



COUNTY OF SISKIYOU

COUNTY ADMINISTRATIVE OFFICE

Ric Costales, Natural Resource Policy Specialist

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December 12, 2008

James N. Goldstene, Executive Director
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Proposed Amendments to CCR Titles 13 and 17 concerning on-road diesel engines

Dear Mr. Goldstene:

The proposed amendments to CCR Titles 13 and 17 affecting on-road diesel engines will have a severe impact on Siskiyou County and other rural counties within the state. While the economic impacts of these measures may have been assessed on a statewide level, this agglomeration does not reveal that rural counties will be bearing a disproportionate and devastating share of the effects of this proposal. As rural counties are already struggling to cope with a multitude of regulatory and economic challenges, this proposal could not have come at a worse time. This situation is particularly onerous since rural counties' contributions to greenhouse gasses (GHGs) and global warming via diesel emissions are rendered infinitesimal compared to the catastrophic wildfires originating on federal land that have ravaged our landscapes, the major contributing factors of which have received virtually no attention by the state government.

Consider:

- Siskiyou County is the 5th largest county in the state of California with about 45,000 residents scattered over 6347 square miles. At 7 people per square mile, our county is among the least populated in the state—at this density certainly entirely incapable of making any remotely measureable contribution, positively or negatively, to GHGs or global warming now or in any reasonable future scenario.
- The 2007 *California County Data Book* put out by the national organization Children Now showed Siskiyou County sharing last place for economic well being with three other rural Northern California counties. This measurement incorporates the fact that only 1/3 of our residents meet the standard of "self-sufficiency" and the fact that median family incomes are barely half that of the state as a whole.
- The same study showed that Siskiyou and the same three counties had the dubious honor of "leading" the state in the percentage of children under 18 in low income families (65%).

Given these and other similarly dismal socio-economic statistics, the Siskiyou County Board of Supervisors passed the accompanying Resolution #08-195 opposing the implementation of these regulations on our County and other rural counties similarly threatened by these proposals.

Thank you for your consideration of these comments and this resolution.

Sincerely,

Ric Costales, Natural Resource Policy Specialist
County of Siskiyou

**RESOLUTION OF THE SISKIYOU COUNTY BOARD OF SUPERVISORS
REQUESTING A DELAY IN THE IMPLEMENTATION OF ALL NEW AIR
RESOURCES BOARD REGULATIONS, INCLUDING THE IN-USE
HEAVY DUTY ON-ROAD TRUCK AIR TOXIC CONTROL MEASURE,
AND REGULATIONS RELATING TO AB 32**

WHEREAS, the State of California's economy is severely depressed and the Governor has recently announced a \$28 billion dollar revenue shortfall for the current and upcoming fiscal years; and

WHEREAS, there is a need to stimulate the state economy and prevent further local job losses and the Governor has called for a Special Session of the legislature to address the economy and budget shortfalls; and

WHEREAS, local business leaders have expressed concerns regarding the damage to the local economy, and to multiple businesses; and

WHEREAS, the Siskiyou County Board of Supervisors recognizes that the State of California Air Resources Board is proposing adoption of an Air Toxic Control Measure to reduce emissions from Heavy Duty On-Road Diesel Trucks; and

WHEREAS, Siskiyou County businesses have already been significantly economically impacted by the Stationary Diesel Engine, Diesel Agricultural Pump, Portable Diesel Engine and In- Use Off-Road Diesel Equipment Air Toxic Control Measures recently adopted by the Air Resources Board; and

WHEREAS, no economic impact analysis of the proposed Air Toxic Control Measure's specific impact on rural communities has been conducted; and

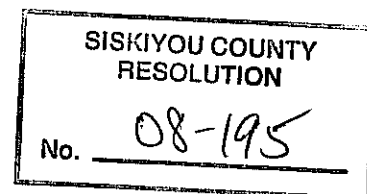
WHEREAS, a statewide analysis of the proposed Air Toxic Control Measure's economic impact in California will overlook the serious economic impact to rural communities; and

WHEREAS, the proposed Air Toxic Control Measure does not take into account the unique operational demands and equipment usage of agricultural and timber operations in rural communities; and

WHEREAS, diesel particulates are a significant health risk in densely populated areas, the risks are greatly reduced in rural communities with lower traffic volumes and population densities; and

WHEREAS, Siskiyou County received an "A" rating in the American Lung Association's 2008 "State of the Air Report"; and

WHEREAS, a significant number of businesses in Siskiyou County operate Heavy Duty On-Road Diesel Trucks; and



WHEREAS, Heavy Duty Diesel Trucking provides one of the few well paying year-round employment opportunities available to residents of Siskiyou County; and

WHEREAS, Siskiyou County residents are solely dependent on Heavy Duty On-Road Diesel Trucks for the delivery of goods; and

WHEREAS, Siskiyou County does not have any "new" Heavy Duty Diesel Truck dealerships to benefit economically from new truck sales thus causing a net transfer of money out of the local economy; and

WHEREAS, Siskiyou County has been significantly impacted by the loss of several large employers; and

WHEREAS, Siskiyou County has been significantly economically impacted by high fuel costs, recent wildfires, decline in the timber industry, and the ongoing national economic crisis; and

WHEREAS, the most recent available unemployment figures from September of 2008 show Siskiyou County currently has an unemployment rate of 8.7%; and

WHEREAS, Siskiyou County median household income is barely half that of California as a whole; and

WHEREAS, Siskiyou County is ranked last in the State of California in Economic Well-Being; and

WHEREAS, the economy of Siskiyou County and most other rural California counties is based on agriculture, forestry, and tourism, and these industries compete in a world market where it is virtually impossible to pass on the additional costs of needless, over-burdensome regulations to consumers; and

WHEREAS, with the current state and national economic situation, companies in rural California will find it difficult to borrow money to update equipment engines since 60% of trucks in rural California are 1994 model year and older thus unable to meet the banks' lending requirement that equipment not be older than 10 years; and

NOW, THEREFORE BE IT RESOLVED, the Siskiyou County Board of Supervisors opposes the implementation of any new ARB regulations, including the In-Use Heavy Duty On-Road Truck Air Toxic Control Measure and measures associated with AB 32 until such time as the economic impact on rural communities has been fully addressed and mitigated; and

NOW, THEREFORE BE IT FURTHER RESOLVED, the Siskiyou County Board of Supervisors will be seeking statewide support from other Counties and elected officials regarding this issue; and

NOW, THEREFORE BE IT FURTHER RESOLVED, the Siskiyou County Board of Supervisors is requesting urgent, immediate action by Assemblymember Jim Nielson and Senator Sam Aanestad to sponsor and/or support legislation to override all new ARB regulations due to their severe financial impact to the State economy and the Districts they represent.

Passed and adopted this December 2, 2008, by the following vote:

AYES: Supervisors Overman, Erickson and Armstrong

NOES: NONE

ABSENT: Supervisors Cook and Kobseff

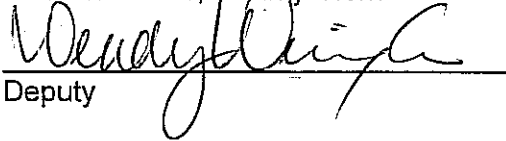
ABSTAIN: NONE



W.R. Overman, Chair
Siskiyou County Board of Supervisors

ATTEST:

Colleen Setzer, County Clerk



Deputy