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California Air Resources Board
In-Use Control Measure Section
Attn: Kim Heroy-Rogalski, P.E.
P.O. Box 2815
Sacramento, CA 95812-2815

April 26, 2007

RE: In-Use Diesel Off-Road Equipment Rule

Dear Ms. Heroy-Rogalski:

The Northern Sierra Air Quality Management District's Board of Directors has directed me to send the following comments on the California Air Resources Board's (CARB's) proposed In-Use Diesel Off-Road Equipment Rule. Please include this correspondence as part of the public record during the public comment period ending on May 23, 2007.

It is our understanding that CARB has conducted its public outreach program to inform potentially impacted businesses of the proposed regulation throughout the development of this regulation. However, as my staff and I discussed with you previously the District received information from some of our local businesses that they were unaware of the economic impacts this proposed regulation could have upon their businesses. As part of the public outreach process, the District's Board of Directors would like to pass on to you these concerns. The local business' primary concern is the economic impact this proposed regulation could have on them. Under the proposed regulation, the District estimates that newer equipment will require a verified diesel emission control system, with an average cost of \$7,000 - \$30,000. Older equipment may require both repowering and a verified diesel emission control system, with average costs ranging from \$45,000 - \$90,000. In some cases, owners may have to replace existing equipment in order to fully comply with this proposed regulation. It is the District's experience that many of the local rural fleets own older equipment.

In order to get better compliance and overall better emission reductions, the Air District Board members urge the CARB to consider how to implement this regulation on a case-by-case basis in the rural counties, rather than a "one-size-fits-all" regulation.

Also, the Board urges CARB to consider eastern Nevada County as a "Captive Attainment Area" for Ozone and be exempted from the NOx turnover requirement in the draft rule.

In conclusion, the District's Board of Directors would like CARB to continue to work with local rural businesses in finding a solution that would work for both. Please contact me at 530-274-9360 if you have any questions or comments.

Sincerely,



Gretchen Bennitt
Air Pollution Control Officer

CC:

Northern Sierra Air Quality Management District Board of Directors
Nevada County Contractor's Association
Plumas County Contractor's Association
Tahoe-Truckee Contractor's Association

