Outlook

CDFA Climate Resiliency Strategy for CA Agriculture – Sac Metro Air District Comments

From Jaime Lemus <JLemus@airquality.org>
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To Jameson, Virginia@CDFA <Virginia.Jameson@cdfa.ca.gov>; CDFA Climate <CDFA.Climate@cdfa.ca.gov>
Cc Paul Philley <PPhilley@airquality.org>; Richard Muzzy <RMuzzy@airquality.org>; Brianna Moland <BMoland@airquality.org>

Deputy Director Virginia Jameson,

Thank you for providing the opportunity for the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) to review and comment on the California Department of Food and Agriculture's Climate Resiliency Strategy for California Agriculture. This strategy is an important tool that will help California achieve its greenhouse gas (GHG) reduction targets within the agricultural sector.

Comments on Strategy 9.1 Improve Air Quality from Agricultural Operations

The California Department of Food and Agriculture's Climate Resiliency Strategy for California Agriculture outlines new climate-smart land management practices to reduce impacts on air quality from the agricultural sector. In Chapter 9: Enhance Agricultural Practices to Support Clean Air Communities, the benefits of agricultural equipment efficiency are discussed. The Sac Metro Air District recommends the adoption of a GHG reduction measure from the California Air Pollution Control Officers Association's 2024 Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (GHG Handbook) to bolster efforts to improve air quality on and near agricultural lands. Acton 9.1.3 in Chapter 9 aims to increase access to equipment upgrades. Measure N-8. Agricultural Equipment Efficiency from the GHG Handbook would support the replacement of conventional gasoline- or diesel-fueled agricultural equipment with zero-emission alternatives. Switching to zero-emission equipment improves air quality by reducing exposure to local criteria pollutants and reduces noise pollution. While zero-emission equipment tends to be more expensive than conventional agricultural equipment, the cost of purchasing and installing the equipment can be offset by savings in fuel use and maintenance.

The Sac Metro Air District administers the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) in the Sacramento region. The Carl Moyer Program can be a useful resource for funding the replacement of conventional gasoline- or diesel-fueled agricultural equipment with a zero-emission counterpart. The program will begin accepting new applications in early 2026, and has provisions for hybrid, electric, and hydrogen fuel cell vehicles.

Other Comments

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Chapter 9 mentions that the California Air Resources Board (CARB) is currently drafting a 2025 update to the Mobile Source Strategy, but as of March 2025, CARB is pausing the development of the Mobile Source Strategy and reconsidering the approach. Potential mobile source strategies developed by

CARB as part of this effort should be reviewed to determine possible methods to enhance program effectiveness.

Thank you,

Jaime R Lemus
Director
Transportation and Climate Change Division
jlemus@airquality.org
www.AirQuality.org
@AQMD

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