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COUNTY OF COLUSA
BOARD OF SUPERVISORS

Board Chambers
547 Market Street, Suite 102
Colusa, CA 95932
(530) 458-0508
cocolusa@countyofcolusa.org

July 30, 2013

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

RE: Truck and Bus Regulation Timeline Extension

Dear Governor Brown:

The purpose of this letter is to respectfully request a meeting in order to discuss the unintended economic consequences creating dire hardship in the transportation industry. According to local transportation industry advocates, Californians are closing their businesses right now or moving out of the state due to the California Air Resources Board (CARB) Truck and Bus Regulation. The local advocates feel that only you can stop the bleeding in the economy that is underway and will continue to get worse in 2014-2016, at the peril of the transportation industry, and have asked the Colusa County Board of Supervisors to encourage you to consider some of the recommendations below.

In response to local requests, the Colusa County Board of Supervisors supports the following action items that can easily be implemented to amend the Truck and Bus Regulations governed by the CARB.

1. One state regulation should require equal funding throughout the state of California for on/off road equipment.

2. Allow time for CARB to collaborate with the other branches of the CA Environmental Protection Agency to assess the unintended consequences created by the Truck and Bus Regulation. CARB should also ensure collaboration with the California Energy Commission as the regulation is actually increasing greenhouse gases, particulate matter, and hazardous materials in the greater supply chain. The air quality regulations are making greenhouse gas emissions grow, for example:

3. Market driven technologies are not realized quickly, efficiently, or effectively. The process to bring technology to market prohibits the free market to determine a product's price based on supply and demand. Allow more time to allow competition to drive market demand and manufacturers to innovate new solutions.

4. Delay the compliance dates to 2023 for trucking companies for the following reasons:

There are many other solutions that could be considered to improve the regulation, including but not limited to:

1. CARB could focus efforts in high-priority areas such as San Joaquin, LA Basin, San Diego and the Bay Area. According to the CAPCOA report, PM2.5 and Ozone are reduced throughout the state. The CARB has already exempted Alpine, Del Norte, Modoc, and Mono for NOx emission controls. **The entire North State should also be exempted, due to smaller populations, clean air, and communities that are frequently ineligible for funding.**

2. Allow small business to upgrade to new 2010 diesel engine according to the new natural life cycle a business would reinvest in newer equipment – compliance through attrition. The accelerated timelines for the phase-in schedule are not viable in these economic conditions.

3. Allow flexibility in the regulation to consider the efforts of the business to manage for sustainability and offer incentive credits. All companies manage efficiencies and focus on health and safety. When a business manages for sustainability they are achieving positive environmental impacts, such as conserving water and energy, reducing pollutants and hazardous waste, and providing raw materials through recycling. When a business offers wellness programs, health benefits, sick and vacation leave, they are also improving the quality of life of the employee and his or her family. Incentives work.

4. Allow flexibility to recognize innovation and ingenuity from the business community. Many companies are investing in alternative gas and electric vehicles or hybrid technology. Give credits and/or exemptions to companies that are employing new technologies not currently permitted for compliance, such as natural gas, propane fuel, alternative low carbon fuels, hydrogen, and hybrid or electric vehicles.

5. Allow further extensions for companies that have already been working toward compliance in accordance with CARB's phase-in schedule. Offer additional incentives or timeline extensions to recognize the significant financial investment into being proactive. This will be a win-win to everyone.

In conclusion, delaying the timeline to 2023 will enable business to invest in growth strategies rather than invest in compliance. Growing businesses will provide long-term economic benefits to the state, and companies can reinvest in new equipment on a natural attrition cycle. We cannot afford our trucking industry to become dominated by national chains, out of state, or foreign companies. These family businesses want to remain in business in California. Most important, these businesses want to remain in business.

We respectfully request that you contact Supervisor Tom Indrieri to arrange a time to meet with local representatives to discuss the proposals contained in this letter and to better understand why a "one size fits all" approach is detrimental to our region's smaller businesses. Supervisor Indrieri can be reached at 530-300-6039 or via email at tindrieri@countyofcolusa.org

Sincerely,

Denise Carter, Chair
Colusa County Board of Supervisors

cc:
The Honorable Brian Dahle, Member of California State Assembly
The Honorable Dan Logue, Member of California State Assembly
The Honorable Jim Nielsen, Member of California State Senate
California State Association of Counties (CSAC)
Rural County Representatives of California (RCRC)
Members, California Air Resources Board
California Air Quality Management and Air Pollution Control District Governing Boards
CalTrans
CA Farm Bureau
CA Transportation Association
Owner Operator Independent Driver Association