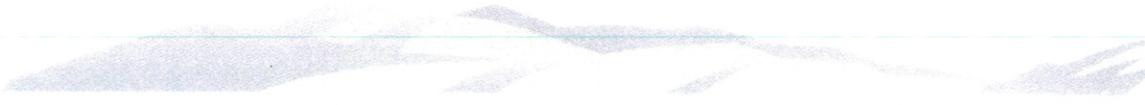


Jared Ficker
14-3-2



SANTA CATALINA ISLAND COMPANY

Chair Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Catalina Island and the Proposed Amendments to the Truck and Bus Regulation (Agenda Item 14-3-2)

Dear Chair Nichols,

The Santa Catalina Island Company just recently learned of the proposed amendment the Truck and Bus Regulation. We greatly appreciate the efforts of the Air Resources Board Staff to develop this proposed amendment to offer additional flexibility in implementing these new standards, which with help improve air quality in California.

We strongly support adoption of the proposed Bus and Truck Regulation with one proposed amendment that would accommodate the unique situation on Santa Catalina Island. **We are requesting that Santa Catalina Island be included in the list of NOx Exempt Areas.**

The total number of vehicles the proposed regulation applies to on Santa Catalina Island is less than 30. Many of these vehicles fall under the existing lower mileage exemption (1000 miles annually) and most would fall under the proposed amended low mileage exemption (5000 miles annually), which phases in particulate filters. Some buses that provide access to the interior of the island would slightly exceed the low mileage exemption.

The Santa Catalina Island Company is committed to installing particulate filters on its vehicles and plans to implement this measure in accordance with the proposed regulation.

However, if Santa Catalina Island does not have a "NOx Exempt Area" status, the proposed regulations would require engine replacement for the buses that provide access to the public throughout Catalina Island. Located 26 miles offshore of Los Angeles, the NOx emissions associated with this extraordinarily small and low mileage bus fleet is not contributing negatively to ambient ozone air quality. It would be prohibitively costly to replace the engines of the bus fleet operated by the Santa Catalina Island Company and replacement would provide no significant

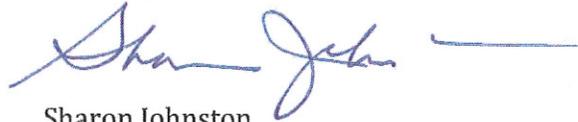
benefit to air quality over the existing engines once equipped with the particulate filters.

It should be noted that the speed limit on the entirety of Catalina Island is 25 MPH, which makes the functionality of particulate filter especially challenging and costly. Nonetheless, the Santa Catalina Island Company is committed to this change to mitigate PM2.5 and will work diligently with ARB staff to see this implemented.

While we learned of the proposed regulation and its impact to Santa Catalina Island just recently, our discussions with your staff have been helpful and we believe that the proposed amendment to the regulation to include Santa Catalina Island as a NOx Exempt Area is appropriate and reasonable.

Thank you and members of the Board for your consideration of this important amendment. Attached is the specific amendment language for your reference. We asked that this be included in the Proposed Amendment to the Truck and Bus Regulation when adopted by the Board.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sharon Johnston", followed by a horizontal line.

Sharon Johnston
Chief Financial Officer

cc:

Member of the Air Resources Board
Richard, Corey, Executive Officer
Tony Brazil, Chief, Heavy Duty Implementation Branch
Assemblymember Bonnie Lowenthal
Senator Ted Lieu
Supervisor Don Knabe

Attachment

**Proposed Amendment to the
Proposed Truck and Bus Regulation
to Accommodate Santa Catalina Island**

(45)(46) “NOx Exempt Areas” are the following counties – Alpine; Amador; Butte; Calaveras; Colusa; Del Norte; Eastern Kern (portion of Kern County within the Eastern Kern Air Pollution Control District); Glenn; Humboldt; Inyo; Lake; Lassen; **Santa Catalina Island in Los Angeles County**; Mariposa; Mendocino; Modoc; Mono; Monterey; Nevada; Northern Sonoma (as defined in title 17, CCR section 60100(e)); Plumas; San Benito; San Luis Obispo; Santa Barbara; Santa Cruz; Shasta; Sierra; Siskiyou; Northern Sutter (portion of Sutter County that is north of the line that extends from the south east corner of Colusa County to the southwest corner of Yuba County); portions of El Dorado and Placer that are within the Lake Tahoe Air Basin; Trinity; Tehama; Tuolumne; and Yuba.



CATALINA ISLAND CONSERVANCY

A responsible steward of its lands through a balance of conservation, education and recreation.

Chair Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Catalina Island and the Proposed Amendments to the Truck and Bus Regulation (Agenda Item 14-3-2)

Dear Chair Nichols,

The Catalina Island Conservancy just recently learned of the proposed amendment the Truck and Bus Regulation. We greatly appreciate the efforts of the Air Resources Board Staff to develop this proposed amendment to offer additional flexibility in implementing these new standards, which will help improve air quality in California.

We strongly support adoption of the proposed Bus and Truck Regulation with one proposed amendment that would accommodate the unique situation on Santa Catalina Island. **We are requesting that Santa Catalina Island be included in the list of NOx Exempt Areas.**

We have just a few vehicles that are affected by the proposed regulation. We operate the Wildlands Express which is a convenient and inexpensive way to Catalina's wild lands and access to the airport. Most of our vehicles fall under the existing lower mileage exemption (1000 miles annually) and most would fall under the proposed amended low mileage exemption (5000 miles annually), which phases in particulate filters.

The Catalina Island Conservancy is committed to installing particulate filters on its applicable vehicles and plans to implement this measure in accordance with the proposed regulation.

However, if Santa Catalina Island does not have a "NOx Exempt Area" status, the proposed regulations would require engine replacement for the buses that provide access to the public throughout Catalina Island. Located 26 miles offshore of Los Angeles, the NOx emissions associated with this extraordinarily small and low mileage bus fleet is not contributing negatively to ambient ozone air quality. It would be prohibitively costly to replace the engines of our Wildland Express bus fleet and replacement would provide no significant benefit to air quality over the existing engines once equipped with the particulate filters.



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It should be noted that the speed limit on the entirety of Catalina Island is 25 MPH, which makes the functionality of particulate filter especially challenging and costly. Nonetheless, the Catalina Island Conservancy is committed to this change to mitigate PM2.5 and will work diligently with ARB staff to see this implemented.

While we learned of the proposed regulation and its impact to Santa Catalina Island just recently, our discussions with your staff have been helpful and we believe that the proposed amendment to the regulation to include Santa Catalina Island as a NOx Exempt Area is appropriate and reasonable.

Thank you and members of the Board for your consideration of this important amendment. Attached is the specific amendment language for your reference. We asked that this be included in the Proposed Amendment to the Truck and Bus Regulation when adopted by the Board.

Sincerely,

Joe Kalla
Chief Operating Officer

cc:

Member of the Air Resources Board
Richard, Corey, Executive Officer
Tony Brazil, Chief, Heavy Duty Implementation Branch
Assembly member Bonnie Lowenthal
Senator Ted Lieu
Supervisor Don Knabe

Attachment



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**Proposed Amendment to the
Proposed Truck and Bus Regulation
to Accommodate Santa Catalina Island**

~~(45)~~(46) "NOx Exempt Areas" are the following counties – Alpine;; Amador; Butte; Calaveras; Colusa; Del Norte; Eastern Kern (portion of Kern County within the Eastern Kern Air Pollution Control District); Glenn; Humboldt; Inyo; Lake; Lassen; Santa Catalina Island in Los Angeles County; Mariposa; Mendocino; Modoc; Mono; Monterey; Nevada; Northern Sonoma (as defined in title 17, CCR section 60100(e)); Plumas; San Benito; San Luis Obispo; Santa Barbara; Santa Cruz; Shasta; Sierra; Siskiyou; Northern Sutter (portion of Sutter County that is north of the line that extends from the south east corner of Colusa County to the southwest corner of Yuba County); portions of El Dorado and Placer that are within the Lake Tahoe Air Basin; Trinity; Tehama; Tuolumne; and Yuba.