



February 25, 2021

California Air Resource Control Board  
PO Box 2815  
Sacramento, CA 95812

Re: 21-1-6: Public Meeting to Consider the San Joaquin Valley 2020 Agricultural Burning Assessment

Chair Randolph and Members of the Board:

Agricultural Council of California (Ag Council) represents over 15,000 farmers across California ranging from small, farmer-owned businesses to some of the world's best-known brands. We support the comments from the broader agricultural coalition and appreciate the opportunity to provide additional observations regarding the San Joaquin Valley 2020 Agricultural Assessment Staff Recommendations.

Because California is on the forefront of achieving the most ambitious environmental goals across the globe, it is imperative the state continues to invest in environmentally transformational practices to attract industry partnerships and to avoid putting farmers in California at a disadvantage. Ag Council emphasizes the need for additional funding for incentive programs, including 3-year funding for Alternative to Open Burn with an allocation of \$45 million per year. We also support one-time funding of \$50 million to incentivize chipping and shredding equipment. Additionally, we support the development of a bio-economy from using woody biomass from agricultural residue as a method for green energy production.

While Ag Council supports additional funds towards this effort, it is imperative that these funds do not come from existing programs including FARMER, Healthy Soils, or any other already existing greenhouse gas reduction funding programs aimed at reducing emissions from agriculture. This new, additional public/private investment would demonstrate the state's commitment, and industry partnership, to continuing to reduce emissions across the sector.

Furthermore, the staff recommendations identify agricultural residue that would otherwise be open-burned as an option for Low Carbon Fuel Standard (LCFS). Although it is not clear at this time if it is cost-effective to convert woody biomass, if investments are made in LCFS for agricultural residues, LCFS standards must be tightened to boost in-state production. If not, we could continue to see out of state projects fill our markets.

Thank you for your time and consideration of our comments. Should you have any questions, please call me, or Dani Diele on my team, at (916) 443-4887. We look forward to a collaborative effort as we accelerate the phase-out of agricultural burning.

Sincerely,

A handwritten signature in black ink that reads "Emily Rooney". The signature is written in a cursive, flowing style.

Emily Rooney  
President