



County of Fresno

BOARD OF SUPERVISORS
SUPERVISOR JUDITH G. CASE – DISTRICT FOUR

December 7, 2009

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

Dear Chairman Nichols:

The purpose of this letter is to request that ARB exercise enforcement discretion and provide extension for drayage truck replacements and retrofits for all truck owners and operators until retrofit devices are available. We appreciate the recent advisory by the ARB that offered extension to truck owners and operators that have secured incentive funding. Unfortunately, the proposed extension does not provide truckers who are willing to purchase retrofits with their own money the equivalent consideration.

At this time, retrofits and installation contractors are not available in adequate supply to allow truckers to meet the January 1, 2010 deadline for retrofit or replacement. As a result, businesses that are willing to make the retrofit investment on their own are being unduly harmed.

Unfortunately, the available incentive funds are well below the level needed. This problem is particularly acute in the San Joaquin Valley. The unprecedented economic downturn that we face as a region and throughout the state has made this challenge even greater. There is a substantial shortage in the availability of retrofit devices and vendors to install the necessary control devices. I have received a number of reports from truck owners and operators that have attempted to procure the required control devices at their own cost and have been unable to purchase the required controls due to severe shortage in equipment and contractor availability.

I fully appreciate the need for reducing truck emissions as a key part of strategy to protect public health and meet the strict federal clean air mandates. Estimates indicate that truck emission have already declined by more than 22 percent, largely due the economic downturn. Additionally, the agriculture industry in San Joaquin Valley that relies on these drayage trucks has already suffered tremendously due to our water shortage problems. Given these dire circumstances and the fact that we have already seen more than expected reductions from this source category due to the industry's economic conditions, I respectfully ask that ARB provide same level of relief that was articulated in your recent advisory to all drayage trucks until such time as the retrofit devices and installation contractors are available in the marketplace.

Sincerely,

Judith G. Case
Fresno County Supervisor, District 4
Member, San Joaquin Valley Air District Governing Board
Former Member, California Air Resources Board

CC: ARB Members of the Governing Board.