



The Cotton Chronicle

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

www.ccgga.org

September 2024

Volume 34, Issue 9

Industry Calendar

CCGGA Research Meeting
Sept. 10, 2024

CCGGA Board Meeting
Sept. 11, 2024

Cotton Harvest Safety Training
Sept. 19, 2024

Association Hosts Critical Electric Infrastructure Meeting

The Association hosted representatives from the **California Energy Commission (CEC), California Air Resources Board (CARB), the San Joaquin Valley Air Pollution Control District (SJVAPCD)** and several agricultural organizations last month to discuss an important survey that will be conducted by Cal Poly San Luis Obispo on potential electrical demand and needs as CARB heads down the path of zero emission mandates on trucks, forklifts, buildings and equipment. The survey will also give the industry a chance to update the statewide emissions inventory for tractors and harvesters as so much equipment has been replaced or upgraded in the past few years, but the emission inventory doesn't yet reflect the tremendous strides agriculture has made taking advantage of incentive programs such as the Carl Moyer Program, CARB's FARMER program or funding through USDA NRCS. The primary purpose is to address statewide deficiencies in electric infrastructure and the survey will be to provide a glimpse of just how much energy will be needed, where is

needed and when will it be needed from an ag perspective. Cal Poly heard comments from everyone at the meeting and is reworking their draft survey and hope to have some finished and ready to go by September or October. Agricultural groups participating in the meeting included the **California Cotton Ginners and Growers Association, Western Agricultural Processors Association, Ag Energy Consumers Association, California Farm Bureau Federation, California Fresh Fruit Association, Milk Producers Council and the Nisei Farmers League.**

Truck Emissions Testing Postponed until 2025

The California Air Resources Board (CARB) has been sending out notices to applicable vehicle owners, requesting that they register with the new Heavy-Duty Inspection & Maintenance rule. Any owner/operator of a 14,000 GVWR truck or heavier, must report their equipment into the new database developed by CARB as well as pay a per truck annual compliance fee. Along with registering, the fleet owner is then required to conduct and submit annual opacity or emission controls inspections done by

a 3rd party in order to obtain the vehicle's annual registration paperwork. It was recently noticed to all applicable businesses and vehicle owners that the **testing requirement of the rule has been postponed for the 2024 year**, and will take effect in 2025. Currently, CARB is still awaiting an approval waiver from EPA Region 9. CARB is being challenged on the several of their approved rules, specifically the Advanced Clean Fleets regulation, which pushes businesses to expedite the

CCGGA Staff

Roger A. Isom
President/CEO
roger@ccgga.org

Priscilla Rodriguez
Assistant Vice President
priscilla@ccgga.org

Christopher McGlothlin
Director of Technical Services
chris@ccgga.org

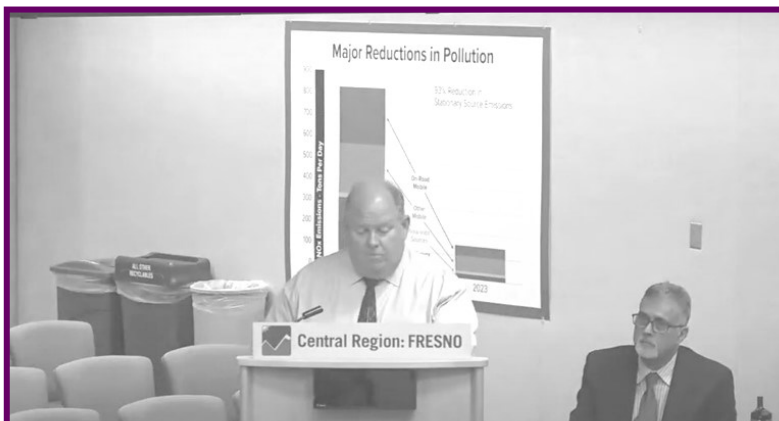
Michelle Franco
Administrative Assistant
michelle@ccgga.org



deployment of electric vehicles within a fleet. Stay tuned for more updates.

Association Once Again Pushes for Science When it Comes to PM2.5

The San Joaquin Valley Air Pollution Control District provided an update on their efforts to implement their PM2.5 State Implementation Plan to meet the National Ambient Air Quality Standard (NAAQS) for the 24-hour standard of 12 ug/m3 for PM2.5. In public testimony, **Association President/CEO Roger A. Isom** urged the Board to reinvigorate the Governing Board's Study Agency. Isom reminded the Board that the Air District achieved the one-hour ozone standard, the PM₁₀ standard and the 65 ug/m3 PM2.5 standard based on the results and guidance from all the research that was conducted under the Central California Ozone Study (CCOS) and the California Regional Particulate Matter Air Quality Study (CRPMAQS), both of which were overseen by the Governing Board's Study Agency. Isom urged science be the driving factor as the District looks to add new or stricter Conservation Management Practices (CMPs) for farming operations, and low dust harvesters for tree nut operations. This will become especially important as the District begins looking at the next standard set forth by Federal EPA, which is the 9 ug/m3 PM2.5 standard. **Governing Board Chairman Vito Chiesa (Stanislaus County Supervisor and walnut grower)** wrapped up comments by agreeing with Isom and stating that meeting the new 9 ug/m3 PM2.5 standard is "going to be very difficult and we're going to need lots of help like FARMER funding". The Association will continue to stay at the forefront of this issue as it does on all regulatory items facing the agricultural industry.



Association Submits Comments Opposing Advance Notification

This past month the Association submitted written comments opposing California Department of Pesticide Regulation's (CDPR) proposed Advance Notification Requirements for Pesti-

cide Applications. The Association called the proposal "unwarranted and frankly unjustified". The Association commented that the proposal ignores the robust science CDPR, and the Federal Environmental Protection Agency (EPA) uses in registering pesticides and allowing their uses. The Association also highlighted the fact that county ag commissioners employ more than 500 inspectors and conduct more than 30,000 inspections statewide annually. The Association expressed concerns that this is only to appease the anti-pesticide activists and could significantly impact future pesticide applications. In addition to the individual letter, the Association joined 23 other ag organizations in signing a coalition letter against the proposed requirements. Furthermore, the Association led a Call for Action and many of our members submitted letters opposing the proposed requirements and follows the personal testimony Association President/CEO Roger Isom gave last month at the CDPR hearing in Turlock.

Cotton Harvest Safety Training

The Association has partnered with Fresno County Farm Bureau to host a **Cotton Harvest Safety Training on Thursday, September 19, from 8:30-10:30 a.m. at the UC West Side Research and Extension Center located at 17353 W. Oakland Ave in Five Points.** This training will be held concurrently in both English and Spanish.

The training will cover equipment safety (preparation and operation), electrical hazards, heat illness prevention and road safety. All information will be provided in English and Spanish. Certificates will be given upon completion. The training will be provided by Zenith Agribusiness Solutions.

There is no cost to attend, and check-in will begin at 8 a.m. Please RSVP for the upcoming training on the FCFB website.

EPA Finalizes Herbicide Strategy to Protect Endangered Species

The U.S. Environmental Protection Agency released its final Herbicide Strategy to protect over 900 federally endangered and threatened (listed) species from the potential impacts of herbicides. EPA will use the strategy to identify measures to reduce the amount of herbicide exposure to these species when it registers new herbicides and when it reevaluates registered herbicides under a process called registration review. The final strategy incorporates a wide range of stakeholder input, ensuring EPA not only protects species but also preserves a wide range of pesticides for farmers and growers. For decades, EPA has tried to comply with the Endangered Species Act (ESA) on a pesticide-by-pesticide, species-by-species basis.

However, because this approach is very slow and costly, it resulted in litigation against the agency and uncertainty for users about the continued availability of many pesticides. At the beginning of 2021, EPA faced almost two dozen lawsuits covering thousands of pesticide products due to its longstanding failure to meet ESA obligations for pesticides. Some of these lawsuits resulted in courts removing pesticides from the market until EPA ensured the pesticides comply with the ESA. Now, all but one of those lawsuits has been resolved. The Herbicide Strategy identifies protections for hundreds of listed species up front and will apply to thousands of pesticide products as they go through registration or registration review, thus allowing EPA to protect listed species much faster. In response to comments on the initial draft, EPA made many improvements to the draft, with the primary changes falling into three categories:

- Making the strategy easier to understand and incorporating up-to-date data and refined analyses.
- Increasing flexibility for pesticide users to implement mitigation measures in the strategy; and,
- Reducing the amount of additional mitigation that may be needed when users either have already adopted accepted practices to reduce pesticide runoff or apply herbicides in an area where runoff potential is lower.

The final strategy includes more options for mitigation measures compared to the draft, while still protecting listed species. The strategy also reduces the level of mitigation needed for applicators who have already implemented measures identified in the strategy to reduce pesticide movement from treated fields into habitats through pesticide spray drift and runoff from a field. The measures include cover crops, conservation tillage, windbreaks, and adjuvants. Further, some measures, such as berms, are enough to fully address runoff concerns. Growers who already use those measures will not need any other runoff measures. The final strategy also recognizes that applicators who work with a runoff/erosion specialist or participate in a conservation program are more likely to effectively implement mitigation measures. These conservation programs include the USDA's Natural Resources Conservation Service practices and state or private stewardship measures that are effective at reducing pesticide runoff. The strategy reduces the level of mitigation needed for applicators who employ a specialist or participate in a program. Geographic characteristics may also reduce the level of mitigation needed, such as farming in an area with flat lands, or with minimal rain such as western U.S. counties that are in the driest climates. As a result, in many of those counties, a grower may

need to undertake few or no additional runoff mitigations for herbicides that are not very toxic to listed species. The final strategy uses the most updated information and processes to determine whether an herbicide will impact a listed species and identify protections to address any impacts. To determine impacts, the strategy considers where a species lives, what it needs to survive (for example for food or pollinators), where the pesticide will end up in the environment, and what kind of impacts the pesticide might have if it reaches the species. These refinements allow EPA to focus restrictions only in situations where they are needed. The final strategy itself does not impose any requirements or restrictions on pesticide use. Rather, EPA will use the strategy to inform mitigations for new active ingredient registrations and registration review of conventional herbicides. EPA is also developing a calculator that applicators can use to help determine what further mitigation measures, if any, they may need to take considering mitigations they may already have in place.

Climate Smart Cotton Program Level 2 Applications Open

U.S. cotton growers can now enroll in [Climate Smart Cotton Program](#) Level 2. This program, led by the [U.S. Cotton Trust Protocol](#), gives Level 1 growers the opportunity to receive additional financial support for implementing Climate Smart Practice Changes into their operations. Additional practice options were also added this year, increasing the number of growers eligible to participate. To qualify for Level 2, growers must meet Level 1 requirements, adopt a new Climate Smart Agriculture practice, verify practice adoption, participate in soil health target setting, and quantify greenhouse gas emissions on all practice change acres. Questions? Email info@trustuscotton.org to be connected with the [Grower Enrollment Specialist](#) for your region.

Compliance Reminder for Stationary Rich-Burn Natural Gas Fired Engines

As of December 31, 2023, all rich-burn natural gas fired engines must meet 11 ppm NOx. To comply with the requirements of Rule 4702, owners/operators must submit either an Authority to Construct (ATC) permit application, a Permit Exempt Equipment Registration (PEER) Application, or an Emission Control Plan (EOP) to the District. The application or plan should identify the chosen method of compliance. Possible methods to demonstrate compliance include:

- Replace engine with an electric motor
- Retrofit or replace engine with a compliant catalyst system
- Retrofit or replace engine to operate in a compliant lean-

California Cotton Ginners and Growers Association
1785 N. Fine Avenue
Fresno, CA 93727

PRESORTED STANDARD
US POSTAGE PAID
FRESNO, CA
PERMIT NO. 2509

Go Electronic!

Do you want our Newsletter & Latest News directly to your inbox? Send your name and email address to info@ccgga.org and we'll get you on the list to receive our important and informative monthly newsletter electronically. It's easy!

WWW.CCGGA.ORG

burn configuration

- Perform a source test on your currently installed engine(s) showing compliance with the limits of 11 ppm NOx.

If you have any questions, please call our office at (559)252-0684.

Cal/OSHA Urges Employers to Protect Workers from Heat Illness Amid High Temperatures

Cal/OSHA is reminding employers to protect workers from heat illness as extreme temperatures are forecast across California on Thursday and Friday. "Even though the summer season is ending, employers must continue to monitor the weather and protect workers from heat illness, especially during periods of high heat," said **Cal/OSHA Chief Debra Lee**. In September 2022, some of the hottest days were recorded in cities across California when an extreme heat wave lasted from August 31 to September 9. During this time, Cal/OSHA coordinated with other state agencies to provide additional resources for power outages and conducted targeted inspections of at-risk worksites. Be advised Cal/OSHA's heat illness prevention standards require employers to protect workers from heat illness, especially during periods of high heat like this week. There are specific requirements for both outdoor and indoor workplaces. To prevent heat illness, employers must train

workers on how to identify and respond to heat illness, as well as provide and encourage the use of enough water, shade and cool-down rest breaks to keep workers safe. All the requirements are posted in English and Spanish on www.99calor.org.

Thank you for your continued interest in the Cotton Chronicles, the monthly newsletter for the California Cotton Ginners and Growers Association. To help reduce costs, we are asking everyone to consider receiving the electronic version of the Cotton Chronicles instead of paper. If you are willing to switch to the electronic version of the newsletter, please send an email to Michelle at michelle@ccgga.org requesting the change. Thank you for your consideration.