



October 14, 2024

The Honorable Liane M. Randolph, Chair

California Air Resources Board

P.O. Box 2815

Sacramento, California 95812

RE: California Farm Bureau's Comments Relating to the Proposed Changes to Carl Moyer and FARMER Programs.

Dear Chair Randolph,

We appreciate this opportunity to provide feedback on the proposed amendments to the Carl Moyer and FARMER programs.

California Farm Bureau (CAFB) is an innovative, service-based organization dedicated to being the foremost advocate, protecting the future and quality of life for all California farmers and ranchers. CAFB protects California's diverse farming and ranching legacy and enables the whole agriculture community to thrive. With over 29,000 members, CAFB is California's largest agricultural association.

It must be kept in mind that oftentimes, large capital improvements and upgrades are costly, and farmers and ranchers need certainty when developing their business plans. CAFB appreciates the longstanding success that Carl Moyer program has had in matching state funds with private investments. We think the ongoing success of Moyer is dependent on this relationship and we continue to advocate for the cooperation between the two.

Moyer and FARMER are two great tools that offer farmers and ranchers ways to reduce their emissions without overburdening their bottom lines, and California Farm Bureau and our members are partners in doing our share to reduce agricultural emissions. We support CARB, and local air districts' work to continue the success of both programs. Most importantly, the data supports the success of these programs in reducing emissions.

It is not without concern that we encourage CARB to continue asking the legislature for appropriations to fund these vitally important programs. Even amid tight budget years like we saw in 2024, Moyer and



FARMER funding must remain constant. Only with the certainty from ongoing funding can we continue to meet our emissions targets.

Carl Moyer Program

Chapter 2

CAFB appreciates and supports the expanded project eligibility by removing the 15% NOx standard for the majority of the categories under the program.

Chapter 3

CAFB supports multiple changes in this chapter, including the change allowing a lease to own option and the extended timeline around scrappage. We can see that CARB doesn't want technical issues getting in the way of program successes and we appreciate that concern.

CAFB also supports the ability for air districts to extend contract liquidation allowance beyond four years and we support the revised electronic recordkeeping, e-signatures, and virtual inspections being proposed. We also appreciate the increased funding for air districts to administer these programs. These partners are vital to the success of Moyer and without increased resources to air districts, we have concerns over the ability to manage and administer the needed programs.

Chapter 4

CAFB welcomes the move of fleet sizes of 20 vehicles or under being eligible for 80% of vehicle cost.

Chapter 5

CAFB appreciates and supports the expansion of Moyer into engines below 25 horsepower. And we appreciate the clarity of having agricultural projects point to FARMER guidelines.

Chapter 8

CAFB supports and appreciates the maximum grant being raised from \$1,500 to \$3,000 for light duty vehicles. This takes into account the rising cost of expenses in California.



FARMER

CAFB supports the updating of many of the definitions in the revised FARMER guidelines. We also welcome the removal of the 15% NOx requirements.

CAFB continues to welcome the 3-year minimum contract term. We understand the need to salvage equipment in a timely manner and appreciate the flexibility and discretion given to air districts to appropriately monitor and enforce this provision. It would be devastating for unforeseen circumstances or delays out of the applicant's control to hamper this program's success. The air district is the best place to leave this discretion, and we urge greater flexibility from CARB.

Also, along the lines of flexibility, we appreciate the ability for the FARMER program to allow for replacement equipment which varies from the original baseline equipment. Farmers and ranchers are innovative and always looking for the best way to do a job rather than just what has been done in the past. If there is a better implement, or tool better suited for a job, we appreciate the ability to use that rather than a one-for-one trade.

CAFB supports the proposed amendments in Chapter 5 around 85% maximum funding amount to repowers, and 80% of mobile or portable combustion equipment, and 85% of zero-emission replacement.

Thank you for your consideration of the matter.

Sincerely,

A handwritten signature in black ink that reads 'Steven Fenaroli'. The signature is written in a cursive, flowing style.

Steven Fenaroli

Political Affairs Director, California Farm Bureau