

COUNTY OF TEHAMA
Air Pollution Control District

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March 18, 2014

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

Subject: Tehama County Air Pollution Control District Board Comments on Proposed Amendments to Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles

Dear Chairman Nichols:

The Tehama County Air Pollution Control District Board sent a letter to you dated August 27, 2013 detailing concerns about the impact within Tehama County 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.

Our letter suggested amendments and concepts that could be incorporated in an amended rule to provide relief for rural counties, such as ours. We thank you for acknowledging our concerns and proposing amendments for consideration at the CARB April Board meeting, including:

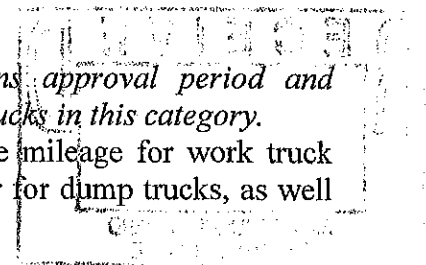
1. *Re-opening the agricultural vehicle provisions approval period and increasing the maximum number of trucks that can be approved.*

CARB has proposed an amendment to allow agricultural vehicles that operate more than 10,000 miles per year and in some instances up to 25,000 miles per year depending on engine year, to be eligible for agricultural exemptions through the end of 2016, with additional extensions based on reduced mileage through 2022.

In addition, CARB has acknowledged that livestock cattle trucks have unique operational characteristics, and has proposed exemptions that would add them as eligible for the agricultural vehicle specialty truck exemptions.

2. *Re-opening the Low mileage Construction Truck provisions approval period and increasing the allowable mileage to 20,000 miles/year for all trucks in this category.*

CARB has proposed amendments that increases the allowable mileage for work truck extensions to 15,000 miles per year, and 20,000 miles per year for dump trucks, as well as providing an extended compliance schedule out to 2018.



3. *Increasing 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.*

CARB has proposed raising the low-use vehicle threshold to 5,000 miles, and has eliminated the 100 hour threshold for vehicles using the power take off while stationary. In addition, the compliance schedule was extended to 2020.

4. *Find a way to provide additional short term relief to rural areas and areas of attainment of existing air quality standards.*

The CARB proposal has added several rural areas to the list of NOx Exempt areas that are able to take advantage of additional compliance deferrals. Specifically, the addition of Butte County allows Tehama County businesses an expanded operational corridor that includes Highway 99.

5. *Delaying the compliance date of January 1, 2014 for small fleet owners of one to three trucks, as used vehicles with 2010 engines will begin entering the market by 2015-2016 and these will be an option for small fleets to begin compliance with the rule.*

The CARB proposal provides owner/operators with 3 trucks or less in NOx Exempt areas an additional 2 to 3 years to comply with filter requirements, with larger fleets gaining up to 4 years additional time (to 2020) to achieve 100% compliance.

To ease the financial hardship that this regulation is bringing on truck owners, CARB has previously authorized incentive funding for truck upgrades in the form of Proposition 1B funds. Unfortunately, truck owners in Tehama County must be able to prove a minimum of 50% of their operation is within the goods movement corridor identified by Prop 1B, which only extends as far north as Sacramento. The Tehama County Air Pollution Control District Board encourages CARB to either reconsider the I5 corridor north of Sacramento as an area eligible for full Prop 1B incentive funding, or to reduce the 50% mileage requirement within the currently identified areas, in order to provide greater incentive opportunities in Tehama County.

The Tehama County Air Pollution Control District has worked productively with the California Air Resources Board in the past and appreciates the regulatory relief proposed for consideration at the April Board meeting. If you have any further questions, you can contact our Air Pollution Control Officer, Alan Abbs, at 530-527-3717 x101. Thank you.

Sincerely,



Steve Chamblin

Chairman, Tehama County Air Pollution Control District Board

CC: Senator Jim Nielson
Assemblyman Dan Logue
Richard Corey, Executive Officer, California Air Resources Board