



GLENN COUNTY
AIR POLLUTION CONTROL
DISTRICT

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Mary Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel Fueled Vehicles

Dear Chairman Nichols:

The Governing Board of the Glenn County Air Pollution Control District (Board) requests the California Air Resources Board (CARB) consider the following comments regarding the CARB's Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles. The Board supports CARB's efforts to reduce public exposure to air pollutants and complying with Federal State Implementation Plan commitments while addressing the economic impacts on the regulated community.

The elected Board serves in multiple capacities, which include examining and studying State and Federal air quality regulations that affect Glenn County, its departments, and its citizens. Many residents and small business owners have spoken with various Board members and have voiced grave concerns regarding their future in the trucking industry. All are in favor of improving air quality and would prefer to drive newer trucks, but are unable to afford them.

Glenn County is located in the heart of the Sacramento Valley and has an economy largely based around the agricultural community. The population of Glenn County is slightly over 29,000 and the two incorporated cities, Willows and Orland, are bisected by Interstate 5 with over 1,000 farms and approximately 500,000 farmed acres. The Board has received many passionate requests to consider a more pragmatic approach toward diesel regulation compliance deadlines, which appear quite Draconian to small businesses in this rural region.

In April 2013, the California Air Pollution Control Officers Association (CAPCOA) released the following 2012 information in their California's Progress Toward Clean Air Report: Glenn County had zero "Unhealthy" and 335 "Good" AQI days, zero days exceeding the 2008 Ozone Standard, and one day exceeding the PM_{2.5} Standard. Also, the American Lung Association's 2013 State of the Air Report gave Glenn County an "A" rating for its air quality. Please note that Glenn County has great air quality despite having Interstate 5 (with approximately 25,000 Average Annual Daily Traffic rate) bisect the county just over one mile from our CARB run air quality monitor.

As is true with the upcoming In-Use Off-Road Mobile Agricultural Equipment Regulation (Ag Equipment Rule), a "one size fits all" approach is not feasible for On-Road truck operators in rural agricultural areas of good air quality. The Board is confident that compromises are possible. Using CARB's own justification for delaying the Ag Equipment Rule, using near-term rulemaking, which could be submitted

to the Board in early 2014, should focus on fully accounting for the voluntary actions by the agricultural and trucking industry to reduce emissions through attrition and their participation in incentive funding programs that accelerate the use of the cleanest available technology equipment. To this tone, the Board makes the following suggestions regarding the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel Fueled Vehicles:

- **Re-open the agricultural vehicle provisions approval period and increase the maximum number of trucks that can be approved above the 2,200 truck limit statewide.** There are more than 1,000 farming entities in Glenn County and as you are likely aware, over 81,000 statewide.
- **Increase the low-use vehicle threshold from 1,000 miles and 100 hours.** Even if the cap is raised in Attainment Areas/NOx exempt areas only, the reductions "lost" are minimal. The replacement and/or retrofitting of low-use trucks will never be cost-effective or a good business model.
- **Increase and improve the outreach to the affected community.** There is a general consensus among air quality staff statewide that the methods of complying with this regulation (and others) are difficult to decipher. Please dispel widespread myths often spread between operators, share more information on grants and loans, and summarize CARB's plan for enforcement.

Finally, additional grant opportunities need to be made consistently available statewide to assist in funding more required retrofits and equipment turnovers. Small and rural Districts are not financially able to provide significant match funds for grant programs. The Glenn County Air Pollution Control District receives the minimum allotment of \$180,000 for Carl Moyer Program Projects and as per the program guidelines, most local on-road trucks cannot qualify for grant funding. Although Glenn County does not have a heavy duty truck dealer, an increase in grant funding available for the Voucher Incentive Program (VIP Program) would be greatly appreciated. Please note that unless extended by the State legislature and signed by the governor, grant opportunities through the Carl Moyer Program will be significantly reduced after the current Year 15 funding cycle. Thank you for your time and consideration.

GLENN COUNTY AIR POLLUTION CONTROL DISTRICT

Sincerely,



Leigh McDaniel, Chairman

cc: Sharon Lemieux, Chief, Heavy-Duty Diesel In-Use Strategies Branch
Scott Rowland, Chief, On-Road Control Regulations Branch
Judith Friedman, Chief, Compliance Assistance & Outreach Branch
Tony Brasil, Chief, Heavy Duty Diesel Implementation Branch
Jim Donnelly, Air Pollution Control Officer, Glenn County Air Pollution Control District
Dan Logue, Assemblyman
Jim Nielsen, Senator
Jerry Brown, Governor of the State of California