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August 11, 2008

Ms. Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Re: **Climate Change Draft Scoping Plan**

Dear Ms. Nichols,

On behalf of the cotton growers and cotton gins in California we wish to express our concern over the Climate Change Draft Scoping Plan. The plan references agriculture's emissions contributions, but does not recognize the significant role agriculture plays in sequestering carbon. Added costs and regulations will only increase the burdens on our farmers and make them more uncompetitive in the world market. Thus, increasing the rate at which farmland is converted for development projects. Conversion to development will decrease carbon sequestration and increase greenhouse gas sources.

The appendices to the Draft Scoping Plan have raised some serious concerns about the approach that ARB is taking with respect to agriculture. There were several items that were a surprise to many in the agriculture industry and were not discussed at any of the agriculture stakeholders workshop. We strongly believe that industry needs to be informed and at the table in order for decision makers to make informed policy decisions.

Efficiency Measures

The agriculture community is always striving to be more efficient users of water, fuel, and fertilizer. Regulations to track, report, and to pay a fee are not necessary to improve efficiency and greenhouse gas reductions in agricultural practices. Time and money would be best spent on research to improve technology and efficiency. We also request that the studies that are currently being explored to measure nitrogen emissions be done with proper scientific approaches and be conducted with the help and expertise of those within the agriculture industry.

Solar-Reflective Paint and Solar-Reflective Glass

We oppose any measure to require solar-reflective paint and/or glass on existing agricultural equipment. Agricultural equipment is mostly seasonal and the cost associated with retrofitting equipment would likely far outweigh the benefits. We

recommend working with equipment manufacturers and the agriculture industry to understand which applications may be feasible.

Electrification

We are opposed to mandatory electrification of any heavy-duty off-road diesel equipment used in agriculture operations. Many agricultural facilities and farms require equipment that can be used in rough terrain and remote locations.

Again, we strongly encourage the board to consider the positive effect that agriculture has in sequestering greenhouse gases when revising the Draft Scoping Plan. Our organization is willing to be at the table and work with staff to come up with common sense approaches that work to increase efficiencies and reduce greenhouse gases.

Sincerely,

A handwritten signature in black ink, appearing to read 'Casey Creamer', with a long horizontal flourish extending to the right.

Casey Creamer
Assistant Vice President