



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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January 22, 2019

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 19-1-1: Public Meeting to Consider the 2018 PM 2.5 and 2016 Moderate Plan State Implementation Plans for the San Joaquin Valley

Dear Ms. Nichols:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input as the California Air Resources Board (CARB) considers adoption of the 2018 PM 2.5 and 2016 Moderate Plan State Implementation Plans for the San Joaquin Valley (PM 2.5 SIP). Farm Bureau represents more than 35,000 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. Farmers in the San Joaquin Valley are being asked to contribute significantly to meet emission reduction goals included in the PM 2.5 SIP and it is for this reason that Farm Bureau is providing comments. Farm Bureau submitted comments dated October 22, 2018 regarding the adoption of the San Joaquin Valley Supplement to the 2016 State Strategy for the State Implementation Plan and would like to incorporate those previous comments by reference.

There are a number of provisions that are likely to have a significant effect on farmers and ranchers in the San Joaquin Valley. These measures include potential changes to the San Joaquin Valley Air Pollution Control District's (SJVAPCD) Conservation Management Practices rule, irrigation pump engine replacement, accelerated turnover of agricultural equipment, and heavy-duty vehicle inspection and maintenance. Farm Bureau and its members support efforts to improve the air quality of the San Joaquin Valley and appreciates the inclusion of incentive-based measures to achieve pollution reduction goals. These goals do not come without significant costs, and Farm Bureau asks that there be a recognition of these costs and meaningful efforts to identify incentive funds and reduce unnecessary costs.

CARB reported at its October Board Meeting that it estimates the cost of replacing 12,000 Tier 0, 1, and 2 tractors by 2024 will be \$1.4 billion. This cost comes on top of expected costs for farmers and ranchers to replace heavy duty diesel trucks by 2023. It will be necessary to obtain a significant portion of this amount as incentive funds to help accelerate the turnover of the targeted tractors. Farm Bureau, and other agricultural organizations, have been instrumental in obtaining both state and federal incentive funds in the past to help incentivize the replacement of older agricultural equipment. Farm Bureau remains committed to continuing its efforts to obtain additional incentive funds to help meet the goal. However, it must be recognized that agricultural organizations will need broad support from both within and outside of state government to obtain the funds necessary to achieve the goal. Farm Bureau is especially concerned about potential

incentive funding availability given that the Governor's budget for Fiscal year 2019-2020 only includes a proposed \$25 million to go towards replacement of diesel agricultural equipment. This is a drop in the bucket towards the necessary \$280 million that will be needed annually to meet the cost of replacing 12,000 tractors by 2024.

Significant work is necessary to achieve the reductions included in the PM 2.5 SIP. There will be myriad ways to implement the measures included in the PM 2.5 SIP and Farm Bureau asks that any costs and potential impacts to farmers and ranchers in the San Joaquin Valley be reduced to the greatest extent possible.

Farm Bureau appreciates the opportunity to comment on the adoption of the PM 2.5 SIP and is ready to work with both the SJVAPCD and CARB to ensure a smooth implementation of the proposed measures.

Sincerely,

A handwritten signature in dark ink, appearing to read "Noelle Cremers", written in a cursive style.

Noelle G. Cremers
Senior Policy Advocate