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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 07-14-4: Public Meeting to Consider the San Joaquin Valley PM10 Maintenance Plan

Dear Chairwoman Nichols:

On behalf of the California Grape & Tree Fruit League, a public policy agricultural trade association representing the approximate two billion dollar California table grape and deciduous tree fruit communities, we are writing to express our support for adoption of the San Joaquin Valley PM10 Maintenance Plan. We urge the California Air Resources Board (CARB) to approve the San Joaquin Valley's PM10 Maintenance Plan and forward it to the Environmental Protection Agency (EPA) as an official amendment to the State Implementation Plan (SIP).

The approval of the PM10 Maintenance Plan is critically important to the San Joaquin Valley because of the investment made by residents and businesses. Before the Valley could demonstrate attainment of the 24-Hour PM10 standard many changes were made from what used to be standard practices. These changes were initiated through rule adoption by the San Joaquin Valley Air Pollution Control District (SJVAPCD). Agriculture Improving Resources (A.I.R.), a coalition of agricultural and governmental agencies, was formed for the sole purpose of working to educate farmers and ranchers about air quality issues. This group devoted hundreds of hours in outreach efforts for such rules as the SJVAPCD Rule 4550: Conservation Management Practices, Rule 4103: Open Burning, Rule 4701 and 4701: Internal Combustion Engines, to name a few.

One of the most impressive changes made in the Valley was the implementation of Rule 4550, which resulted in PM10 reductions of more than 34 tons per day. This reduction was achieved with the adoption of more than 6,400 Conservation Management Practice plans representing 3.2 million acres of productive agricultural land, according to the SJVAPCD's 2006 Report Card.

We respectfully urge CARB to affirm the staff's recommendation to adopt the San Joaquin Valley PM10 Maintenance Plan and forward to EPA for adoption into the SIP. Thank you for the opportunity to comment regarding the Board's consideration of the plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Kirkland".

Gabrielle Kirkland
Director, Environmental and Regulatory Affairs

C: Members of California Air Resources Board
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