



March 19, 2018

Clerk of the Board
California Air Resources Board
1001 I St.
Sacramento, CA 958114

Re: FARMER Guidelines

Dear CARB board members and staff:

The Almond Alliance of California respectfully submits the following comments on behalf of the California Almond Industry regarding the proposed Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program Guidelines, as presented in the discussion document and associated workshops.

The Almond Alliance has encouraged making this \$135M investment towards improving air quality from agricultural sources, and in large part supports the current guidelines for use of these funds to reduce emissions from agriculture equipment. Addressing mobile sources through the existing Carl Moyer program has great potential to continue agriculture's efforts to reduce criteria air pollutants, and help meet challenging air quality requirements in the San Joaquin Valley and elsewhere.

It is also important that both self-propelled and PTO driven harvesters qualify for incentives, given the extensive use of both types of harvesters. Incentive funding could be both through the harvester category in the existing Carl Moyer Program and if necessary through creation of an additional project category created by CARB's Executive Officer, as described in the FARMER guidelines. Farmers in air districts in both San Joaquin and Sacramento air basins should be able to apply for low-dust harvester funds. We encourage the CARB board and staff to work closely with us to ensure these goals are achievable in the final guidelines.

Incentive programs have shown their value in reducing agricultural induced air pollution impacts. Funding from NRCS, CARB and San Joaquin Valley Air Pollution Control District (SJVAPCD) have outpaced improvements that may have been expected from regulations. The funding for the SJVAPCD will improve air quality and continue their tireless efforts and cutting-edge programs. As stated in a separate letter, we also appreciate the reallocation of funds towards Sacramento Valley Growers.

As an industry, we remain committed to the health and safety of everyone living and working in our communities. To this end, inclusion of a low-dust harvester incentive

program in this, and in following years, will help encourage adoption of the most modern technology in every almond orchard in the state.

Therefore, we would like to take this opportunity to request that funds be used to encourage investment in new low-dust harvesters currently on the market. The Almond Board of California (ABC) has been partnering with SJVAPCD to support development of a new low-dust harvester incentive program over the past year, with the goal that it will be ready to go in time to use these funds.

With approximately 86% of all almonds produced in California in the area covered by the SJVAPCD, this is an appropriate area to initiate investment in low-dust harvesters through development of a new incentive program. Additional incentivizing of low dust harvesters will improve air quality in communities near orchards, some of which may qualify as DACs.

ABC has worked with the SJVAPCD on development of this program in a number of ways. First, they provided significant funding to develop revised emission factor estimates for low-dust harvesters. This research was performed by the University of Texas, and initial results show an average of 50% reduction by the four manufacturers' equipment compared to conventional harvesters. Final results from this research are expected this spring.

Second, ABC is preparing an online survey, in coordination with the Walnut Board and the SJVAPCD. This survey will help develop an estimate of current harvester inventory including low-dust harvesters, to further inform development of this incentive program. The survey will be industry wide, and will help determine the amount of need not only in the San Joaquin Air Basin but also in the Sacramento Valley and other areas where harvest dust may be a concern.

Once this research and survey are complete, we look forward to further working with the SJVAPCD on designing the incentive program, and implementing it through education and outreach. While we are focused on getting this up and running in the San Joaquin Basin, once established it will provide an excellent model for similar incentive programs in the Sacramento Valley.

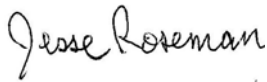
ABC has also invested significant amounts in research on additional ways to reduce dust, followed by extensive outreach. ABC's Harvest Dust Tool Kit provides all growers and harvesters with methods to reduce dust in all harvest equipment. This past year, ABC also organized and held several demonstration days in coordination with all four manufacturers to increase awareness of new equipment.

Additional suggestions for your consideration of the FARMER program include:

- Any programs should be accessible to all farmers, regardless of income. The program should be developed in conjunction with the existing USDA-NRCS efforts and one of the issues with the NRCS programs are income limits. It is harder for the higher value specialty crops that California typically grows to stay under the income caps.
- We support the use of the funds to incentivize higher tier motors in tractors
- When drafting guidelines, we encourage weighting and selection of projects that reduce dust near major thoroughfares or residential areas, increasing traffic safety and also near DACs, increasing health benefits
- The Ag Trade-Up concept and program is valuable, and hope that it is taken statewide, and potentially expanded to other types of equipment such as trucks. This accounts for the diversity of farming operations in size, in capitalization, in values of crops grown within the Central Valley. It also fits a common system whereby ag equipment is often sold from the largest to the mid-sized to the smaller acreage growers.
- The Alliance also supports determining methods to incentivize the upgrading of trucks used for various on-farm tasks including tasks related to the beekeeping industry, which is critical to almonds. Their needs in terms of truck upgrades should be included.

Thank you for your efforts in developing this funding, and work to design a program that works both for agriculture and air quality improvement.

Sincerely,



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