



December 19, 2018

Submitted via electronic submittal: [www.arb.ca.gov/lispub/comm/bclist.php](http://www.arb.ca.gov/lispub/comm/bclist.php)

Ms. Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Proposed Amendments to the Heavy-Duty Vehicle Inspection Program and the Periodic Smoke Inspection Program**

Dear Ms. Nichols:

The signatories to this letter are writing to express support for the proposed amendments to the Heavy-Duty Vehicle Inspection Program (HDVIP) and the Periodic Smoke Inspection Program (PSIP). Our members rely on heavy duty diesel trucks and specialty vehicles to help plant, harvest, and transport agricultural products to market. Trucks used on California's farms and ranches are predominantly used during specific times of the year and then parked for the remainder of the year. We recognize the challenges California faces in meeting its air quality mandates. California's ever-increasing regulations to address the myriad environmental challenges continue to add costs to California farmers.

We submitted comments May 25, 2018 regarding the first set of amendments to the HDVIP and PSIP and requesting changes to the proposed amendments. We appreciate the changes that were made through this and the previous 15-Day Change Notice and support the removal of the requirement to report the annual PSIP opacity test results. Requiring reporting of the annual test results is unlikely to improve air quality, but it will add costs both to the reporting party and to the California Air Resources Board. We urge the adoption of the proposed 15-day changes.

We appreciate the opportunity to comment and the changes made in response to our earlier comments. Thank you for your consideration.

Sincerely,

Handwritten signature of Justin Oldfield in black ink.

Justin Oldfield  
California Cattlemen's Association

Handwritten signature of Noelle G. Cremers in black ink.

Noelle G. Cremers  
California Farm Bureau Federation