



TULARE COUNTY FARM BUREAU

Mission: to promote and enhance the viability of Tulare County agriculture.

October 22, 2007

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

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

Dear Chairwoman Nichols,

On behalf of the Tulare County Farm Bureau's 2,890 member families I would like to express our support for the proposed "Affirmation of Determination of Attainment for the San Joaquin Valley Non-attainment Area."

The San Joaquin Valley District has taken several actions in the past 15 years to reduce PM10 exceedances in the San Joaquin Valley. Several control measures to reduce directly emitted PM10 have been adopted by the District including all of the rules included in Regulation VIII – Control of Fugitive PM10, Rule 4901 - Wood Burning Fireplaces and Wood Burning Heaters, and Rule 4204 – Cotton Gins. In addition, the District has adopted several rules and regulations to reduce NOx, which contributes to the formation of secondary particulate. These rules include, but are not limited to, Rules 4701 and 4702 – Internal Combustion Engines, Rule 4703 – Stationary Gas Turbines, and Rules 4305, 4306, 4307 and 4308 – Boilers, Steam Generators and Process Heaters. In addition, the District has begun the implementation of the phase out of agricultural burning as set forth in District Rule 4103 – Open Burning. Lastly, the District adopted a far reaching rule to reduce PM10 from farming operations within the San Joaquin Valley. This effort, as contained in Rule 4550 – Conservation Management Practices, generated over 34 tons per day of PM10 reductions. We believe this rule to be the single most significant rule the District has adopted with regards to PM10. The adoption of these rules and regulations has greatly reduced emissions of PM10. As a result, the District has now enjoyed four years without exceedances of the Federal PM10 standard.

It should also be noted that a very large voluntary effort to reduce fugitive dust has been undertaken in the San Joaquin Valley through the USDA Natural Resources Conservation Service (USDA NRCS) and the implementation of their Environmental Quality Incentive Program (EQIP). Through the EQIP program, growers in the San Joaquin Valley have received cost share dollars to oil unpaved roads, implement conservation tillage and perform chipping of agricultural prunings instead of burning. From the period of 1998 to 2006, EQIP funding was used to oil over 1800 miles of unpaved roads, resulting in emissions reductions of over 6,086 tons of PM10 per year. In addition, EQIP is providing some cost sharing dollars for implementation of conservation tillage. EQIP is now covering almost 80,000 acres generating over 1,700 tons per year of PM10 emission reductions from the implementation of conservation tillage. These substantial reductions have greatly contributed to the District's success in achieving attainment of the Federal PM10 standard.

In addition to the substantial reductions generated by the above actions, the District has implemented a strict fireplace burning rule, which has had a tremendous impact on reducing PM10 emissions in the San Joaquin Valley, especially during the winter time. According to a report from the California Regional Particulate Matter Air Quality Study (CRPMAQS), "The vegetative burning contribution profile exhibited, not surprisingly, peaks in the evening samples at the urban sites, corresponding to domestic fireplace usage."

It is also noteworthy that the District has begun preparation on its PM2.5 plan, which will focus on additional NOx reductions. NOx is a key component in the formation of ammonium nitrate, which is a "predominant component of PM mass" in the wintertime formation of PM in the San Joaquin Valley. With the additional NOx measures included into the PM2.5 plan, PM10 will continue to be reduced in the San Joaquin Valley. Furthermore, the ARB is also undertaking substantial rulemaking to reduce NOx from three major source categories, including on-road heavy and medium heavy duty trucks, off-road equipment, and farm equipment. The implementation of these rules will generate substantial reductions in NOx and correspondingly, substantial reductions in PM10 and PM2.5.

Based upon the comments provided here, we respectfully urge the California Air Resources Board to affirm staff's recommendation to adopt the San Joaquin Valley PM10 Maintenance Plan, and forward to EPA for adoption into the State Implementation Plan. We thank the ARB for the opportunity to provide comments on the Board's consideration of the plan.

Sincerely,



Keith Watkins, President
Tulare County Farm Bureau