



**Santa Barbara County
Air Pollution Control District**

May 8, 2007

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

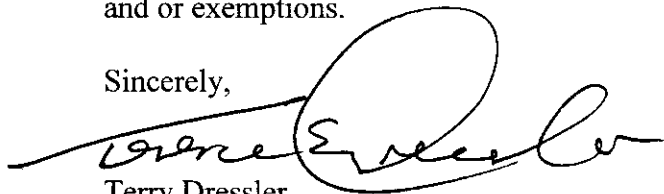
Subject: Comments on Proposed New Section 2449, Title 13, Regulation for In-Use Off-Road Diesel Vehicles.

I appreciate the opportunity to comment on ARB's proposed regulation to reduce emissions of diesel particulate matter (diesel PM) and oxides of nitrogen (NOx) from in-use off-road diesel vehicles that operate in California. The proposed regulation is expected to significantly reduce emissions of diesel PM from in-use off-road diesel vehicles. Diesel PM emission reductions are needed to reduce premature mortality, cancer risk, and other adverse impacts from exposure to this toxic air contaminant. The regulation would also reduce diesel PM and NOx emissions that contribute to exceedances throughout the State of ambient air quality standards for both PM2.5 and ozone.

I am concerned, however, about the application of an exemption from the NOx fleet average requirements for "Captive Attainment Area Fleets" as defined in Section 2449(c)(5). The staff report indicates that this exemption is for those NAAQS attainment areas that also do not contribute to a downwind transport couple. However, notwithstanding the fact that Santa Barbara County is a NAAQS attainment area that has been determined by ARB to not contribute to a downwind non-attainment area, Santa Barbara County is not included in the list of counties designated in Section 2449(c)(5) of the proposed regulation.. During the development of our 2004 Clean Air Plan, my staff worked closely with ARB to determine the level of impact that Santa Barbara County has on air quality in the South Coast Air Quality Management District. The results of this study are summarized in a letter from the Air Resources Board dated August 25, 2004 determining that our contributions are "inconsequential." The findings of the study were incorporated into our 2004 Clean Air Plan and forwarded to ARB.

While I understand the importance of obtaining emission reductions from Off-Road Diesel Vehicles, I believe that Santa Barbara County should be treated the same as other similar attainment areas unless there are overriding circumstances that justify different control strategies and or exemptions.

Sincerely,



Terry Dressler
Air Pollution Control Officer
Santa Barbara County Air Pollution Control District

cc: Dennis Wade, ARB
Lynn Terry, ARB

