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September 26, 2006

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: California's Heavy Duty Diesel In-Use Compliance Regulation

Dear Clerk of the Air Resources Board:

The proposed adoption of California's Heavy Duty Diesel In-Use Compliance Regulation continues to be of concern to Stanislaus County. The requirements for public agencies under Sections 2022 and 2022.1 of Title 13 of the California Code of Regulations (CCR) will have a significant impact to local jurisdictions without any reimbursement provided from State sources.

For Stanislaus County, compliance with the regulation is expected to cost in excess of \$350,000. As a result of the regulation, the County will be faced with the decision of replacing the vehicle altogether or installing a control device that can cost in the range of \$10,000 - \$20,000 depending on the age and type of vehicle. In any event, the cost that will need to be absorbed by Stanislaus County will be substantial.

The goal of reducing diesel particulate matter from heavy-duty powered vehicles is one that Stanislaus County supports. Over the past several years, our County has been proactive in the purchase of Compressed Natural Gas (CNG) vehicles to begin moving our fleet to current emission standards. Nonetheless, we do have strong concerns regarding how the referenced regulation was developed. It does not differentiate between existing and new vehicles. In addition, it appears to unfairly target public agencies and utilities that have suffered fiscally over the last decade.

As the Chairman of the Stanislaus County Board of Supervisors, I want to communicate to the Air Resource Board our opposition to the current regulation. We would welcome any changes to the regulation that would make implementation more practical at the local level and would be glad to participate in such discussions.

Sincerely,

Thomas Mayfield, Vice-Chairman
Stanislaus County Board of Supervisors