

El Rancho Español
de Cuyama

April 7, 2014



Spanish Ranch

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Mail: P.O. Box 1029
Santa Ynez, CA 93460
Physical: MM 47, Hwy 166
New Cuyama, CA 93254

Phone (805) 245-0434
Fax (805) 475-2813
doiron@spanishranch.net
www.spanishranch.net

Dear Chair Nichols,

I am writing to support for your staff's proposed revisions to the **Truck and Bus Regulation that would classify trucks that exclusively haul cattle as specialty farm vehicles**. The proposed provisions will ensure we ranchers have enough trucks to move our cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

We live in a rural area -- 37 miles from Santa Maria and over 50 miles from Bakersfield. Our livestock haulers typically travel far fewer miles annually compared to other truckers but exceed the mileage threshold for the agricultural provisions currently included in the rule. We move cattle in the spring and fall. Unfortunately, we California ranchers are already subject to a shortage of livestock haulers and depend on both in-state and out-of-state truck fleets to provide enough trucks to move livestock when it is necessary. It has become clear that the implementation of this rule has severely limited the number of truckers who are willing to continue to operate their vehicles in California, and has resulted in out-of-state haulers not wanting to operate in California any longer.

Our ability to break even at the end of any given fiscal year is subject to the whim of evolving market conditions, weather and rising input costs. The economic returns associated with cattle ranching are small, and the risk is huge. For example, this year has been especially devastating to beef producers as California enters the third year of the worst drought in our history. Many ranchers have already been forced to liquidate their herds due to the lack of feed and many others are struggling to survive by feeding hay that has doubled or even tripled in price.

Many livestock haulers and ranchers with trucks also are not eligible for funding under the Carl Moyer Program or Proposition 1B. Many of these vehicles do not travel through the "goods movement corridor" as required by Proposition 1B, and drive too few miles in mostly rural air districts, and are not competitive for funding under the cost formula generated for the Carl Moyer Program.

Unfortunately, some truckers have voiced their opposition to staff's proposed livestock provision. While it is very important to provide further forms of regulatory relief for those who have already spent the money to install particulate matter filters, this cannot be done solely at the expense of the proposed livestock provision. Bottom line: this provision helps alleviate the economic suffering that is currently taking place for many ranchers and is good for the overall health of California's beef cattle industry. It is strongly supported by both ranchers and livestock haulers throughout the state -- *including* many who have spent money to retrofit their trucks.

Please do not delay in supporting this important and critical provision as proposed by staff at your hearing on April 24, 2014.

Sincerely,


Pamela Doiron

El Rancho Español de Cuyama/The Spanish Ranch
P.O. Box 367
New Cuyama, CA 93254