



BILL CONNELLY, Chair
Supervisor, District #1

MAUREEN KIRK, Vice Chair
Supervisor, District #3

JANE DOLAN
Supervisor, District #2

CURT JOSIASSEN
Supervisor, District #4

KIM YAMAGUCHI
Supervisor, District #5

DOUG ARNOLD
Councilmember, Biggs

SCOTT GRUENDL
Councilmember, Chico

JERRY ANN FICHTER
Mayor, Gridley

JAMES JOHANSSON
Vice Mayor, Oroville

ROBIN HUFFMAN
Councilmember, Paradise

W. James Wagoner
Air Pollution Control Officer

(530) 891-2882
(530) 891-2878 Fax

May 24, 2007

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

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

The Governing Board of the Butte County Air Quality Management District (Board) is contacting the California Air Resources Board (CARB) to provide comments on the proposed regulation for in-use off-road diesel vehicles. Our Board endorses the comments provided by the Sacramento Valley Basinwide Air Pollution Control Council in their letter dated May 21, 2007, which are included below.

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.

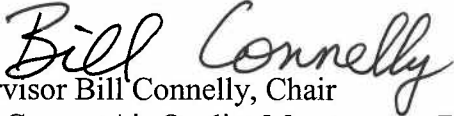
In this context we provide the following comments:

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 District 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 non-attainment 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.

Clerk of the Board
California Air Resources Board
Page 2

Thank you for the opportunity to comment on the proposed regulation. If you have any questions regarding this correspondence, please contact Jim Wagoner at (530) 891-2882.

Sincerely,

A handwritten signature in cursive script that reads "Bill Connelly". The signature is written in black ink and is positioned above the typed name and title.

Supervisor Bill Connelly, Chair
Butte County Air Quality Management District Governing Board