



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 · PHONE (916) 446-4647

July 23, 2018

Submitted via online portal

Ms. Karen Magliano
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Draft Community Air Protection Blueprint

Dear Ms. Magliano:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input on the development of the California Air Resources Board's (CARB) Draft Community Air Protection Blueprint. 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. California's farmers and ranchers, and the agricultural processors upon which they depend, are likely to be impacted by the implementation of Assembly Bill 617 (C. Garcia, 2017). It is for this reason that Farm Bureau is writing to provide input as CARB develops its Community Air Protection Blueprint (Blueprint).

As AB 617 was being considered by the legislature, the discussions focused upon increasing resources and actions to improve air quality in "the highest priority locations"¹. Farm Bureau urges CARB to continue its focus on these highest priority locations by focusing resources there, rather than committing its limited resources to areas throughout the state, thereby diluting the effectiveness of actions aimed at improving air quality. Farm Bureau believes it is best to focus resources narrowly, so that there is a greater chance of succeeding in each community before moving to add additional communities.

The Blueprint includes extensive discussion of monitoring efforts to assist with implementation of AB 617. It is imperative that these monitoring efforts be scientifically valid and done in a manner in which data quality is assured and there is appropriate quality control of the data. The Community Air Monitoring Plan outlined in Appendix E discusses the expectation that community members will be implementing some of the air quality monitoring. There are 14 elements listed to ensure that the monitoring is scientifically valid, however the Appendix does not make clear how community monitoring will meet the 14 elements. The data generated from these community monitoring efforts could have significant impacts on businesses in the selected communities. It is important that monitoring efforts be accurate and scientifically valid to ensure resources are focused appropriately; this is especially important when assigning pollution to

¹ Health and Safety Code Section 42705.5 (c)

specific sources. It is important that monitoring be able to identify the source, if it is to be used to support additional regulatory requirements on businesses.

Farm Bureau appreciates the recognition of the role that land use plays in air quality impacts in communities. However, land use control has and should continue to remain at the local level. Farm Bureau would like to see a recognition by local land use authorities of the impacts that their decisions have on continuing agricultural uses. For example, when schools are sited in the middle of farmland, there are operating restrictions placed on those farms regarding pesticide use. There is significant value in preventing these land-use conflicts from occurring, rather than placing business restrictions on existing businesses after schools and homes have been allowed to be sited in agricultural or industrial zoned areas. However, existing businesses shouldn't be penalized for poor land use decisions made in the past.

These business restrictions are of particular concern to Farm Bureau. When AB 617 was being considered by the legislature, there was no discussion of pesticides being included in the program. Reviewing the Blueprint with a recognition that CARB plans to include pesticide reductions creates additional concerns on the impact AB 617 will have on Farm Bureau members. For example, page 10 includes a list of themes expressed during public comments. The desire to require mandatory setbacks on emissions sources located near sensitive populations could be interpreted to mean a loss of farmland near populated areas. Additionally, the desire to ensure that emissions don't increase in impacted communities could also restrict farmers' ability to combat pests or rotate crops.

Farm Bureau is also concerned about the increased costs AB 617 implementation is likely to place on California farms and ranches as well as agricultural processors upon which our members depend. This is particularly concerning as AB 617 requires the addition of new communities on an annual basis. As the state continues to add communities to this effort, those communities will have cleaner and cleaner air to begin with, leading to higher costs upon businesses to reduce emissions in areas that don't have particularly poor air quality. The additional costs to businesses in these areas, without a significant corresponding improvement in air quality should be considered as AB 617 is implemented over time.

Farm Bureau urges CARB to focus heavily on offering incentives to businesses to implement pollution reduction measures, rather than command-and-control regulations. Incentives can lead to much greater emissions reductions due to the innovation that can be generated through voluntary efforts. When restrictions are mandated on businesses, only the minimum required reductions are achieved, while incentives can create much greater reductions due to the cooperative nature of incentives. Our agricultural processors are already facing additional costs due to compliance with all of California's environmental requirements, including the Cap and Trade program, it is important to recognize these ongoing costs when considering the implementation of further restrictions on emissions from agricultural processors. It is these processors to whom California farmers and ranchers sell their products, and it is important that these buyers remain in California to purchase California grown agricultural products.

Appendix C mentions that air districts should consider activity limits and other operations requirements². Efforts to place activity limits on farming, ranching, and agricultural processing should recognize the seasonal nature of agriculture. Restrictions on activities during planting, harvesting, or processing seasons would severely impact these businesses. Farm Bureau urges CARB and local air districts to appreciate the impact that seasonal restrictions would create for farmers and work to ensure that implementation of AB 617 doesn't lead to those impacts.

The same appendix also mentions encouragement of "processes to terminate existing incompatible land uses within selected communities"³. This is an extreme action and should be used only as a last resort. Farm Bureau would have significant concern about any efforts to restrict the availability and use of agricultural land and would not want to see ag zoning changed due to urban or suburban encroachment.

Farm Bureau appreciates the opportunity to comment on the implementation of AB 617 as it could have significant impacts on farming and ranching. These efforts should be done in an effective manner and undertaken in a way that appropriately balances costs and benefits. Air quality is important to all Californians, and Farm Bureau is hopeful that CARB's efforts to improve air quality on a community level will be successful.

Sincerely,

A handwritten signature in cursive script, appearing to read "Noelle Cremers".

Noelle G. Cremers
Senior Policy Advocate

² Page C-18

³ Appendix C, page C-21