WESTERN GROWERS™

Fresh produce from our families to yours.

December 15, 2010

The Honorable Mary Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Via-Electronic: http://www.arb.ca.gov/lispub/comm/bclist.php

RE: Comments of Western Growers Concerning Proposed Amendments to On- Road Truck and Bus Rule

The members of Western Growers thank you for the opportunity to comment on the California Air Resources Board's proposed amendments to the on-road truck and bus rule.

Western Growers is an agriculture trade association whose members grow, pack, and ship ninety percent of the fresh fruits, nuts and vegetables grown in California and seventy five percent of the fresh fruits, nuts and vegetable in Arizona. Our members produce roughly half the nation's fresh produce and are an important part of the larger specialty crop sector.

We would like to thank CARB staff for working with us to address some of our serious concerns with the proposed rule. We especially note improvements made to rule with respect to delayed implementation dates of the Best Available Control Schedule and the addition of "yard dogs" to the agricultural vehicle provisions.

At the same time, we must also repeat our concern that even with these changes, this rule will still cause significant negative economic impact to California farming operations by driving up costs associated with transportation of California fresh produce. This will only increase the regulatory cost advantage enjoyed by farmers in other states and nations.

Western Growers thanks you again for working with the agricultural industry and we look forward to working with you in the future. Should you have any questions regarding these comments, please do not hesitate to contact me at 916-446-1435 or via email at kmckechnie@wga.com.

Sincerely,

Kelly McKechnie

Kelly McKechnie
Government Affairs Analyst

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