



April 21, 2014

Ms. Mary Nichols  
Chair, California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

**RE: Proposed Amendments to the Truck and Bus Regulation**

Dear Chair Nichols:

On behalf of the Rural County Representatives of California (RCRC), I appreciate this opportunity to address the proposed amendments to the Truck and Bus Regulation. RCRC is an association of thirty-four rural California counties and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

Since its adoption, Air Resources Board (ARB) has been deluged with communications from truck owners and associations of the financial hardship the regulation is causing, especially in rural areas and the smaller fleet owners. Additionally, ARB received requests from Air Pollution Districts and Board of Supervisors representing rural counties asking for additional considerations, exemptions, and delays due to the continued depressed economy. We appreciate the responsiveness of ARB to propose amendments that provide additional compliance flexibility, options, extensions, and exemptions for fleet owners in our member counties.

Meeting the nitrogen oxides (NOx) reductions is a considerable financial impact to fleets, which have a disproportionate negative economic impact in rural counties. During the promulgation of the rule and the 2010 amendments, RCRC requested ARB to consider those counties in nonattainment status, strictly due to intrastate transport of air pollution, also be exempt. We gratefully support the proposed added regions and request you reconsider those areas that were under consideration but omitted from the proposed regulation.

While RCRC welcomes the proposed set of amendments, we also continue to have concerns about the economic impact of this regulation to many of the businesses within our member counties. We look forward to working with you and your staff to monitor the economic impacts as this regulation is implemented and to maintain your receptive attitude towards future adjustments, as needed.

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Again, RCRC would like to express our gratitude to you and all the ARB staff for your continued outreach efforts to understand the rural county constraints.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is written in a cursive style with a large, looped initial "M".

Mary Pitto  
Regulatory Affairs Advocate

cc: RCRC Board of Directors