



National Hmong American Farmers

Committed to making a difference in the farming community

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California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: Recommendations on Greenhouse Gas Reductions Funding Guidelines for Administering Agencies

Chairwoman Nichols, Board Members and Staff,

We thank the California Air Resource Board (CARB) for releasing the Draft Funding Guidelines for Administering Agencies of the Greenhouse Gas Reductions Fund (GGRF) for public review and comment. National Hmong American Farmers Inc. works to promote economic self-sufficiency for Hmong-American and other immigrant and ethnically underrepresented farmers. We provide services to independent farmers throughout the country, with special focus on California's Central Valley farmers, who may have limited access to government programs. We thank you for the opportunity to provide comment reflective of the needs of our constituency.

Agriculture plays a significant role in the production of greenhouse gases (GHG), and as climate change science progresses, we are ever more aware of the role of the entire food system, from seed to plate, in contributing a staggering percentage to GHG emissions. Agriculture however holds many potential solutions and can serve as an assistant in reaching California's climate goals. Localized agriculture has played a positive role in climate change solutions and mitigating climate impacts the world over, and a community of international science speaks to the potential of small-scale agriculture in improving soil carbon, bringing down local temperatures, and improving chances for disaster resilience. GGRF provides a first-of-its-kind opportunity to identify and support the roles of California's small-scale farmers in reversing the worst impacts of climate change and innovating towards a climate resilient food system.

GHG Quantification Methodologies and Ongoing Research

Our community of small-scale and linguistically isolated farmers in low-income rural communities require additional information and research to assist in quantifying GHG emission reductions for proposals such as renewable energy projects on small farms,

Organizational Background

The National Hmong American Farmers, Inc (NHAFF) is a non-profit, community based organization that provides direct services to limited resource and immigrant farmers in the Central Valley of California. Additionally, NHAFF focuses on local, state, and federal agricultural policy analysis and advocacy and assists new and developing immigrant-led community-based organizations across the country with capacity building efforts. NHAFF is committed to improving the social and economic development of small, immigrant, and minority farmers as well as the larger community in which we work.

community farms and gardens, brown-field projects, roof-top farming, and community orcharding.

GGRF funds may be used towards research, development and deployment of innovative technologies, measures and practices. Such program as CDFA's Healthy Soils initiative as well as the Green Innovations program administered by CalFire are landmark investments that has the potential to highlight the role of small-scale agriculture in the larger narrative around reversing climate impacts. NHAF has engaged in conversation with ARB staff and are looking forward to assisting in developing much-needed research and data from pilot projects that can demonstrate GHG reduction and scalable on-farm practices that help California reach its climate goals, however we suggest that ARB require administering agencies conduct the appropriate outreach to ensure that the target constituencies are equipped with the tools to quantify their GHG reductions and their contributions to climate change mitigation. We have specific observations and recommendations regarding quantification tools used for the agricultural programs under GGRF.

Cal EE Mod: Disadvantaged communities have higher emissions figures due to climate, topography, and concentration of toxic industries. Cal EE Mod's testing is dependent on land-use and site specifications determined per-area, with a sustainability criteria dependent on existing lifestyle and infrastructure within the community. For example, proposed Affordable Housing and Sustainable Communities projects as well as Sustainable Agriculture Lands Conservation Program in communities such as Marin test positively due to their existing sustainability indices, i.e. existing low-emissions rangeland management practices, sustainable transit for workforce, and the ability of a proposed project to "link in" and avail of these existing green elements. This causes a weight against disadvantaged communities for a lack of existing infrastructure in conjunction with existing GHG emissions and criteria air pollutants, and appear negatively on Cal EE Mod reports. For the purposes of grant administrations that utilize Cal EE Mod as a methodology for GHG reductions quantification, ARB must look into updating the quantification software or using a set of criteria for GHG emissions reductions that levels the scale for disadvantaged communities where these programs are most needed.

COMET-Farm: For quantifications of GHG reductions under CalFIRE and CDFA, resources must be made available to understand the GHG reductions capacity of diversified agriculture. COMET-Farm is an advanced modeling tool that is suited to large-scale agriculture and is excellent for carbon foot-print mapping for rangeland, pasture, and large scale irrigated crop land. Residents of DACs, small farmers and community gardeners who are pioneering GHG reductions projects in their communities require a modeling tool that can allow non-profits, small farms and business owners to receive the same spatially-explicit data on climate and soil carbon sequestration available to large-scale growers to determine their eligibility for CalFIRE and CDFA funds.

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Linguistically Appropriate Outreach and Technical Assistance

It is critical that ARB oversee the translation of grant guidelines and solicitation materials, particularly for competitive grants for businesses, farms, and individuals. In order to ensure participation by disadvantaged community residents and small farm and business-owners, administering agencies must conduct outreach efforts in-language and in-culture, and must use administrative funds towards these ends. NHAF has provided a list of languages to ARB staff for inclusion in the guidelines, including but not limited to Spanish, Hmong, Vietnamese, Chinese (Cantonese and Mandarin), Punjabi.

Maximizing GGRF Co-Benefits to Disadvantaged and Small-scale Agricultural Operations

GGRF presents an enormous opportunity to highlight the co-benefits of historically neglected farmers. For instance, Cal Enviro Screen deems South West Fresno as the single most environmentally burdened area of the state. When observing a map of where our small farms are located overlaid with Cal Enviro Screen mapping tool, it is obvious that a concentration of ethnic-owned small farms are located directly in some of the top 10% areas of environmental and social burden. These farmers are the least educated about government programs, yet they do the greatest work in bringing down regional temperatures and building ecologically resilient farm-scapes that beautify the local area. Additionally these farmers are sometimes the sole source of fresh fruits and vegetables in our area. Fresno is the single most food insecure region of the nation and a strong co-benefit of their production is meeting local needs for fresh vegetables.

We would like to see that these guidelines, especially for those administered by CDFA are “located within or benefitting a disadvantaged community” is extended to “located in or benefitting a disadvantaged farm” and that improved market channels and improved regional food security are counted as community co-benefits.

Addressing Dairy Digesters and Community Co-benefits

Dairy digesters, though sequestering methane for positive impacts on global GHG reductions, do nothing to impact local criteria air pollutants such as ammonia within the disadvantaged communities they operate in. This freebie for the dairy industry continues to complicate the prioritizing of co-benefits for disadvantaged communities, since digesters represent a benefit to a multi-million dollar polluting industry which does nothing for the local economy, pollutes groundwater with dairy waste and run-off, creates a nuisance through odors, and generates toxic local air pollution.

We strongly encourage close compliance with guidelines for administration of Dairy Digester funds, and an assured reporting piece from applying dairy owners, to show a demonstrated co-benefit in the form of a community benefits agreement, a demonstrated activity to improve local air quality, a transition to organic herd-management practices, and/or a concerted contribution to the local economy. Jobs creation in toxic dairy

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industries cannot and should not qualify as a community co-benefit. In regions where Dairy Digesters are not elected for use by the local dairy community, we would like to see ARB maintain the authority to recycle these funds into programs in soil carbon sequestration and increased funding for renewable energy programs for small-scale growers that have both immediate co-benefits to local air quality, local food production, and local economy.

Addressing the Flaw of Increased Job Opportunities as Co-Benefits in Agricultural Programs

According to the GGRF guidelines all projects should improve employment and career opportunities for disadvantaged community residents-- however these jobs must be clean, offer a living wage, and must not be harmful to worker health. Large farms already supply a vast majority of employment to disadvantaged communities. The laying of drip-tape as conversation from flood irrigation or the replacement of a diesel pump engine for a solar powered pump, and associated job-hours creation should not be counted as a co-benefit to a disadvantaged community. Jobs created should be healthy and reflective of local need, provide diverse employment opportunities, and bolster the regional economy.

Ongoing Participation and Public Process

We look forward to seeing the positive impacts of SB 535 on our local agricultural communities and in supporting innovations towards a climate-friendly farming culture that was pioneered by farmers of color millennia ago. Agricultural activity is incredibly important to the economy and culture of our disadvantaged communities, and if done with the engagement of communities of color and with sensitivity to the local ecology, can also have a positive impact on the environment, on health, and on people's access to food. As climate science progresses and we begin to see a shift towards an understanding that biodiverse and smaller scale agriculture is the key to a more resilient and climate friendly food system, we hope to see ARB reflect this science in the monitoring of administration by SGC, CDFA, CalFire and other agencies concerned with agriculture.

Thank you for your leadership in this landmark funding program; National Hmong American Farmers Inc. looks forward to continuing its legacy work of partnering with government agencies to ensure fair participation of farmers of color in all government programs. Questions can be sent directly to Janaki Jagannath at Janaki.anagha@gmail.com

Chukou Thao
Executive Director

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