

Daniel Sanchez

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## CDTOA & On the On-Road Rule

My name is Daniel Sanchez and I'm the Southern California Membership Services Directory for the California Dump Truck Owners Association. We are a statewide association with 1600+ members. I'm here to express our thoughts and concerns regarding CARB's proposed Off-Road diesel engine regulations.

The Association and its members support the idea and plan to improve California's air quality. The issues our members are most concerned with have to do with the costs to their businesses and families they will encounter in order to be and stay in compliance with not only this regulation but the proposed On-road regulations soon to follow. Many of our members who are in the dump truck business also own off-road equipment like backhoes and loaders – all this equipment will be subject to these new rules.

We are especially concerned with the small and medium sized business within the industry. These owners that can least afford it will be forced to retrofit, re-power or replace not only their trucks but Off-road equipment first if they wish to stay and operate in an industry that many have been in for 30+ years or more.

We ask as an Association that you deeply consider this financial burden you are placing on these small business owner-operators and consider ways to minimize this burden.

The Board needs to consider financial subsidy programs to assist these individuals. Some ideas that should be considered are low or no-interest "Loan Programs" that provide financial aid through the term of the implementation period of these new regulatory programs. These aid programs should last as long as it takes to implement your programs. And they should be available equally to both large and SMALL businesses. It is also important to remember that none of the business people here today profited from the design, manufacturing, sales or approval of these diesel engines that they utilize. We would hope that since the engine manufactures that seem to have the most to gain from these rules will be asked to help support subsidies and no-interest loans along with the state government who is now working towards prohibiting the use of this older equipment.

We total support improving our environment, but it seems too imbalanced and unfair to burden those individuals that can least afford it today.

Please consider our comments and suggestions when finalizing both these rules and those to come – and commit to finding financial help for these small businesses that that have traditionally been such an important part of our states economy.

Thank you.