

California Air Resources Board  
Clerk of the Board  
1001 I Street  
Sacramento, CA 95814

RE: Comment to Off-Road Regulation Amendments –  
Extension of Early Double Credit for Retrofits.

Clerk of the Board,


As a representative of Holt of California, a Northern California Caterpillar Dealer, I would like to ask the Board to extend the double credit deadline for early installation of Retrofits (VDECS). The PM portion of this rule will be the most difficult for fleets to comply with, regardless of fleet size or age of equipment. While the PM filters will prove to become commonplace in the years to come, as of present they are a new technology, with various unknown and unique challenges to matching and installing the retrofit devices on existing machines. While the number of verified retrofit devices certainly has increased, the majority of devices that have come to market that will realistically fit the variety of machine applications that are affected by the rule, and can be used in an effective manner have only done so within the last 2 to 12 months.

There still is a large gap on what is available for the various machine applications that operate under the scope of the rule. Dependent on machine application, there may only be as few as one filter manufacturer available which could potentially lead to exceedingly high costs to the end user, in addition to having little choice in type of device that is installed. Additionally care must be exercised in matching a device to a particular machine application, as said device that may work well in some applications, in others it may cause a detriment to the performance of the machine. With costs of these devices in certain applications ranging from \$20,000 to upwards of \$75,000 per machine, we feel more time is warranted to allow these various technologies to become approved and come to the market, so the equipment end-user can make the best decision that would be applicable for their machine application.

Extending these deadlines could help bring a successful outcome to this regulation and would not impact the emission reductions that this rule is designed to do.

Thank-you for your time and consideration.

Sincerely,



Rob Cram  
Emission Solutions  
Holt of California