



COMMUNITY ALLIANCE
WITH FAMILY FARMERS

March 20, 2018

The Honorable Jim Frazier, Chair
Assembly Transportation Committee
1020 N Street, Room 112
Sacramento, CA 95814

RE: AB 2940 (Caballero) – SUPPORT

Dear Assemblyman Frazier:

The Community Alliance with Family Farmers (CAFF) is a statewide organization that represents both farmers and non-farm urban residents who support sustainable food and farming policies. CAFF is pleased to support AB 2940 (Caballero), which will revise the Air Resources Board's Truck Rule as it pertains to diesel agricultural trucks used on a limited basis and driven very few miles annually.

Specifically, the ARB's existing compliance schedule takes into account the number of miles an agricultural truck is driven annually, by requiring 2020 compliance for trucks driven less than 15,000 miles/year and 2023 compliance for those trucks driven less than 10,000 mile/year. Only the lowest mileage trucks, those driven less than 5,000 miles/year, are allowed to continue in use without upgrades, but that threshold drops to 1,000 miles/year as of 2020.

AB 2940 will keep the threshold for lowest mileage agricultural trucks at 5,000 miles/year. CAFF supports this amendment to the rule for two reasons: first, because these trucks are driven so few miles annually, they represent an extremely small portion of the state's overall diesel emissions; and second, because they are driven so little, a farmer's return on investment in the truck is much longer than usual. Reducing the mileage compliance threshold from 5,000 to 1,000 miles/year will impose a significant economic loss, particularly on many small- and medium-scale farmers that CAFF represents. We note that the ARB's own Carl Moyer program, which awards retrofit funds on a cost-benefit basis, has determined that ag trucks are not eligible because of the very low return in emissions reductions for the cost of upgrades.

AB 2940 also makes another small but important change to the Rule by giving owners of agricultural trucks until January 31, 2019 to report their trucks to the ARB. Under current law, these trucks had to be registered with the ARB by January

2015. We believe there are many farmers who were unaware of this requirement before January 2015. AB 2940 gives these farmers a very small but important window of opportunity to sign up with the ARB to avoid unintentional noncompliance.

CAFF has been a consistent supporter of the state's efforts to reduce air pollutant emissions and greenhouse gases. We were the only farm organization in the state to support AB 32 in 2006 and have led the fight to change agricultural practices to reduce greenhouse gas emissions. But AB 2940 will help farmers avoid outsized economic impacts that will do very little to improve air quality and will limit farmers' opportunities to adopt more sustainable practices. For these reasons, we urge your support of AB 2940.

Sincerely,

A handwritten signature in black ink, appearing to read "David Runsten". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Runsten
Policy Director