

Theodore D. Schade
Air Pollution Control Officer



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

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July 5, 2012

Mr. James N. Goldstene
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Subject: Impact of Truck and Bus Regulation on California's Eastern Sierra

Dear Mr. Goldstene:

On May 24, 2012 the Great Basin Unified Air Pollution Control District Governing Board held a workshop regarding the California Air Resources Board's Truck and Bus Regulation (13 CCR section 2025). The Board would like to thank Mr. Tony Brasil from CARB's Mobile Source Control Division for his presentation to the Board, as well as for his patience and understanding of the situation faced by District businesses and government agencies.

Based on concerns voiced by District business owners and the government agencies that make up the District Board (Alpine, Inyo and Mono Counties and the Town of Mammoth Lakes), the Board believes it is important for CARB to understand the impact of the Truck and Bus Regulation on Eastern Sierra businesses and governments. The Great Basin Air Pollution Control District encompasses three of California's most rural counties. The District is nearly 14,000 square miles in size (larger than the nine smallest U.S. States, up to and including Maryland), yet it has a population of less than 34,000 people. Although District residents are subjected to some vehicular air pollution, our low population density and lack of any high-traffic transportation corridors (there are no interstate highways or railroad tracks within the District), mean that diesel emissions air pollution is simply not a significant threat to our air quality. As you know, Great Basin's air quality challenges are different, if not unique, from the challenges faced by other air pollution control agencies in the state. Although much of the District enjoys excellent air quality, anthropogenic fugitive dust emissions, winter wood-heating smoke and icy road traction-control cinder dust are the air pollution sources that prevent some areas of the District from being in attainment with the state and federal air quality standards. Diesel emissions are not a meaningful component of the air quality problems we face.

Because of the District's rural character and the lack of significant diesel emissions air pollution, the Governing Board is concerned about the impacts of the Truck and Bus Regulation on the economic viability of our small businesses and government agencies. The current poor financial

conditions, which have hit our tourist-based economies especially hard, will make it difficult or impossible for many District businesses and all government agencies to comply with the Regulation. This could mean the closing of important local businesses and the loss of important government services.

The Great Basin APCD is home to the highest, lowest, hottest and, sometimes, coldest public roads in the state. There is concern among our fleet operators regarding the ability of the currently-available required diesel particulate filters (DPFs) to function at the high altitudes and extreme temperature conditions found within the District. The District believes CARB should require equipment manufacturers to test their devices in the extreme environments found in our District. Devices that work in Los Angeles, the Bay Area and Sacramento could have operational and maintenance difficulties in our remote areas and extreme conditions.

CARB's certification and subsequent decertification of some of the DPFs makes it very difficult for small fleets to make the best possible economic decisions. Owners that purchased devices that subsequently lost certification have spent hard-earned money on devices that now do not work and could find themselves in violation of the Regulation, through no fault of their own. These owners must receive some relief.

Because the District is home to only small fleet owners and operators, they are sometimes confused by the current requirements, reporting obligations and the status of certified devices. In addition, these owners/operators may be unaware of any technical or financial assistance that may be available to them. Both advance and ongoing outreach, specifically targeted to our remote, rural communities, is important if CARB expects the fleets in these areas to comply with the Regulation.

The Great Basin Governing Board asks CARB to take the following actions to assist District diesel fleet owners and operators in complying with the Truck and Bus Regulation:

- Designate Inyo and Mono Counties as NOx exempt areas. This will give local fleet owners additional time to comply with the Regulation. Although CARB designated Great Basin's Alpine County as a NOx exempt county, there is no justification for not including Inyo and Mono Counties on the exempt list. Their diesel emissions are certainly far less than those in most of the other exempt counties.
- Consider a Regulation modification that would provide for "compliance by attrition" for rural small businesses and government agencies. New equipment should certainly comply with the Regulation, but rural businesses and governments often have equipment that they are forced by economics to keep for many years. Wholesale fleet changeovers cannot occur within the decade or so provided in the Regulation. They need more time.
- Support efforts to secure financial assistance in the form of grants and low-interest loans to assist small business owners and small government agencies with the cost of compliance.
- Provide targeted outreach to assist fleet owner/operators and make them aware of both the requirements and any available assistance.
- Commit to more rigorous testing of control devices. Assume that operators in remote rural areas with both extreme operating conditions and reduced maintenance budgets are

going to be harder on their equipment than large-fleet operators in urban areas. The devices should be designed for more demanding conditions.

- Provide longer-term relief and/or financial assistance to fleets that tried to do the right thing and ended up with uncertified or poorly operating equipment.

The District appreciates everything the Air Resources Board is doing to clean California's air. We only ask that it remember California's rural areas face different needs and challenges from the state's more populated areas. Please let us know if we can be of any assistance.

Sincerely,



Theodore D. Schade, P.E.
Air Pollution Control Officer

Mary Nichols, CARB Board Chair
Erik White, CARB Mobile Source Control Division
Judith J. Friedman, CARB Compliance Assistance and Outreach
Tony Brasil, CARB Heavy Duty Diesel Implementation
Lee Brown, California Construction Trucking Association