



April 17, 2006

To: California Air Resources Board

Fm: Rob Neenan, Director of Regulatory Affairs

Re: **Proposed CARB Rule Regarding LSI Engines Greater than 25 Horsepower**

APR 18 2006

The California League of Food Processors (CLFP) is a statewide trade association that represents fruit and vegetable processors located in California. CLFP's members include canneries, freezer plants, dryers, and dehydrators. Most processors use forklifts to move products, packaging, equipment, or other materials. CLFP would like to request clarification regarding the California Air Resources Board's (CARB) proposed rule for new emissions standards for Large Spark Ignition (LSI) forklifts.

CLFP strongly supports the proposed alternative compliance option for agricultural activities. As noted in the draft proposal, many agricultural operations possess older forklifts and there are few options for retrofitting the equipment. Further, seasonal food processors and other agricultural operations are less able to afford substantial short-term investment in new equipment. An extended compliance period is necessary, but the proposed schedule will still ensure that agricultural operations are progressing towards significant reductions in emissions.

The draft rule proposes an alternative compliance option for LSI equipment owned by agricultural operations. The text indicates that "agricultural operations" be defined to include processors and dehydrators (page 13). The term "processors" may require additional clarification to avoid any confusion. CLFP suggests that CARB's define the category of processors and dehydrators to specifically include all canneries, freezer plants, juice manufacturers, and dryers. All of these operations involve basic processing of fruits and vegetables, analogous to the nut hullers, packinghouses, and cotton gins that are also included in the proposed rule as agricultural operations.

CLFP would also like to confirm that food processors with owned fleets of LSI forklifts will be eligible for any Carl Moyer funding made available for off-road equipment retrofits. Many processors operate 24 hours per day during the processing season and use a number of forklifts in their operations. As an intensive user of this type of equipment

food processors would benefit greatly from the Carl Moyer funding and the retrofits would contribute significantly to meeting emissions targets.

Finally, CLFP urges CARB to continue to work closely with the agricultural industry to identify the methods that will be used for establishing baseline inventory and compliance. CLFP looks forward to working with CARB staff to ensure the fair and efficient implementation of this rule.