Debbie Ferrari

dferrari@magtrucking.com

Re: Extension Proposal “for those that cannot qualify for loans”

It looks as though part of the reason as to why CARB has made this proposal is so that there can be more time to make grants available. The crux of the problem is that there are many that have already complied in order to follow the law. They are now facing a financial burden that others are not and this impairs their ability to do business on an even playing field. They have to earn higher rates to support their investment while others do not. They cannot compete in a fair way, they will suffer. If Carb is intent upon keeping this rule so that more grant money can become available, here are some ideas on as to how it should be modified. I encourage others to post ideas and comment on mine. You can’t let the proposal stay in its current form. If you do you are affectively throwing the program out and again, what about those that have already had to comply?

1) In order to be able to use a grant you must be able to qualify for a loan. When you apply, the loan company takes the grant into consideration before you have it. You don’t need the grant in hand to apply and have the grant considered. Those that are serious should be required to pre-qualify for the loan and the grant in order to get the extension. They would need to qualify by their original compliance date.

2) Those that already had to buy filters should be able to apply for a grant to cover that incurred cost.

3) Those that have retrofitted should not have an expiration date.

4) Trucks applying for extensions should be required to pass a DOT inspection and smoke test

5) Those very large corporations that received grants (many say those should not have been the recipients and that money could have been utilized more fairly by the small business owners) Those companies should be asked to start and contribute to a voluntary fund, to be earmarked for one truck owners. Carb can encourage and actively lobby these firms to do so.

6) Shorten the proposed extension by at least a year.

7) One way that is more affordable to comply is to buy a newer truck (say 2005) at auction and to retrofit. Carb should encourage this more affordable option by offering grants to cover the cost of the filter. This is much more affordable for both truck owner and Carb.

Don’t force those that can get a loan to lie to the government and pretend that they cannot. Don’t favor those that have not made an effort over all others.