

**CALIFORNIA ASSOCIATION OF WINEGRAPE GROWERS
CALIFORNIA CATTLEMEN'S ASSOCIATION
CALIFORNIA CITRUS MUTUAL
CALIFORNIA DAIRY CAMPAIGN
CALIFORNIA COTTON GINNERS AND GROWERS ASSOCIATION
CALIFORNIA FARM BUREAU FEDERATION
CALIFORNIA GRAPE AND TREE FRUIT LEAGUE
CALIFORNIA RICE COMMISSION
NISEI FARMERS LEAGUE
WESTERN AGRICULTURAL PROCESSORS ASSOCIATION**

September 23, 2010

The Honorable Mary Nichols
California Air Resources Board
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

**RE: Proposed Minor Amendment to the Periodic Smoke Inspection Program in
Response to the Inclusion of Diesel Vehicles in Smog Check**

Dear Chairwoman Nichols:

The following agricultural organizations are strongly opposed to the proposed amendments to align the Periodic Smoke Inspection Program ("PSIP") with the new diesel smog check requirements contained in AB 1488 (Mendoza) passed in 2007.

ARB has not done a sufficient effort to educate consumers about the existing PSIP, specifically farmers and ranchers. This was made clear from recent efforts conducted by the agricultural industry to inform farmers and ranchers about new smog check requirements for smaller diesel vehicles adopted by the passage of AB 1488. During this outreach process, we found that many farmers and ranchers had never heard of PSIP nor had ever been informed by ARB about the regulatory requirements under the PSIP in the past. For example, the most reputable and busiest smog testing facility in San Luis Obispo County was unaware of the PSIP requirement and did not know how to conduct a smoke opacity test.

Relative to the smog test program now mandated by AB 1488, your staff proposes a new amendment that would still require an emissions test for diesel cars and pickups between 6,000 - 14,000 GVWR and MY 1998 and newer every year by requiring a PSIP test during the off-year of the diesel smog check program. We find this to be a duplicative requirement and inconsistent with the smog test program for gasoline vehicles that suffices with a biennial smog check.

While the staff proposal states the PSIP test averages \$55 per test, this amount adds up quickly with several vehicles and does not include the time and effort it takes to actually get these tests done. Furthermore, we believe this is onerous and duplicative requirement does little to reduce emissions.

The 6/7/10 staff mail out (#MSO 2010-02) states that the synergistic effects of the PSIP and smog check test will provide “some nominal gaseous emissions benefits.” An effective outreach program of the existing PSIP program will garner far more than “nominal” benefits and far outweigh the emissions reductions, time and cost requiring the later model (cleaner) vehicles to do different smoke tests every year.

Therefore, we recommend that ARB instead eliminate the PSIP requirement for 1998 and newer diesel vehicles between 6,000 lbs and 14,000 lbs subject to the diesel smog check program. We believe our proposal will prevent a duplication of efforts, decrease unnecessary regulatory costs on businesses and increase emission reductions while maintaining the integrity and intent of both the PSIP and the smog check programs.

Thank you for your consideration of our comments.

cc: Linda Adams, Cal-EPA
Cindy Tuck, Cal-EPA
CARB Members