



## Butte County Rice Growers Association

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March 27, 2019

Dave Edwards, Chief  
Greenhouse Gas and Toxics Emissions Inventory Branch  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95814

Subject: Proposed changes under AB 617

Dear Mr. Edwards,

I am writing you to provide comments to the proposed changes that the California Air Resources Board (CARB) outlined on March 5, 2019. I am greatly concerned with these changes for the following reasons:

- Lowering the threshold to four tons (down from 250 tons) and increasing the scope of the regulation to a statewide basis is a broad overreach beyond the original intent of the underlying legislation AB 617, which was to focus on heavily industrialized communities of concern.
- This regulation will now impact small to medium-sized businesses throughout rural California, which have very minimal emissions so will likely have no improvements to air quality, while increasing the costs to businesses.
  - It is expected reports will be required from all dryers (rice, prunes, etc.), all livestock operations, the use of some chemicals and other typical farming activities.
- By lowering the threshold from 250 tons to 4 tons, CARB will now require reports from small businesses in addition to the reports submitted to the local air districts, therefore potentially creating duplicative reports.
- At a recent workshop, CARB staff estimated this new, modified regulation will generate an additional 50,000 reports to CARB with no plans on how to staff the increased workload, including how many staff it will take to manage the regulation or who will pay for this increased activity.

In summary, these proposed changes will create a significant burden to small businesses in rural California.

Sincerely,

Carl D. Hoff  
President