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California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812-2815

RE: Proposed Amendments to the Truck and Bus Rule

I would like to thank the Staff of CARB for working hard for some very helpful amendments to the rule, they will greatly help rural operations and Log Truck Companies achieve compliance. Even with the proposed amendments this rule will dramatically impact employment in rural California. There simply is not the money available for the updates even with the amendments in this rule, for rural operations to continue with seasonal constraints as they have for multiple generations. These companies have provided jobs in rural California for generations and today these same areas are listed in the top ten cleanest air districts in the Country.

Even though these districts are ranked high nationally for clean air, businesses within them will suffer greater impacts and higher costs to comply when compared with companies operating in San Joaquin and South Coast air basins. The inequity in this regulation is due to seasonality of operation and access to public funding. A majority of the trucks operating in rural California are pre 1994 mechanical engines; no current filter will bring them into compliance. These trucks are still being utilized because seasonal operations take decades to exhaust the useful life of a truck, not to mention the cost to purchase a replacement truck or engine using a rural business model, State agencies have no concept of the burden this puts on small business in the current financial situation.

There is no public funding for truck/engine replacement in rural California, Mendocino County has turned down Carl Moyer funding the last 3 years because they have no matching funds. There are no other direct funding opportunities in our County as with most of rural California. Even with the matching funds no more than 3 trucks would be replaced assuming the county did not use the funds to replace their own engines first. Industry only receives funds once municipalities have turned it down, and seldom is there any funding left. Mendocino County with its clean air is still going to face significant job losses due to their employer's inability to replace trucks in compliance with the amended rule. This scenario will play out in multiple rural counties facing the exact same problem.

Replacing a pre 1994 mechanical engine with a post 1994 electric engine is something that can be done at a reasonable cost or hopefully no more than the fair market value of the original truck itself. In NOx compliant rural California the result of taking mechanical engines out of service and replacing them with electronic versions would have an astronomical impact on the reduction of Particulate Matter. Replacing mechanical engines with electric engines and no further requirements could save jobs in rural clean air districts while providing significant PM reduction. Instead the PM reduction will come from business's closing their doors and eliminating jobs because of the cost of this rule. Everyone would like to have a new truck however spending money that the business does not have makes no sense. Requiring local trucking firms to run the cleanest diesel technology in the low use areas of the state that currently have the cleanest air in the nation makes little sense either. Only Government agencies with no practical experience of living within their means would come up with an idea like this and make it law.

The NOx exempt boundaries leave a lot to be desired, boundaries should coincide with impaired air districts not county lines. A perfect example is the Northern Sonoma air quality district where the air is not impaired, however NE trucks cannot operate there because of a line on a Map. Southern Sonoma air district is the impaired district where the air quality problem exists and that is where the exclusion to NE trucks should take place. If lines are to be drawn restricting access it should be done by actual air quality conditions not abstract boundaries set up over 100 years ago for a different purpose. In order to minimize the impact on jobs in rural California this rule must be as flexible as possible; otherwise it is an all out recipe for disaster.

Sincerely,

Myles Anderson
Anderson Logging, Inc.