

**August 25, 2010 Comments on the EPA CASAC Particulate Matter Review Panel Draft Letter on  
Policy Assessment for the Review of Particulate Matter National Ambient Air Quality Standard—  
Second External Review Draft (June 2010)**

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Rod Michaelson, Bay Cities Paving and Grading. I've been working with the CARB off road implementation group now for 2 ½ years in Sacramento. I'm trying to figure out how to get CARB's implementation of your rules and CARB's rules established. CARB always uses the EPA as well, if we don't hit their standards, we will not get federal funds. Therefore, it is in your best interest to do everything we are telling you to do.

I did enjoy reading the 85 pages of all your questions and it doesn't seem like the science by any of you is determined as being a closed case. Some of you say that you need to take decades before it is resolved—fine particulate matter being not addressed yet.

We are a contractor that's got 350 employees and have been in business since 1947. And if we had followed CARB's original plan we would have been out of business in the next four years. We do 100 million dollars of work in this state a year and we would be out of business because we could have not, not kept up with their pace.

So its very important that the science that you propose is correct. There is uncertainty on your part. I expect, or I would hope that you continue to study it, but if you make policy that is making us go out of business, that does no good for anybody. It creates more unemployment. So staying on your study there still seems to be a lot of questions before we get into the policy attainment. And one of your people did talk about that you guys should be talking about policy, because nothing, nothing in science is in a vacuum and the unintended consequences of your actions need to be looked at very tightly. Thank you.