



CITY OF REDDING

RICK BOSETTI, MAYOR

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September 4, 2013

E-020-010; L-040-300

Mary D. Nichols, Chairman
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Chairman Nichols:

The City Council of the City of Redding is concerned about the impact of the California Air Resources Board's Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles on all businesses utilizing trucks within Shasta County.

This On-Road In-Use Diesel regulation was originally adopted by your Board in December 2008. After numerous updates and public hearings, this regulation became effective in December 2011. This regulation requires that most fleets of heavy-duty diesel trucks within Shasta County demonstrate compliance with the engine and retrofit requirements beginning January 1, 2014.

To ease the financial hardship that this regulation is having on truck owners, your Board has authorized incentive funding for truck upgrades in the form of Proposition 1B funds and Carl Moyer funds. Unfortunately, the Shasta County Air Quality Management District is specifically excluded from 1B funds by law and the short implementation time of the regulation makes the Carl Moyer funding not cost-effective. Consequently, small businesses that own dump trucks and other construction and service trucks have not been able to obtain grant funding.

Since Shasta County remains in compliance with all federal Ambient Air Quality Standards and is very nearly in attainment with state Ambient Air Quality Standards, the benefit the citizens of Shasta County will see from the tremendous expense of implementing this regulation will be minimal. Therefore, the Redding City Council joins the Shasta County Air Pollution Control Board in asking the California Air Resources Board to consider the following common-sense amendments to this regulation:

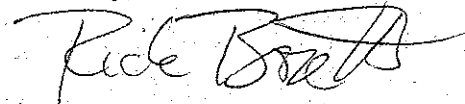
1. Re-open the agricultural vehicle provisions approval period and increase the maximum number of trucks that can be approved.
2. Re-open the Low mileage Construction Truck provisions approval period and increase the allowable mileage to 20,000 miles/year for all trucks in this category.

3. Increase the low-use vehicle threshold from 1,000 miles and 100 hours. Raising the low-use cap in Attainment/NOx exempt areas will create only minimal emissions and allow low-use vehicles some reasonable opportunity to provide an owner a living.

In addition to the above improvements, the Redding City Council respectfully requests that your Board take action to delay the compliance date of January 1, 2014, to January 1, 2023. Delaying the implementation of this rule, at least within rural California areas that are not subject to emission reductions prescribed by State Implementation Plans, will provide these areas with a chance for continued economic recovery from the severe recession. The small fleets that are common in rural California cannot afford to purchase particulate filters or new trucks. By delaying the implementation date of this rule, used vehicles with 2010 engines will begin entering the market and this will be the best option for small fleets to begin compliance with the rule. Right now, these fleets have to essentially buy new trucks. Lower mileage construction trucks are probably the most demanding application for retrofit particulate filters and are often disqualified for use based on data logging of exhaust temperature. Delaying the compliance date of this regulation will reduce the failure rate of engines and retrofit devices by allowing the filter technology to improve.

Thank you in advance for your consideration.

Sincerely,



Rick Bosetti
Mayor

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c: Chairman, Shasta County Air Pollution Control Board