



# Shasta County

## AIR POLLUTION CONTROL BOARD

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August 6, 2013

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

Subject: On-Road In-Use Diesel Regulation

Dear Chairman Nichols:

The Shasta County Air Pollution Control 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.

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 Shasta 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 funds. Unfortunately, the Shasta County Air Quality Management 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.

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. Unfortunately, the large number of dump trucks, mixers, flatbed, single-engine cranes, and other construction and service 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 1B funds arrive in Shasta County and squeeze out local fleets.

Since Shasta County remains in compliance with all federal Ambient Air Quality Standards and is very nearly in attainment with state Ambient Air Quality Standards, the benefit the citizens of Shasta County will see from the tremendous expense to individuals and the local economy of implementing this regulation will be minimal. Our board is well aware that for every grant program

On-Road In-Use Diesel Regulation

August 6, 2013

Page 2 of 2

there is a corresponding tax and that additional taxes and grants will not make this regulation more tolerable. We are asking the Air Resources Board to consider the following common-sense amendments to this regulation:


1. Re-open the agricultural vehicle 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 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, 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 prescribed 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, used vehicles with 2010 engines will begin entering the market by 2015-2016 and these 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.

The Shasta County Air Pollution Control Board has worked productively with the California Air Resources Board in the past as continued improvements in air quality have demonstrated. We ask that you consider the economic impacts to our Air District that will result from the aggressive implementation schedule in the Truck and Bus Rule. Thank you for your consideration.

Very truly yours,

  
DAVID A. KEHOE, CHAIRMAN  
Air Pollution Control Board  
County of Shasta

C: Senator Jim Nielson, Assemblyman Brian Dahle  
Richard Corey, Executive Officer, California Air Resources Board

CC:

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