



# The Cotton Chronicle

1785 N. Fine Avenue, Fresno, CA 93727 • Telephone: (559) 252-0684 • Fax: (559) 252-0551

[www.ccgga.org](http://www.ccgga.org)

November 2020

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## Industry Calendar

Joint Steering Committee  
Nov. 18th

Board Meeting  
Dec. 1st

## CCGGA Staff

Roger A. Isom  
President/CEO  
[roger@ccgga.org](mailto:roger@ccgga.org)

Christopher McGlothlin  
Director of Technical Services  
[chris@ccgga.org](mailto:chris@ccgga.org)

Priscilla Rodriguez  
Director of Regulatory Affairs  
[priscilla@ccgga.org](mailto:priscilla@ccgga.org)

Shana Colby  
Administrative Assistant  
[shana@ccgga.org](mailto:shana@ccgga.org)

## Invitation to Attend US Cotton Trust Protocol Webinar

On behalf of the US Cotton Trust Protocol and the California Cotton Ginners and Growers Association you are invited and urged to participate in a live US Cotton Trust Protocol information webinar for AZ, CA, NM and TX El Paso Valley producers scheduled for **Tuesday, December 8, 2020 at 7:30 am PST/8:30 MST**. To register for this webinar, copy and paste this link into your browser:

<https://zoom.us/meeting/register/tJEpd-CtrD0jGtJNOt-Rz9buwNURX7c1Ln9n>



U.S. COTTON  
TRUST PROTOCOL®

As you may be aware, the Trust Protocol is a US cotton industry effort to validate sustainability practices, provide confidence and ensure demand for US cotton among brands and retailers. The purpose of these webinars will be to inform producers of the value of joining the U.S. Cotton Trust Protocol and provide instructions on how to join. Participation in the Protocol by producers is critical to its success. (Reg IO) supports this effort and urges your participation in this webinar. If you are unable to participate in this session, please copy and paste this link below into your browser for a complete list of all regional webinars. All program information will be similar. <https://trustuscotton.org/enrollment-webinar-live-sessions/>

Please contact us or Marjory Walker ([mwalker@cotton.org](mailto:mwalker@cotton.org)), Ken Burton ([kburton@cotton.org](mailto:kburton@cotton.org)), Craig Brown ([cbrown@cotton.org](mailto:cbrown@cotton.org)) or Tas Smith

([tsmith@cotton.org](mailto:tsmith@cotton.org)) if you have questions. Thanks for your attention to this request.

## Association Delivers Socks to Veterans in Need

This past week **California Cotton Ginners and Growers Association President/CEO Roger Isom** delivered 1,440 pairs of pima cotton socks to the **Veterans Village in San Diego** as part of the Annual Stand Down Event for homeless veterans. This event is held every year and serves more than 800 veterans and their families each year. For veterans who have lost everything and are living on the streets, Stand Down provides an opportunity for them to access services, connect with the community, restore hope, and “Stand Down” for a weekend. Thanks to the support of cotton growers in California as members of **Supima** and the **California Cotton Ginners and Growers Association**, 1,440 pairs of brand new socks made from California pima cotton were delivered this past week, and will be handed out on November 2<sup>nd</sup> at the one day event. **Association President/CEO Roger Isom** stated, “This is the 3<sup>rd</sup> year, the Association and Supima have been involved, and it has been an honor and a privilege to



give back to those who have fought and worked so hard to protect us. It is time for us to help them get back up on their feet. And thanks to **Senator Toni Atkins** for her efforts to help coordinate this very important donation.”



### **NO on Proposition 15 Campaign - UPDATE**

The largest tax hike in California’s history is on the ballot, and if passed would create \$12.5 billion in new taxes, the largest tax hike in our state’s history. It is known as Proposition 15, and it would eliminate the 1% cap on property taxes for businesses throughout the state, including agricultural processing facilities such as cotton gins. In addition, it would trigger annual reassessments for agricultural fixtures, such as irrigation systems, solar installations on farms and processors, barns, and even permanent crop trees and vines. In a year like 2020, it is difficult to fathom we are facing something like Proposition 15. For tree nut growers, hullers and processors, the time to take a stand is right now! We need every member to contribute! We would like to thank those members that have already contributed like **Bone Farms, Borba Farms, County Line Gin, Cross Creek II Gin, Farmers Cooperative Gin, Gilkey Five, Modern Ginning Company, Sage Creek Ranch, Seasholtz Farms, Teixeira & Sons, Dos Palos Cooperative Gin, Hansen Ranches, Brian Watte Farms, Greg Watte Ranch, Julia Scott, Robinsons Sheet Metal, Todd Landry, J. Loogman and McKean Farms**. We appreciate your help!

### **Association Submits Comments on CARB’s Draft 2020 Mobile Source Strategy**

The Association submitted comments this past week on the California Air Resources Board’s (CARB’s) DRAFT 2020 Mobile Source Strategy. This ambitious and all-

encompassing approach to address both greenhouse gas (GHG) and criteria pollutant emissions is concerning, and in some ways will actually delay short term, but significant air quality improvements with little more than goals that are unproven and, in some cases, maybe not even possible. The 2020 Mobile Source Strategy (2020 MSS) is a multi-pollutant planning approach to determine the pathways forward for the various mobile sectors CARB fees are necessary in order to achieve California’s numerous goals and targets over the next 30 years. The plan addresses the full spectrum of mobile sources, including trucks, tractors and harvesters, forklifts transportation refrigeration units (TRUs), and cars. In addition, on September 23, 2020, Governor Newsom signed Executive Order N-79-202 which established a goal that 100 percent of California sales of new passenger car and trucks be zero-emission by 2035. Furthermore, the Governor’s order set a goal to transition all drayage trucks to zero-emission by 2035, all off-road equipment to zero-emission where feasible by 2035, and the remainder of medium- and heavy-duty vehicles to zero-emission where feasible by 2045. Specifically for medium- and heavy-duty vehicles, the scenarios call for the deployment of approximately 1.4 million medium- and heavy-duty zero-emission vehicles (ZEVs) in California by 2045. Statewide, the concepts in the 2020 Strategy could achieve criteria pollutant NOx reductions of over 600 tons per day in 2037, and reduce mobile source fuel consumption by 9.5 billion gallons of gasoline and 3.0 billion gallons of diesel equivalent in 2045. The Association’s comments centered on three specific areas. First, we are extremely concerned with the impact on the current and highly successful effort to replace agricultural equipment with new Tier 4F equipment due to the fact that this new equipment will again be forced to be replaced in less than 10 years to meet these new goals. Second, we are concerned with the proposed goals that are not yet demonstrated and at this point not anywhere near cost effective. Lastly, we are concerned with the overwhelming impact the proposed strategy will have on agriculture with the cumulative impact of all of the strategies laid out in the proposed plan including, trucks, agricultural equipment, transportation refrigeration units (TRUs) and large spark ignited (LSI) equipment (i.e. forklifts). These regulations will be implemented in roughly the same time period causing significant economic harm to an industry which does not have the ability to pass along any increased cost due to being subject to a world market price.

### **EPA Proposes New Safety Measures for Paraquat**

EPA is taking the next step in its regulatory review of paraquat dichloride (paraquat), a widely-used herbicide. As outlined in the proposed interim decision for paraquat, the agency is proposing new measures to reduce risks associated with paraquat in order to better protect human health and the environment. These measures include:

- **Prohibiting aerial application for all uses and use sites except cotton desiccation;**
- **Prohibiting pressurized handgun and backpack sprayer application methods on the label;**
- **Limiting the maximum application rate for alfalfa to one pound of active ingredient per acre;**
- **Requiring enclosed cabs if area treated in 24-hour period is more than 80 acres;**
- **Requiring enclosed cabs or PF10 respirators if area treated in 24-hour period is 80 acres or less;**
- **Requiring a residential area drift buffer and 7-day restricted entry interval (REI) for cotton desiccation;**
- **Requiring a 48-hour REI for all crops and uses except cotton desiccation; and**
- **Adding mandatory spray drift management label language.**

Paraquat is applied annually to control invasive weeds and plants in more than 100 crops—including cotton, corn, and soybeans, and there are presently no direct alternatives to this product. Because all paraquat products are Restricted Use Products, they can only be applied by certified pesticide applicators. Additionally, specialized training for certified applicators who use paraquat was released earlier this year to ensure that the pesticide is used correctly. The proposed interim decision (PID) for paraquat is the third step in EPA’s four-step process for evaluating a pesticide registration application that EPA conducts at least every 15 years. It is not a denial or an approval of the active ingredient. In the PID, EPA proposes mitigation measures to reduce the human health and ecological risks identified in the agency’s human health and ecological risk assessments (step two). The agency published the draft risk assessments for paraquat in October 2019. The ID is the fourth step in the registration review process. In the ID, EPA finalizes mitigation measures to reduce the human health and ecological risks.

### **Association Submits Comments Opposing NRDC Petition to Regulate Treated Crop Seeds**

This past week, the California Cotton Ginners and Growers Association (CCGGA) submitted comments opposing

the “petition to Regulate Crop Seeds Treated with Neonicotinoids and Other Systemic Insecticides” as filed by the Natural Resources Defense Council (NRDC). We found this petition to be unnecessarily duplicative of existing federal requirements, burdensome with the ability to reduce risk, and without merit. Accordingly, we urged the California Department of Pesticide Regulation (CDPR) to reject the petition. EPA regulations include the concept known as the “treated article exemption”, which has historically been applied to include treated seed as it is appropriate and avoids unnecessary duplicative regulation. The Petition seeks to impose a regulatory process upon agriculture that would entirely duplicate EPA’s existing exercise of its authority under FIFRA while having no positive impact on human health or environmental safety. The EPA assesses the potential risk for seed treatment products from treating, planting and growing the seed (i.e., environmental fate, ecotoxicology and operator exposures), to the consumption of the harvested commodity (i.e., human health). Labels approved through EPA’s registration process include seed treatment uses that, when their instructions are followed, do not pose an “unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits”. Seed treatments offer many benefits to California agriculture and the environment. It can deliver a precise application that shields seeds from insects and diseases during early developmental stages. It controls key pests, especially below the ground; and in some cases, increasing crop yield, providing growers an economic return on investment. It is a critical component of integrated pest management (IPM) they reduce non-target exposure and allow for lower application rates compared to alternate applications methods, and it can reduce the environmental impact of pest control by decreasing the need for supplemental foliar applications. The Association believes this petition is unnecessary, unwarranted and without merit, and urged the CDPR to outright and immediately reject the proposed petition.

### **President Donald Trump signs Executive Order on Modernizing America’s Water Resource Management and Water Infrastructure**

Last month, President Donald Trump signed an Executive Order on “Modernizing America’s Water Resource Management and Water Infrastructure.” This action ensures Federal coordination on water policy is standard

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1785 N. Fine Avenue  
Fresno, CA 93727

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practice now and into the future by formally establishing a Water Subcabinet of senior Federal agency officials to facilitate efficient and effective management and modernization of our water supplies and systems while also eliminating duplication between agencies.

The new, formalized Water Subcabinet will be co-chaired by Interior Secretary Bernhardt and U.S. Environmental Protection Agency (EPA) Administrator Andrew Wheeler, and will include senior officials from the U.S. Department of Agriculture (USDA), the Department of Commerce, the Department of Energy, and the Department of the Army (Civil Works).

Under the Executive Order, the Water Subcabinet will:

- Promote effective and efficient water resources management by reducing duplication between Federal agencies developing water policy;
- Develop a national water strategy to ensure the reliability of our water supplies, water quality, water systems, and water forecasting;
- Protect taxpayer investments and improve water infrastructure planning by promoting integrated planning and coordination for drinking water, wastewater, water reuse, water storage and delivery, and water resource management; and
- Support and enhance workforce development to re-

cruit, train, and retain water sector professionals. You can read the entire press release <https://www.epa.gov/newsreleases/president-trump-signs-executive-order-modernizing-americas-water-resource-management>.

## **State Water Board Releases “Emergency Rulemaking” Proposal on Water Fees**

Earlier this month, the State Water Resources Control Board (State Water Board) released an “Emergency Rulemaking” specific to fees administered by the agency. The State Water Board is allowed to present Emergency Regulations specific to fees to assist in meeting the revenue levels set forth in the State Budget. Detailed in the document is the proposal for the State Water Board to increase fees associated with the Irrigated Lands Regulatory Program (ILRP) by 3.5% for the 2020-2021 fiscal year. For years, the State Water Board has increased fees to try and meet revenue goals, much to the frustration of the regulated community. Fees collected are pooled together and distributed amongst the various regulatory programs overseen by the State Water Board. The Association submitted comments in opposition to this proposed fee increase, and will continue to engage State Water Board staff on reducing fees levied on growers.