

**Comment 1 for Updated AB 32 Economic Analysis (nov-16-econ-ws) - 1st Workshop.**

First Name: Tom

Last Name: Jefferson

Email Address: its4Tom@aol.com

Affiliation:

Subject: Its Happening Now

Comment:

When the people fear their government there is tyranny; when the government fears the people, there is liberty. Thomas Jefferson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-21 02:39:12

No Duplicates.

## **Comment 2 for Updated AB 32 Economic Analysis (nov-16-econ-ws) - 1st Workshop.**

First Name: Duncan

Last Name: Elledge

Email Address: duncane@allenlbender.com

Affiliation: Safety Coordinator

Subject: Economic distress caused by off-road diesel requirements

Comment:

I don't have to tell you that California is in a historically desperate financial condition. The coffers are empty and business is leaving the state in droves. Government bureaucracy is choking the life out of our fragile economy.

Allen L. Bender, Inc, once an innovative, dynamic force in the construction industry has their back against the wall and the very entity which we once depended upon for lucrative projects, the State of California, has slipped a noose around our throats and is threatening to destroy our future in the construction industry.

Allen L. Bender, Inc has conducted business in an honorable manor for over 35 years in California. We have been a leader in our industry and our resume reflects a commitment to excellence. What more could the most prosperous state in this country ask of its tax paying contributors.

Good stewardship of our environment is of utmost importance and always has been but not at the cost of an entire industry's livelihood. Our modest company does not have the resources to jump through the impossible hoops CARB has placed before us. We have been able to compete in this highly competitive industry because of our resourcefulness. Like nearly every company of our size and category, the purchase of an \$80,000 piece of equipment is not just a short term decision, it is a long term commitment. We take excellent care of every piece of machinery we own and expect to receive many years of reliable use from these significant expenses.

This company was built on a dream that if you apply the laws of success, maintain integrity and attempt to contribute in a positive way to your community the positives will out weight the negatives. Unfortunately in the current financial climate made substantially more difficult by unreasonable requirements imposed by the State our continued success is precarious at best.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-08 08:44:28

No Duplicates.



## **Comment 3 for Updated AB 32 Economic Analysis (nov-16-econ-ws) - 1st Workshop.**

First Name: Aric

Last Name: Anderson

Email Address: a2anderson@mcmconstructioninc.com

Affiliation: MCM Construction Inc

Subject: Cost of the on-road and off-road rules

Comment:

This year MCM Construction is seeing a reduction in hours of operation for our off road fleet of 25% compared to last year. In addition we are expecting 4 of our 11 projects to be finished this December.

75% of our fleet contains tier 0 and tier 1 engines. This means that our only way to comply is through the BACT part of the rule. Foreseeing this rule, we got a head start and spent 1.5 million dollars repowering our large track cranes and loaders. With this early repower credit we are compliant with the Nox side of the rule for a couple years. However, with the recent requirements from CALOSHA requiring that installation of retrofits not inhibit operator visibility, we've decided, until CALOSHA comes up with a system for measuring what is an acceptable retrofit installation that doesn't block visibility, to retrofit our track cranes. Currently there are only two retrofit technologies that are verified for use with our tracked cranes that we can meet the required retrofit operating temperatures for. One of those systems requires an electrical plug in to regenerate for 8 hours and the other is on a 6 week back order. We are required to Data log the temperature readings for any engine that we are going to install these retrofit devices on. Since its winter and we're running out of work for our cranes to do we are having trouble getting all the temperature readings we need.

Our cost to comply with the PM portion of BACT this year is 300 thousand dollars. With the first compliance date of the On-Road Diesel Regulation next year we expect to spend 600 thousand on retrofits for the off road rule and another 500 thousand on retrofits for the on-road rule. This is money we're spending on devices that neither increases the life nor the productivity of our equipment. There is neither the money nor the technology to make these regulations work. With the reductions in work from the recession, CARB should be getting its emission reductions just from the fact that equipment isn't operating. I suggest that we give the economy time to recover before putting even more of a monetary strain on an already suffering construction industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-08 14:42:55

No Duplicates.

**Comment 4 for Updated AB 32 Economic Analysis (nov-16-econ-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison

Subject: Comments of Southern California Edison Company on the Updated AB 32 Economic Analysis

Comment:

Attached are SCE's Comments to CARB on the Updated AB 32 Economic Analysis.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/nov-16-econ-ws/4-sce\\_comments\\_to\\_carb\\_on\\_updated\\_ab\\_32\\_economic\\_analysis.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/nov-16-econ-ws/4-sce_comments_to_carb_on_updated_ab_32_economic_analysis.pdf)

Original File Name: SCE Comments to CARB on Updated AB 32 Economic Analysis.pdf

Date and Time Comment Was Submitted: 2009-12-09 11:14:34

No Duplicates.

**Comment 5 for Updated AB 32 Economic Analysis (nov-16-econ-ws) - 1st Workshop.**

First Name: John  
Last Name: Busterud  
Email Address: jwbb@pge.com  
Affiliation: Pacific Gas and Electric

Subject: PG&E's Comments on the CARB's Nov. 16, 2009 Workshop on AB 32 Economic Analysis  
Comment:

Attached are PG&E's Comments in PDF format.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/nov-16-econ-ws/5-clean\\_120909\\_ltr\\_to\\_judith\\_friedman\\_00092340.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/nov-16-econ-ws/5-clean_120909_ltr_to_judith_friedman_00092340.pdf)

Original File Name: clean\_120909\_Ltr to Judith Friedman\_00092340.pdf

Date and Time Comment Was Submitted: 2009-12-09 14:44:40

No Duplicates.

**There are no comments posted to Updated AB 32 Economic Analysis (nov-16-econ-ws) that were presented during the Workshop at this time.**