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October 22, 2007

Ms. Mary Nichols  
Chairwoman  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

***Subject: Board Agenda Item 07-10-4: Public Meeting to Consider the San Joaquin Valley PM10 Maintenance Plan***

Dear Chairwoman Nichols:

Western United Dairymen is California's largest dairy family trade association, representing approximately 1,100 families throughout the state. Our members, the majority of whom live and work in the San Joaquin Valley, proudly produce over 60% of the California milk supply.

We have reviewed the San Joaquin Valley PM10 Maintenance Plan, and believe that the plan has complied with the requirements of the Clean Air Act. We support the staff recommendation to the California Air Resources Board (CARB) to approve the San Joaquin Valley Unified Air Pollution Control District's (SJVAPCD) PM10 Maintenance Plan and forward it to EPA as an official amendment to the State Implementation Plan (SIP).

Western United Dairymen has actively worked with the District as rules relating to PM10 control were developed, particularly, Rule 4550, which is a landmark rule to reduce PM10 emissions from farming and livestock operations, including dairy farms, in the San Joaquin Valley. Rule 4550 implements a program of Conservation Management Practices (CMPs). We note that this rule alone is credited with reducing PM10 emissions by 34 tons per day. We worked closely with the District to develop the menu of CMPs available to our dairy farms, and believe we have a practical and efficient program in place, one that will allow the San Joaquin Valley to continue to maintain its PM10 attainment status.

It should also be noted that the District has not confined its rule-making to agricultural sources and has adopted effective and enforceable rules covering many other sources of PM10 in the valley. Additionally, we support the District in prioritizing the reduction of NOx emissions, as NOx is a primary factor in the formation of secondary wintertime PM. An expansion of NOx measures is expected as the District prepares its PM2.5 plan. This will further reduce PM10.

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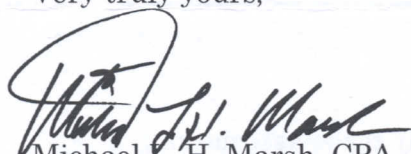
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We are aware of the fact that there were certain days where the 24-hour PM10 standard was exceeded. However, EPA has already found the 2004 event as a natural event, and is currently proposing to find the 2006 events as natural events. If these days are removed, as they should be, there has not been a single exceedence in the last three years.

Western United Dairymen appreciates the opportunity to comment on the PM10 Maintenance Plan. We respectfully urge the California Air Resources Board to support the staff recommendation and adopt the San Joaquin Valley PM10 Maintenance Plan, and subsequently forward it to EPA for adoption into the State Implementation Plan. Should you have any questions regarding our comments, please feel free to contact us at (209) 527-6453.

Very truly yours,



Michael L. H. Marsh, CPA  
Chief Executive Officer

MM/kmr

cc: Paul Martin

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