

May 11th, 2016

Mary D. Nichols
Air Resources Board Chair
California Environmental Protection Agency
1001 “I” Street
Sacramento, CA 95814

**RE: Public Workshop on the Agricultural Sector to Inform the 2030 Target Scoping Plan Update**

Dear Ms. Nichols:

The California Cotton Ginners and Growers Associations represent the grower and ginning community of California cotton production. We have nearly 800 growers producing over 200,000 acres of cotton annually, with close to 30 gins processing every acre of harvested cotton in California. We are writing to you today to discuss the recent California Air Resources Board’s workshop on the Short Lived Climate Pollutant strategy.

There were several points brought up throughout the presentation, as well as comments that were presented at the end of the discussion that we would like to weigh in on. The Associations believe that to most effectively reduce Short Lived Climate Pollutants (SLCP’s), it is vital to have the necessary funding in place to encourage emission reductions through incentive based practice implementation. The specific activities that we are referencing include the Bio-gas, Bio-Char, and/or biomass derived Co-Generation plants. These facilities are vital to help divert biomass material away from landfills, and bring a beneficial use to material that is often considered waste or by-product.

On the issue of healthy soils, there is also a major concern among the agricultural sector on the lack of information in regards to carbon sequestration and management practices. The development of regulation with limited research can have negative impacts on the industry. Further research is needed to better understand, define and quantify the benefits.

We also would like to cite the amount of reductions that the agricultural sector has made with voluntary incentive programs implemented to replace fuel-fired irrigation pump engines. With the help of the San Joaquin Valley Air Pollution Control District and electric utilities, growers have surpassed the predicted NOx reductions through the utilization of the incentive funding available. Another program that is has helped the agricultural sector is California Department of Food and Agriculture’s State Water Efficiency and Enhancement Program (SWEEPs). This grant has made micro-drip irrigation conversion on farms easier. We feel that the development of similar programs will also have the same success.

I would also like to note a correction for the official record. Near the end of the public comment period, an environmental justice representative noted that Sulfuryl Fluoride was a GHG influencer and should be regulated as well. We would like to have the record reflect that Sulfur Hexafluoride is the actual compound that is considered a Greenhouse Gas influencer.

Thank you for taking the time to review these comments. If you have any questions, feel free to contact me at chris@ccgga.org.

Sincerely,

Chris McGlothlin
Director of Technical Services