



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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November 10, 2006

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

RE: AGENDA ITEM 06-10-5 – PROPOSED AMENDMENTS TO THE STATIONARY DIESEL ENGINE CONTROL MEASURE

The California Farm Bureau Federation would like to submit the following comments regarding the Stationary Diesel Engine ATCM. The agricultural community is willing to reduce air emissions from our farms and ranches when the reductions are meaningful and necessary; there is sufficient time to comply; and incentives are available to make the changes in a cost-effective manner. Unfortunately, the compliance schedule currently proposed does not provide adequate time for complete and measured implementation of this rule.

1. We request that an additional year (at minimum) be added to all compliance dates for meeting emission standards for stationary diesel-fueled engines used in agricultural operations. This is especially important for Tier 0 (pre-1996) engines, which according to the September 2006 staff report represents 3,600 (42%) of the total engines affected by this proposed rule. The report concludes that the average size of diesel agricultural pump engines is approximately 200 hp. This means the majority of these engines will need to be replaced by December 31, 2010.

ARB staff has indicated following their current schedule they plan on this rule being finalized in July 2007. To be eligible for the Carl Moyer Program there must be a full 3 years of reductions before the compliance date. The timeline proposed in this rule would only leave five months for outreach and application of Carl Moyer funding for Tier 0 engines. This is not a sufficient time period for growers to become aware of the program and apply for incentive funding from various state or federal programs, including the USDA Environmental Quality Incentives Program (EQIP) that can have a limited application window early in a given year.

2. CARB should provide local air districts with additional financial support to enable them to recover the cost of implementation, including outreach and compliance assistance and extend the registration deadline by a year. Many districts do not have available funding to properly implement this rule. If districts

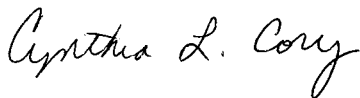
are not given adequate funding from CARB they will have to recover the many implementation costs by raising the registration and inspection costs which is not fair to the agricultural community that are bearing many new regulatory costs in a very short period of time since enactment of Senate Bill 700 (2004).

Without adequate funding they will not be able to do the outreach and compliance assistance that will be crucial to implement this rule. CFBF is very supportive of growers being able to use alternative fuels as a compliance method. How this will be put into practice needs to be available to the growers early in the process so they can weigh this option in deciding how to best comply with the engine rule. CFBF and other agricultural associations will be providing outreach to their members, but the state must step up to the plate and support outreach efforts if they are going to impose such a significant regulatory requirement on growers. Private entities and local air districts should not have to bear the entire burden of this new regulatory burden.

3. CARB needs to insure during their approval of district rules that discrepancies do not occur between local and state engine rules. It will be imperative that local districts do not set different engine standard criteria that could unintentionally allow a grower to purchase an older engine for a short period of time. Growers could purchase an older engine assuming they are in long-term compliance, only to have to replace the engine well before the useful life of the engine has occurred. The districts and state must be sending a consistent message to the agricultural community statewide so growers can make lasting and educated engine purchases.

Historically, agricultural engines have not been subject to local air district permitting or registration programs. This rule will have significant impact on agricultural community. CFBF asks that you take our points into consideration and make the suggested changes prior to rule approval.

Respectfully submitted by:



Cynthia L. Cory
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cc: Robert Fletcher, CARB
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