



Allied Grape Growers

A California Wine Grape Growers Cooperative Serving California

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October 23, 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,

As President of Allied Grape Growers, a California winegrape marketing association representing over 500 members throughout California since 1951 through the effective and equitable marketing of their grapes, I wish to express our support for adoption of the San Joaquin Valley PM10 Maintenance Plan. Allied Grape Growers agrees with ARB staff that through the adoption of enforceable rules and regulations, the San Joaquin Valley has met all applicable requirements of the Federal Clean Air Act. Therefore, we respectfully urge the California Air Resources Board (CARB) to approve the San Joaquin Valleys PM10 Maintenance Plan and forward such to EPA as an official amendment to the State Implementation Plan (SIP).

The San Joaquin Valley District has taken several actions in the past 15 years to reduce PM10 with in the San Joaquin Valley. Several control measures to reduce directly emitted PM10 have been adopted by the District including all of the rules in Regulation VIII – Control of Fugitive PM10. In addition, the District has adopted several rules and regulations to reduce NOx, which contributes to the formation of secondary particulate. Also, 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 exceeding 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 pruning' instead of burning. In addition to the substantial reductions generated by these 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. It is also noteworthy that the District has begun preparation on its PM2.5 plan, which will focus on additional NOx reductions.

In summery, 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. Thank you and if you have any questions regarding our comments, please feel free to call my office at (559) 276-7021.

Sincerely,

Nat DiBuduo
President CEO

ORIGINAL:

Copies:

Board Clerk
Executive Officer
Chair