



November 15, 2013

VIA ELECTRONIC SUBMISSION

Clerk of the Board, Air Resources Board  
1001 I Street, Sacramento, CA 95814

Re: Proposed Amendments to California's Existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Title 17, California Code of Regulations, Section 95115) (hereinafter "Mandatory Reporting")

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I am writing on behalf of Paramount Farms International LLC ("Paramount Farms") regarding the proposed amendments to California's Existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Title 17, California Code of Regulations, Section 95115). Paramount Farms appreciates the opportunity to provide comments to the California Air Resources Board ("ARB") regarding the proposed staff amendments to the Mandatory Reporting of Greenhouse Gas Emissions ("GHG").

Paramount Farms is the world's largest vertically integrated grower and processor of pistachios and almonds, representing approximately 60% of all pistachios harvested in California and representing over 550 California pistachio growers. Collectively, we farm approximately 75,000 acres of pistachios and almonds across the Central Valley and deliver nearly 280 million pounds of pistachios and 140 million pounds of almonds annually throughout the world.

We have reviewed the proposed staff amendments to the Mandatory Reporting regulation and request that the ARB consider revising proposed section 95115(n)(17) to properly address nut processing facilities in California. Paramount Farms recommends replacing the current language of proposed section 95115(n)(17) with the following:

*(17) The operator of a pistachio processing facility must report the sum of pistachios (in short tons) hulled and dried, and/or flavored and packaged where the hulling and drying is a continuous process that can be independently operated from flavoring and packaging, which is a continuous process. The*

*reported totals of pistachios will consist of the following categories: Pistachio Hulling & Drying and/or Pistachio Flavoring & Packaging. The operator of an almond processing facility must report the sum of almonds (in short tons) pasteurized, blanched and/or flavored and dried where flavoring and drying is a continuous process. The reported totals of almonds will consist of the following categories: Almond Pasteurization, Almond Blanching, and/or Almond Flavoring & Drying.*

Paramount Farms believes the above modified language provides the necessary clarifications on reporting requirements for these types of entities and adequately addresses the intention of the proposed regulations. We hope the ARB will strongly consider our recommendation for proposed section 95115(n)(17) of the Mandatory Reporting of GHG for fuel combustion sources. We appreciate the opportunity to provide our feedback on this proposal and are available should the ARB require additional input or information.

Respectfully Submitted,



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Director of Government Affairs/Counsel

Cc: Dan Lee, Paramount Farms International LLC  
Charles Lee, Trinity Consultants