

COUNTY OF EL DORADO

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October 22, 2013

Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
1001 I Street
Sacramento, CA 95812

Subject: Request for Consideration of Change to Truck and Bus Regulation Implementation

Dear Chair Nichols:

The El Dorado County Board of Supervisors (EDC BOS) respectfully requests consideration of amendments to the implementation of the California Air Resources Board (CARB) Truck and Bus regulations. The EDC BOS recognize the toxicity of diesel particulate matter (PM) and acknowledge the health benefits realized from reducing this pollutant. However, we also recognize the public health reductions caused by the significant economic impacts. In this case the magnitude of the public health reduction economic impact may well exceed the public health benefit. While CARB staff have provided data predicting a 75% reduction in diesel PM is anticipated from rule implementation, they also acknowledge that the normal replacement of old trucks with new will achieve a 60% reduction over the same 14 year period. Subsequent penetration or normal truck replacement beyond 2023 will further reduce diesel PM.

While many trucking companies have taken steps to comply with the regulation, it is estimated that the owners of 50,000 to 100,000 trucks in California have been unable to due to economic conditions, the high cost and timeliness of compliance. According to transportation industry advocates, many Californians are closing their businesses or moving out of State as a direct result of the Truck and Bus regulation.

The regulation has several compliance dates for the replacement of heavy (>26,000 lbs.) and lighter (14,000-26,000 lbs.) trucks. The use of diesel particulate filters can delay the replacement dates for six (lighter) to 11 (heavy) years. To qualify for the delay all pre-2009 lighter trucks must be retrofitted with diesel particulate filters by January 1, 2014, at a minimum cost of \$16,000 per truck. New truck average cost is over \$100,000.

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California air quality continues to improve significantly. California resident's health also continues to improve. Life expectancy has increased by three months every year for the last 100 years. Improving air quality is one of many factors contributing to this increase.

Implementing a more gradual truck and bus air quality improvement regulatory program schedule will not measurably impede continuing public health improvement. Conversely, California resident's health may be measurably impacted by rapid compliance schedule and high costs that contribute to business closure and the loss of trucking company owner's and employee's ability to provide for their families. The El Dorado County Board of Supervisors respectfully requests consideration of the following:

1. Delay the compliance dates to January 1, 2023.
2. Re-open the low mileage construction truck vehicle provisions approval period and increase the allowable mileage to 20,000 miles/year for all trucks in this category. This could be limited to those trucks based outside of the South Coast and San Joaquin Valley federal non-attainment areas.
3. Increase the low use vehicle threshold from 1,000 miles and 100 hours to 7,000 miles and 700 hours. This could be limited to those trucks based outside of the South Coast and San Joaquin Valley federal non-attainment areas.
4. Increase fund amounts available in the Prop 1B and Carl Moyer grant programs and expand eligibility requirements to include additional trucking companies. For example, currently the 1B funds are available only to those companies transporting goods. Since water used for dust control is not considered a good, funding for water trucks would not be eligible.
5. Direct CARB staff to exercise sound enforcement discretion by recognizing good faith efforts to comply.

Please contact our El Dorado County Air Pollution Control Officer, Dave Johnston at (530)-621-7578, dave.johnston@edcgov.us if you would like to discuss this request. Thank you for your consideration.

Respectfully,

Ron Briggs

Chair, El Dorado County Board of Supervisors

Chair, El Dorado County Air Quality Management District Board of Directors

cc: Jerry Brown, Governor