma attacks, cancer, and other health emergencies.

I call on you to step up and defend this rule, stop the proposed delay and remember that this regulation protects communities, keeps children out of the hospital, reduces greenhouse gas emissions, and saves lives.

Thank you for your time and consideration. New Voices are Rising staff urge you to implement this rule immediately.

Myesha Williams and Jill Ratner - Oakland residents and youth educators.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 16:52:56

No Duplicates.

## **Comment 227 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Lee

Last Name: Brown

Email Address: leebrown@calcontrk.org

Affiliation: CCTA

Subject: Truck Rule - PM2.5 Not Killing Truckers

Comment:

Mortality Study on Owner-Ops Disproves Claims of Risk From Exposure to PM2.5

As readers of California Transportation News are aware, the California Construction Trucking Association (CCTA) is at the forefront of challenging the environmental regulation of the trucking industry based on questionable claims that exposure to diesel PM somehow represents a significant health risk – to anyone.

While many in our industry have grown weary of the fight and have either chosen to comply with onerous and expensive regulations, or decided to leave the industry altogether, the fact that epidemiological studies used as the basis to regulate our industry are flawed must still be pursued – especially since the proverbial “goal posts” are in the process of being moved in regards to unsupported health effects from increasingly cleaner diesel emissions.

Staff for the CCTA attends many various meetings of environmental agencies and we can report that academic researchers (such as John Froines at the Southern California Particle Center) are already soliciting additional research funds from those agencies to study “diesel vapor” and its “unknown health risks.” Obviously, researchers think their work thus far has shown conclusive linkage between exposures to diesel PM and adverse health consequences. Even with the 2010 EPA compliant engines producing nearly zero emissions, opponents of diesel need to create a new boogeyman in order to keep the hundreds of millions in research dollars flowing. We hear “autism” is next on the list.

Truckers, the Big Canaries

Without going into a long dissertation on all the statistical and methodological problems with virtually every study of diesel PM, consider this; when it comes to diesel exhaust exposure, who are the proverbial “canary’s in the coalmine” when it comes to real world ambient exposure to diesel exhaust?

If diesel exhaust actually leads to all the deleterious health affects claimed by environmentalist and their lackeys inside public agencies and conflicted academia, who would be most affected and show a direct linear relationship between exposure and adverse health risk?

Truckers of course, they are “ground zero” when it comes to diesel

exhaust exposure and a study exists that shows truckers are not dying at the same rate from the same causes as the population as a whole.

A number of years ago as a member of the Board of Directors of a trucking trade association we were presented a pretty convincing theory that truckers were inherently at risk of an early demise - it was an occupational hazard we were told. We were also told that the average age of death for a member was 55 years of age and that the average age of death for a retired Teamster driver was just past 61. These unsubstantiated statistics actually worked their way into public discussion of driver health risks and were often cited as facts.

It was believed that if a study were performed by the National Institutes of Occupational Safety and Health (NIOSH) confirming the grim reality it would be immeasurably useful in advancing certain legislative priorities of the association. The organic statute creating the Federal Motor Carrier Safety Administration (FMCSA) requires that the agency ensure that operating a commercial motor vehicle would "not create an adverse impact on driver health," so being able to cite to a definitive government study that confirmed the hypothesis would have been worth its weight in gold.

#### The Bell That Didn't Ring

Researchers for NIOSH eventually did an analysis culled from a cohort of 156,241 owner-operators (truck drivers) located throughout the U.S. and compared that list with death certificates on file with the National Death Index (NDI). Researchers were able to pull and identify the cause of death for 4,368 individuals and statically compare the cause of death rate against 26 major disease classifications for the entirety of our national population. If truckers were dying sooner or more frequently from diseases commonly associated with diesel exhaust exposure it should have easily shown up - it didn't.

With the exception of one category - accidental deaths from transportation accidents - truckers are not dying at the same rate as the general population from a wide range of diseases. Simply stated, for those exposed to diesel exhaust at higher concentrations and for durations extending into decades, an analysis of death certificates does not show them dying at statistically relevant elevated levels compared to the general population.

It almost seemed this finding was unexpected by the researchers and in order to explain the surprising results they attributed their findings to the Healthy Worker Effect (HWE). Basically, researchers assumed that because truckers (CDL holders) must be medically re-qualified every other year and because certain medical/physical conditions can prohibit someone from driving a truck, as a group truckers are healthier than the general public.

That assumption is dead wrong. Everyone in trucking knows the medical qualification process is and has been a joke for decades. It has never been a problem simply paying to get a medical card where the doctor asked "how do you feel?" and simply signed off on the whole process. Because of this and outright fraud identified post-crash by the National Transportation Safety Board, the entire medical qualification process is undergoing significant regulatory revamp to tighten up the process, ensure that drivers are actually

medically qualified and place significant oversight on medical providers. Those changes have not actually had an impact as yet, since they will be implemented over the next couple of years. Hence, reliance on the HWE to explain the unexplainable is scientific misdirection.

Besides the obvious implications related to diesel exhaust exposure, the study is also useful for our industry to push back against further regulation of our industry based on unsupported claims that the task of driving a truck inherently compromises driver health.

CTN is republishing the abstract of the study that was published in a 2010 journal of the American Association of Occupational Health Nurse (AAOHN) - See centerfold pullou in CTN Magazine November issue

Editor's note: CCTA recently submitted comments to the U.S. EPA regarding CARB's off-road diesel engine regulations.

To support our opinion that CARB cannot meet an extraordinary and compelling need to regulate as required under the Clean Air Act, we attached the same study abstract to our comments. The U.S. EPA has embargoed that portion of our comments from public display claiming it is copyrighted material in spite of the fact we have paid AAOHN to republish it.

Additionally, our use was within the copyright acceptable use policy as published by AAOHN. We have been in contact with the periodicals editor and she cannot understand the EPA's refusal to fully publish our comments. Truth suppression anyone?

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/253-truckbus14-BmdXMFM9BD8FbQNp.pdf>'

Original File Name: AAOHNJ Mortality Among Truck Driver Assoc Members Birdsey 1110 (3).pdf

Date and Time Comment Was Submitted: 2014-04-21 17:03:53

No Duplicates.

## **Comment 228 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: John

Last Name: Olagaray

Email Address: colagaray@aol.com

Affiliation:

Subject: Special Provisions for Livestock Haulers

Comment:

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

Dear Chair Nichols,

As a California sheep producer and livestock hauler, I am writing to voice my strong support for your staff's revisions to the Truck and Bus Regulation that would classify trucks that exclusively haul livestock as specialty farm vehicles. The proposed provisions will ensure ranchers have access to enough trucks to move their livestock by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

My sheep operation requires me to haul my livestock from ranch to ranch within state, as well as out of state. When time allows I also haul livestock for other ranchers. Owning a truck and trailer rig allows me to get into tight areas where semis cannot, therefore putting my type of truck in demand. Hauling livestock is an integral necessity of my sheep business, but not a daily job or main source of income. Because of my sporadic use of my livestock truck, the inconsistent sheep market, rising costs, drought conditions, and feed and water shortages, I am not financially able to meet the costs associated with the retrofit. The proposed revision and January 1, 2013 date would allow me to continue my sheep operation and over time be able to replace my truck as necessary with age. Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,

John M. Olagaray  
Five-O Ranch  
11888 N. Davis Rd.  
Lodi, CA 95242

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2014-04-21 16:39:45



No Duplicates.

## **Comment 229 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Roberta

Last Name: Fonzi

Email Address: Non-web submitted comment

Affiliation: San Luis Obispo County APCD

Subject: Support for Proposed Truck and Bus Reg Amendments

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/255-truckbus14-WyhXPVI8UI4EYVM8.pdf'

Original File Name: Slo County APCD Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-23 08:53:26

No Duplicates.

## **Comment 230 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Sara

Last Name: Jewett

Email Address: Non-web submitted comment

Affiliation: Jewett Livestock

Subject: Comment

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/257-truckbus14-WyhTNAd0AjBVDAIj.pdf'

Original File Name: Sara Jewett Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-23 11:07:05

No Duplicates.

## **Comment 231 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Vicki

Last Name: Garner

Email Address: Non-web submitted comment

Affiliation: Garner Livestock

Subject: Comment

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/258-truckbus14-UScAb1c1AjoLZAJd.pdf'

Original File Name: Vicki M. Garner Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-23 11:11:44

No Duplicates.

## **Comment 232 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Heather

Last Name: Mendonca

Email Address: heathermendonca@gmail.com

Affiliation: Mendonca Transport

Subject: Comment

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-truckbus14-B29WNQZmVHNWOARh.pdf'

Original File Name: Heather Mendonca Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-23 11:20:13

No Duplicates.

## **Comment 233 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Leslie

Last Name: Phipps

Email Address: Non-web submitted comment

Affiliation: Ancile Ranch LLC

Subject: Truck and Bus Comment

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/275-truckbus14-BmcFbQFjWWNWPAdi.pdf'

Original File Name: Ancile Ranch LLC.pdf

Date and Time Comment Was Submitted: 2014-04-29 16:07:56

No Duplicates.

## **Comment 234 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Douglas

Last Name: Filipponi

Email Address: Non-web submitted comment

Affiliation: Santa Margarita Cattle Co.

Subject: Truck and Bus Comment

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/276-truckbus14-VCdUM1E+WX5QNwVa.pdf'

Original File Name: Santa Margarita Cattle Company.pdf

Date and Time Comment Was Submitted: 2014-04-29 16:09:25

No Duplicates.

## **Comment 235 for Truck and Bus Regulation (truckbus14) - 45 Day.**

First Name: Julie

Last Name: Arenz

Email Address: julie@cleanfleets.net

Affiliation:

Subject: 15 Day Comments on Truck and Bus Regulation

Comment:

Please see the attached document.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/379-truckbus14-UjFXNwFuVmBXJVIN.pdf'

Original File Name: CFNET 15 Day Comments on Truck Bus Regulation 7-17-14.pdf

Date and Time Comment Was Submitted: 2014-07-17 16:39:41

No Duplicates.



## **Comment 1 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Patricia

Last Name: Barrett

Email Address: Non-web submitted comment

Affiliation: Aloha Transport

Subject: - support for good faith amendments

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/260-truckbus14-BXUCZVQhVHUBbgVm.pdf>

Original File Name: Patricia Barrett.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:16:50

No Duplicates.

## **Comment 2 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: William

Last Name: Allen

Email Address: Non-web submitted comment

Affiliation: CA Bus Association

Subject: - response to staff report - t&b amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/261-truckbus14-Wi1VOlwxWWYAb1Iz.pdf>

Original File Name: William Allen.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:34:19

No Duplicates.

### **Comment 3 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Gayle

Last Name: Lopopolo

Email Address: Non-web submitted comment

Affiliation: Ganduglia Trucking

Subject: - T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/262-truckbus14-UTYAZ1IqUG8BYIIN.pdf>

Original File Name: Gayle Lopopolo.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:37:33

No Duplicates.

## **Comment 4 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Jared

Last Name: Ficker

Email Address: Non-web submitted comment

Affiliation: Santa Catalina Island

Subject: - T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/263-truckbus14-Vz1dOlEiAjQDYQIW.pdf>

Original File Name: Jared Ficker.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:44:08

No Duplicates.

## **Comment 5 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Douglas

Last Name: Gearhart

Email Address: Non-web submitted comment

Affiliation: Lake County AQMD

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/264-truckbus14-Wj4Ca1EIVWFWPAhp.pdf>

Original File Name: Douglas Gearhart.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:46:16

No Duplicates.

## **Comment 6 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Steve

Last Name: Weitekamp

Email Address: Non-web submitted comment

Affiliation: CMSA

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/265-truckbus14-UiEFd1UxByIGZQJd.pdf>

Original File Name: Steve Weitekamp.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:48:44

No Duplicates.

## **Comment 7 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Chuck

Last Name: Bacchi

Email Address: Non-web submitted comment

Affiliation: Rancher

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-truckbus14-B2QAbgRwBzcLZIMM.pdf>

Original File Name: Chuck Bacchi.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:50:04

No Duplicates.

## **Comment 8 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Ralph

Last Name: DiLibero

Email Address: Non-web submitted comment

Affiliation: LACMA

Subject: T&B Amendments

Comment:

See attached.

Attachment:

Original File Name: Ralph John DiLibero.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:51:22

No Duplicates.



## **Comment 9 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Michael

Last Name: Coates

Email Address: Non-web submitted comment

Affiliation: Diesel Tech

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/268-truckbus14-B2oGaVAyWGMBZgdi.pdf>

Original File Name: Michael Coates.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:53:46

No Duplicates.

## **Comment 10 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Bruce

Last Name: Perelman

Email Address: Non-web submitted comment

Affiliation: Caprice Enterprises

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/269-truckbus14-VDZVIQN3AjJWNQZZ.pdf>

Original File Name: Bruce Perelman.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:55:52

No Duplicates.

## **Comment 11 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Craig

Last Name: Phillips

Email Address: Non-web submitted comment

Affiliation: Ironman Parts

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/270-truckbus14-BmUHc1U1AzlVNFUK.pdf>

Original File Name: Craig Phillips.pdf

Date and Time Comment Was Submitted: 2014-04-29 13:57:12

No Duplicates.

## **Comment 12 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Lucy

Last Name: Feijo

Email Address: Non-web submitted comment

Affiliation: Terry Feijo Trucking

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/271-truckbus14-WjYAc1Y0VnwBWANl.pdf>

Original File Name: Lucy Feijo.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:03:36

No Duplicates.

## **Comment 13 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Sal

Last Name: Frausto

Email Address: Non-web submitted comment

Affiliation: Public Member

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/272-truckbus14-UCNVMgNuBAhVNVIg.pdf>

Original File Name: Sal Frausto.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:04:38

No Duplicates.

## **Comment 14 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Jill

Last Name: Ratner

Email Address: Non-web submitted comment

Affiliation: New Voices Rising

Subject: T&B Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/273-truckbus14-AHRQJFwoVWVXOghX.pdf>

Original File Name: Truck & Bus Comments - New Voices Are Rising.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:08:58

No Duplicates.

## **Comment 15 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Alex

Last Name: Alifaris

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/274-truckbus14-UTBcNgFlV3wEXQNi.pdf>

Original File Name: Alex Alifaris.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:55:06

No Duplicates.

## **Comment 16 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Don

Last Name: Knabe

Email Address: Non-web submitted comment

Affiliation: Board Of Supervisors Couty of L.A.

Subject: comment

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/278-truckbus14-AWWWP1wzAg4GawFv.pdf>

Original File Name: Don Knabe.pdf

Date and Time Comment Was Submitted: 2014-04-30 11:48:09

No Duplicates.



## **Comment 17 for Truck and Bus Regulation (truckbus14). (At Hearing)**

First Name: Wayne

Last Name: Griffin

Email Address: Non-web submitted comment

Affiliation: Catalina Island Chamber of Commerce

Subject: comment

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/279-truckbus14-VjUFYl0oUmAHbVQ9.pdf>

Original File Name: Catalina Island.pdf

Date and Time Comment Was Submitted: 2014-04-30 11:49:14

No Duplicates.

## **Comment 1 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: chris

Last Name: wortman

Email Address: papabear911@comcast.net

Affiliation:

Subject: Comments

Comment:

Just thought I'd give you an update.

It is now July, well into the regular work season and for tomorrow

I have one out of three trucks scheduled for work.

The last few weeks have been about the same.

I know I get as much or more work than most.

When I'm out on the road I see the amount of trucks on the road and it's not many.

Although the extensions are hopeful it is difficult to assume we will be able to update our equipment in this working environment.

There are some companies working more and some that are working less. It is the companies that are tied into large corporations that are working more and the companies that are smaller are working less, if at all.

It seems as though big business always finds a way to succeed, usually on the backs of the little guy.

I know one broker that charges the customer 95 per hour and pays the trucker 80 per hour, then takes his brokerage fee (7-10%) from the 80.. Known as top rating.

In the old days the rates were controlled by the PUC and it worked out pretty well.

But without enough work and a better economy all the guys that have invested in new equipment will go under.

That is a very real possibility. If things don't improve the industry will fail.

Chris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-01 17:55:27

No Duplicates.

## **Comment 2 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: raul

Last Name: guevara

Email Address: raulguevara72@gmail.com

Affiliation:

Subject: need more time

Comment:

I rebuilt my truck engine \$9,000.00+new turbo \$3,500.00 I can't afford the filter my truck is the only incoming money we have and now I have payments for the money turbo and engine please give me more time to operate in california

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 07:14:13

No Duplicates.

### **Comment 3 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Thomas

Last Name: Davison

Email Address: davisonandsons@sbcglobal.net

Affiliation: Davison & Sons Trucking

Subject: DPF Extensions

Comment:

Would like to see older trucks that can not be retrofitted with a DPF device granted extensions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 07:57:36

No Duplicates.

## **Comment 4 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: David

Last Name: Torres

Email Address: rossana@bak.rr.com

Affiliation:

Subject: extension waiting for filter

Comment:

I understand about all the change with ARB but at this moment the filters are not available immediately. I'm owner for 2 trucks and still waiting for the filter to be install. I'm in the process to be in compliance with ARB, I paid the down payment to install the filter, but the filter is not going to be ready before July 30. Just requesting to get an extension for ONE MORE MONTH to report my filter information that way I can get an extension for my second truck till 2017.  
FILTERS ORDERS ARE REALLY BEHIND.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 08:40:30

No Duplicates.

## **Comment 5 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Major

Last Name: Singh

Email Address: dhaliwalrani@yahoo.com

Affiliation:

Subject: request for some more time

Comment:

This is Major Singh from G M A Truck line my truckers id is 96920  
i have a request for some more time plz because i am not qualifiey  
for loan i dont know what i have to do i have only one truck plz  
contact to me and help me plz what i have to do

Thanks  
Major Singh  
G M A Truck line

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 09:41:25

No Duplicates.

## **Comment 6 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinnpower.com

Affiliation:

Subject: PM Retrofit Using BACT - No Reporting

Comment:

I provided a comment in the 45-day comment period about the new, undue burden of unnecessary fleet reporting for those fleets utilizing the straight BACT schedules (Tables 1 and 2) that installed PM filters prior to January 1, 2014. This change in the regulation that should not have been overlooked at the recent Governing Board hearing represents a major reporting change for fleets that will easily lead to compliance issues.

Under the provisions of the current regulation, CARB provided relief from reporting if the straight BACT method was utilized, provided that the fleet followed the rigorous schedule of installing PM filters (or replacement) on 1996 - 2006 heavy-duty engines in vehicles > 26,000# GVWR prior to January 1, 2014. Installation of the PM filters allows fleets to operate these retrofitted trucks until sometime between January 1, 2020 and January 1, 2023 depending upon the engine model year without any vehicle reporting other than for low-use vehicles and the annual affirmation reporting. This relief from reporting has been addressed by CARB at workshops and in their on-going training as an added plus for those electing this path for compliance. Reporting for vehicles with other than 1996 - 2006 engines that were retrofitted still required reporting by January 31, 2014.

In an attempt to recognize 'good-faith' fleets that followed the proper compliance retrofit requirements of the regulation, CARB made proposed changes in the regulation that is awaiting final approval that would allow for a 3-year extension of the original January 1, 2020 date to January 1, 2023. However, contrary to CARB's original "no-reporting" relief, CARB will now require fleets to report their entire fleet of heavy duty vehicles to have any extension for any vehicle retrofit before January 1, 2014. This unfair change actually penalizes those that followed the BACT compliance path with the extra, unnecessary reporting.

In cases like ours, where we replaced over 75 vehicles with 2010 or better engines and retrofitted over 30 vehicles, such reporting would be a huge undertaking as engine information must be pulled manually from each vehicle's engine as this information is not available with the VIN data. There are many other fleets like ours that would also be unnecessarily forced to now report. Many of these fleets will likely not understand the ramifications of this change and will suffer undue compliance.

In my comment made during the 45-day comment period, I suggested the following changes to sections 2025(f)(2) and 2025(g)(4) to alleviate this now-imposed burden on fleets that elected the BACT

approach with no previous fleet reporting:

1. The "no reporting" provision should be retained for vehicles with 1996 - 2006 engines in vehicles > 26,000# GVWR if the PM filter was installed in accordance with Table 2 and a fleet wants to keep the original deadlines for replacement as per Table 2.
2. Reporting would still be required as in the current regulation for retrofitted vehicles > 26,000# GVWR with engines other than 1996 - 2006, or for any vehicles retrofitted on vehicles < 26,000# GVWR.
3. Reporting of an entire fleet would only be required if the fleet desired the extra 3 years for vehicles > 26,000# GVWR with engines other than 1996 - 2006, or for any vehicles retrofitted on vehicles < 26,000# GVWR. Note again, as confirmed by CARB staff, the provision in 2025(g)(4) should only apply to vehicles > 26,000# GVWR with other than 1996 - 2006 engines. Provisions for "no reporting" for vehicles with engines in the 1996 - 2006 range is exempt from reporting as stated in the preamble to 2025(g) if the BACT schedule is utilized.

The following language is suggested:

In the preambles of 2025(f) and 2025(g) the following sentence must be retained to state reporting is not required if using the straight BACT method for compliance: "Fleet owners are not required to meet the reporting requirements of section 2025(r)."

In addition, the following modifications to 2025(f)(2) and 2025(g)(4) are necessary:

2025(f)(2) - Any engine that meets PM BACT prior to January 1, 2014 does not have to be upgraded to a 2010 model year emissions equivalent engine until January 1, 2020 as long as the vehicle remains in the fleet, and the owner meets the reporting and record keeping requirements of sections 2025(r) and 2025(s) for such vehicle. Fleets may extend this deadline to January 1, 2023 for engines that met PM BACT prior to January 1, 2014 provided that all lighter vehicles in the fleet meet the reporting and record keeping requirements of sections 2025(r) and 2025(s) by no later than January 31, 2015.

2025(g)(4) - Any engine that meets PM BACT prior to January 1, 2014 does not have to be upgraded to a 2010 model year emissions equivalent engine until January 1, 2020 as long as the vehicle remains in the fleet, the owner meets the reporting and record keeping requirements of sections 2025(r) and 2025(s) for such vehicle, and the vehicle is in compliance with the schedule set forth in Table 2 above at the end of this extension. Fleets may extend this deadline to January 1, 2023 for engines that met PM BACT prior to January 1, 2014 provided that all heavier vehicles in the fleet meet the reporting and record keeping requirements of sections 2025(r) and 2025(s) by no later than January 31, 2015.

Again, the regulation needs to stick to the original CARB incentive of "no reporting" if the BACT path is utilized.

Thank you for your consideration.

Bob Shepherd



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 11:21:32

No Duplicates.

## **Comment 7 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: JoAnn

Last Name: Kohanek

Email Address: mystandthedragon@aol.com

Affiliation: trucking dispatcher

Subject: extending any deadlines

Comment:

Trucks that are well kept up and are not in a un-maintained condition should be able to get and keep a certificate to keep running in California. Owner-operators do not have the money to keep up with every ruling that you make for their trucks. If you continue to go in this direction, you will be destroying your trucking industry. Your small businesses with one or two loads will not be able to get their commodities shipped. The big companies are not going to want them because it is not money for them. A lot of the o/o are telling us that they will not be going to california after their certificate is done. O/o should not be penalized for this. You have way more cars, small trucks and farm vehicles and construction equipment that puts more pollutants in the air than the trucks that haul your loads for your stores, factories, shipping and so on. I believe you will find within a year's time, you will be on the brink of a mass fallout from this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 12:26:00

No Duplicates.

## **Comment 8 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Walter

Last Name: Lopez

Email Address: walterjlopez@comcast.net

Affiliation: solo

Subject: Unable to afford Filter Installation

Comment:

Hello, my concern is that I was unable to get a loan because of my credit score, I was referred to a few financial institutions, but all of them turned me down, later I was contacted by Providence Capital financial to propose me an offer, and since I didn't have no choice to neither upgrade the equipment, I took it because I believe I'm being robbed by this institutions, Providence Capital Financial offered me a LEASING AGREEMENT. on which I will lease the equipment for \$700.00 a month for 3 years and after 3 years, we will renegotiate the status of equipment, also in another hand the equipment has to be modified to make room for it and it will not work for me due the type of work, anyways I decided to stop the lease program with Providence Capital and I have under dispute the deposit I give them plus interest totalling \$28000.00 dollar and they are refusing to return none because of the contract with original signed, I believe this institution is taking advantage of the rule to rip people with little opportunities please take my case in consideration I'm barely creating self income

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 12:38:56

No Duplicates.

## **Comment 9 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Charles

Last Name: Avery

Email Address: cavery@tnt-materials.com

Affiliation:

Subject: Placer County NOx map

Comment:

The area east of Hwy 89 in Placer County has been included into the NOx exempt map. I am concerned about the communities of Squaw Valley and Alpine Meadows not being included in this adjustment since they are west of Hwy 89 but only served by Hwy 89. The Donner Summit communities of Norden and Soda Springs have portions located in Placer County and are only served by roads located in Nevada County. Finally Interstate 80 crosses multiple times between Nevada and Placer Counties prior to Hwy 20. I would like to see these areas of Placer County included into the NOx exempt map.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 13:47:34

No Duplicates.

## **Comment 10 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Brian

Last Name: Marsh

Email Address: bmarsh88@sbcglobal.net

Affiliation:

Subject: Placer County NOx

Comment:

In the most recent map adjustments for the NOx exempt areas you have failed to include areas that are serviced only through currently exempt areas. i.e. Squaw valley and Alpine Meadows communities are served by hwy 89 yet they are not included in the exempt area. Also the Donner summit communities located in Placer county are serviced from Nevada county and are not included. It would make more sense that all areas East of Blue Canyon be included in the NOx exempt area as they are all in the same air region as Nevada County. This would also give access to the Northern exempt areas of the state when coming from the Nevada State line by being able to travel on Hwy 80 over the pass to Hwy 20. Please review your maps and look at the geographic region rather than roads or county lines.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 14:21:07

No Duplicates.

## **Comment 11 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Cesar

Last Name: Polanco

Email Address: polancotransport@yahoo.com

Affiliation:

Subject: Economic Hardship

Comment:

I purchased my 2007 freightliner columbia in September 2012 and enrolled in the trucrs and got an extension for the good faith effort due to loan denial. I come to find out I don't qualify for the Economic Hardship Exemption because my fleet was not established on January 1, 2012 which I don't understand. I think this is unfair to people like me I still can't afford or qualify to purchase a filter or a new truck because I have filed for bankruptcy in order to save my home and when I called the trucrs hotline they say I don't qualify for anything please respond and I hope they take into consideration that owner operators going through this problem of not qualifying for the Economic Hardship Exemption due to not having the fleet since January 2012 please help the rest of us our families depend on us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 14:35:10

No Duplicates.

## **Comment 12 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Melanie

Last Name: Flores

Email Address: mnavarro@thesae.k12.ca.us

Affiliation: concerned

Subject: Deadlines

Comment:

As a consumer and a friend of several truck drivers one of whom is my brother, a small owner operator. They are not able to afford the expense of this new PT Trap. The deadline(s) for this are completely unreal.

For example a very good friend of mine purchased his truck on 11/1/13 and reported as her should on 11/25/13 (time frame in which he was told to report and received an extension until July 1. That is IT! No other extension, he can not afford to install the PT he is barely making ends meet now and to expect him to get a loan to put something on a truck that is not even working properly for so many is just simply ridiculous. I do not support this new ruling. We all follow the rules and are trying to keep the air clean but this is forcing us all into the POOR HOUSE. We will not be able to purchase goods because the trucks that are needed to bring them will not be operational. Or the ones that are will need to recoup that cost hence forth pass down to consumers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 14:20:36

No Duplicates.

## **Comment 13 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Cindy

Last Name: Morgan

Email Address: morgancbd@gmail.com

Affiliation: Marsh Ventures, Inc.

Subject: NOx Exempt - Placer County map

Comment:

The Placer County Nox Exempt map needs to include the communities of Squaw Valley (aka, Olympic Valley), Alpine Meadows and the Donner Summit areas. They are presently not on the map and there is not way to reach them with a concrete mixer truck other than to drive outside the existing map.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 16:05:03

No Duplicates.



## **Comment 14 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Genny  
Last Name: Godwin  
Email Address: info@cdltrucksales.com  
Affiliation: Truck Sales

Subject: carb issues

Comment:

Please fine and suspend registration on the trucks that applied for a grant or voucher just to get the 6 month extension and then never followed through with using it to get a new truck. These drivers wasted the time of dealers who helped them and wasted the time of the Air Districts who had to process the applications. These people should be fined first for intentional neglect of compliance.

Also please work on an extension or solution to the problem that drivers have with upgrading after having been approved for a 1B Grant. These drivers now no longer have an extension but have not been given the 1B Contract yet so they can go purchase an approved truck. These drivers are left in a void and this issue should be addressed.

Thank you  
Genny Godwin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 16:20:48

No Duplicates.

## **Comment 15 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Elli

Last Name: Cordova

Email Address: mshollister831@gmail.com

Affiliation:

Subject: !!!!!!!!!!!!!!!MORE TIME TO BE ABLE TO BUY!!!!!!!!!!!!!!!!!!!!!!

Comment:

I'm owner operator (one Truck) and my truck does not qualified to get a filter on, but it runs perfect. can't get a Loan due to bad credit (bad economy results) and the Economy still very slow in my work field, Please give us more time I don't want to GO TO OTHER STATE and Start all over. Our Truck is the only Income in our Family.

Thanks in advance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 20:28:00

No Duplicates.

## **Comment 16 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Scott and Cheryl

Last Name: Maddison

Email Address: maddtrk@sbcglobal.net

Affiliation: Scott Maddison Trucking

Subject: Carb Truck Regulation

Comment:

We are a one Truck owner of a 2001 Peterbilt, We have been in the Trucking Industry for about 30 years We maintain our Truck its our only income its how we live and pay our bills we don't get rich but have raised two kids and pay California taxes we do all our own maintenance so we can keep cost down our truck runs good and looks good and have had no problems with it now with Carb We would have to put out \$50,00 to retrofit because they say it would have to be overhauled to put a filter on it with one Truck We don't have an extra fifty thousand so the other option is to buy a Truck so yes We figured we are going to do this a while trade our truck in get a newer one Well with what California has done has now made the value of our truck nothing we would have to have cash for a down payment, We do not qualify for grant incentives because we haul produce from California to other states My husband and I and both our kids were born in California now California wants us to somewhere else to work

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-02 22:48:04

No Duplicates.

## **Comment 17 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: James

Last Name: Helmuth

Email Address: majestytransport@hotmail.com

Affiliation:

Subject: Hardship for the clean air upgrade for single truck owners

Comment:

My wife and I have been completely put through the ringer in regards to this trucking industry. We purchased a 2008 Kw 9001 so we would not have to worry about California laws just to loose it to a cheating lease purchase company. We lost our truck and ride in December 2011 and was not able to purchase another truck because of lost contract and job. We fought hard to be able to get back to what we love and finally was able to purchase a 2005 Kw 9001 custom in May 2012. At this time we still did not need to worry about California because we were a single truck and not a fleet. We planned to buy a new truck or build one for the custom work we do in the aviation transportation and to meet clean air for California. Things were looking great for this and we had already started to build a new truck to be ready for mid 2014 when on September 2017, 2013 we were in a major truck accident that was not our fault. Here we go again out of work for 5 months waiting for insurance companies and shops to get this truck back together. In the meantime with no income and no insurance money coming in we had to stop this new truck build and suffer from lost of wages and let our credit go to pot. We have done everything to try and rebuild and now California is showing discrimination against us because of the Jan. 2012 in fleet change. We definately fall under the hardship program for the extention and don't understand why the direct attack on the owner operator. I understand the clean air change however the big companies can afford to do this and We can not with just one truck of income coming in and just barely having enough to make one truck make any money at this time with this economy. I hope things start to get better but would need to have the government and California understand that not everyone fits in the same group. Major companies and big fleets have more money to be able to play around with the percent of trucks to be in compliant than that of a 1 truck company. We don't just have spare money to make these changes. My truck was consider compliant when it was built and should still be considered ok till it dies. The trucking industry is making only new trucks since 2010 and the old trucks will slowly die off anyway and then a new one will half to be pruchased. If 1 truck is considered a fleet then why don't we get the discounts and help that the fleets get. You can not have it both ways. We deserve the discunt help and special loans if we are considered a fleet or if not then don't put me in the same rules of a fleet. 1 truck is not a fleet. Please put things back and the single truck owners will eventually be able to get new trucks when these die.

We feel we more that meet the hardship and feel we should be allowed to get extension till the Jan 2017 at which time by then we will already have a new truck anyway.

Thanks James Helmuth owner of Majesty Transport of Kentucky

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-03 07:40:06

No Duplicates.

## **Comment 18 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: DAMANJIT

Last Name: MAHAL

Email Address: DMKATHGARH@YAHOO.COM

Affiliation:

Subject: EXTENSION FOR YEAR 94 AND OLDER TRUCKS

Comment:

Hello Sir/Mam,

I Damanjit S Mahal would like to state that due to the economic meltdown the hardship I and many others like me have faced all kinds of financial difficulties.

I would like to propose that for anyone having financial problems and not being able to afford a filter or let alone a new truck, should be given extra time (extension) to be able to work with the truck they have and save some money. So that they then have a better chance of affording something in future. I heard that there is a proposal for extension up till January 2017, if that is so I think this should be ample time for truckers to get through the financial difficulties of the past and the present.

Thanking you  
Yours Sincerely

Damanjit Mahal

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-03 16:38:03

No Duplicates.

## **Comment 19 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Jim

Last Name: Fuller

Email Address: Jamflrjr@aol.com

Affiliation:

Subject: One truck

Comment:

I have one truck it's old but good just like me. I have been doing this construction work for fifty years. Iam in the low mileag. My truck engine is mecancal no filter is made for it. Just let me work for five more years thank you Jim fuller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-04 07:11:05

No Duplicates.

## **Comment 20 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Cesar

Last Name: Polanco

Email Address: polancotransport@yahoo.com

Affiliation:

Subject: Economic Hardship

Comment:

My name is Cesar and I'm on the verge of taking my hard earned business to another state. I love California I grew up here having a dream to become a business owner but my dream is fading away, sad to say. Im a father of 5 beautiful kids and a husband looking to give my kids a better future, but with all the high price in diesel and regulations for trucks its a very stressful situation. I own a 2007 truck which does not meet California Regulations and lack of credit issues and money I cannot purchase another one or purchase a pm filter. Last year when we register with the CARB deparatment we qualified for the "Good Faith Effort" extension until July 1,2014 but now we're in July and they say we dont qualify for the "Economic Hardship" extension because we had to have the fleet established since January 1,2012 and not after I only have 1 truck not more than one so it doesn't count as a fleet it would be a one owner operator of one single truck.I unfortunately did not now that, and I purchased my truck in September 2012 which that un qualify us. I honestly think this is unfair because I do qualify under that extension but unfortunately I did not start my business in January 2012 but after that. My wife and I are under alot of stress due to this matter. Because of this situation I'm not left with other choices but to rent my home which my wife and I work so hard on, to provide a nice living for our children and relocate my entire family and move to another state which it will bring emotional distress to my children and ourselves. We would have to move into a much smaller place and adjust to another state that is not where we had our lives planned. I hope that whomever read this helps me and the rest of fellow truck drivers we are not trying to pollute the air we are trying to comply but unfortunately some of us can't comply due to an Economic HARDSHIP if I was able to comply I would at the end of the day we live and wish to stay here in California. Other than that why dont you guys consider giving the people like me and others that were discriminated by one silly rule of the specific date the fleet had to e established of January 1,2012 and give us relocation money so our trucks stop polluting the state. Reconsider what all these laws are doing to ourselves and our families and GIVE US MORE TIME!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-06 12:57:18



No Duplicates.

## **Comment 21 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Timothy

Last Name: Brown

Email Address: brntrkg@gmail.com

Affiliation: owner oper 1 trk

Subject: new truck regulations

Comment:

Well here we go again, CARB is doing there dance once again and changing the truck regs. Last year in Dec. before I spent over 20K to install the DPF on my truck, I checked the online CARB site and in the questions box it someone asked if there where going to be any more extensions and of course CARB said "NO" that this was the final ruling. How can you trust an agency that constantly lies and manipulates the rulings to fit there political needs?

Why can't CARB have some integrity? for instance, I was reading a CARB file titled Alternitives Considered para 7 stakeholders asked, why cant small fleets be exempt from the DPF requirements? CARB answered by saying that small fleets cause or make over 50% of the nox and particulates in the state, well if that where true, why wasnt the small fleets given half of the funding? It was because CARB gave it to the big boys like UPS and Fed Ex the ones who make millions of net profits, not us little guys who struggle every day to make a living in an economy that still hasnt recovered.

In my opinion CARB is a lying, cheating, and deceptive agency that is politically motivated and not really interested in helping the small fleets, but is afraid of the impending law suits and is trying to get in front of them by changing the rulings.

What would make me happy, Well I would like to get some financial help on the DPF I installed, since I had to foot the whole Bill, ( go figure, CARB gave money to APCD's in nox exempt areas and then gave them extensions to comply!) and make more funding available to small fleets and make sure that those applying for financial extensions are really legit and not trying to screw the system.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-06 12:49:13

No Duplicates.

## **Comment 22 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Jeff

Last Name: Burleson

Email Address: Biggin35@hotmail.com

Affiliation:

Subject: Carb rules

Comment:

The amount of money it takes to retrofit a truck just to do business in your state or to buy a newer truck doesn't justify the cost.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-06 16:31:08

No Duplicates.

## **Comment 23 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Roger

Last Name: Flythe

Email Address: Rgflyth@aol.com

Affiliation:

Subject: Arb exemptions

Comment:

Those of us who drive less than 5% of our mileage per year in California, are finding it difficult to justify the expense of an 18,000 particulate filter for our older equipment. The only viable option for many of us is to not operate in the state of California.

I personally will be retiring within the next two years and will not upgrade my existing equipment or purchase new equipment. Perhaps there should be a mileage exemption for those of us that drive less than 5,000 miles total in California over the course of a year.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-06 16:55:03

No Duplicates.

## **Comment 24 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Timothy

Last Name: Bottorff

Email Address: tbotatt@gmail.com

Affiliation:

Subject: All ready compliant

Comment:

I think that any "hardship extensions" are pure rubbish. Most owner operators that are not compliant YET, are victim of nobody but themselves. There has been ample time to be compliant, they have made choices knowing about the deadline.

Fleets or single truck operators by not being compliant are driving down rates for people who have complied.

By only offering a extension of time that vehicles who complied by 12/31/2013 with a dpf, we are being punished unfairly. For example I have 1997 peterbilt tractor that I saved every penny I could to be compliant on time. When my truck needs to be replaced in will be nearly 26 years old, with proably 3 million miles on it.

I think the arb should pay me back for my expenditure Of the dpf filter and compensate me for the lost wages (no rate increase do to scofflaws), and diminished value of my tractor.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-06 19:44:23

No Duplicates.

## **Comment 25 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: jaime

Last Name: arreola

Email Address: asebis2007@yahoo.com

Affiliation:

Subject: filter

Comment:

Hi my name is Jaime I have 2005 freightliner with a Detroit engine my truck broke down last year I had to pay over twelve thousand dollars to fix it, money that I borrow from my brother and I still making payments to pay that money, so last year I spent about twenty thousand in repairs,so is pretty hard to save money to install a filter that cost me sixteen thousand,and my credit record is not good right now to apply for a loan in a bank but, I will try. but we really need more time, and also there are a lots of trucks that are in real conditions like mine. I don't think a 2005 truck is old enough to get him out of the road. now I don't understand why older truck have more time like 94s and 95s, that does not make sense to me,I hope the people that is in charge of this program try to understand us and give us more time. thank you for this opportunity to speak out our concerns.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-07 09:52:12

No Duplicates.

## **Comment 26 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Victor

Last Name: Paredes

Email Address: victorsemailbox@gmail.com

Affiliation:

Subject: Economic Hardship Amendment

Comment:

I believe that this entire Clean Air Regulation has created more problems than it has solutions...

- 1) When was the last time someone died of air intoxication in California? (they haven't)
- 2) Is this truly about clean air or is this a propaganda strategy?
- 3) Are the residents of California asking for clean air or are we trying to please those foreign visitors who come with their fancy gadgets and tell us that our Air is so dirty they don't understand how we are still alive?
- 4) I have visited our neighboring country of Mexico and experienced their Air Quality which we all know is extremely poor "News Flash" "No one is Dying!" So what are we truly trying to accomplish?
- 5) Do we truly not see that this is counter productive for our economy?

I believe that ARB has meant well but not taken into consideration that there are people out here that are barely surviving. Do you not see that Diesel Fuel Prices have not went down in the last 7+ years. Do you not know that you are asking for all of a single truck owner operator's profit when you ask him to upgrade his equipment? I believe ARB perhaps doesn't even know the price of a gallon of milk and truthfully has no business handling the sort of matter...

I believe that all of the remaining trucks that have not been able to retrofit or upgrade should be given the opportunity to prove their Economic Hardship. I believe that ARB should not make anyone jump through hoops to prove that either. At the end of the day Please keep in mind that every Owner Operator would Love to Upgrade his Equipment...However most of us came into this industry with a goal to own our equipment someday after many years of monthly truck payments ranging from \$1800 to \$3000 a month...we arrived after an extremely rough economic blow...then you hit us with this! Wow!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-07 22:00:46

No Duplicates.

## **Comment 27 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Rudy

Last Name: Ceja

Email Address: hildaceja@gmail.com

Affiliation: Ceja and Sons Trucking

Subject: Project # C-27144 / Waiting for Grant Approval/ Extension

Comment:

To whom it may concern,

I work seasonal in agriculture. Transporting produce locally within San Joaquin County. Since last year I have been trying to get a grant through the state to sponsor our fleet of three trucks. I still have hope. They told me I did not make it to the second round of money disbursements, now I have hope to receive it. We are currently in raking number 517. The Air Resource Specialist does not promise we will get the grant to complete the purchase of my new truck, but there is hope.

ALL I ask for, is an extension under Prop. #1 to continue waiting for this grant until December.

If I do not get the grant, I will be able to afford a truck at the end of this year when the season ends. This season looks promising.

Please allow me to have an extension through Prop #1 to wait for the grant approval or otherwise save to buy the truck before Dec. 2014.

Thank you for all that you do. I look forward to seeing this opportunity.

Regards,  
R.C.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-09 13:14:37

No Duplicates.



## **Comment 28 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: JUAN

Last Name: VILLARREAL

Email Address: villarreal.truck@gmail.com

Affiliation:

Subject: NEED MORE TIME TO BE ABLE TO BUY THE FILTER!!!!

Comment:

Good Afternoon,

This Letter is to inform you that I apply for a loan for the PM Filter and the loan got declined. I will like to know if you guys can help me out with an extension to operate the vehicle with a permit because I'm the only one that work and support my house and cannot stop my truck for day or months.

Thank you in advance,  
Villarreal Transportation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-09 15:14:39

No Duplicates.

## **Comment 29 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Artemio

Last Name: Villa

Email Address: villaenterprises@yahoo.com

Affiliation:

Subject: serious concerns

Comment:

I am very concern with the regulations and the primary purpose of why we are going through this changes anyways,. I am an owner operator with just one truck that I drive no more than 15,000 a year. If the idea is to clean the air why are other work trucks allowed to continued to operate under low mileage? because I pulled a trailer the restrictions changed, 2nd scenario is if I owen one truck and it meets emissions I would be allowed to continued to operate a 2nd and 3rd truck for a longer period of time... so is it "do we want to clean the air or is it all special interest"? that 2nd and 3rd truck will continued to emit toxins, taking care of one truck didn't of a sudden fix the other 2... so why is it so hard for me to not keep operating a perfectly good, running truck? Why am I being force to have payments on a rig I don't need? Where are my freedoms as a hard working American? I need some logic to all this and if I don't get answers I will continued to search for them and get my voice heard... Thank You for your time and input  
Artemio Villa

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-09 18:53:48

No Duplicates.

## **Comment 30 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Dana

Last Name: Faulkner

Email Address: advfreight@yahoo.com

Affiliation: Advanced Freight Systems, Inc.

Subject: Advanced Freight Systems, Inc. Comments on Proposed Amendments Dated July 1, 2014

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/318-truckbus14-VjdWNFQjU2EGbgRn.pdf>

Original File Name: Advanced Freight Systems Comments on Truck and Bus Reg.pdf

Date and Time Comment Was Submitted: 2014-07-11 16:50:35

No Duplicates.

## **Comment 31 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Richard

Last Name: Tognoli

Email Address: tognolitruucking@att.net

Affiliation:

Subject: Nox exempt counties

Comment:

I have been to several town hall meetings and have requested on numerous occasions a pass similar to the out of state three day pass to deliver loads outside nox exempt counties. So far I see emergency exemptions and repair exemptions. I envision a pass system perhaps one day at a time up to 10 times a year or something similar.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-14 10:56:34

No Duplicates.

## **Comment 32 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: jim

Last Name: doukakis

Email Address: jimdoukakis@gmail.com

Affiliation:

Subject: Small Fleet option

Comment:

Hello i have a small fleet of 2 dump trucks and it wasnt clear to me on the deadline to comply for the small fleet option. I have missed this deadline and the date was changed but no one knew. After just speaking with one of your techs i find that this option is no longer available to me because it expired just a few days ago.

I wish i would have know this, i never got a notification fro ARB. ive been trying my best to stay in compliance and i wanted to ask if you could reconsider in giving me this option for one of my trucks.

This is making it difficult for everyone. especially now, we are still trying to recover from the mortgage crisis and many of us have gone bankrupt just to keep our homes. On top of all the problems with our economy and many people trying to survive, these new laws come out adding additional stress and making it impossible to stay in business in California and support our families.

Please let me know how i, a small fleet can still have some hope and stay in business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-14 12:08:39

No Duplicates.

## **Comment 33 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Julius

Last Name: Rim

Email Address: dieseltrap@gmail.com

Affiliation: International Metals & Energy Technology

Subject: IMET's Comment on Proposed Amendments to the Truck/Bus Regulation  
Comment:

Please see attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/321-truckbus14-UThTOFYyByAGXwFi.pdf>

Original File Name: IMET Comments on Amendments to the Truck and Bus Regulation.pdf

Date and Time Comment Was Submitted: 2014-07-14 12:26:33

No Duplicates.

## **Comment 34 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Tom

Last Name: Giddens

Email Address: info@cbabus.com

Affiliation: California Bus Association

Subject: Response to 15 Day Notice

Comment:

Please see attached file for comments from the California Bus Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/322-truckbus14-U2ICMF1sUjYGMQQw.pdf>

Original File Name: 140714 Response to 15 day notice.pdf

Date and Time Comment Was Submitted: 2014-07-14 14:35:06

No Duplicates.

## **Comment 35 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Yadida

Last Name: Saldana

Email Address: monstertrans2@yahoo.com

Affiliation:

Subject: hardship

Comment:

I dont see how making us get rejected for a loan and showing you our taxes is going to prove anything. We have lost our house a couple years ago when the construction industry took a dump and also filed bk it was heart breaking to have to pick up and move our Boys into an 2 bedroom apartment now as we try to recover you feel the neex to make us incur more debt buy having to buy a newer truck we have a 91 peterbuilt which there is no filter offered and buying or leasing a truck will only cause majior finacial hardship to my family and will eventuallt get repossessed. Last year my husband had to overhaul his engine and that expense was very difficult on us as we had to borrow off every family member we have. Trucking is our life and our truck is our pride and joy please dont make us get rid of it as I know we will end up out of business. Our hopes of ever owning another home woykd be shattered and we would be forced to move out of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-14 20:49:40

No Duplicates.



## **Comment 36 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Leonel

Last Name: Arteaga

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on Proposed Amendments to the Truck/Bus Regulation

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/324-truckbus14-VDdQOVc7V2lVNgZo.pdf>

Original File Name: Comment Letter - Leonel Arteaga.pdf

Date and Time Comment Was Submitted: 2014-07-15 08:39:53

No Duplicates.

## **Comment 37 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: R

Last Name: Goodwin

Email Address: bjcgoodwn@aol.com

Affiliation: Owner/Operator

Subject: Economic Hardship Status

Comment:

I am the owner of 1987 Peterbilt Dump Truck and will effectively be out of business come January 1, 2015. I do not qualify for any upgrades, retrofits or extensions. My family, as have many others, are just coming out of the worst four economic years of our generation. I have used all our life savings and taken out a second mortgage on our 980 sq foot home just to get by and struggle to stay in business that we felt would eventually recover. My wife and I did what we had to in order to responsibly take care of our family and keep a roof over our heads while taking any and all work that was available and then wait and wait in order to get paid and sometimes not at all should the business we worked for go under. Now there is a proposed option of Economic Hardship in order for us to extend the life of a perfectly good truck. We would probably qualify for a loan, our credit is good because we were responsible and paid our bills. What would not be responsible is taking on the loan for a new truck, and used compliant trucks just don't exist. There isn't enough work to justify the payment and the down time that many of these new trucks are experiencing. Everyone would love to drive a new truck. That combined with the fact that our dealerships have long sold their allotments of new trucks for the year, with a waiting list well into 2015 now for a newer truck. Should we somehow qualify for EH distinction, then we would proudly display that sticker for all to see on the side of our truck? That isn't right. We don't do that to people anymore. People aren't required to wear signs around their neck that says poor. In what other areas of government is this kind of treatment tolerated? Check yourselves.

Here's a solution that could help a great deal. Most of us have benefitted from government jobs and that has been what started the economic recovery process. How about requiring or giving a break to hiring local companies? I see city, county, state jobs all over our area using trucks from far away, that drive 60-100 miles in the morning before they ever start their day and then return back to their terminals at night. Local contracts would reduce total mileage thus reduce pollution. We have had to drive long distances as well because local jobs went to out of towners. Thus our total mileage is far higher than it should be and disqualifying us for WT distinction.

In conclusion, we're not poor, we're just not poor enough. Come January 1, 2015, we will be.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 10:44:52

No Duplicates.

## **Comment 38 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Michael

Last Name: Brown

Email Address: bigmike58.mb@gmail.com

Affiliation: truckdriver

Subject: carb

Comment:

I guess you people have nothing better to than screw with the one industry that keep this nation running your going to regulate this country out of business then hou you expect to get your food wine and all the other crap you just assume shows up like magic even before this studies have proven diesel exhaust is less of a pollutant than gasoline but the standards for cars are less than diesel trucks so go ahead and regulate the trucking industry out of exsistantance

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 13:20:24

No Duplicates.

## **Comment 39 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Vardan

Last Name: Avetisyan

Email Address: runAVE@mail.com

Affiliation:

Subject: Economic Hardship Extension

Comment:

Dear ARB team/board-members,

I am writing these comments to shed light on my specific situation (as a small fleet) and for other small carriers in the same position. I hope you will read and hear the following with an open mind to do what's right for those genuinely trying in this ever-more challenging industry, but need assistance and time.

My comment(s) are intended for the "Economic Hardship Extension" section for small fleets that are unable to receive the necessary funding to comply.

As a small fleet, I applied for funding from the two financial institutions (US Bank & Chase) with whom I had a prior relationship with hoping I would be approved for lending. However, I was rejected by both parties. As a result, I attempted to seek assistance by way of the "Economic Hardship Extension", but there too I was rejected. I believe the "Economic Hardship Extension" is intended to relieve smaller, financially incapable fleets from compliance for the short term; however, does not dismiss the expectations from these same carriers to become compliant, but yet allows for a more methodical, planned out, financially lenient manner the carrier can take advantage of rather than be set up for failure.

So with that in mind, if you ask why I was rejected by the ARB team, simply due to the fact that I didn't have my 2 trucks register as of January 1st 2012. But forgive me, for I didn't have anything registered at that point in time because I started business later on in the year (2012). With that said, as a small fleet owner trying to steady his operation, I am asking the board to please add an amendment that will allow me (and other carriers like me) to continue operating (rather than cease) but with the mutual understanding that a plan should be put in place to comply by January 1st, 2017. (Fundamentally, small fleets that have been in business for a longer period of time than I, one can argue should be more mature and financial capable to absorb these costs of bringing their fleet into compliance; however they have been given the extension opportunity and I'd like to be given the same chance.)

(Note I have already invested in bringing both trailers and their TRUs into compliance, but need further time to be at a financial position to absorb the remaining costs of bringing both trucks into compliance. And as you know, the regulatory and compliance initiatives and their corresponding costs do not just end there...)

Please help small fleets stand a chance to do what's right within their means.

Thank you for your time and understanding,  
A.V.E.

Note: Version of my comments in Microsoft Word document attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/328-truckbus14-AGxcPIYjVnEEZ1Ai.docx>

Original File Name: Letter to ARB.docx

Date and Time Comment Was Submitted: 2014-07-15 14:05:43

No Duplicates.

## **Comment 40 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Robert

Last Name: Robinson

Email Address: greatamericanstage@att.net

Affiliation: California Bus Association

Subject: public comment-Section 2025 as modified

Comment:

I am in agreement with the proposed modification of Section 2025 as proposed by the California Bus Association.

I prepaid the units deemed appropriate for my buses and found at installation time that they would not fit and no approved unit will fit my coaches. I am currently awaiting a decision on my request for an extension until a unit can be manufactured to fit my coaches. We have spent 27,000.00 and still do not have a suitable filter. We cannot risk a unit that will catch fire or endanger lives if it does catch fire.

Robert Robinson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 15:32:21

No Duplicates.

## **Comment 41 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Gary

Last Name: Grace

Email Address: gary@expresstranspro.com

Affiliation: Express Transpro Inc.

Subject: Extentions

Comment:

They have had enough time to get in compliance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 15:50:52

No Duplicates.



## **Comment 42 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltrucking.com

Affiliation: Transportation company

Subject: Delays implimenting the Truck and Bus rule

Comment:

I feel making in hard to utilize the delays is important. This makes the playing field more level. If a O/O is not financially savvy enough to jump through the hoops of this, he will never be able to save the money for a new truck in the future. I would like to know how many O/O's actually know their cost to operate their trucks? I doubt but a few. Many O/O's will need to become drivers for companies plain and simple. They need to be responsible for their part in this. The Truck and Bus rule has been out for awhile. They should have pulled their heads out of the sand and started saving a long time ago. We have spent countless hours and recourses to stay in compliance. Not to mention the amount of capitol. I think it is great that they have to put EH on their trucks! This makes people accountable!

We have to little accountability in our society today, we need more. This is a good step forward.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 16:40:07

No Duplicates.

## **Comment 43 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Irvin

Last Name: Moya

Email Address: Imoya89@gmail.com

Affiliation:

Subject: Economic hardship extension

Comment:

I think this is a great idea to give truck owners extra time to be able to qualify or save for a truck purchase. The part of this amendment that I disagree with is its only for a truck that has been in a fleet since January 2012, my opinion is that regardless how long this truck has been in the fleet it doesn't directly affect the fact that one simply can't afford a new truck or a loan for a truck, I think this requirement needs to be dropped in order for it to be a truly fair way to get an extension especially for those of us who have no other options financially. Please reconsider removing this January 2012 requirement.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 16:56:50

No Duplicates.

## **Comment 44 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Jose

Last Name: Moya De la Torre

Email Address: josemoya1223@gmail.com

Affiliation: Owner Operator

Subject: Economic hardship deadline

Comment:

My name is Jose Moya I've been a owner operator for 15 years, unfortunately I went through a bankruptcy which ruined my credit. My old truck broke down in 2012, I tried to receive a loan for a new truck that would comply for the CARB regulations which I was denied. I tried going through programs which I was told there was no money available for help, I had no other choice to buy a cheap used truck in order to continue working and provide for my family. I am not able to qualify for the new economic hardship extension because I bought my current truck in May 2012 and I have applied for loans and can't receive any for a new truck which lands me in a stressful situation of uncertainty. Please reconsider the January 1 2012 deadline in order to give myself and others in the same situation more time to be able to comply with your regulations and stay in business, thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 17:26:01

No Duplicates.

## **Comment 45 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Richard

Last Name: Miller

Email Address: Rmiller84@hotmail.com

Affiliation:

Subject: I'm appalled with CARB

Comment:

I'll be blunt. If I'm denied a loan to upgrade or retrofit my truck by a reputable finance institution, Wells Fargo, what grounds does CARB have to tell me that I can or can't afford a DPF. Since when did they become a financial institution? How big are we going to let this corporation get? What other issues besides clean air will they try to regulate? This madness must stop

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 17:39:32

No Duplicates.

## **Comment 46 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Deborah

Last Name: Paskman

Email Address: Kilmer7165@yahoo.com

Affiliation:

Subject: New Carb regs loan denial extension

Comment:

I have a 2005 truck that passed the smoke check earlier in the year and is equipped with an MXS engine that is not eligible for this PM filter adjustment so my only other option is to buy a new truck, which I cannot afford. I am behind on bills and basically stay on the road to work my way out of these issues. I was turned down by Paccar and Rush peterbilt for financing because I have no down payment. I have expensive medical issues as well and an aging mother that I must care for since our new social status says people over 70 need to be out of work. With tht back story I also disagree with California telling independent truckers how to run their own business by requiring certain options on trucks. I would actually rather find a replacement career than to continue in this business being told that I am or am not financially able to buy a new truck. I have been in the trucking business for over 30 years have no tickets or CSA points no accidents etc and I feel that I know what is best for my business normally running my trucks for 10 or 12 years until I can save a reasonable down payment for a new truck. I feel that if forced to buy a truck for California regs I would be putting myself in a position for business failure it's that simple. Possibly if they gave me until 2017 I might be in a better position.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 17:46:34

No Duplicates.

## **Comment 47 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Javier

Last Name: Ramirez

Email Address: beltran69@gmail.com

Affiliation:

Subject: MORE TIME TO COMPLY

Comment:

need more time, since the economy has not recover and can not buy a newer truck and there is no filter for my truck

will be force to move to other state, to continue with my perfect running truck.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 19:45:15

No Duplicates.

## **Comment 48 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Timothy  
Last Name: trotter  
Email Address: tgtrotter@gmail.com  
Affiliation:

Subject: TruckBus 14 comments  
Comment:

Dear CARB,

Your proposal to label my truck "EH" is unconstitutional. I do not know of anyone on food stamps or welfare or medicaid that needs to tatoo their belongings.

Your proposal for compliance extension for "1-3 truck owners" needs to be changed to "2-3 truck owners". There is no relief for a one truck owner at all. Under your proposal any extension must have at least one truck compliant by July 31, 2014. Well if you ONLY OWN 1 truck where is the extension for just owning one truck ? Fact is there is none. I consider this false and mis-leading and the only one you are fooling are yourselves.

Lastly the economic hardship for those owners who are not incorporated or have a dba is again unconstitutional. First let me point out it is not illegal to own a business and not be unincorporated, an llc, etc. So if you require proof of economic hardship across the board how do you differentiate between an owners private income and business income. You can't. I know that I work over 4,000 hours a year and some years only make \$45k. I barely make minimum wage but have excellent credit. Where is the retrofit money to come from that you demand ? My spouse does not work but if she did, say as a public school teacher, how would she be responsible for regulations you make ?

I've said it before and I'll say it again. FOCUS on grants and provide GRANTS to individual owners and not to big carriers. That is how you clean the air. I urge you to consider the small businesses and quit enabling those who are better off. Take care of Californians by providing across the board funding and grants. You have been very discriminatory in an unfriendly small business manner.

One more thing. This low mileage exemption is not a one size fits all, Include HHG movers as a P.U.C. entity we are.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 22:28:18

No Duplicates.



## **Comment 49 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Robert  
Last Name: Chappell  
Email Address: bchap02@yahoo.com  
Affiliation: R.A.Chappell

Subject: CARB RULES  
Comment:

Don't take a bad economy to start stupid rulings ,if you run the small businesses out of business you won't have tax rev.to collect.Further more no one will come to pick up your goods,meaning no money for taxes!!!!NO TRUCKS your state stops,without trucks no jobs,no freight,no construction.This would be really dumb to enforce at this time!!!!!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-15 23:58:34

No Duplicates.

## **Comment 50 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Rasto  
Last Name: Brezny  
Email Address: rbrezny@meca.org  
Affiliation: MECA

Subject: MECA's 15-Day Comments  
Comment:

Please find attached, MECA's 15-day comments in support of the 15-day changes being proposed to the Truck and Bus Regulation. If you have any questions please let me know.

Best regards,

Rasto Brezny  
Deputy Director - MECA  
301-717-3628

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/340-truckbus14-AG1TMABiBTdQCQEw.pdf>

Original File Name: MECA 15-day Comments Truck & Bus 071614.pdf

Date and Time Comment Was Submitted: 2014-07-16 07:21:38

No Duplicates.

## **Comment 51 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Kenneth  
Last Name: Koyama  
Email Address: kenk@capcoa.org  
Affiliation: CAPCOA

Subject: CAPCOA Truck & Bus 15-Day Comments  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/341-truckbus14-UzBWMVwtWGgFbARl.pdf>

Original File Name: CAPCOA Letter - Truck & Bus 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2014-07-16 16:22:42

No Duplicates.

## **Comment 52 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: William

Last Name: Thompson

Email Address: camolightning@yahoo.com

Affiliation:

Subject: Regulation to reduce emissions of Diesel-Fueled Vehicles

Comment:

Now is not the time to make more regulations, that will hurt the working men and women of California. Drive more businesses out of the state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 18:47:59

No Duplicates.

## **Comment 53 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Joel

Last Name: Norton

Email Address: Joeljnorton@yahoo.com

Affiliation:

Subject: Carb truck commercial exemption

Comment:

Commercial vehicles are the lifeblood of our economy. Already costs of new exhaust filtered and urea injected diesels have skyrocketed maintenance costs for trucking companys translating to increased goods costs in a already economically challenged times. A exemption is essental for the economic health of california.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 18:50:23

No Duplicates.

## **Comment 54 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Larry

Last Name: White

Email Address: whitelm@excite.com

Affiliation:

Subject: I am opposed to CARB

Comment:

No further restrictions! The economic impact will be detrimental.  
We're already experiencing a serious impact from all the  
regulations, high fuel cost, and inflated prices on EVERYTHING!

NO to CARB intrusion on free markets and capitalism!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:04:52

No Duplicates.

## **Comment 55 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Carol & Dan

Last Name: Porter

Email Address: JumpRHigh@aol.com

Affiliation:

Subject: CARB regulations

Comment:

The requirement to either purchase new equipment or add the extremely expensive and unreliable filter has decimated the small trucking companies in California. We have been in business for more than 30 years. We worked hard and paid off our vehicles. At one time we had 5 trucks and trailers shipping horses in California. We downsized to three trucks a couple of years ago. Suddenly our paid for equipment had little value because they didn't pass the CARB requirements for emissions. So our trucks which had a book value of 250,000 now were only worth a tiny fraction. We sold at prices of 3500 to 4000. We looked into the Prop B and other grant programs. But in order to receive sufficient money to make a difference, each truck had to go more than 25,000 annual miles IN CALIFORNIA. We could not quite meet that requirement, which would only gain us a 10,000 down payment at one of the partner sellers. We found out that they had inflated their prices to the point that a 2010 Kenworth tractor (only good until 2023) was priced at 68,000. 2011 tractors were in excess of 90,000. Eventually we purchased a 2011 tractor in Missouri for 69,000. This is nearly the identical price as the model year newer in California. So now we are in debt, when a year ago we were debt free. We took the small fleet option, so our second truck is not due for replacement until the end of this year. We simply cannot afford another truck payment. The filters cost between 18,000 and 30,000 depending on the truck. The do damage to Caterpillar engines. (our 1996 Kenworth runs great and has a Cat engine). Caterpillar went out of the truck engine building business for this reason. That lost many thousands of jobs from the California work force. With fuel so expensive and the cost of upgrading equipment, many independent truckers have simply parked their vehicles and walked away. I know two who have quit the businesses they worked for decades to establish, which supported them and their families through hard work and a sense of accomplishment and also provided work for employees. One friend quit last week and is in the process of selling his house and moving to Texas.

REMEMBER: EVERY SINGLE ITEM on store shelves, from bread to milk to computers to furniture is shipped on a truck at some point from the manufacturer to the end seller. EVERY ITEM. Raising the cost of doing business in the state, reducing the number of independent trucking firms and putting people out of work simply raises the cost of living for everyone.

PLEASE CONSIDER for the small fleets at least: Anyone who is in compliance with one truck, grandfather in their second vehicle. One other issue: We are in compliance. There are THOUSANDS who are not. They compete unfairly.

Sincerely,  
Carol & Dan Porter  
Porter Horse Transportation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 18:55:54

No Duplicates.



## **Comment 56 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Lynn

Last Name: Hawkins

Email Address: lynn3hawkins@yahoo.com

Affiliation: California native and American citizen

Subject: Proposed Amendments to the Regulation to Reduce Emmisions of Diesel Particulate Matter,,,

Comment:

Dear Sirs,

My husband just retired from commercially driving a big rig. If extensions for commercial drivers to comply is not extended, you are going to have a ton of drivers that will no longer be able to drive in California, and many non-California commercial drivers who will simply refuse to carry loads in California.

If you think food and sundry prices have gone up a lot in the past few years, well, YOU AIN'T SEEN NOTHIN' YET!! When there are not enough truck drivers to carry products to the stores and distribution centers, you will see empty shelves and outrageous prices.

But, hey! Go ahead! I haven't seen California, where I was born and my mother was born, actually make a decision that made sense and helped the citizens in MANY years. I'm sure you don't give a damn about senior citizens that will no longer be able to afford enough food to survive on, or how many working people simply leave the state because they can no longer afford to live here because of the outrageous prices.

IS THERE ANYONE LEFT IN CALIFORNIA THAT HAS ANY COMMON SENSE?

Please, make some common sense decisions for a change!

Sincerely,  
Lynn Hawkins

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:11:10

No Duplicates.

## **Comment 57 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: VIRGINIA

Last Name: SANDS

Email Address: ginnysands@yahoo.com

Affiliation:

Subject: CA truckers/ Carb Emission Control

Comment:

Why is CA trying to run the trucking industry out of business? We need the truckers to service our state. Without trucking we don't get gasoline/ food/ grocery store products/ ect. STOP killing jobs. Leave the truckers alone. Enough companies are moving out of this state for numerous good reasons....we need the trucking industry just to get these products back to us. Sad state when we could have kept industry AND keep our truckers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:15:11

No Duplicates.

## **Comment 58 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: christian

Last Name: lynch

Email Address: christianlynch@gmail.com

Affiliation:

Subject: trucking industry

Comment:

You fools are not going to be happy until you have put every private trucker out of business or cause a mass strike. You continued attack on our state with ridiculous requirements has already shown it's impact on private citizens. How much more do you think the tax payers are going to put up with. California is already the worst state in the nation to do business in.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:19:55

No Duplicates.

## **Comment 59 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: jim

Last Name: mullin

Email Address: taxmanusa@aol.com

Affiliation:

Subject: carp rules

Comment:

these rules will just make trucker take their trucks to other states and leave California without needed products. rules need to be workable so the truckers can make money, the products can be delivered and will stop the unnecessary raise in prices that these rules will cause.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:48:23

No Duplicates.

## **Comment 60 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: sam

Last Name: spade

Email Address: robostamped@yahoo.com

Affiliation: United Staes Citizens

Subject: Carb rules

Comment:

Hello,

You need to stop creating barriers for Americans to earn a living. Until you require smog checks on cars in the bay area you need to stop making any further rules effecting the trucking industry who we rely on to deliver food and other daily essentials. How do you think food is going to get into grocery stores without trucks?

You are an agency that has continually overstepped and outlived it's usefulness.  
thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 19:58:52

No Duplicates.

## **Comment 61 for Truck and Bus Regulation (truckbus14) - 15-1.**

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

## **Comment 62 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: emmanuel

Last Name: jones

Email Address: ethemanjoe@aol.com

Affiliation:

Subject: comment on the carb regs

Comment:

well i don't agree with this new rule with forcing any trucking company to install these retrofitted engines in their trucks. these new engines from 2008 thru 2010 or so on are giving the trucking companies a lot of problems with down time poor fuel mileage. these engines don't allow for production. its way to many good older trucks that has been well maintained that can and would be productive if they were able to be productive in the lower 48 states verses be productive in the other 47 states because of this over bearing reg. i know and respect that we want to keep old mother earth clean and long lasting thats a good thing however there needs to be a compromise. just like the owners of classic automobiles they're still here in all 48 state and are insured to roll on the nation hwy & byways so should owners and companies with classic and older trucks be allowed to roll america's hwy%byways many owners and companies like some of the older equipment they take pride in their rides. all this fuss over this issue should stop and new remedy should be sought out i known its not an easy answer to this issue with all the regs. i just beleive that as the economy improves most owners and companies will upgrade their equipment as they begin to earn more .and older equipment will fade away .allow a stipu for good equipment to be allowed to earn&spend in your good state. in another 10 to 20 yrs the issue will be electric commercial vehicle i reckon it'll never end. but for now we need regulation to to keep good older equipment on the road in all of america.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 20:52:15

No Duplicates.

## **Comment 63 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Sandra

Last Name: Mitsler

Email Address: route66mama@verizon.net

Affiliation:

Subject: Trucking Regulations

Comment:

Please stop the insanity. You made this bogus and idiotic order which puts most independent truck drivers out of business, including us (DNS Transport, Inc). The people you listened to were liars and one did their dissertation in the California ground squirrel. You are also driving up the costs of EVERYTHING we buy in this state, making it even MORE difficult for seniors to survive. Maybe that's the plan...kill off the old people. Please don't put us out of business. And please don't make it impossible to continue to live in this state. All you are going to have left are the illegal aliens and they will not be able to make up for all the people that leave the state as this takes affect.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-16 21:45:26

No Duplicates.



## **Comment 64 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Carolina

Last Name: Guzman

Email Address: mbacarolinaguzman@gmail.com

Affiliation:

Subject: please give us an extension. I am a single mother with a small truck credit was denied  
Comment:

Good Morning

I am requesting your help to obtain an extension to install the equipment. I have gotten estimates from 2 different companies. they price is \$18,000. I have 5 Credit Cards that are maxed out. I also lost my home 3 years ago. the truck I have was my husband's. He passed away 6 months ago, so I kept it running. I'm trying to make a living I don't receive any California help for my children because "I make too much money". with a profit of \$25,000 a year... I need more time to clear. my credit cards so I can install the system with the help of one. I had one Credit Card free, but I had to replace my entire engine 3 months again. and now I just had to spend another amount fixing the turbo please understand we need some help.

thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 07:15:03

No Duplicates.

## **Comment 65 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Juan

Last Name: Cabrera

Email Address: whitediamondtransport@gmail.com

Affiliation:

Subject: Try to become a trucker for one day so you understand how we roll

Comment:

To whom it may concern:

I am requesting more time to install a PM filter on my truck. I have been in this business for about 4 years. Most of the money goes to the brokers, I know is very easy to gather with all the CARB members and come up with an excellent solution. being a small owner is not as easy as you think. I was told 6 months ago that I needed to install a \$20000 filter. really? or purchase another truck, so I had no option so I went to wells Fargo. my bank for 20 years, I applied for 3 different loans  
equipment  
personal  
and business

all three were denied. The reason . bad credit because of the economy back in 2006 I lost my house because all the corrupt real estate agents. I hold 5 credit cards.. all ate maxed out. I do have prove that the loans were denied, I can prove you that my income is not as great as you all think. we all my text returns in the past 6 years. last month I had some money saved. and suddenly I had to rebuild all my engine marketing that was a \$10,000 expense. I used 1 of 2 credit cards I had free to use.. after that I run my truck 50000. miles and my engine broke down again. I have prove that was another \$6000 expense. now I have all my credit cards maxed out and my wife's credit cards are too. that is a \$60000 debt. my wife is unemployed so I have to support my house and my family myself. as a truck driver with limited education is not easy no get a job for more than \$500/week. I cannot live with that. so please give me more time to save those 20000 dls. and on top of that I need to loose one week of work.

I hope you understand and please our your self one minute in my shoes and tell me what would you do?..

I know you probably say. "well is not my fault you did not ear a degree". the reason I'm a truck owner is because I had no other choice in life when my parents passed away In my early years. I am a good man working and paying my taxes. I not a citizen trying to take advantage off all the programs California offers for low income pple.

Thank you.

I couldn't upload my documents because I am out of state working everything is at home.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 07:26:30

No Duplicates.

## **Comment 66 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Matt

Last Name: Schrap

Email Address: mschrap@crlease.com

Affiliation: Crossroads Equipment Lease and Finance

Subject: Comments on Modified Text for the Proposed Amendments to the On-Road Rule

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/361-truckbus14-U2JSYVwCAzRRNghx.pdf>

Original File Name: 15 Day EH Letter.pdf

Date and Time Comment Was Submitted: 2014-07-17 08:22:16

No Duplicates.

## **Comment 67 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Charlotte

Last Name: Matthews

Email Address: camscm@msn.com

Affiliation:

Subject: Small Truckers Extension

Comment:

These people need to work, with so many people unemployed I find it irresponsible to put more people out of work

thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 08:28:14

No Duplicates.

## **Comment 68 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Mark

Last Name: Johnson

Email Address: bunky59@msn.com

Affiliation: 9092342794

Subject: Help

Comment:

Dear CARB I HAVE BEEN SITTING BACK THE LAST SEVERAL YEARS IN LIMBO  
WATCHING THE WAST OF TIME AN MONEY WITH THE CHANGES AN EXTENSIONS  
IN THIS PEOGRAM MY ONLY COMMET TO THIS PROPOSAL HA HA SUCH A EZ FIX  
ATTRITION MAY TAKE A LITTLE LONGER but the Unrealistic 85 percent  
reduction in exhaust should start with the manufacter not the  
consumer Why did we stop THE VIP PROGRAM TO 1996 an older viechles  
did you waste the funds on proposals these are the viechles that  
were under Attack in the first place with the wishy washy rule  
CHANGES AN EXTENIONS YOU HAVE PUT MY FAMILY AN BUSINESS IN FANICAL  
RUIONS AN NO OPTIONS BUT TO TAKE UNCOULATTED RISK IN INVESTING IN  
UNPROVIN EQUIPMENT P S HELLO TEXAS HERE I COME MARK JOHNSON

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 08:33:36

No Duplicates.

## **Comment 69 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Swan

Last Name: Lam

Email Address: Swan.Lam@hacla.org

Affiliation:

Subject: Truck and Bus Amendment Comments

Comment:

The definition (38) for Lighter Vehicles of 14,001 to 26,000 lbs should reflect the Header or Title of Table #1 to indicate the correct GVWR. Now it stated incorrectly as 26,000 lbs or less for Lighter Vehicles.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 09:17:15

No Duplicates.

## **Comment 70 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: John

Last Name: Busskohl

Email Address: [jbusskohl@ryanstransportation.com](mailto:jbusskohl@ryanstransportation.com)

Affiliation: California Bus Association

Subject: Truck Bus 14 - Defective Filters and Recalled Filters

Comment:

I am writing in to support the California Bus Association comments regarding the defective filters and recalled filters under the CARB Bus and Truck Rule regarding vehicle emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 09:25:41

No Duplicates.



## **Comment 71 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Timothy

Last Name: Jones

Email Address: bordway@wjhattorneys.com

Affiliation:

Subject: Comments of John R. Lawson Rock & Oil and California Tructing Association

Comment:

Please see attached Comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/367-truckbus14-UDNVPFA8Az0HZFU7.pdf>

Original File Name: Comments on 15-day notice (00484431x9E488).pdf

Date and Time Comment Was Submitted: 2014-07-17 10:37:34

No Duplicates.

## **Comment 72 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Julius

Last Name: Rim

Email Address: dieseltrap@gmail.com

Affiliation: International Metals & Energy Technology

Subject: IMET's Comment on Proposed Amendments to the Regulation to REDUCE  
EMISSION OF PM and NO<sub>x</sub>

Comment:

Please see attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/368-truckbus14-UjtdNgBkWH8DWgBj.pdf>

Original File Name: IMET Comments on Amendments to the Truck and Bus Regulation.pdf

Date and Time Comment Was Submitted: 2014-07-17 11:22:43

No Duplicates.

## **Comment 73 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Gene

Last Name: Pratt

Email Address: mikeditka56@yahoo.com

Affiliation: TEA PARTY

Subject: LEAVE OUR TRUCKERS ALONE

Comment:

The EPA has gone hog wild with their stupid regulations, TRUCKER'S move our food and other items to stores and retailers so they can provide our families and our children and the EPA'S families and children too, with these needed items. I use to drive a truck years ago and the regulations were bad enough then, now they are getting ridiculous. These truckers are the life blood of this country, diesel fuel is needed to drive the trucks, so do not regulate it so heavily as it is going to help destroy the trucking industry which will in effect cost a lot of jobs and help to destroy the AMERICAN ECONOMY, and I firmly believe the EPA has out lived its usefulness and should be ABOLISHED and give the power back to the STATES to regulate things as the EPA is to restrictive and anti american, all they do is put people out of work instead of trying to improve our economy all they are doing is making it worse.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 11:41:03

No Duplicates.

## **Comment 74 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Allen

Last Name: wayman

Email Address: nowayman.aw@gmail.com

Affiliation:

Subject: p\_m filters

Comment:

I believe the state should give all small businesses with 3 trucks are less financial assistance in installing p m filters because of the doubt your program wood forest small businesses to go in debt for a newer truck I also believe this is a arby's way with the bigger trucking companies of california to knock get rid of the independent truck drivers note, did you all know that one of these scientists home work for e p a was fired because of his test showed that today's diesel fuel burns cleaner then most gasolines so there it is people force out of work by the EPA does anybody wanna chip in for a law firm to take on this so we all don't have to go on disability Social Security or welfare are

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 11:53:56

No Duplicates.

## **Comment 75 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Ron

Last Name: Nuss

Email Address: ron@nwexc.com

Affiliation: Northwest Excavating, Inc

Subject: July 31, 2014 Deadline

Comment:

Dear CARB Staff,

I would like to ask the staff to consider extending the July 01, 2014 deadline and the July 31, 2014 reporting to December 31, 2014 for those owners that meet the "Good Faith Effort" requirements. that would make recording keeping for owners, Brokers and the CARB staff much easier.

Thank You for your time,

Ron

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 13:22:47

No Duplicates.

## **Comment 76 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Betty

Last Name: Moyer

Email Address: willnghrt@live.com

Affiliation:

Subject: Revisions

Comment:

I oppose the proposed revisions to the language of the Truck and Bus rule. They must not be implemented!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 14:05:56

No Duplicates.

## **Comment 77 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Loren

Last Name: Hutnick

Email Address: HandHExcavation@yahoo.com

Affiliation: 7079750045

Subject: Proposal of good faith extens

Comment:

Reference to the good faith extension

As I see it the good faith extension proposal is a detrimental killer to all small business owners and owner operators in the truck and community. Carbon is requesting information that is personal in is not easily allowed out alone the requirements of this proposal carb staff has set a high standard that only caters to the greater good of the larger trucking companies that work within the state of California. These requirements do not show any good faith on the part of carb to the small owner of single and small fleet owners that are struggling in an economy that is barely moving forward. like I've said before the requirements of this proposal by step of carbon will echo through the economy for the State of California. We already know that the largest trucking companies that do not have to comply under the good faith program will benefit and succeed in there quest to monopolize the transportation of all commodities and goods for the state of California.

This proposal also shows no transparency but a monopoly for the larger companies and the City California. Along with all this does in shows that carpet is out to do one thing and that's it accelerate their timetable on their bad and frivolous science Also I feel in I have to ask for this proposal under the good faith program what is and what is not legal to be requested by carb alone it comes in the question a lot of statements of the constitution of central and state. This is another proposal that has shown that car is overstepping the boundaries and exercising the power that they were granted that personally I feel they are abusing in every way shape and form.

Alone is car she is fit to move forward with this proposal will greatly diminished will greatly diminish the infrastructure of the roads and highway system of our of our state. This City California already has issues that it it cannot jeopardize or remove the taxpayer of these trucks that will be removed the families that have to be relocated outside of the state California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 14:00:29

No Duplicates.

## **Comment 78 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Kerry

Last Name: Mullins

Email Address: joe6packamerican@gmail.com

Affiliation: Trucking Co. Owner Operator

Subject: CARB rules

Comment:

I hope you've noticed the increase in class 8 fires. DPF filters burning people's belongings and livelihood up in smoke.

Making it so that older trucks have to be retrofitted is going to cause death and destruction and it's really not going to improve your air quality. Your air quality has a lot to do with the trade winds bringing China's pollution to you.

As a trucking company my trucks will not be going to California again and I am talking with any trucking company that will hear me to do the same. Interstate Commerce is supposed to be an even playing field across the board. Burdening trucking companies to comply with your rules that have no basis in science (since the person who wrote the rules didn't have the degrees he claimed) isn't providing for a fair and equal playing field.

These new trucks are unreliable, dangerous to life and property and have poor fuel mileage. Burning more fuel per mile is what your policies have created.

I hope someone with some common sense will prevail at CARB but I highly doubt it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 15:18:26

No Duplicates.



## **Comment 79 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Elizabeth

Last Name: Long

Email Address: Patriotstarinc@gmail.com

Affiliation:

Subject: Non-CARB compliant

Comment:

I am against the restrictions on in-use, heavy-duty, diesel fueled vehicles. I own a small motor carrier and I would like to be able to operate legally in the state of CA again.  
Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 15:51:04

No Duplicates.

## **Comment 80 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: William

Last Name: Curtin

Email Address: wcurtin1962@yahoo.com

Affiliation:

Subject: truckbus14

Comment:

Your regulations have forced me to cease doing business in your state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-07-17 15:54:51

No Duplicates.

## **Comment 81 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: TRENT

Last Name: JONES

Email Address: trentmj2@sbcglobal.net

Affiliation:

Subject: Diesel Particulate Filter Mandate

Comment:

To Whom It May Concern:

I am a California resident, and I own and operate a 2005 Freightliner Columbia truck tractor in interstate commerce. My truck is already equipped with EGR technology, is well-maintained, and burns very little oil.

Thanks to CARB's mandate that I retrofit my truck with a DPF, I spent \$16,900.19 to comply. Having no other means of financing at my disposal, I was forced to charge this expense to several credit cards, which means that I will incur several thousand dollars of interest charges in addition to the cost of the retrofit itself. Add to that a probable annual expense of at least \$400.00 to remove and clean the DPF and one wonders what sane person would even attempt to continue doing business in this state. I suppose I should strongly consider seeking professional help, but I digress.

Since the retrofit, my fuel economy has decreased .448 miles per gallon. If this decrease holds or worsens, I will incur approximately \$4000.00 in additional fuel expenses per year based on today's fuel prices and last year's total of 110,633 miles driven.

Needless to say, all of this added expense has put an incredible strain on my ability to operate my business profitably. I fail to see how forcibly requiring me to spend an exorbitant amount of money just to end up consuming more diesel fuel can possibly improve California's air quality.

I suppose if the goal is to put independent businessmen like myself OUT of business with prohibitive costs to continue DOING business in this state, thereby reducing the overall number of trucks on California's roads, there could be said to be some method to this state's madness.

For what it's worth, I think it is an unspeakable evil for one state to force such incredible costs and inconvenience upon the other 49. California's increasingly unwieldy, impractical, and impracticable emissions requirements are each year making it ever more difficult and expensive for freight carriers to operate profitably. With each succeeding model year, trucks are incurring higher and higher maintenance costs and spending more and more time in the shop and less on the road, almost entirely due to these cumbersome emissions mandates. Unfortunately, and worst of all, it's all being done as a result of politics, not science.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/378-truckbus14-BjQANlRkWT4AWQZg.xlr>

Original File Name: 2014 Fuel and Expense Tracking Worksheet.xlr

Date and Time Comment Was Submitted: 2014-07-17 16:23:15

No Duplicates.

## **Comment 82 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: Truck and Bus Regulation

Comment:

On behalf of Construction Industry Air Quality Coalition (CIAQC, please see attached comments on 15-day comment period for Truck and Bus Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/380-truckbus14-Wy9UIAdzUGAHalAP.pdf>

Original File Name: Truck and Bus Regulation - CIAQC Letter on 15-Day Comment Period - 7-17-14.pdf

Date and Time Comment Was Submitted: 2014-07-17 16:42:48

No Duplicates.

## **Comment 83 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Joe

Last Name: Rajkovacz

Email Address: joe@calcontrk.org

Affiliation: California Construction Trucking Associa

Subject: comments - 15 day modifications to truck and bus

Comment:

See attached comments of the California Construction Trucking Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/381-truckbus14-WjkBZlA9UGoFZQVq.pdf>

Original File Name: California Construction Trucking Association - CARB 15 DayII.pdf

Date and Time Comment Was Submitted: 2014-07-17 16:46:54

No Duplicates.

## **Comment 84 for Truck and Bus Regulation (truckbus14) - 15-1.**

First Name: Julie

Last Name: Arenz

Email Address: julie@cleanfleets.net

Affiliation:

Subject: 15 Day Comments on Truck Bus Regulation 7-17-14

Comment:

Please see the attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/382-truckbus14-BWYAYAFuU2UGdFUK.pdf>

Original File Name: CFNET 15 Day Comments on Truck Bus Regulation 7-17-14.pdf

Date and Time Comment Was Submitted: 2014-07-17 16:52:32

No Duplicates.

## **Comment 1 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: BARRY

Last Name: CARTER

Email Address: sherwood16@netzero.net

Affiliation:

Subject: particular filters

Comment:

THE BURDEN THAT HAS BEEN PUT ON A 1 TRUCK OWNER THATS FROM ANOTHER STATE IS A HEAVY BURDEN...PUTTING ON A 20.000 MUFFLER ON A 12.000 TRUCK THAT JUST HAD A 8,000 ENGINE PUT IN IT LESS THAN 2YRS AGO IS JUST A BUSINESS KILLER FOR ME....I'M JUST NOW COMING CLOSE TO BEING OUT OF A BANKRUPTCY DUE TO THE AUTO INDUSTRY COLLAPSING....I DON'T QUALIFY FOR CALIFORNIA'S HELP TO BUY A NEW TRUCK..EVERY DEALERSHIP HAS ADVISED ME MY TRUCK IS JUST NOT SET UP FOR THE PATICULAR FILTER....ANOTHER 1- OR AT LEAST A 2010 UNIT YR EXT WOULD REALLY HELP SO I CAN SAVE UP ENOUGH TO GET A NEW TRUCK...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-12 16:30:01

No Duplicates.



## **Comment 2 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Cesar

Last Name: Polanco

Email Address: polancotransport@yahoo.com

Affiliation:

Subject: Economic Hardship

Comment:

My name is Cesar and I'm on the verge of taking my hard earned business to another state. I love California I grew up here having a dream to become a business owner but my dream is fading away, sad to say. Im a father of 5 beautiful kids and a husband looking to give my kids a better future, but with all the high price in diesel and regulations for trucks its a very stressful situation. I own a 2007 truck which does not meet California Regulations and lack of credit issues and money I cannot purchase another one or purchase a pm filter. Last year when we register with the CARB depatment we qualified for the "Good Faith Effort" extension until July 1,2014 but now we're in July and they say we dont qualify for the "Economic Hardship" extension because we had to have the fleet established since January 1,2012 and not after I only have 1 truck not more than one so it doesn't count as a fleet it would be a one owner operator of one single truck.I unfortunately did not now that, and I purchased my truck in September 2012 which that unqualify us. I honestly think this is unfair because I do qualify under that extension but unfortunately I did not start my business in January 2012 but after that. My wife and I are under alot of stress due to this matter. Because of this situation I'm not left with other choices but to rent my home which my wife and I work so hard on, to provide a nice living for our children and relocate my entire family and move to another state which it will bring emotional distress to my children and ourselves. We would have to move into a much smaller place and adjust to another state that is not where we had our lives planned.I hope that whomever read this helps me and the rest of fellow truck drivers we are not trying to pollute the air we are trying to comply but unfortunately some of us can't comply due to an Economic HARDSHIP if I was able to comply I would at the end of the day we live and wish to stay here in California. Other than that why dont you guys consider giving the people like me and others that were discriminated by one silly rule of the specific date the fleet had to e established of January 1,2012 and give us relocation money so our trucks stop polluting the state. Reconsider what all these laws are doing to ourselves and our families and GIVE US MORE TIME!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-14 20:23:07

No Duplicates.

### **Comment 3 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Zayde

Last Name: Barcenas

Email Address: zayde@barcenastrucking.com

Affiliation: Barcenas Trucking (San Diego, Ca.)

Subject: Mid-Size fleet extension

Comment:

We are not considered a small fleet (5 trucks) but we've made our best effort to comply since 2012 making changes one truck at a time unfortunately we can't afford to do more because we're at the Otay Mesa border competing with other local trucking companies low prices, high diesel price and of course compliance year truck parts are more expensive plus monthly payments on each truck. We're currently working in California Ports so we have to comply with the Truck and Bus Regulation AND the Drayage Regulation at the same time, both having the ARB as the main authority. Each year I've made my best effort to changed an old truck for a compliance truck and of course adding more debts to the business and less income each year. As of today I have 3 out of 5 compliance trucks. Small fleets are the only ones benefiting from the numerous changes made so far to the ruling since it started enforcing. At some point as long as the truck was still in compliance we did not have to report it on the ARB reporting system, suddenly in 2014 if you missed the deadline, now you are not in compliance and you have a new problem to add to the daily fight to continue working even if back then we were in full compliance. At this point with 5 trucks, not been considered a small fleet or a large fleet I can't seem to find anything that helps us comply with both Truck and Bus Regulation/Drayage Regulation even though we've made out best effort to comply and at the same time not to file for bankruptcy and fill one of our main customer requirements to have at least 5 trucks and we are facing a state regulation that worries more air quality that of course helps our environment but doesn't care at all if you have enough money to feed your family at the end of the day. For the records, I was a driver until a medical diagnose made me stop driving making our problem even worse but not enough to give up so far.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-12 21:54:48

No Duplicates.

## **Comment 4 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: elizabeth

Last Name: jimenez

Email Address: Elizabethjmnz@gmail.com

Affiliation: Jimar Transport

Subject: Re: PM Filter regulations

Comment:

I purchased a 2009 truck with a filter. It has financially burdened me with breakdowns about every other month since I purchased it back in January. It is absurd that my old truck had to be removed and replaced from my fleet "because of particulate matter".

Most of the pollutants come from the FOOD (read cows). According to the UNITED NATIONS, "cattle-rearing generates more global warming greenhouse gases, as measured in CO2 equivalent, than transportation." So why does our great state of broke California keep pushing for these regulations? We already have one of the SLOWEST economies in the country, (thanks to our democratic/liberal agenda of caring for everyone and paying for it as well) and with this drought that seems to have no end in the near future it is only going to get worse.

Our legislature already royally "messed" up our trucking industry as it is, give the ones who haven't taken the plunge a break. And let small businesses grow by allowing older models to get a bigger fleet. I hope someone reads this, as I have made excellent points and given what I think are great suggestions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-15 11:25:08

No Duplicates.

## **Comment 5 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Kent

Last Name: Bauman

Email Address: kbauman@sarstransport.com

Affiliation:

Subject: Need for Exemption of Specialty Equipment from Truck & Bus Rules

Comment:

Auto transport trucks with head racks installed above the cabs must operate as a matched set of tractor & trailer. Due to height limitations, and the envelope available for engines and DPF retrofits, it is impractical and costly to bring such trucks into compliance with CARB regulations.

The cost of a new matched tractor/trailer unit exceeds \$250,000. Since autos are carried on both the tractor and trailer, auto transporters are unable to hand trailers off to compliant trucks at the California border, as is the practice of many general freight haulers today. Replacing or leasing a tractor isn't viable either because of \$20,000 cost of refitting a headrack from one tractor to a newer one with a 2010 engine.

Our Arizona-based fleet is comprised of all Caterpillar engines from 2004-2006 with miles ranging from 700,000 to 1,000,000. Even if we were able to raise the funds to cover an \$18,000 retrofit, none of our regular certified Caterpillar truck engine shops here in Arizona are certified by CARB, nor willing to install a retrofit, and in fact, have warned us of the consequences to reliability of doing so.

Please add a waiver to the CARB Truck & Bus regulations for specialty equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-16 11:29:35

No Duplicates.

## **Comment 6 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Gabriel

Last Name: Garcia

Email Address: garciatransport1@hotmail.com

Affiliation:

Subject: Extension

Comment:

I agree with the new regulations of the state of California but what I do not agree with is that they leave us out of circulation without receiving any help (with exception of the first extension that was given) It would be nice if they provide us with information on where we could install a filter where they offer payment plans, because in my case it is impossible for me to be in compliance for lack of money. I have applied for loans with different banks to buy a truck but unfortunately none of those loans have been approved. Hope you can help in any way because in my case I am the support on my family and this is how I make a living.

Thank you,

Gabriel Garcia

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-17 11:50:23

No Duplicates.

## **Comment 7 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: william

Last Name: mccarthy

Email Address: williammccarthy55@comcast.net

Affiliation:

Subject: regulation of dieselParticulate matter

Comment:

We are already long past what would be a reasonable standard to be imposed to promote the Enviroment and a Thriving economy. These new regs. should be advisory and scheduled to be imposed at least 5 yrs from now. It is unreasonable to set new targets everytime the previous standards are close to or being met. Placing the matter in perpetual catch up is dishonest! Set a goal meet it and that is the END! Please keep the Publics interest in sight, not the excessive bureaucracy, the Air Board that seems intent on growing itself!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-18 11:18:18

No Duplicates.

## **Comment 8 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Jaswinder

Last Name: Singh

Email Address: Sunnysandhu78@gmail.com

Affiliation:

Subject: Extension

Comment:

My name is jaswinder singh. I own a single truck which has worked more then 11 million miles. My financial condition is not very good. I have to rebuild mu truck engine and turbo. The filter for my truck is \$18000 to \$24000. Which is to much expensive. I have many other bills and payments also including appartment rents,medical bills ,insurance and many more. If there will be no extension we have to move the state which is so hard to resettle again in a new state . I am only working in my family. So i request you to give the extension to our trucks.  
Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-19 23:22:50

No Duplicates.



## **Comment 9 for Truck and Bus Regulation (truckbus14) - 15-2.**

First Name: Jim

Last Name: Fuller

Email Address: Jamflrjr@aol.com

Affiliation:

Subject: Carb filter

Comment:

I have old ten wheeler dump truck I work 5 month out of the year to buy a new truck is to much money for what I do. I am 71years old a little late to start over. I have one truck my engine has no computer soo can't make it work to your standards there are a lot of one truck owner like me thank you Jim Fuller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-25 10:29:07

No Duplicates.