

December 16, 2016

California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814  
P.O. Box 2815  
Sacramento, CA 95812

*Re: 2030 Target Scoping Plan Discussion Draft Comments*

On behalf of the California Fresh Fruit Association I write to express the following thoughts on certain elements of the draft scoping plan. Our members are the producers of California's, permanent crop, fresh fruits with production spanning the state from Lake County in Northern California, down through the Sacramento-San Joaquin Delta, into the San Joaquin Valley, and throughout the Coachella Valley. In general, the underemphasized view on the role of incentive programs in attaining significant emission reductions and disproportionate weight afforded to views and recommendations of certain interests overlooks the potential negative economic and human costs that could result from an imposition of new regulatory burdens unless balanced with the ability to adapt and support both industry and the economic livelihoods of communities while progressing toward public health goals.

ARB staff is strongly encouraged to place greater emphasis on direct role played by incentive programs to attain emission reductions, and their continued need for achievement of additional emission reductions from the agricultural sector. For instance, the Agricultural Tractor Replacement Program, as administered by the San Joaquin Valley Air Pollution Control District, incentivizes the replacement of in-use, off-road mobile equipment that are engaged in agricultural operations. The success of this program results from the incentives, efficient program administration and outreach, and the industry's willingness to utilize the program. Taken together with the incentive program led by USDA-NRCS, approximately 5000 pieces of older equipment have been replaced by cleaner equipment. Combined, these programs generated significant industry interest with an approximate investment of quarter of a billion dollars spent to upgrade to the cleaner equipment. The program is a model for a working partnership between industry and administering government agencies for producing real success, as evidenced with over twelve tons per day of NOx reduced.

#### *Appendix D*

We urge caution when considering value from the recommended "report card" for elected officials. Report card campaigns have traditionally been used by interest groups to generate resources to fund messages supporting or opposing actions by elected officials. This document is not the appropriate vehicle, nor is it an appropriate role for a member of the Executive Branch of government to fund or support an activity that amounts to taxpayer funding shaming of individual members of the Legislature for actions taken that are perceived to conflict with one's agenda.

With regard to the longer term vision, beyond 2050, we do not believe the document should be used to criticize the generation of agricultural biomass. Resources should be identified at a scale that aligns with current and anticipated biomass volumes. Small-scale projects are invariably part of the overall solution set however we believe all identified solutions must be evaluated through a calculation factoring for both current and future biomass volumes. Calls for outright elimination of agricultural burning blindly overlooks near-term disposal needs while ignoring critical considerations for whether any alternative is, in fact, both feasible and cost-effective.

We look forward to the continued opportunity to provide input on the *2030 Scoping Plan*.

Regards,

A handwritten signature in black ink, reading "Christopher Valadez". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Christopher Valadez  
Director, Environmental & Regulatory Affairs