

**California Cotton Ginners and Growers Associations
Nisei Farmers League
Western Agricultural Processors Association**

August 11, 2011

Mr. Robert Fletcher
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Comments on Mandatory Reporting 15-day Modifications

Dear Mr. Fletcher,

On behalf of the members of the above mentioned agricultural organizations, we appreciate the opportunity to submit comments on the Proposed Mandatory Reporting 15-day revisions. In reviewing the proposed language, we feel that the language does not fully align with the adopted language in Board Resolution 10-43 Attachment B. The resolution reads as it relates to agricultural irrigation pumps, *"Staff also proposes to add language to section 95101(f) excluding agricultural irrigation pumps from reporting, consistent with U.S. EPA."*

Section 95101(f) Exclusions, item (4) of the proposed modification states *"Portable equipment, including agricultural irrigation pumps, except where specifically required to report under 40 CFR Part 98 or this article"*. We believe that in order to be more accurate and consistent with the adopted resolution, the reference to agricultural irrigation pumps should be separated from the portable equipment exclusion. As it is currently written, it is not clear that stationary agricultural irrigation pumps and not just those that are "portable" are excluded. We propose that reference to agricultural irrigation pumps have a separate exclusion from the "portable equipment" exclusion to align with the Federal program and with the intent of the language in Resolution 10-43.

Thank you for the opportunity to comment on this matter and look forward to working with you on the revised language.

Sincerely,



California Cotton Ginners and Growers Associations
Nisei Farmers League
Western Agricultural Processors Association

cc: Lynn Terry, ARB
Edie Chang, ARB