

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

Dear Chair Nichols,

As a California beef producer I am writing to voice my strong 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 ranchers have access to enough trucks to move their cattle by delaying retrofit and replacement requirements for dedicated livestock haulers until January 1, 2023.

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. The movement of cattle in California is generally seasonal, taking place in the spring and fall, and miles traveled by livestock haulers typically occur in rural areas. Unfortunately, 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 amount of truckers who are willing to continue to operate their vehicles in California and resulted in a complete disinterest by most out-of-state haulers 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. Ranching is not a job, but a lifestyle. The economic returns associated with cattle ranching are small, but 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, and for some varieties, tripled in price.

Many livestock haulers and ranchers with trucks are also 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 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,
Signature

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