June 19, 2007

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HEAVY-DUTY DIESEL
IN-USE STRATEGICS BRANCH

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

Subject: Proposed New Regulations
In-Use Off-Road Diesel Vehicle/Equipment

To whom it may concern,

My name is Kendal Leslie. I am all for reducing particulate matter and NOx from off-road diesel engines. I believe that each and every person around the world needs to work together to improve air quality.

I work for a General Engineering contractor that owns and runs off-road diesel equipment on construction projects. During the 4+ years that I have been with this company, my employer has verbally and physically exhibited concern for clean air. My employer is very conscientious. Every piece of our equipment receives regular maintenance and upkeep from the top to bottom. This includes, but is not limited to the engine compartment, frame, body, tires, etc... Coastal Earthmovers, Inc. strives to keep all of its equipment in the best mechanical and visual condition possible.

Coastal Earthmovers, Inc. employs up to 65 people at any given time. If this proposed regulation is approved retroactively, it will have an overall negative impact on the California economy. Coastal Earthmovers, Inc. will be forced to reduce our fleet or go out of business all together. In turn, this will cause a substantial loss of higher end construction jobs; supervisors, operating engineers, mechanics, field crews and office staff will be drastically reduced or will be cut all together. Employees will be forced to hit the unemployment lines and they and their families will no longer have company paid health benefits. They may then be forced to join the California Welfare and Medi-Cal programs to ensure they and their families have a roof over their heads, food on their plates and medical care. Some homes and automobiles will be foreclosed upon/repossessed. The fall out could be devastating. This will be the same for many businesses. They will have 3 choices; reduce their fleet, move their business out of California or close their business all together.

The California Air Resources Board' proposed regulations are not feasible. The regulations would require that we re-power or retrofit all of our engines to Tier 3, and then, when the new technology is developed for Tier 4, we would have to replace all of our Tier 3 engines with the Tier 4 engines. At this time, there are no diesel engines capable of addressing particulate matter and NOx. The lack of equipment technology will seriously hinder compliance. Yes, we all know we need to reduce emissions, but I firmly believe we can achieve this by moving forward, rather than going backwards. The financial burden on contractors and the economy will be astronomical if this regulation becomes effective retroactively.

Your review and consideration of this matter will be greatly appreciated.

Sincerely,
Kendal Leslie
Coastal Earthmovers, Inc.
Lompoc, CA