



April 14, 2014

Richard W. Corey, Executive Director
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: On-Road Diesel Rule Amendments

Dear Mr. Corey:

Thank you for the opportunity to comment on these amendments to the Truck and Bus Rule. I do not support the amendments because they do not help the problem, Rural California cannot afford this rule and do not have the air quality issues to warrant the cost associated with compliance. These amendments do nothing but move the brick wall around a little bit and fly in the face of companies already meeting or exceeding compliance.

I have simple compliance strategy that will allow rural California business's to stay here and to help fix the real problem. The following two parts will keep rural trucking companies in business and should be all that is needed for a Nox exempt rule and should be used throughout the state at reduced mileage.

1. Nox exempt county's must replace all mechanical engines with electric ones (83% reduction in PM) and keep them under 100k miles, run anywhere in the state and they are good for ever.
2. Ag Low mileage, Ag Limited mileage, Construction limited mileage exemptions are good forever.

By taking the cost factor out of rural California then the focus can be on the San Joaquin, South Coast Air basins and Urban Districts where the air quality issue actually resides. Cleaning up trucks in good Air Districts or putting companies out of business there will do nothing to help clean the air in the poor air districts. I understand that CARB needs this for their modeling however is modeling what Congress had in mind when they authored the Clean Air Act, or were they really hoping to clean up bad air basins? I would bet the latter, take the cost out of Rural parts of the state and put the money where it is needed.

3. Take all available funding and use it to clean up the air in the poor Air Districts.

Now the issue of rural Nox exempt companies that have gone into debt to comply with the rule, another simple solution. Any company that has exceeded compliance as stated above will receive a tax credit for the amount spend towards compliance.

4. Tax credit for companies that have exceeded compliance.

Without a commonsense approach to this rule the consequences will be catastrophic. Rural California has been bringing this to CARB's staff for years with very little evidence that it is sinking in. Putting companies out of business so that CARB can meet its computer modeling while not addressing the real air quality problems is not a good use of a State Agencies time. Perhaps if CARB staff was paid based on performance or production like the private companies they are putting out of business there would have been workable changes to the rule over the last 6 years.

Please address the Air Quality problem and don't put hard working people out of business in rural California that need every legal, living wage job we can find.

Thank you for the opportunity to comment,



Myles Anderson