



South Coast Air Quality Management District

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*Office of the Executive Officer
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December 9, 2008

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Goldstene:

SCAQMD Staff Comments on the Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles and Amendments to the Regulations for In-Use Off-Road Vehicles, Drayage Trucks, Municipality and Utility Vehicles, Mobile Cargo Handling Equipment, Portable Engines and Equipment, Heavy-Duty Engines and Vehicle Exhaust Emissions Standards and Test Procedures and Commercial Motor Vehicle Idling

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to provide comments on the California Air Resources Board's proposed regulation for In-Use On-Road Diesel Vehicles and associated amendments to existing mobile engines and equipment regulations. As you are aware, the South Coast Air Basin experiences the nation's highest concentrations of fine particulates (PM_{2.5}) and ozone despite decades of increasingly stringent air pollution controls. The South Coast Air Basin is one of two PM_{2.5} nonattainment areas in the State, and the most serious in the nation. Its ozone levels are currently 50 percent above the federal standard, making it one of the nation's worst areas in nonattainment of the federal 8-hour ozone ambient air quality standard. Mobile source emissions are the most significant contributors to the air quality problems in the South Coast Air Basin. The 2007 Air Quality Management Plan (AQMP) for the South Coast Air Basin shows that the category of on-road heavy-duty vehicle emissions is in the top three categories of nitrogen oxide (NOx) emissions and in 2014, is the highest source category of emissions. As such, it is imperative that on-road heavy-duty vehicles be cleaned up as early as possible. The 2007 State Implementation Plan (SIP) for the South Coast Air Basin calls for significant emission reductions from

on-road heavy-duty vehicles by 2014. In fact, the 2007 SIP control measure for on-road heavy-duty vehicles calls for 66 tons/day of NO_x emissions reductions and 3 tons/day of particulate emissions reductions by 2014.

More significantly, the recent Multiple Air Toxics Exposure Study (MATES-III) for the South Coast Air Basin indicates that diesel combustion emissions contribute to over 70 percent of the Basin's potential cancer risk. In addition, CARB's revised estimates of the health impacts of fine particulate concentrations show a 70 percent increase in premature deaths compared to previous estimates (or about 6,200 premature deaths/yr associated with fine particulate concentrations). As you are aware, there are no clear indications that any specific chemical components of PM_{2.5} contribute primarily to premature deaths. As such, we must reduce all precursors of PM_{2.5} as early as possible.

Support for the Proposed In-Use On-Road Diesel Vehicles Regulation

The South Coast AQMD staff is in full support of the proposed regulation for In-Use On-Road Diesel Vehicles. It is imperative that the CARB Board adopt the proposed regulation as proposed by your staff on December 11, 2008, given the short time that the South Coast region has to attain the federal annual PM_{2.5} ambient air quality standard. We strongly believe that your staff has crafted a regulation that is reasonable and sufficiently aggressive to meet the 2007 SIP commitments. Due to the large-volume demand for compliant engines that will follow adoption of the regulation, fleet implementation needs to be phased in over time, as proposed in the regulation. Any delays from the proposed implementation schedule would compress the schedule to meet air quality standards and lead to continued exposure to high levels of diesel emissions.

We understand that the proposed regulation would cost between \$4.5 to \$5.5 billion over a 15-year period. However, the associated monetary savings of the proposed regulations in terms of health benefits are at least six-to-ten times greater than the cost of the proposed regulation. Regardless, we believe that your staff has been working to develop appropriate funding assistance mechanisms to assist affected vehicle owners to comply with the proposed regulation. In addition, the South Coast AQMD continues to prioritize its funding programs to the continued modernization of the on-road vehicle fleet.

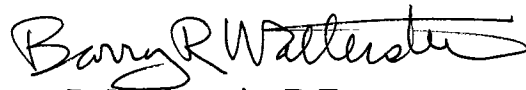
Comments Regarding Related Proposed Amendments to Existing Regulations

The South Coast AQMD staff is in general support of the proposed amendments to other existing mobile source regulations to further reduce emissions from those categories. However, we have some concerns with the proposals regarding two-engine cranes and sweepers. It is our understanding that these proposed amendments are not intended to change the existing classification of the auxiliary engines as "portable engines," such that districts may still require permits and establish emission standards (if the owner chooses not to register the engine under the PERP program). However, the proposed amendments to the Portable Engines and Equipment Regulation and the Initial Statement of Reasoning Staff Report do not make this clear. We are concerned that once these engines become

subject to their associated regulations (i.e., two-engine sweepers would be subject to the proposed In-Use On-Road Vehicle Regulation and two-engine cranes would be subject to the In-Use Off-Road Vehicle Regulation), air districts that would be permitting these equipment if these pieces of equipment have not entered into the state's registration program, would not have an ability to disallow older Tier 0 engines from operating as they do currently. As a result, even though these older equipment would eventually be cleaned up under the on-road or off-road diesel vehicle regulations, they can continue to operate over a longer period of time in areas such as the South Coast Air Basin than they would have otherwise. For example, equipment that are running with Tier 0 engines are presently not allowed to be permitted and operate in the South Coast Air Basin. Equipment that have Tier 1 engines may be permitted to operate, but must demonstrate that the engine does not exceed the certification level since the engine is certified under a "family emissions level". We request that CARB preserve air districts' authority to affect the use of cleaner equipment through permitting or other means with the proposed amendments.

In conclusion, we urge the CARB Board to adopt the proposed In-Use On-Road Diesel Vehicles Regulation at its December 2008 meeting. We commend CARB staff efforts in developing the proposed regulation, which would provide the single greatest emission reductions towards PM_{2.5} attainment provided in the 2007 SIP for the South Coast Air Basin. If you have any questions regarding our comments, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Source Division, Science and Technology Advancement, at 909-396-3184.

Sincerely,



Barry R. Wallerstein, D.Env
Executive Officer