



May 26, 2010

Mary Nichols, Chair
Members, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairman Nichols and Members of the Board:

On behalf of the Center for Energy Efficiency and Renewable Technologies (CEERT) and the Clean Power Campaign (CPC), I write to urge the Board not to accept the San Joaquin Valley Air Pollution Control District staff's recommendations ("Draft Staff Report") to postpone burning bans for several crop types. Given the degree of air pollution in the San Joaquin Valley, we believe that the ARB should move forward aggressively with the phase-out of open field agricultural burning.

In 2003, the State Legislature adopted an aggressive schedule to phase out burning practices at all agricultural sources (S.B. 705 (Florez)). The recent Draft Staff Report recommends postponing the deadline for the burning ban until at least 2015 for removal activities at all citrus, apple, pear, and quince orchards, as well as for all vineyard removals and raisin trays, almond, walnut, and pecan prunings from orchards under 3,500 acres, all orchards less than 15 acres in size, and diseased beehives. EarthJustice estimates the emissions impact of this postponement to be at least 1,030 tons per year of oxides of nitrogen ("NOx") emissions, 1,262 tons per year of fine particulate matter ("PM-2.5") emissions, and 1,138 tons per year of volatile organic compound ("VOC") emissions.

CEERT and CPC therefore propose that the Air Resources Board hold consideration of the Draft Staff Report at its May 27, 2010 meeting in order to explore other options for implementation of the agricultural burning rule.

Sincerely,

V. John White
Executive Director, Center for Energy Efficiency and Renewable Technologies
Legislative Director, Clean Power Campaign