

Darlene Din  
08-11-3

## **The Impact of Rising Food Prices on Low-Income Families in California –**

### **A Framework for the Federal and State Response**

Testimony before the California State Assembly

by

H. Eric Schockman, Ph.D.

President

MAZON: A Jewish Response to Hunger

May 15, 2008

I appreciate the opportunity to talk this morning about the impact on low-income Californians of rapidly rising food costs in the context of the current economic downturn. In particular, I'm going to: describe the situation; describe what the federal government is and is not doing; and talk broadly about some steps our state should take, although I will leave it to the experts who follow to give you specifics.

First, it's important to note that for millions of Californians, the rising food prices and the recession we are seeing unfortunately do not come as a sudden change in fortune. Instead, they come as an exacerbation of an already difficult situation. Millions of people in our state, even before these events, were suffering from low and stagnant wages, inadequate employer health coverage and other benefits, and inadequate and often shrinking public supports. As a result, many of them were suffering real hardship even in the better times for the economy as a whole – at least better times as measured by GDP.

One important form of this hardship has been food insecurity. The Census Bureau and U.S. Department of Agriculture tell us that, before these most recent economic troubles began, in 2006, 10.9 percent of households in this country, with 35.5 million people in them, were "food insecure." And families with children were even more likely to be food insecure.

And the situation in California was hardly any better. Over the three year period of 2004-2006 (because of sample sizes, the federal government uses three year spans for state food insecurity data), an average of 10.9 percent of California households were food insecure. This almost certainly means that considerably more than 10.9 percent of people in the state were in food insecure households, because families with children – and larger households generally – are more likely to be food insecure. While USDA doesn't tell us how many people were in those 10.9 percent of California households, if we make the reasonable assumption that the distribution in California looks like the distribution nationwide, then about 4.2 million Californians (11.8 percent of our population) were living in food insecure households.

And that's before the economy took a turn for the worse.

"Food insecurity" is a bland phrase. What it means in real life is that the households, because of shortages of resources, are running out of food during the month, or parents are skipping meals so children can have enough to eat, or the family can't purchase a minimally adequate, balanced and healthy diet. These families are struggling with hunger.

more. Food stamps and other supports don't reach all people in need – far from it. The most recent data (from 2005) indicate that only about 65 percent of eligible people receive food stamps nationally. And millions more people in need aren't even eligible because of various limitations built into the federal program. They include (without going into the details of the rules) many adult legal immigrants, many childless, unemployed adults, and many people with very low incomes but small IRAs or bank accounts that make them ineligible. So tens of millions of lower-income people are in households that don't even have food stamps as a crucial, if only partial, buffer against hunger and food inflation. Summer food, school breakfast, senior nutrition programs and others reach even smaller proportions of those who are eligible.

And that brings me to California. Because, regardless of what help the federal government may or may not provide in the weeks ahead in the nutrition programs, it pales in comparison to the help that California can provide itself.

I've discussed the fact that USDA says that only 65 percent of eligible people actually received food stamps in the latest study. But California does worse. That same study said only 50 percent of eligible Californians get food stamps. That ranked California 49th in the nation (among the 50 states plus D.C.) – third from the bottom. (Among our big cities, by the way, San Diego's performance is particularly appalling, ranking worst in one study of 24 urban areas across the country.)

When it came to the sub-group of working poor families, California did even worse in the USDA study. Nationally, only 57 percent of eligible people in working families got food stamps. In California it was 34 percent. California ranked 50th in the nation on this measure. The good news is we beat out Colorado. The bad news is we were beaten by every other state plus D.C.

If, in the year of these data, California had only reached the national average (65 percent participation), an additional nearly 1 ¼ million people in our state would have gotten food stamps, bringing well over \$1 billion/year in federal funds. If we had done as well as our nearest neighbor, Oregon (86 percent), nearly 3 million additional people in California would have gotten benefits, providing them more than \$3 billion/year in federal food stamp help. By comparison, the Farm Bill, as important as it is, would, according to the Center on Budget and Policy Priorities, will bring California \$35 million in additional federal nutrition funds in FY 2009 and \$589 million over the next 10 years. We can't afford to forego \$3 billion – or \$1 billion – in available federal funds because of our own inaction.

And it's not just food stamps. According to the Food Research and Action Center data, California ranks 35th in the country in reaching low-income students with school breakfast. Nationally, states reached 45.3 children with free and reduced-price breakfast for every 100 they reached with lunch in the 2006-2007 school year. In California it was 40.7 per 100. If California were doing as well as the best performing states, more than 400,000 additional low-income children would be getting school breakfast every day.

So, low-income Californians are suffering terribly from the state's under-performance. But this is doubly self-destructive because these programs are essentially 100 percent federally-funded.

**December 11, 2008**

**To: Members of the California Air Resources Board**

**From: Central Coast Agricultural Associations  
and Independent Farming and Ranching Operations**

**Topic: Proposed In-Use, On-Road Diesel Truck and Bus Rule**

**President**  
**Scott Violini**  
Monterey County  
Cattlemen's  
Association

**Vice President**  
**Celeste Settrini**  
Monterey County  
Cattlemen's  
Association

**Secretary/Treasurer**  
**Thomas Rider**  
Santa Cruz County  
Farm Bureau

**Jason Smith**  
Monterey Vintners and  
Growers Association

**Jennifer Clark**  
CAPCA  
Monterey Bay Chapter

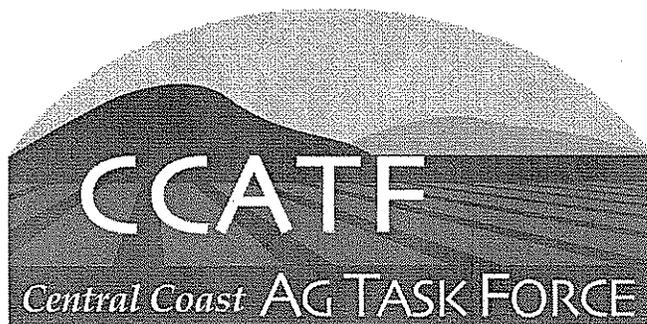
**Kay Filice**  
Grower Shipper  
Association of Central  
California

**Bill Hammond**  
Monterey County Farm  
Bureau

**George Bonacich**  
San Benito County  
Farm Bureau

**Joe Morris**  
San Benito County  
Cattlemen's  
Association

**Colby Willoughby**  
California Women for  
Agriculture, Salinas  
Valley Chapter



141 Monte Vista Ave, Watsonville, Ca 95076 (831) 682-0734

December 3, 2008

Mary D. Nichols, Chairperson  
California Air Resources Board  
Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Reference: Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles.

To Ms Nichols and Board Members:

I am writing on behalf of the Central Coast Ag Task Force (CCATF), a coalition of ten agricultural organizations: California Association of Pest Control Advisors; California Women for Agriculture (Salinas Valley Chapter); Grower-Shipper Association of Central California, Monterey County Cattlemen; Monterey County CattleWomen; Monterey County Farm Bureau; Monterey County Vintners and Growers; San Benito County Cattlemen; San Benito County Farm Bureau; and Santa Cruz County Farm Bureau.

Our members view these proposed regulations as a potentially major change in rules regarding transportation. We want to thank your staff for travelling to the Central Coast for a workshop with farmers and ranchers and providing an opportunity for questions and answers about this proposed regulation. We greatly appreciate Tony Brasil's responsiveness to our request for that workshop.

It is important to note that the farmers and ranchers of the Central Coast are located in an air basin that does not exceed emission standards for oxides of nitrogen (NOx) though we would be subject to a statewide standard under this proposed regulation.

-Page Two-

**President**

**Scott Violini**  
Monterey County  
Cattlemen's  
Association

Our farming and ranching families want clean air for the state of California and are willing to participate in programs that provide flexibility that allow us to meet the standards and fulfill our role as responsible citizens.

**Vice President**

**Celeste Settrini**  
Monterey County  
Cattlewomen's  
Association

We appreciate that the Air Resources Board (ARB) does recognize the importance of agricultural vehicles and the functions they perform. We strongly encourage you to increase the mileage thresholds for vehicles 1995 and older in the final rule. You have provided extra time for compliance for agricultural vehicles that operate below specific mileage thresholds. But the proposed thresholds are not going to help us keep our carefully maintained, older vehicles that we actually use for day to day farming activities. Without more miles these agricultural vehicles will become unusable and make it impossible for smaller, family-based farming operations to keep going.

**Secretary/Treasurer**

**Thomas Rider**  
Santa Cruz County  
Farm Bureau

**Jason Smith**

Monterey Vintners and  
Growers Association

An irony that must be pointed out is that so many people say they would prefer to buy their food from the small, local farmer. Unlike almost all other industries, farmers and ranchers can never pass on increased costs to their customers. Regulations like this one, supported by well-meaning but unaware folks, will get rid of small farmers faster than any corporate take-over.

**Jennifer Clark**

CAPCA  
Monterey Bay Chapter

Ultimately, the requirement for particulate matter (PM) traps is a no-win situation for more than just agricultural vehicles in California, a no-win for businesses and jobs, and a no-win toward a cleaner, safer environment, here's why.

**Kay Filice**

Farmer Shipper  
Association of Central  
California

**Bill Hammond**

Monterey County Farm  
Bureau

PM traps will cause our engines to burn more diesel fuel rather than less. With PM traps, our engines will burn hotter and less safely. This is not a good scenario for trucks performing jobs in and around farm fields and near potentially flammable materials such as crops and other vegetation. Who will be liable when an ARB-required and ARB-verified PM trap causes a fire and harms life and property?

**George Bonacich**

San Benito County  
Farm Bureau

**Joe Morris**

San Benito County  
Cattlemen's  
Association

Most of the vehicles that this proposal would require to have a PM trap could not be sold for as much as the cost of the PM trap itself - \$12,000 to 20,000 for each vehicle! With reduced fuel economy and higher maintenance costs with a PM trap than without, are we really doing California any favors? It just doesn't make sense for independent operators and it doesn't make sense for California. Public assistance funds are appreciated, but will be in high demand throughout the state especially in these hard economic times.

**Colby Willoughby**

California Women for  
Agriculture, Salinas  
Valley Chapter

We ask that you not require us to add an expensive PM trap onto an older, but well-maintained vehicle and then also require us to purchase a 2010 vehicle to meet the NOx standards. We ask that you fund research into the use of bio-fuels and come up with a way to encourage their use that actually addresses the air quality issues of concern.

-Page Three-

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California Women for  
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Valley Chapter

This is clearly not a request to obtain an exemption from regulation but rather the flexibility that will help us all do our part in this state. 1 A Biodiesel blend reduces particulate matter emissions by as much as 18% and overall tailpipe emissions by 45%. (Source: EPA and US Dept of Energy studies & National Biodiesel Board)

We appreciate that ARB staff and Board have recognized that agricultural vehicles allow farming to take place in California. We hope that California consumers will take the time to understand how their food is safely brought to market.

Delivery of farming inputs: including these vehicles under the agricultural vehicle provision is critically important to ensure the safe and efficient transport of these inputs. Rather than hundreds of individual farmers driving to a central location to pick up their fertilizers, compost, and crop protection products, quantities of these inputs are brought to a farming region and local distributors make more efficient trips to deliver to multiple farmers. These distributors are licensed and trained in the safe transport of these inputs.

Transport of harvest farm produce to the first point of process: packing sheds, coolers, and processing plants are the first points to which harvested produce is delivered from the field. In Central Coast, as in many of our farming areas statewide, these points of process are most often located in less populated areas and have more than one entry/exit point spreading out the movement or emissions from these trucks.

Finally, we do not understand why the CA Air Resources Board is being asked by its staff to over-reach the requirements of the U.S. Environmental Protection Agency. We are concerned for the California economy if the businesses that support our communities are pushed too hard, too fast. We are also concerned that this Board could be left open to valid challenges.

We encourage you to use a phased-in approach treating diesel engines the same way California treated cars. That is, only require vehicles to meet the standards in effect the year of manufacture. A phased-in approach will lead all Californians toward cleaner engines in just a few years more than with this proposed regulation.

As it is now written, this proposed regulation:

- will not reduce diesel fuel use
- will not make our environment safer and cleaner
- will jeopardize small businesses that depend on a few vehicles
- will be unfriendly to independent operators, and
- will cost California jobs and money.

-Page Four-

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California Women for  
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Valley Chapter

In closing, this rule will affect our businesses through inter-state trade, the movement of trucks to different farming areas such as the State of Arizona, without a clear detailed economic review by the State of California. The State of California has many "single" focused regulations that are reviewed one rule at a time by the State Air Board, State Water Board and many other regulatory bodies, each of those rules are reviewed in a "vacuum" without regard to the many other conflicting regulations adopted. We see this transportation rule if adopted to be a negative factor in the future for economic recovery of the State. We request that this rule is not adopted as written and submitted by Staff; the cost is too great with very little return to clean air and the goals of the rule.

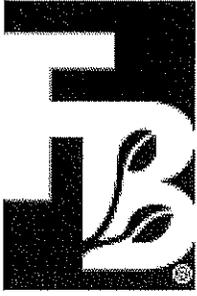
Thank you for the opportunity to comment on this proposed regulation.

Sincerely,

**Scott Violini**  
President of the Board

**Dorene D'Adamo**, Chair, Agricultural Advisory Committee, CA Air Resources Board

**Jeff Denham**, California State Senator  
**Abel Maldonado**, California State Senator  
**Bill Monning**, California Assemblymember  
**Ana Caballero**, California Assemblymember  
**Ed Kendig**, Interim APCO, Monterey Bay Air Pollution Control District  
**Simone Salinas**, Director MBAPCD and Monterey County Supervisor  
**Lou Calcagno**, Director MBAPCD and Monterey County Supervisor  
**Fernando Armenta**, Director MBAPCD and Monterey County Supervisor  
**Reb Monaco**, MBAPCD and Chair San Benito County  
**Ellen Pirie**, MBAPCD and Santa Cruz County  
**Tony Campos**, MBAPCD and Santa Cruz County



Monterey County Farm Bureau  
Mailing address: P. O. Box 1449 Salinas, California 93902  
*Street address: 931 Blanco Circle Salinas, California 93901*  
Telephone (831) 751-3100 Fax (831) 751-3167  
*traci@montereycfb.com*  
[www.montereycfb.com](http://www.montereycfb.com)

November 20, 2008

Clerk of the Board  
Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Reference:** Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles.

To Whom It May Concern:

First, we want to thank your staff for travelling to the Central Coast for a workshop with farmers and ranchers and providing an opportunity for questions and answers about this proposed regulation. We greatly appreciate Tony Brasil's responsiveness to our request for that workshop.

It is important to note that the farmers and ranchers of Monterey County are located in an air basin that does not exceed emission standards for oxides of nitrogen (NOx) though we would be subject to a statewide standard under this proposed regulation. Monterey County Farm Bureau represents farmers and ranchers in the fourth most productive farming county in the nation.

Our farming and ranching families want clean air for the state of California and are willing to participate in programs that provide flexibility that allow us to meet the standards and fulfill our role as responsible citizens.

We appreciate that the Air Resources Board (ARB) does recognize the importance of agricultural vehicles and the functions they perform. We strongly encourage you to increase the mileage thresholds for vehicles 1995 and older in the final rule. You have provided extra time for compliance for agricultural vehicles that operate below specific mileage thresholds. But the proposed thresholds are not going to help us keep our carefully maintained, older vehicles that we actually use for day to day farming activities. Without more miles these agricultural vehicles will become unusable and make it impossible for smaller, family-based farming operations to keep going.

An irony that must be pointed out is that so many people say they would prefer to buy their food from the small, local farmer. Unlike almost all other industries, farmers and ranchers can never pass on increased costs to their customers. Regulations like this one, supported by well-meaning but unaware folks, will get rid of small farmers faster than any corporate take-over.

Ultimately, the requirement for particulate matter (PM) traps is a no-win situation for more than just agricultural vehicles in California, a no-win for businesses and jobs, and a no-win toward a cleaner, safer environment, here's why.

PM traps will cause our engines to burn more diesel fuel rather than less. With PM traps, our engines will burn hotter and less safely. This is not a good scenario for trucks performing jobs in and around farm fields and near potentially flammable materials such as crops and other vegetation. Who will be liable when an ARB-required and ARB-verified PM trap causes a fire and harms life and property?

Most of the vehicles that this proposal would require to have a PM trap could not be sold for as much as the cost of the PM trap itself - \$12,000 to 20,000 for each vehicle! With reduced fuel economy and higher maintenance costs with a PM trap than without, are we really doing California any favors? It just doesn't make sense for independent operators and it doesn't make sense for California. Public assistance funds are appreciated, but will be in high demand throughout the state especially in these hard economic times.

We ask that you not require us to add an expensive PM trap onto an older, but well-maintained vehicle and then **also** require us to purchase a 2010 vehicle to meet the NOx standards. We ask that you fund research into the use of bio-fuels and come up with a way to encourage their use that actually addresses the air quality issues of concern<sup>1</sup>. This is clearly not a request to obtain an exemption from regulation but rather the flexibility that will help us all do our part in this state.  
<sup>1</sup> *A Biodiesel blend reduces particulate matter emissions by as much as 18% and overall tailpipe emissions by 45%. (Source: EPA and US Dept of Energy studies & National Biodiesel Board)*

We appreciate that ARB staff and Board have recognized that agricultural vehicles allow farming to take place in California. We hope that California consumers will take the time to understand how their food is safely brought to market.

- ❖ Delivery of farming inputs: including these vehicles under the agricultural vehicle provision is critically important to ensure the safe and efficient transport of these inputs. Rather than hundreds of individual farmers driving to a central location to pick up their fertilizers, compost, and crop protection products, quantities of these inputs are brought to a farming region and local distributors make more efficient trips to deliver to multiple farmers. These distributors are licensed and trained in the safe transport of these inputs.
- ❖ Transport of harvest farm produce to the first point of process: packing sheds, coolers, and processing plants are the first points to which harvested produce is delivered from the field. In Monterey County, as in many of our farming areas statewide, these points of process are most often located in less populated areas and have more than one entry/exit point spreading out the movement or emissions from these trucks.

Finally, we do not understand why the CA Air Resources Board is being asked by its staff to over-reach the requirements of the U.S. Environmental Protection Agency. We are concerned for the California economy if the businesses that support our communities are pushed too hard, too fast. We are also concerned that this Board could be left open to valid challenges.

We encourage you to use a phased-in approach treating diesel engines the same way California treated cars. That is, only require vehicles to meet the standards in effect the year of manufacture. A phased-in approach will lead all Californians toward cleaner engines in just a few years more than with this proposed regulation. As it is now written, this proposed regulation :

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- will jeopardize small businesses that depend on a few vehicles

- will be unfriendly to independent operators, and
- will cost California jobs and money.

Who can afford that?

Thank you for the opportunity to comment on this proposed regulation.

Sincerely,

The undersigned:

<b><u>Name</u></b>	<b><u>Company Name</u></b>
Kay Filice	Filice Farms, Hollister
Louie Manzoni	Louie Manzoni Farms, Inc.
Scott Anthony	Scott Anthony Ranches
Chris Bunn	Crown Packing
Russ Cauley	Lonoak Farms
Jennifer Clarke	Christensen & Giannini
Pat Collins	Dole Fresh Vegetables
April England-Mackie	Martin Jefferson & Sons
Miguel Errea	Miguel Family Ranch
George Fontes	
Dirk Giannini	Christensen & Giannini
Bill Hammond	Vineyards of Monterey
Kent Hibino	Henry Hibino Farms, LLC
Benny Jefferson	Martin Jefferson & Sons
Ross Jenson	Jensen Farms
David Kegebein	KB Farms
Bob Martin	Rio Farms
Peter Odello	Higashi Farms, Inc.
Al Oliveira	G.O. Farming / Basport
Matt Panziera	Royal Packing Company
Jeff Pereira	King City Nursery; Mayor of King City
Kevin Piearcy	Industrial Pump Shop, Inc.
Matt Plymale	Tanimura & Antle
Tom Rianda	Rianda Farms
Brad Rice	Salinas Land Company
Jason Smith	Paraiso Vineyard; Valley Farm Management
Scott Storm	
Steve Storm	Duda California, Farm Fresh Foods
Gary Tanimura	Tanimura & Antle
Bill Tarp	Triangle Farms, Inc.
Colby Willoughby	Costa Family Farms, Inc.

CC:

Mary Nichols, Chair, CA Air Resources Board

Dorene D'Adamo, Chair, Agricultural Advisory Committee, CA Air Resources Board

Jeff Denham, State Senator

Abel Maldonado, State Senator

Bill Monning, California Assemblymember

Ana Caballero, California Assemblymember

Cynthia Cory, Director of Environmental Affairs, Govt Affairs Division, California Farm Bureau Federation

Ed Kendig, Interim APCO, Monterey Bay Air Pollution Control District

Simone Salinas, Director MBAPCD and County Supervisor

Lou Calcagno, Director MBAPCD and County Supervisor

Fernando Armenta, Director MBAPCD and County Supervisor

Mike Sewell, Air Quality Engineer, Monterey Bay Air Pollution Control District

Lance Ericksen, Air Quality Engineer, Monterey Bay Air Pollution Control District

Nick Papadakis, Executive Director, Association of Monterey Bay Area Governments



# Monterey County Farm Bureau

Mailing address: P. O. Box 1449 Salinas, California 93902

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[www.montereycfb.com](http://www.montereycfb.com)

July 28, 2008

Erik White, Chief  
Heavy-Duty Diesel In-Use Strategies Branch  
California Air Resources Board  
Headquarters Building  
1001 "I" Street / P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. White,

This letter is to offer a viable alternative to your draft Statewide Diesel Truck and Bus Regulation. We believe our proposal will effectively achieve and maintain clean air in California.

Monterey County Farm Bureau represents farmers and ranchers producing 3.8 billion dollars in farm gate value for the state of California here in the fourth most productive farming county in the nation.

Our farming and ranching families want clean air for the state of California and are willing to participate in programs that take practical steps to improve and maintain good air quality for our families and neighbors. However, we are extremely concerned about the cumulative economic impacts of this diesel truck and bus rule combined with the on-farm diesel equipment rule the Air Resources Board (ARB) intends to propose next year. Although they generate a relatively small portion of emissions, many of our farming and ranching families could face going out of business with these two rules in place.

To achieve clean air without overly burdensome regulations on people who own their own businesses, we propose the following:

- ❖ The new rule should be directed at engine manufacturers and require that new engines, or significantly rebuilt engines, meet the PM and NOx standard you specify; and
- ❖ Engines currently in use must meet, and continue to meet, the emissions standard that was in effect at their date of their manufacture.

Our proposal makes practical sense and is in line with the logic of the vehicle emission standard (or SMOG-check) that we are all subject to. An owner/operator is not a manufacturer and should not be the party required to upgrade or replace an engine that was in full compliance when purchased. Requiring the engine owner/operator to continually upgrade rather than the industry that makes the engines is not practical and can be likened to giving us all traffic tickets for past violations of a new speed limit.

Our proposal would address the many other concerns we and others have regarding the current draft rule's ability to safely and effectively achieve clean air. Some of these are listed below.

We are concerned that the solution you have chosen, PM filters, could actually cause our engines to run less efficiently, possibly malfunction, and burn hotter and more dangerously for off-road agricultural use. Before the ARB finalizes this rule, we ask that more information be developed and made available about the fuel efficiency and safety of an engine retro-fit with a PM filter. Such information should be compatible with your needs as well.

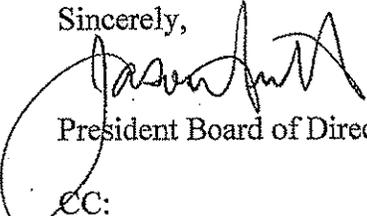
The current draft rule disproportionately harms lower resource owner/operators such as many of our farmers, ranchers, and other independent business people. Some of our members own only one truck and would not be able to take advantage of fleet averaging. There are also some without their own trucks who hire in-state and interstate trucking firms to transport their goods. The current rule makes the one hiring the truck responsible for the compliance of the hired trucking firm. This seems not only unfair but extremely difficult to administer such requirements across both in-state and out-of-state trucks without a practical way for the person hiring a trucking firm to ensure that firm is in full compliance.

We would appreciate the scheduling of a workshop on the Central Coast so that the many, many businesses that will be affected by this rule can have an opportunity to understand the proposed rule and how it will affect them. Our office is available to assist in arranging for such a hearing in the August - September time frame.

Please contact our office at: 831-751-3100 to discuss these issues further and to arrange for a workshop on the Central Coast.

Thank you for allowing us to provide you with these comments.

Sincerely,



President Board of Directors

cc:

Mary Nichols, Chair, CA Air Resources Board  
Dorene D'Adamo, Chair, Agricultural Advisory Committee, CA Air Resources Board  
Jeff Denham, U.S. Senate  
Abel Maldonado, U.S. Senate  
John Laird, California Assemblymember  
Ana Caballero, California Assemblymember  
Cynthia Cory, Director of Environmental Affairs, Govt Affairs Division, California Farm Bureau Federation  
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Mike Sewell, Air Quality Engineer, Monterey Bay Air Pollution Control District  
Lance Ericksen, Air Quality Engineer, Monterey Bay Air Pollution Control District  
Nick Papadakis, Executive Director, Association of Monterey Bay Area Governments

December 1, 2008

Clerk of the Board  
Air Resources Board  
1001 "T" Street  
Sacramento, Ca. 95814

Reference: Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles.

To Whom It May Concern,

I am concerned as to what these new air rules in regards to diesel truck emissions will have on the economy of California, the County of Monterey and my family business. My families Beef Cattle operation relies on large trucks to move our commodity when sold. We do not have any slaughter or feedlot facilities within the local area so everything must be move out of County and generally out of State. Will we be liable for hiring a truck that does not meet your standards? Livestock trucks are difficult to hire, there are very few around this area, so we maintain a Semi-truck for our own use.

This vehicle currently meets the air standards at time of manufacture in 1999. To upgrade this engine with special apparatus would not be economically feasible for our operation. Fortunately, I am in an attainment area. The problem lies when we ship our cattle to Northern California to another attainment area. We must past thru a non-attainment area; this has not been addressed by the Air Board. One attainment area to another within the mileage parameters set forth in the rule.

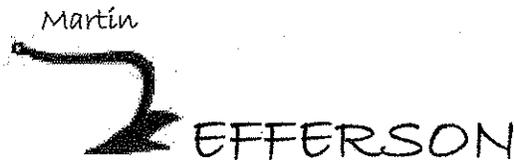
I have read the proposed rules and for-see the future demise of productivity in California. I appreciate the effort made by Air Resource Board recognizing the importance of agricultural vehicles and the functions they perform.

I have a difficult time knowing that a GPS unit, or any other tracking device, will be attached to any vehicle allowing the government to know every move we make as a private citizen. I believe at one time under the PUC, before it was deregulated, that truck operators were required to turn in certain forms stating their mileage in the state.

Realizing that things change and that there are a lot of vehicles that do need to come off the road, I have yet to see any rule that addresses Smog or Smoke tests. This test may determine that, so called out of date, engines do comply with the standards set forth by the Air Board.

In closing, I foresee the economy of California to be severely shaken by the loss of available truck transportation. I also in fear of large corporate trucking companies taking advantage of the family business through un-fair transportation charges.

Regards,  
Aunt Violini



JEFFERSON  
& SONS

P.O. Box 56  
Castroville, CA 95012

December 3, 2008

Clerk of the Board  
Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Reference:** Proposed Regulation to Reduce Emissions from In-Use On-Road Diesel Vehicles

To Whom It May Concern:

I was advised by some of our local membership organizations that as a farmer I should attend one of the air board's "workshops". I traveled from Salinas to San Jose to attend a workshop and quickly realized that the verbiage "workshop" was used very loosely; there was no "work" or input involved in this process that would actually accomplish any changes in the proposed regulation. It became evident a broader group from the agriculture industry needed to become aware of these burdensome regulations and that many farmers and ranchers on the Central Coast had little to no knowledge of this issue. At the meeting in San Jose representatives from the Central Coast Ag Task Force, the Monterey County Farm Bureau and I requested that a "workshop" be held in San Benito County, a centralized location for Central Coast farmers and ranchers. I would like to thank Tony Brasil for his responsiveness to our request for conducting the "workshop" and thank the Board for supporting his travels to the Central Coast. This event greatly opened the eyes of our industry and further proved that the rumors regarding these burdensome regulations were true.

It is important to note that the farmers and ranchers of Monterey County are located in an air basin that does not exceed emission standards for oxides of nitrogen (NOx) though we would be subject to a statewide standard under this proposed regulation. As a board member of the Monterey County Farm Bureau, I take pride in representing farmers and ranchers from our area who provide such a vast amount of food for the world. In fact, Monterey County is the fourth most productive farming county in the **nation**.

Martin Jefferson and Sons is a family farming operation that prides ourselves on sustaining agriculture for ourselves and future generations. This is evident in the fact that our family business has been farming the same ground in the Salinas Valley since 1862 and is being managed by both the fifth and sixth generation of Jeffersons. Without maintaining and improving management in our operation, we would cease to exist. We are only one example of a dwindling number of family farmers who have managed to hang on by our coat tails. The success of an agriculture business fully depends on maintaining our environment; water, air, soil, etc. We currently participate and

support future initiatives that improve and maintain these “inputs” as long these rules and initiatives provide flexibility; allowing us to meet the standards and fulfill our role as responsible citizens and food producers.

We appreciate that the Air Resources Board (ARB) does recognize the importance of agricultural vehicles and the functions they perform. Previously I mentioned that we have been in business since 1862. Part of the success of being in business for that length of time is due to utilization and maintenance of older equipment. Older equipment is utilized on a farm for many reasons; ease of maintenance, tax depreciation incentives, as well as increased costs for newer equipment. We strongly encourage you to increase the mileage thresholds for vehicles 1995 and older in the final rule. You have provided extra time for compliance for agricultural vehicles that operate below specific mileage thresholds. However, the proposed thresholds are not going to allow us to utilize our carefully maintained, older vehicles that we actually use for day to day farming activities. Without more miles these agricultural vehicles will become unusable and make it impossible for smaller, family-based farming operations to continue financially.

I pose a few questions to you and your staff who are making these “recommendations” and “laws”. Consider yourself a human who has to eat to survive (which I believe that you all are). Can we all agree that if you had to pick one crucial thing in life that keeps your heart beating, food would be it? Are you hearing reports that food prices are increasing due to “increasing regulations”? Have you or your spouse complained about it as well? Well, how much are you willing to pay for your food? I challenge you to go home and create a budget for your family. Triple your monthly food expenditure on food, could you afford it? Even if you could, how many Californians would be in the same situation as you?

Did you know that according to the 2006 Census for Government Employees for every 10,000 residents in California there are 142 government employees who are lucky enough to have sustainable wages and medical privileges. So yes, maybe you yourself could afford an increase in your monthly food bill but the other 9,858 out of 10,000 residents most likely cannot. I also challenge you to review the attached document, “The Impact of Rising Food Prices on Low-Income Families in California” that was presented to the California State Assembly in May of 2008. Maybe this document will prove to you that it is not just Agriculture that is raising a stink about how food prices are effecting the economy.

Now you may refute these comments and say to the ag industry, “Well, what do you care? If food prices are increasing you farmers will still get your share of the increased costs, right?” WRONG!!! An irony that must be pointed out is that so many people say they would prefer to buy their food from the small, local farmer. Unlike almost all other industries, farmers and ranchers can never pass on increased costs to their customers. Regulations like this one, supported by well-meaning but unaware folks, will get rid of small farmers faster than any corporate take-over.

Ultimately, the requirement for particulate matter (PM) traps is a no-win situation for more than just agricultural vehicles in California, a no-win for businesses, jobs as well as all Californians, and a no-win toward a cleaner, safer environment, here’s why.

PM traps will cause our engines to burn more diesel fuel rather than less. With PM traps, our engines will burn hotter and less safely. This is not a good scenario for trucks performing jobs in and around farm fields and near potentially flammable materials such as crops and other

vegetation. Who will be liable when an ARB-required and ARB-verified PM trap causes a fire and harms life and property?

Most of the vehicles that this proposal would require to have a PM trap could not be sold for as much as the cost of the PM trap itself - \$12,000 to 20,000 for each vehicle! With reduced fuel economy and higher maintenance costs with a PM trap than without, are we really doing California any favors? It just doesn't make sense for independent operators and it doesn't make sense for California. Public assistance funds are appreciated, but will be in high demand throughout the state especially in these hard economic times. Also, it is usually an onerous process to apply for these funds and persons such as I have to be paid to take the time to fill out the paperwork and do the leg work to even attempt to receive assistance from government agencies. This extra task again increases production costs which contributed to the diminished returns to the farmer or rancher. It may seem like a minor detail, but that's the point; every "minor" detail adds up.

We ask that you not require us to add an expensive PM trap onto an older, but well-maintained vehicle and then **also** require us to purchase a 2010 vehicle to meet the NOx standards. We ask that you fund research into the use of bio-fuels and come up with a way to encourage their use that actually addresses the air quality issues of concern<sup>1</sup>. This is clearly not a request to obtain an exemption from regulation but rather the flexibility that will help us all do our part in this state. <sup>1</sup> *A Biodiesel blend reduces particulate matter emissions by as much as 18% and overall tailpipe emissions by 45%. (Source: EPA and US Dept of Energy studies & National Biodiesel Board)*

We appreciate that ARB staff and Board have recognized that agricultural vehicles allow farming to take place in California. We hope that California consumers will take the time to understand how their food is safely brought to market.

- ❖ Delivery of farming inputs: including these vehicles under the agricultural vehicle provision is critically important to ensure the safe and efficient transport of these inputs. Rather than hundreds of individual farmers driving to a central location to pick up their fertilizers, compost, and crop protection products, quantities of these inputs are brought to a farming region and local distributors make more efficient trips to deliver to multiple farmers. These distributors are licensed and trained in the safe transport of these inputs.
- ❖ Transport of harvest farm produce to the first point of process: packing sheds, coolers, and processing plants are the first points to which harvested produce is delivered from the field. In Monterey County, as in many of our farming areas statewide, these points of process are most often located in less populated areas and have more than one entry/exit point spreading out the movement or emissions from these trucks.

We encourage you to use a phased-in approach treating diesel engines the same way California treats cars. That is, only require vehicles to meet the standards in effect the year of manufacture. A phased-in approach will lead all Californians toward cleaner engines in just a few years more than with this proposed regulation. As it is now written, this proposed regulation:

- will not reduce diesel fuel use
- will not make our environment safer and cleaner
- will jeopardize small businesses that depend on a few vehicles
- will be unfriendly to independent operators, and
- will cost California jobs and money.

Who can afford that?

Finally, we do not understand why the CA Air Resources Board is being asked by its staff to over-reach the requirements of the U.S. Environmental Protection Agency. We are concerned for the California economy if the businesses that support our communities are pushed too hard, too fast. We are also concerned that this Board could be left open to valid challenges. Our government is a government of the people, by the people and for the people. You are all fortunate to have your positions on this Board and as staff because of the freedom of our political process. We believe that the "PEOPLE" are speaking out and that if there is one crucial role that you must play in your position as a Board Member, it is to listen to the people. I believe the people of agriculture as well as many other industries that will be affected by this proposal have spoken!

Thank you for the opportunity to comment on this proposed regulation.

Sincerely,

April England-Mackie  
Food Safety & Farm Programs Manager

On behalf of:  
Benny Jefferson, Partner  
Allan Jefferson, Partner  
Jay Jefferson, Partner  
Marin Jefferson, Farm Manager

San Benito Farm Bureau  
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December 8, 2008

### Triples for Clean Air

#### Incentive alternative for meeting new Diesel Emission Regulations

The proposed new diesel emissions regulations will have a significant negative impact on agricultural trucking. The current regulations only add cost and bureaucratic obstacles to utilizing our existing over the road tractor fleet.

It is proposed to improve air quality and reduce diesel fuel demand; we recommend that longer combination trailers be allowed on California highways utilizing state of the art over the road tractors which meet the 2010 emission standards to haul this longer and heavier combination. This would provide a positive economic alternative for replacing non-conforming equipment. Existing trucks could still be converted but would not be allowed to haul these larger combination trucks.

This same policy should be implemented on the federal level which would reduce diesel demand.

Furthermore, large scale implementation of this alternative would provide industry wide mitigation benefits to reduce the need for retrofitting field tractors and forklift fleets. It is more effective to utilize capital in the most efficient manner to meet the clean air objectives by directing that capital to high use vehicles.

To place some size on the scale of transportation in California agriculture, the processing tomato crop requires 480,000 truck trips to get the crop from the field to the processing plant. With this proposal, we could reduce the truck trips by 1/3 or an actual reduction of 120,000 truck movements. This equates to a reduction of 18 million miles with probable fuel savings of 2.5 million gallons.

Triples have proven to be a safer alternative than existing truck length combinations. There are two major reasons for this, one; the reduction of truck trips reduces the opportunity for accidents and, two; driver qualifications for longer combinations are more stringent as well as equipment standards being higher.

This proposal will provide cleaner air and reduced costs by improving fuel and manpower efficiency.