

Sean Edgar
10-11-3

Clean Fleets Coalition

December 17, 2010

Mary Nichols, Chairman
California Air Resources Board
1001 I Street, PO Box 2815
Sacramento, CA 95812

**Ref: AGENDA ITEM 10-11-3 (STATEWIDE TRUCK & BUS REGULATION):
Technical Revisions Proposed for the 15-day Change Package**

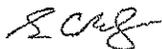
Dear Chairman Nichols:

The Clean Fleets Coalition wishes the Board to consider the following technical revisions to the Proposed Regulation Order before you today:

- **Early Action:** The "prepayment" requirement by May 1, 2011 to claim early credit for VDECS installed by September 1, 2011 should be amended to allow a purchase order or deposit by the fleet owner. It is not a standard business practice to pay for vehicle service prior to completion [ref. Section 2025 (j)(1)(A), p. A-23]
- **Engine Family:** Fleets required to report should be relieved of the requirement to report the "engine family" or "engine family name" unless the engine has had a VDECS installed. Where a VDECS is installed the engine family name is mandatory and fleet owners are encouraged to consult the ARB guidance on proper VDECS selection [ref. Section 2025 (r)(9) p. A-58]
- **Expanded Fuel Types for Hybrid Vehicle Credit:** Fleets that implement hybrid heavy duty vehicles, regardless of fuel type, should be eligible for the Credits for Early PM Retrofits, Hybrid Vehicles, Alternative Fueled Vehicles [Section 2025 (j) p. A-23]. In an atmosphere where the Board is encouraging vehicle efficiency, work trucks or vans that incorporate the 20% increased fuel economy should be treated equally whether they are diesel, natural gas, or gasoline powered.
- **Switching Compliance Paths:** An explicit statement is needed to indicate that a fleet with four or more vehicles may switch compliance paths in any compliance year provided compliance with one path is achieved.

Thank you for the opportunity to do these changes during the 15-day period.

Sincerely,



Sean R. Edgar

cc: Mr. Erik White, Mr. Tony Brasil, ARB

1822 21st Street
Sacramento, CA 95814
916-739-1139 Fax 916-739-1216

RE: AG
VEHICLES

December 16, 2010

Mary Nichols, Chairman
California Air Resources Board
1001 I Street, PO Box 2815
Sacramento, CA 95812

**Ref: AGENDA ITEM 10-11-3 (STATEWIDE TRUCK & BUS REGULATION):
Request to Expand Specialty Agricultural Vehicle Definition**

Dear Chairman Nichols:

The Clean Fleets Coalition appreciates this opportunity to submit this information concerning specialty equipment used in lettuce harvesting in California. In support of this request to add the lettuce harvesting truck (LHT) as a "specialty agricultural vehicle", we offer:

1. **Unique function:** As documented in the attachment to this letter, the LHT is very similar to the cotton module movers, which is currently defined as a "specialty agricultural vehicle."
2. **Small inventory:** We believe that there are less than 100 LHT's in the state and the only truck manufacturer (FABCO, formerly of San Leandro) is no longer in business, making near-term replacement unlikely.
3. **Geographic considerations:** This harvesting equipment operates almost entirely within the Central Coast. The Board has recognized that this "NOx Exempt Area" does not typically have the same localized health risk and also merits a less aggressive compliance schedule.
4. **TRUCRS reporting data:** We understand from Board staff that the 2010 reporting reveals that the expected statewide limit of 2,200 specialty agricultural vehicles has not been exceeded. It appears that there remains room within the current cap to accommodate our request.

Additionally, we request for agricultural vehicles that the out-of-state miles not count against the limits established in "Table 5: Agricultural Vehicle Mileage Limits." We request that the same proof of operation deemed acceptable by your staff for the phase-in option be allowed (i.e. "Records could include IRP records, GPS tracking records, or DMV or law enforcement permits.")

Sincerely,



Sean R. Edgar
Executive Director

cc: Mr. Erik White, Mr. Tony Brasil, and Mr. Ron Nunes, ARB

Request to Expand Specialty Agricultural Vehicle Definition

Facts

- The existing Statewide Truck & Bus Rule (“Rule”) contains provisions for specialty agricultural vehicles. The definition in Section 2025 (d) (67) includes the following vehicle type, “(B) A truck, or a truck tractor and trailer combination, that is equipped with a self-loading bed and is designed and used exclusively to transport field manufactured cotton modules to a cotton gin.”
- Approximately 100 similar specialty vehicles operate primarily on the Central Coast of California in the harvesting of lettuce.

Description of Lettuce Harvesting Truck (LHT)

This specialty equipment is a motor vehicle registered with either the California DMV or the IRP. This motor vehicle is powered by a diesel or gasoline engine. It has an 80-inch axle width to accommodate the standard 40-inch lettuce growing beds. It is a six-wheel drive vehicle in order to maneuver with a heavy load. The vehicle is rated up to a 75,000 gross vehicle weight rating (GVWR).

The vehicle is primarily used along the Central Coast, encompassing the “NOx Exempt Areas” which are subject to reduced requirement under the Rule. The vehicle is one part of a harvesting system that includes packing machines and other equipment that is not owned by the Lettuce Harvesting Truck owner, but that has been modified to facilitate the rapid and efficient harvest.



Photo 1: View of rear of LHT vehicle. Note three packing machines in the background

Request to Expand Specialty Agricultural Vehicle Definition

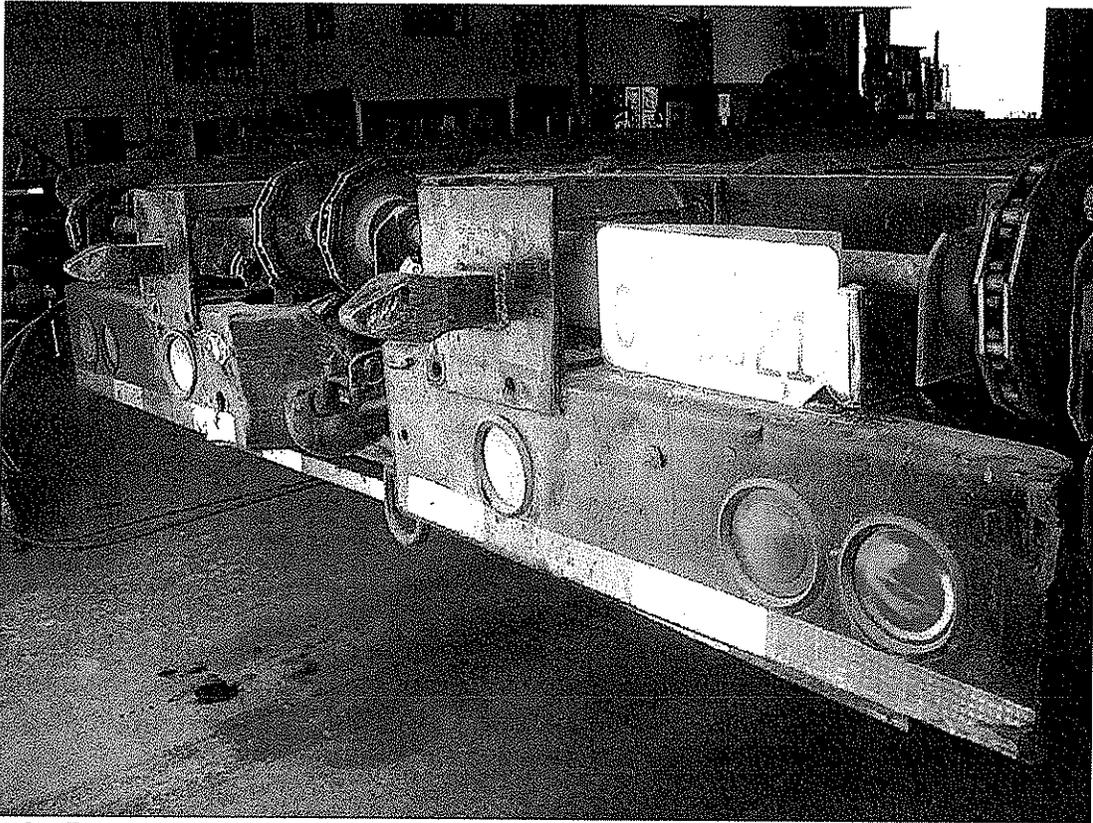


Photo 2: Rear of LHT vehicle with chain drive and "mating" rods to allow connection to packing machines

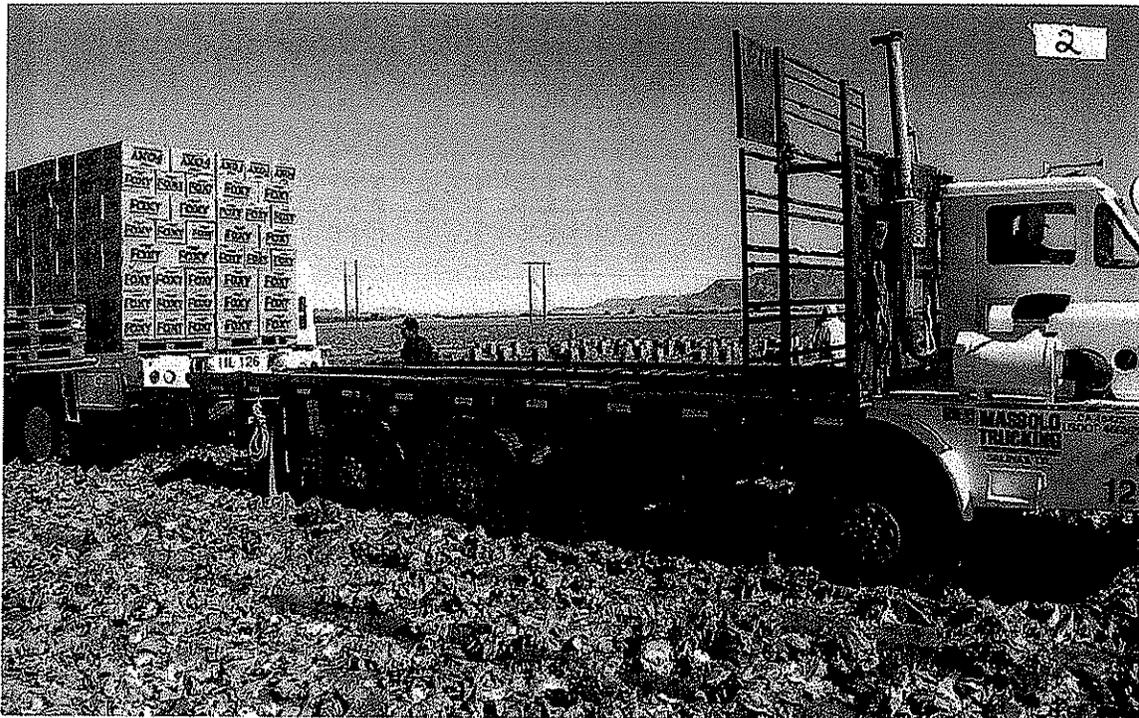


Photo 3: LHT vehicle (right) preparing to connect to packing machine (at left)

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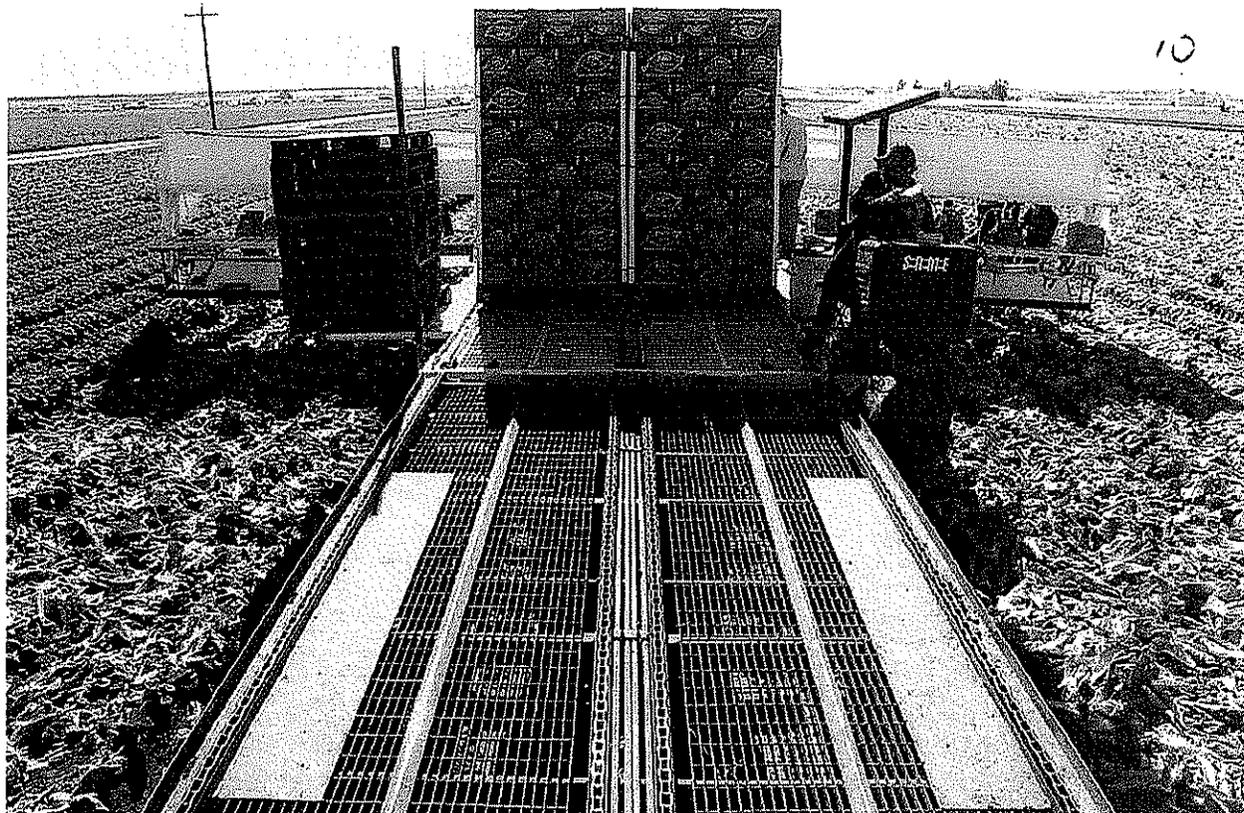


Photo 4: View toward rear of vehicle. Now fully connected to packing machine



Photo 5: Half of load transferred from packing machine to the LHT

Request to Expand Specialty Agricultural Vehicle Definition



Photo 6: Full load transferred from packing machine to LHT vehicle and load securement for over the road delivery to vaccum cooler facilities

GHG Truck/Trailer Rule Request to Exempt “Belly Box Trailers”

Facts

- The existing Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation (“Rule”) exempts “drop frame trailers” from the Rule.
- Belly Box trailers commonly used in the moving and household goods storage industry already provide significant increased aerodynamic advantages and present the same challenges as “drop frame trailers” to modify to make them more aerodynamic

Description of Belly Box Trailer

This specialty trailer primarily used in household goods movement. These are “flat floor” trailers but have extended capacity below the level of the trailer axles to hold oversized goods. These boxes are not uniform in dimensions.

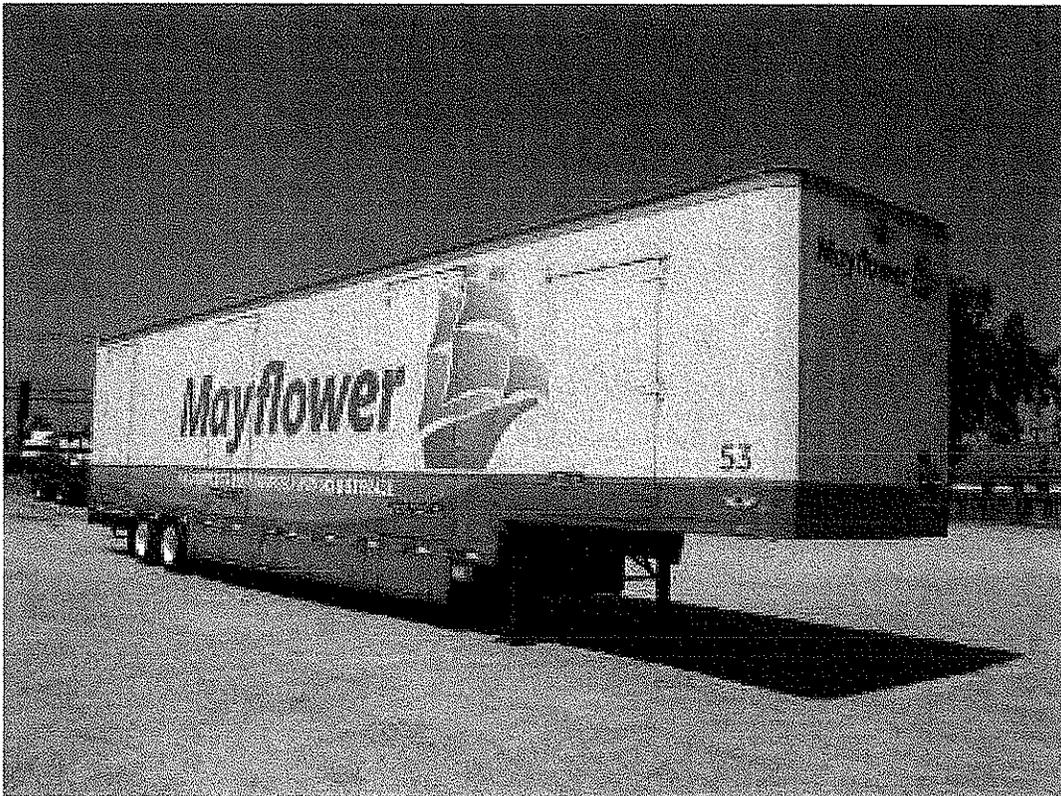


Photo 1: View of Belly Box Trailer.

Our Request

- Exempt “drop frame trailers” from the Rule.
- Consider the California Moving and Storage Association comments heard earlier today