



# CALAVERAS COUNTY

## AIR POLLUTION CONTROL BOARD

891 Mountain Ranch Road

San Andreas, California 95249

(209) 754-6370

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October 8, 2013

The Honorable Jerry Brown  
Governor, State of California  
State Capitol, Suite 1173  
Sacramento, CA 95814

Subject: Truck and Bus On-Road In-Use Regulation

Governor Brown,

The Calaveras County Air Pollution Control Board (Board) wants you to consider the unintended economic consequences from the Air Resources Board's (ARB) Regulation to reduce emissions of diesel from in-use heavy-duty diesel-filled vehicles on all businesses utilizing trucks within Calaveras County.

The Calaveras County Air Pollution Control District (District) has been contacted by local owner-operators who have expressed their concerns regarding their future. Though industry is in favor of improving air quality, most rural businesses do not have the means to purchase new trucks or, install particulate filters. For small fleet owners common in our District, the purchase of a \$20,000 particulate filter, or \$120,000 new engine and cab, without financial assistance, will be devastating to their business.

Our District administers the Carl Moyer Program. This is an effective tool in assisting industry in retrofitting and/or replacing diesel engines, however restrictions in the Moyer Guidelines limit applicants in qualifying for grant funding as a result of older trucks having lower mileage or hours of use. Mileage, not necessarily age, directly effects the amount of grant funding that can be made available. The other significant concern is associated with the close deadline of the upgrade regulation.

The Board is requesting that ARB provide short term relief to rural areas. We want ARB 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 vehicle owner-operators a reasonable opportunity to be successful.

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In addition, we request action be taken to delay the compliance date of January 1, 2014 to January 1, 2023. This action is critical for rural California, and would benefit the economy of the entire state.

Please consider the economic impacts to our District, and others that will result from the current implementation schedule in the Truck and Bus Rule.

  
Merita Callaway, Chair

CC: Lori Norton, County Administrative Officer  
Brian S. Moss, APCO  
Congressman Tom McClintock  
Assemblyman Frank Bigelow  
Senator Leland Yee  
Mary Pitto, RCRC  
Karen Keene, CSAC  
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