

07-9-5



MEMORANDUM

September 26, 2007

To: Members of the Air Resources Board

From: Erin Field, CA Government Affairs Manager

EA

Re: **Agenda Item 07-9-5: Continued from June 22: Public Meeting to Consider Approval of a Modification to the Current SIP Commitment for Pesticide Emission Reductions in the Ventura County Nonattainment Area**

On behalf of the members of Western Growers, I am writing to respectfully request your consideration of *Agenda Item 07-9-5: Continued from June 22: Public Meeting to Consider Approval of a Modification to the Current SIP Commitment for Pesticide Emission Reductions in the Ventura County Nonattainment Area*.

Western Growers is an agricultural trade association whose members grow, pack and ship ninety percent of the fresh fruits, nuts and vegetables grown in California and seventy five percent of the fresh fruits, nuts and vegetables in Arizona. Our members produce roughly half of the nation's fresh produce and are an important part of the larger specialty crop sector. Western Growers is committed to working with the California Air Resources Board (ARB) and other regulatory agencies to improve air quality and recognizes that agriculture is one of the industries required to reduce its emissions.

According to Appendix H as revised August 13, 2007, ARB staff is proposing to revise the 1994 Ozone SIP to substitute 1.3 tpd of Reactive Organic Gas (ROG) emission reductions from California's on-going mobile source emission control program for 1.3 tpd of the ROG emission reduction commitment for pesticides in the 1994 Ozone SIP in Ventura in 2008. The proposal includes a phase-down of the implementation of the ROG reductions from 1.3 tpd in 2008 to zero by 2012 for Ventura.

It is our understanding that the Department of Pesticide Regulations (DPR) and the ARB staff have been collaboratively working on supplementary language to the phase down approach that Western Growers supports. In summary, the supplemental language would require ARB, DPR and the California Department of Food and Agriculture (CDFA) to reassess Appendix H in 2010. The reassessment would provide the Board with the opportunity to evaluate the effects of Appendix H on Ventura's air quality, agricultural production, and review potential new technologies while still allowing the state to meet its 1994 SIP obligations.

While Western Growers remains concerned about the future of production agriculture in the Ventura region, we feel that the supplementary language cooperatively developed by DPR and ARB staff is a fair compromise that will provide time for the phase down to go into effect so that its impacts can be assessed and adjusted if necessary.

Western Growers appreciates your consideration on this issue.