



COUNTY OF SISKIYOU

AIR POLLUTION CONTROL DISTRICT

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September 3, 2013

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

Subject: On-Road In-Use Diesel Regulation

Dear Chairwoman Nichols:

The SCAPCD Board is concerned about the impact of the Air Resource 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.

This 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 Siskiyou 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, your board has authorized incentive funding for truck upgrades in the form of Proposition 1B funds and Carl Moyer Program funds. Unfortunately, the SCAPCD is specifically excluded from Prop. 1B funds by law and the short implementation time of the regulation makes the Carl Moyer Program funding not cost-effective.

The one area 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. Unfortunately, a large number of service and construction trucks, mixers, flatbed and dump trucks have not been able to obtain grant funding. The financial hardship on our local trucking industry will only worsen as fleets from the transportation corridors, that have utilized Prop 1B funds arrive in Siskiyou County and take jobs from our local fleets.

Since Siskiyou County remains in compliance with all federal and state Ambient Air Quality Standards, the benefit to the citizens of Siskiyou County from the tremendous expense to individuals and the local economy of implementing this regulation will be minimal to non-existent. Our board is well aware that for every grant program, there is a corresponding tax and those additional taxes and grants will not make this regulation more tolerable. We are requesting the Air Resources Board to consider the following common-sense amendments to this regulation:

1. Re-open the agricultural 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/or 100 hours to 10,000 miles and/or 1000 hours. Raising the low-use threshold in PM and Ozone attainment and 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, your board should take action to delay the compliance date of January 1, 2014 to January 1, 2023. This action, while critical for rural California, would benefit the economy of the entire state. All areas of California have seen reductions in air pollution over the last three years. This improvement in air quality has occurred in spite of coinciding with a period of increased economic activity. The requirements of this rule are so deleterious to the financial health of small business truckers that it will threaten the continuing economic improvement in California to the point of actually reversing air quality improvements that have come with recent growth by requiring continual utilization of out-of-area fleets.

Delaying the implementation of this rule, at least within rural California, in areas that are not subject to emission reductions proscribed by State Implementation Plans will provide these areas with a chance for continued economic growth. 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 for rural districts, used vehicles with 2010 engines will begin entering the market by 2015-2016 and these vehicles 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 and vehicles with 2010 engines to become available in the used truck market.

The Siskiyou County Air Pollution Control Board has worked productively with the California Air Resources Board as evidenced by the District's continued attainment status for both state and federal ambient air quality standards. We ask that you consider the economic impacts to our District that will result from the aggressive implementation schedule in the Truck and Bus Rule. Thank you for your consideration.

Sincerely,

ED VALENZUELA, CHAIR
Air Pollution Control District Board
County of Siskiyou

CC:

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