

MR. SCHRAP: Thank you very much for the

15 opportunity. Really appreciate this workshop.

16 One question though. Actually, I have more
17 questions than any type of commentary or testimony.

18 First of all, I can appreciate this workshop set
19 up the way it is.

20 My name is Matt Schrap with California Trucking
21 Association -- sorry -- for the purposes of the
22 recordkeeping here.

23 Will all future workshops be handled in this way
24 where we have a formal presentation and there is a court
25 reporter, or is this kind of just a one-off workshop?

1 SENIOR STAFF COUNSEL OLIVER: We have no definite
2 plans on how to proceed from here, except that we will be
3 reporting the results of the workshop to our management
4 and evaluating all the comments that we get.

5 So if you have a preference for something for
6 another type of --

7 MR. SCHRAP: Well, throughout the development on
8 the port truck reg, on-road reg, greenhouse gas SmartWay
9 efficiency upgrade regulation, there was many comments
10 made about some type of formal recordkeeping being held
11 for all the questions and comments that was directed
12 toward staff during the regulatory development. And I was
13 thinking maybe this was a step in that direction or if it
14 was a one time. So we're supportive of some sort of
15 formal recordkeeping in any workshop scenario where
16 stakeholders who have a very valuable perspective
17 obviously will be heard and potentially recognized later
18 on those issues.

19 I heard a lot of things that were mentioned
20 during the workshops that were -- I won't say glossed
21 over -- but were definitely not paid as much attention to
22 as some would have hoped for.

23 But, again, appreciate the opportunity to come
24 up. And, you know, from our perspective, fair,
25 consistent, and sustainable enforcement or our three

1 favorite words or two favorite words are level playing
2 field here in California. Especially in the trucking
3 industry, we're competing on a national basis with many
4 fleets from out of state doing here business here. It's
5 very important that all actors are consistently enforced.
6 And we, as California Trucking Association, are more than
7 willing to assist enforcement staff in getting out the
8 word.

9 A couple more questions, and I hadn't heard it
10 alluded to. I know the AB 233, some of the revenue that
11 was supposed to be generated from that fine increase, was
12 going to be used to hire more inspectors. I was curious
13 on the number of in-field inspectors we have out there.
14 And if anyone could maybe address that, just for my own
15 edification and our members. A lot of them are asking me,
16 and I'd like to give them the right answer.

17 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:
18 Thank you, Matt.

19 Paul Jacobs, Chief of Mobile Source Enforcement.
20 Enforcement Division wide, we have roughly about
21 125 staff, of which in the Mobile Source Enforcement side
22 about 60 full-time staff and a handful of students.

23 And in terms of those that are deployed to the
24 field at any given time, any of the enforcement division
25 staff full-time that are can be employed to the field.

1 In terms of specific ones assigned to diesel,
2 it's near about 50 enforcement staff.

3 MR. SCHRAP: Great. Thank you, Paul. I
4 appreciate that.

5 Also, another question. I know that you guys
6 have a partnership with the California Highway Patrol. Is
7 there -- I know a contract was going to be renewed for
8 inspections. And are they very willing and able to
9 participate? We've been hearing mixed messages also on
10 their level of involvement.

11 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:
12 In terms of our long-standing interagency agreement with
13 the Highway Patrol, that's been in effect since roughly
14 1990. And that is currently in effect and is renewed on
15 an annual basis.

16 And they're fully supportive and required under
17 statute to actually be present in the field. They're the
18 ones that have the authority to pull vehicles over under
19 2813 of the vehicle code.

20 MR. SCHRAP: Within the enforcement reports, is
21 there going to be in the future a delineation between CHP
22 violations and ARB staff-issued violations?

23 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:
24 No. They track their own statistics. They do have
25 express authority under statute to write tickets for

1 various violations, be it tampering or smoke and the like.
2 And they report those in their own enforcement reporting.

3 MR. SCHRAP: Great. I appreciate that and also
4 appreciate your candor.

5 Moving forward here and kind of to echo what the
6 gentleman who was previous to me about these courtesy
7 inspections, I think this would go a long way with
8 stakeholders and trying to help facilitate additional
9 enforcement, especially for some of those bad actors that
10 are out there. Is it a thought maybe within Air Resources
11 Board staff to maybe start certifying a third party to go
12 through and do some of the training and outreach and
13 potentially as we do for biennial inspection in terminals,
14 we'll go through everyone's -- their entire fleet to make
15 sure that when the CHP does come on site that they're
16 ready to go. Is this something that potentially
17 enforcement or outreach maybe might be looking to get
18 involved in later?

19 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:

20 We currently have our in-house training program that
21 recently expanded to cover the mobile sources in the past
22 year. And we have a series of new courses, including the
23 512 course, which is an overview of all the new diesel
24 regulations.

25 Companion to that is our community college

1 training program, longstanding California Council on
2 Diesel Education and Technology that's been in effect
3 since 1992. And we're expanding the scope of that
4 curriculum as well.

5 But in terms of, you know, having some
6 third-party certification, we haven't broached that yet.

7 But I encourage you and your members, as you
8 effectively do, to work with the Program staff and our
9 Compliance Assistance staff on these training issues, like
10 those of you in the construction industry and the program
11 staff, our the Mobile Source Control staff and Stationary
12 Source Control Division staff with the port truck rule is
13 there to help you with compliance as we are.

14 When it comes down to the actual enforcement,
15 that's where we have to come in. And we want to keep a
16 line there, a bright line, to know when this line is
17 crossed. We're going to take swift and effective
18 enforcement action.

19 MR. SCHRAP: I appreciate that again, and I won't
20 belabor this much longer.

21 I think that one point that you made especially
22 with the TRAC, the recent Truck Rule Advisory Committee, I
23 think it would be -- behoove staff to be involved in that,
24 someone from the Enforcement staff to be directly involved
25 with TRAC. I think it's important to hear some of the

1 issues that will be popping up. And especially the
2 enforcement of these on-road regulations is going to be
3 interesting, to say the least.

4 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:
5 We do have staff assigned to that. And I do sit on those
6 meetings to the extent I'm available. But I do have staff
7 assigned to that.

8 MR. SCHRAP: When I had mentioned that last time,
9 they were sort of chasing each other's tails and saying,
10 "Well, that's Enforcement's problem. They do their own
11 thing. We're our" -- so what have you.

12 And then also just we've been hearing a lot from
13 a lot of the border operators. I know you guys do a lot
14 of inspections down there. But especially on the Mexican
15 side, a lot of the operators are really thinking that
16 these regulations are not going to touch them at all
17 whatsoever. So I would encourage Enforcement staff to
18 make this known to them. We'd like to see a continuing of
19 the flow of goods. And it seems they might be a little
20 out of the loop as of late.

21 With that, that's all I have. Thank you for your
22 time.

23 MOBILE SOURCE ENFORCEMENT BRANCH CHIEF JACOBS:
24 Just real quick on the Mexican trucking issue, we do have
25 ongoing meetings with the Mexican Trucking Association.



1 And we host with the California Highway Patrol in the
2 border region these industry compliance days. And we
3 fully plan to continue those. And we'll continue our very
4 aggressive outreach efforts with our friends south of the
5 border.