

Paul Schlenvogt
08-11-3/4

BLUE SKY BEE

O. Paul Schlenvogt

Pollination

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November 10, 2008

California Air Resources Board
Sacramento, CA

Dear Board,

I am a beekeeper. I am the spokesperson for the CAL-DAK Beekeepers Association and the Washington Professional Beekeepers Association. I am a professional beekeeper with a substantial beekeeping operation and a fleet of trucks. I am both an owner of trucks and a user of common freight carriers.

The C-DBA and the WPBA and my own operation do oppose the Private Fleet Rule and the new proposed diesel truck regulations as proposed.

The current economy cannot possibly handle the burden of a massive and instant change in the smog regulations for the trucking industry. The common freight carriers cannot possibly pass on the costs to us, as we cannot pass the costs to our clients, primarily the Almond Industry. The older trucks are becoming valueless and we cannot recover our investment to upgrade. Our ability to borrow money is seriously handicapped by the current economic crisis, the devaluation of real-estate, and the Colony Collapse Disorder issues that effect our beekeeping industry today.

Currently the majority of bee freight moved into CA is done by carriers based out of California. The new proposed regulations would eliminate them as options and leave the currently California based carriers as the sole providers. The shortage of freight carriers would be devastating to our industry.

A more gradual phase-in of regulations is the only practical way to make a change. We must maintain economic stability in all industries and help all industries transition into new programs.

Currently the DTCC's proposed alternatives is the most viable option on the table. We must find

an affordable, gradual transition into new regulations and controls.

Thank you for your courtesies,

A handwritten signature in black ink, appearing to read "O. Paul Schlenvogt", with a long horizontal flourish extending to the right.

O. Paul Schlenvogt

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Washington Professional Beekeepers Assoc.

Chester H. Ferguson, Pres
417 E. Q St.
Yakima, WA

December 10, 2008

California Air Resources Board
Sacramento, CA.

Dear Board,

We at the WPBA have been watching the development of the Private Fleet Rule and the new diesel truck emissions regulations as proposed. We currently are seriously opposed to the new regulations and proposals as proposed.

We as beekeepers are both owner operators and users of common freight carriers. In light of the current conditions of the economy the proposals being considered at this time are entirely too burdensome to be economically viable. Our industry is at this time in a weakened state and unable to handle the burden of increased mandated changes.

We are already in a condition with our lenders that is strained. We cannot at this time replace our equipment or retrofit them to meet California regulations.

Our ability to pass on our costs to the users of our industry is extraordinarily limited. The Almond Industry is the primary user of our services during our stay in California. The current almond nut price is at a serious low.

We are already paying freight rates for the shipment of our bees that is at an all time high and still have difficulty finding willing operators. Placing an additional regulatory burden on the operators that carry our bees into California will place an ever more serious limitation on the number of carriers available and increase our freight costs, costs that we cannot pass on to our clients.

We whole heartedly express support of the DTCC's alternative plan and encourage it or the formulation of a new plan that would permit a more gradual phase in of regulations that could be passed on to the clients over a period of time.

Sincerely,

Chester Ferguson

Chester H Ferguson