



July 31, 2019

Submitted through online portal

David Edwards, PhD
Branch Chief
Greenhouse Gas and Toxics Emission Inventory Branch
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

RE: Regulation for Criteria Air Pollutant and Toxic Air Contaminant Emissions Reporting – Proposed 15-Day Changes

Dear Dr. Edwards:

The signatories to this letter are writing to express appreciation for the response to our earlier comments on the proposed regulations for Criteria Air Pollutant and Toxic Air Contaminant Emissions Reporting. Our organizations represent farmers, dairy farmers and ranchers, as well

as agricultural businesses who process California farm products. Our members grow and process the more than \$50 billion worth of agricultural products raised in California. The proposed regulation would have affected many of our members and we appreciate the changes that were made to limit the scope of the draft regulations and make them more consistent with AB 617.

The regulation now makes a number of specific clarifications that are important in better understanding the scope of the new reporting requirements. The California Air Resources Board (CARB) specifies that the regulation pertains only to permitted facilities with criteria emissions greater than 250 tons per year, which is consistent with the original intent of AB 617.

CARB also clarifies that fugitive emissions are excluded from the regulation and if information is submitted to the local air district, it will suffice for reporting requirements for any facilities included in this regulation. The agricultural industry appreciates that CARB has also created an abbreviated reporting system for agricultural entities having to participate in the regulation.

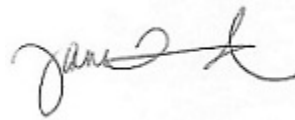
It is our understanding that the purpose of this regulation is to report and publicly disclose emissions from all sources on the CARB website. The agricultural industry greatly appreciates these changes because unlike other business sectors in California, many farmers, ranchers and dairy families reside at their place of business. Protections are needed to prevent the residences of our farming families from being disclosed to the public.

Thank you for the time and consideration of our concerns. We look forward to working with CARB on the implementation of this regulation.

Sincerely,



Emily Rooney
Agricultural Council of California



Jane Townsend
California Bean Shippers Association



Elaine Trevino
Almond Alliance of California



Justin Oldfield
California Cattlemen's Association



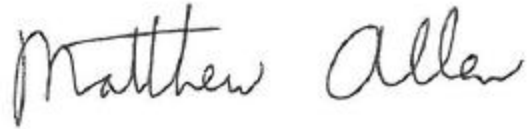
Colleen Cecil
Butte County Farm Bureau



Roger Isom
California Cotton Ginners and Growers
Association



Noelle Cremers
California Farm Bureau Federation



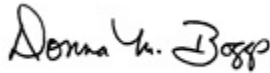
Matthew Allen
Western Growers



Chris Zanobini
California Grain and Feed Association



Debbie Murdock
California Pear Growers Association



Donna Boggs
California Seed Association



Tito Martinez
Kern County Farm Bureau



Debbie Murdock
Pacific Egg and Poultry Association



Roger Isom
Western Agricultural Processors Association