

December 3, 2008

Christine
Foster

Chairwoman Mary Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812

08-11-3/4

RE: Proposed Statewide Truck and Bus Regulation

Dear Chairwoman Nichols and Board Members:

Tulare County Asthma Coalition is a grassroots organization with members from a diverse segment of the local population that is concerned about a growing incidence of asthma here in the Central Valley of California. We have joined with a collaboration of organizations throughout the state to reduce triggers of asthma. As asthma advocates, we are very concerned about poor air quality associated with diesel pollution and urge you to approve a strong, health protective regulation.

We recognize the challenging economic times that the state is facing as the Board is presented with this regulation. However, the economic and health costs of doing nothing are apparent. Because California is home to some of the worst air quality in the country, it is not surprising that asthma is a major cause of lost school days and emergency room visits. In California, there are over 14,000 asthma-related hospitalizations a year just for children under the age of 15 with a cost of about \$19,000 per stay. Furthermore, the November 2008 Jane Hall study found that air pollution in the South Coast and San Joaquin Valley regions alone costs the California economy \$28 billion annually. The swift adoption of a strong regulation is vital to removing the health and economic burdens of unhealthy air and can ensure that California can meet federal air quality standards. However, we ask the Board to consider restricting the proposed exemptions for agricultural trucks and provide a margin of safety for meeting SIP commitments.

We applaud ARB's efforts to move forward with this ground-breaking regulation that will reduce costly public health emergencies and clean our air. Our main concerns with the October 24, 2008 proposed regulations involve the agricultural exemptions. These exemptions are far too broad and compromise the health protections of the regulation for those living or working near the agriculture industry, especially the Central Valley. We suggest reducing the mileage threshold, requiring PM filters, limiting fleet size, and not expanding the definition of agricultural vehicle to include trucks owned by ancillary businesses. This will still provide special consideration to the agriculture industry, but will better protect public health.

Finally, we hope that CARB will continue vigorous outreach to truck owners to ensure incentive programs are understood and accessible. We will not see benefits from this regulation if owners are unable to comply with the rules. Ensuring owners are aware of the multiple funding sources that can be leveraged to assist individual truck and fleet owners, will maximize compliance with the rule and minimize the economic impact on owners and business.

Sincerely,
Christine Foster
Secretary
Tulare County Asthma Coalition