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Air Resources Board

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CARB
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Subject: Proposed New Regulations
In-Use Off-Road Diesel Vehicle/Equipment
Off-Road Diesel Equipment Already in the Field

Ladies and Gentlemen:

I am writing to you today regarding the proposed new regulations for In-Use Off-Road Diesel Equipment.

I strongly believe in the need to reduce particulate matter (PM) and oxides of nitrogen (NOx), but feel that the proposed regulations are not a viable solution.

I would like to emphasize that the proposal would sharply cut the value of existing fleets – wiping out the net worth of many construction companies, depriving them of their bonding capacity, and simultaneously requiring them to make massive capital investments.

The government should set emissions standards before equipment is manufactured, and sold to end-users, and not after the fact.

CARB's new rule would render thousands of pieces of construction equipment worthless unless and until fitted with emission controls that may or may not be available, or repowered with entirely new engines. I fear that the proposal would compel many construction contractors to retire equipment long before the end of its useful life, costing workers their jobs and delaying the completion of essential infrastructure improvements.

Going beyond the enormous financial burden that CARB's proposal would impose on the construction industry, there are also technological barriers to meeting the standards. CARB needs to consider reasonable, less costly alternatives that would also improve air quality in California.

Sincerely,

Robert J. Lewis, Jr.
Vice President