



COUNTY OF TEHAMA
Air Pollution Control District

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August 27, 2013

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

Subject: Tehama County Air Pollution Control District Board Comments on Upcoming Enforcement of the California Air Resources Board Regulation of In-Use Heavy-Duty Diesel-Fueled Vehicles

Dear Chairman Nichols:

The Tehama County Air Pollution Control District Board is concerned about the impact of the 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 the district.

The On-Road In-Use Diesel regulation was originally adopted by your board in December of 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 Tehama County demonstrate compliance with the engine and retrofit requirements beginning January 1, 2014.

To ease the financial hardship that this regulation is bringing on truck owners, the Board has authorized incentive funding for truck upgrades in the form of Proposition 1B funds and Carl Moyer funds. Unfortunately, the Tehama County Air Pollution Control 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 for this type of project, as Carl Moyer funding can only be used during a time period prior to the replacement or retrofit otherwise being required by regulation. As it is, the District currently receives less than \$300,000 per year in Carl Moyer funding, which includes the District supplied matching funds, which would not go far even if we dedicated it all exclusively to on-road diesel projects.

The one area where our district will be able to utilize a reasonable amount of incentive funding is the TIMBER program for log trucks and our board is very grateful for this funding. Still, the financial hardship on our local trucking industry will only worsen as fleets from the transportation corridors that have utilized 1B funds, or trucks based outside of California, compete in Tehama County against local owner/operators.

Since Tehama County remains in compliance with all Federal Ambient Air Quality Standards, the benefit the citizens of Tehama County will see from the expense to individuals and the local economy of implementing this regulation will not be as great as reductions in areas of nonattainment, and we encourage the Air Resources Board to find a way to provide short term relief to rural areas and areas of attainment of existing air quality standards. We would like the Air Resources Board to consider amendments to this regulation that could include:

1. Re-opening the agricultural vehicle provisions approval period and increase the maximum number of trucks that can be approved.
2. Re-opening 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. Increasing 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, we request your board take action to delay the compliance date of January 1, 2014 for small fleet owners of one to three trucks. This action is critical for rural California, and would benefit the economy of the entire state. Delaying the implementation of this rule at least within rural California in areas that are not subject to emissions reductions prescribed by State Implementation Plans will provide these areas with a chance for continued uninhibited economic growth. For small fleet owners that are common in rural California, the purchase of a \$20,000 particulate filter or \$120,000 new engine and cab, without financial assistance, will be devastating. By delaying the implementation date of this rule, used vehicles with 2010 engines will begin entering the market by 2015-2016 and these will be an option for small fleets to begin compliance with the rule. This will also allow filter technology to improve for operators that can only afford to comply via retrofit.

As the Air Resources Board is aware, Tehama County is bisected by Interstate 5 as well as Highway 36/395, which are both corridors of interstate travel. As our local trucking industry would be economically disadvantaged in having to compete with trucks registered outside of California, we believe the Air Resources Board also should be prepared to vigorously verify compliance of trucks entering California within the current regulatory framework.

The Tehama County Air Pollution Control District has worked productively with the California Air Resources Board in the past and very much appreciates the regulatory relief provided to attainment areas for mobile agriculture, as well as targeted funding for logging trucks through the TIMBER Program. We ask that you consider the economic impacts to our Air District that will result from the current implementation schedule in the Truck and Bus Rule. If you have any further questions, you can contact our Air Pollution Control Officer, Alan Abbs, at 530-527-3717 x101. Thank you for your consideration.

Sincerely,



Dennis Garton

Chairman, Tehama County Air Pollution Control District Board

CC: Senator Jim Nielson
Assemblyman Dan Logue
Richard Corey, Executive Officer, California Air Resources Board