

# SACRAMENTO VALLEY

## BASINWIDE AIR POLLUTION CONTROL COUNCIL

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May 21, 2007

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

Re: Comments on Proposed Regulation for In-use Off-road Diesel Vehicles

The Sacramento Valley Basinwide Air Pollution Control Council (BCC) is contacting the California Air Resources Board (CARB) to provide comments on the proposed regulation for in-use off-road diesel vehicles.

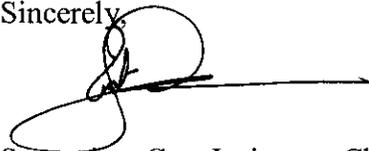
We appreciate CARB's work in reducing public exposure to diesel particulate matter, a toxic air contaminant. We recognize that off-road vehicles are a significant source of diesel particulate matter and oxides of nitrogen. We are supportive of reasonable, effective efforts to reduce emissions from off-road vehicles, but we are concerned that the proposal's standards are based on a regulatory "floor" set to achieve drastic emission reductions in the severe or extreme federal non-attainment areas. There are areas of the state, particularly rural areas in the Sacramento Valley, which do not need these drastic emission reductions. Yet we are again facing a "one size fits all" regulation. The provisions provided for low population counties are helpful but we request additional flexibility.

In this context we provide the following comments:

1. Additional grant opportunities must be made available to fleet owners, both public and private, to assist in funding the necessary retrofits and fleet turnovers. For example, there needs to be increased flexibility in the Carl Moyer Program Guidelines to fund emission reductions in this class of vehicles;
2. The BCC supports the low population county provisions provided in the proposed regulation;
3. The concept of the captive attainment area fleets should be extended to rural areas that are classified as ozone nonattainment under Subpart 1 Basic, as a result of transport;
4. More public outreach is needed so that those affected are aware of the requirements, compliance timelines, and the potential grant and funding opportunities; and,
5. Provisions should be included to preclude equipment "dumping" in rural areas as some fleet owners seek to sell their dirty units to unsuspecting rural operators.

Thank you for the opportunity to provide these comments on the proposed regulation.

Sincerely,



Supervisor Curt Josiassen, Chair  
Sacramento Valley Basinwide Air Pollution Control Council

cc: Sacramento Valley Basinwide Air Pollution Control Council  
Catherine Witherspoon, Executive Officer  
BCC-TAC

