



Skanska USA Civil West Region  
California District

1995 Agua Mansa Road  
Riverside, CA 92509  
Phone 951-684-5360  
Fax 951-684-1644  
Web [www.skanska.com](http://www.skanska.com)

May 23, 2007

Catherine Witherspoon, Executive Officer  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, California 95812

Proposed In-Use Off-Road Diesel Regulation

Dear Ms. Witherspoon

We appreciate the time you and your staff has taken, and providing us the stakeholders, the opportunity to participate in the development of the propose regulation that would reduce emissions of diesel particulate matter (PM) and oxides of nitrogen (NOx) from in-use off-road diesel vehicles, which will collectively improve the state's air quality to provide a healthy environment.

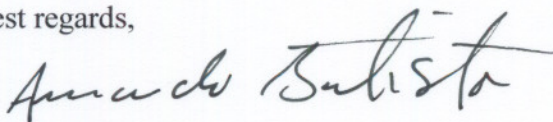
SKANSKA's primary objective with all construction projects is to sustain and maintain compliance with all rules and regulations, prevent and continually minimize adverse environmental impact and to conserve resources. We are in support and believe that collectively can reduce particulate matter (PM) and oxides of nitrogen (NOx) emissions from diesel engines and improve the state's air quality. In fact, we took part of the Carl Moyer program, along with others in the construction industry and collectively have *replace* over 1,000 high polluting engines in Southern California.



The implementation of the current draft regulation would have a negative impact on the construction industry and the state's economy. The proposed in-use off-road diesel vehicles regulation will have a devastating effect on our company, which forces us to replace the majority of our equipment in an unreasonable time-frame. Furthermore, the equipment technology that is capable of addressing both particulate matter (PM) and oxides of nitrogen (NOx) is unavailable, the anticipated engines and equipment technology to meet the stringent standards outlined in the current draft regulation will not be available for purchase until 2014. With the recent introduction of the oxides of nitrogen (NOx) in the regulation, it changes the position on the kind of technology needed to comply. There is presently no diesel engine that is capable of addressing both particulate matter (PM) and oxides of nitrogen (NOx) emissions.

Therefore, please considerer this request to eliminate the oxide of nitrogen from the current proposed regulation and provide us with an extended time-frame of five years so that we and other contractors can properly plan for the transition and give equipment manufacturers time to produce engines and technology that will meet California's advancing air quality standards.

Best regards,



Armando Bautista  
Principal Environmental Engineer

Cc: