



# CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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September 14, 2018

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

**RE: Cap-and-Trade Auction Proceeds Third Investment Plan**

Dear Ms. Nichols:

The California Farm Bureau Federation (Farm Bureau) appreciates the opportunity to comment on the Draft Cap-and-Trade Auction Proceeds Third Investment Plan: Fiscal Years 2019-20 through 2021-22 (Third Investment Plan). Farm Bureau represents more than 39,000 members as it strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. The Third Investment Plan includes a number of proposed funding opportunities that Farm Bureau supports.

Farm Bureau is particularly appreciative of the inclusion of the Funding Agricultural Replacement Measures for Emission Reductions Program (FARMER) in the Third Investment Plan. Under the proposed PM 2.5 State Implementation Plan, farmers in the San Joaquin Valley are going to be asked to replace 12,000 tractors by 2024, this effort will require significant incentive funding to be successful. It is important that there be a committed stream of funding for tractor replacements in the San Joaquin Valley and Farm Bureau appreciates the inclusion of funding in the Third Investment Plan for this purpose. It is currently unclear as to whether tractor manufacturers will be able to supply tractors at the rate set forth in the PM 2.5 SIP. However, if manufacturers are able meet the supply necessary, achieving the goal without significant incentive funding will be impossible.

Farm Bureau is supportive of many other programs included in the Third Investment Plan that will help farmers and ranchers make efforts to reduce greenhouse gas emissions or increase carbon sequestration. Additionally, Farm Bureau appreciates the investment the state is making to improve the health of California's forests and reduce the risk of catastrophic wildfires and the resulting carbon emissions from forest fires.

California's farmers, ranchers, and forest landowners are facing significant challenges on many fronts including implementation of the Sustainable Groundwater Management Act, lack of access to labor, reduction in water availability due to State Water Resources Control Board decisions, the Diesel Truck and Bus Regulation, and many others. Incentive funds included in the Third Investment Plan to assist farmers, ranchers, and forest landowners are appreciated.

Sincerely,

A handwritten signature in blue ink, reading 'Noelle Cremers'.

Noelle G. Cremers  
Senior Policy Advocate