## Addendum to the June 2022 Economic and Pest Management Evaluation of Proposed 1,3-Dichloropropene Regulation

Prepared for the Department of Pesticide Regulation by the California Department of Food and Agriculture's Office of Pesticide Consultation and Analysis, and the University of California, Davis

Rachael Goodhue ${ }^{1}$, Kevi Mace ${ }^{1,2}$, Steve Blecker ${ }^{3}$, Yanan Zheng ${ }^{1}$, Samuel Raburn ${ }^{1}$, Jessica Rudder ${ }^{4}$, Ashley Spalding ${ }^{5^{*}}$, Tor Tolhurst $^{6}$, Hanlin Wei ${ }^{7}$, Brian Gress ${ }^{1,2}$, John Steggall ${ }^{1,2}$
${ }^{1}$ University of California, Davis
${ }^{2}$ California Department of Food and Agriculture
${ }^{3}$ Colorado State University, Colorado
${ }^{4}$ University of Chicago
${ }^{5}$ Economic Research Service, USDA
${ }^{6}$ Purdue University, Indiana
${ }^{7}$ China Agricultural University, Beijing
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## Description of Addendum

This is the second addendum to the June 21,2022 , report on the economic and pest management impacts of potential 1,3-D regulation (Goodhue et al. 2022a). ${ }^{1}$ On February 2, 2023, DPR informed CDFA OPCA of several changes in the proposed regulation relative to the version analyzed in the first addendum dated June 23, 2022 (Goodhue et al. 2022b). ${ }^{2}$ In the newly revised proposed regulation, DPR included the following changes:

1. Add more application rates in setback tables - changing from $25 \mathrm{lbs} / \mathrm{ac}$ to $10 \mathrm{lbs} / \mathrm{ac}$ intervals, resulting in a total of 26 application rates.
2. Add region-specific setback tables (inland vs coastal)
3. Change $50 \%$ TIF method to $40 \%$ TIF with resulting changes in the setback tables
4. Add $24-$-in injection GPS-guided application method
5. Add options for 300 ft and 400 ft setbacks instead of only $100 \mathrm{ft}, 200 \mathrm{ft}$ and 500 ft

Only the proposed changes 1-3 are considered in this analysis. The addition of a $24-\mathrm{in}$ GPS application method does not change the setback tables and, therefore, would not impact this analysis. The addition of options for 300 ft and 400 ft setbacks gives the growers and applicators more flexibility. Given the limited time available for analysis, we analyzed only the 200 ft and 500 ft application rules that were included in the original report and first addendum. Consequently, our estimates are an overestimate in this regard as fields with buildings in the 300-400 ft range will be able to treat larger blocks than they would if limited to using the 200 ft setback rules.

This addendum includes the number of affected fields and estimated costs of the proposed regulation but does not include detailed discussions of methods or other information that did not change from the June 21, 2022, report. The original report is quoted as needed to provide context, and the first addendum is referenced as needed. However, this addendum is not an independent, comprehensive document and should be read in conjunction with the June 21, 2022, report and the June 23, 2022, addendum.

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## Summary

As in the June 23,2022 , addendum, this addendum examines the mitigations for acute exposure to non-occupational bystanders by evaluating how growers could comply with modifications to the proposed regulations analyzed in the June 21, 2002 report regarding the relationships between the allowable application method, setbacks to occupied structures, and block size. The addendum is not a full report. Instead, it estimates the economic impacts associated with these proposed changes to the draft regulations compared to current regulations. DPR's proposed regulation regarding these three factors is reported in tables for each mitigation option showing the maximum allowed daily acres treated (block size), which are based on distance from the field to an occupied structure ( $100 \mathrm{ft}, 200 \mathrm{ft}$, or 500 ft ) and the application rate. As stated in the June 21, 2022, report:

In general, the higher the application rate and shorter the distance to an occupied structure the lower the maximum application block size for each application method. The maximum permitted block size can range from 0 acres (application not permitted) to as much as 80 acres for some application methods and rates. But for untarped applications the proposed maximum block size has been reduced to achieve the minimum 100 ft setback from occupied structures even with new application methods. Current restrictions allow a block size of up to 80 acres in an application while maintaining a 100 ft setback from occupied structures.

We examine the cost of complying with the proposed regulation for acute exposure in two ways. First, we evaluate the cost for all 1,3-D applications to comply with the proposed changes by adopting, if needed, a new application method and/or reducing block size to retain a 100 ft setback and current application rate, regardless of whether or not the applications are in fact near an occupied structure. This approach identifies how costly the proposed changes would be if all applications had to comply with the combinations of application rate, application method, and maximum block size permitted under the proposed regulation. This analysis uses data on applications from 2017-2020 (Method 1). Second, for three focal counties in 2017-2018, Fresno, Kern, and Stanislaus, we integrate GIS data with application data and isolate only those applications within certain distances of occupied structures. We then identify how much acreage would have been impacted directly for all crops and the associated mitigation cost (Method 2). However, we cannot know with certainty that all of the applications examined using Method 2 are ones that would have been impacted by the occupied distance restriction because fields, not applications, are mapped. If not all of a field was fumigated with $1,3-\mathrm{D}$ it is conceivable that the proposed setback distance for that application would not be binding.

Under the newly proposed changes estimated costs range from \$973,349 (2019) to \$1,513,792 (2017) (Table 1). Comparable annual cost results from the June 21, 2022 report and June 23, 2022 addendum are presented in Table 2 (a reproduction of ES-Table 1) and Table 3 (a reproduction of Table 1). Each year the cost of the original proposed regulation would have been higher than the proposed regulation considered in this addendum. Because the initial proposed regulations did not differentiate between regions there are only statewide totals. Figure 1 illustrates the
differences in annual costs across years and the relative importance of the two regions in determining total costs.

Table 1. Updated Annual Cost of Compliance with Occupied Structure Setback for 1,3-D Applications Assuming a 100 ft Setback and Current Application Rate: Coastal and Inland Regions and Statewide

| Year | Total <br> Cost: <br> Coastal | Total <br> Cost: <br> Inland | Total <br> Cost: <br> State |
| :--- | ---: | ---: | ---: |
| 2017 | $\$ 534,428$ | $\$ 979,364$ | $\$ 1,513,792$ |
| 2018 | $\$ 341,927$ | $\$ 1,162,738$ | $\$ 1,504,665$ |
| 2019 | $\$ 252,329$ | $\$ 721,020$ | $\$ 973,349$ |
| 2020 | $\$ 491,150$ | $\$ 948,749$ | $\$ 1,439,899$ |

Table 2. June 21, 2022 Report Annual Cost of Compliance with Occupied Structure Setback for Statewide 1,3-D Applications Assuming a 100 ft Setback and Current Application Rate

| Year | Total <br> Cost |
| :--- | ---: |
| 2017 | $\$ 1,897,283$ |
| 2018 | $\$ 1,996,093$ |
| 2019 | $\$ 1,278,772$ |
| 2020 | $\$ 1,729,988$ |

Table 3. June 23, 2022 Addendum Annual Cost of Compliance with Occupied Structure Setback for Statewide 1,3-D Applications Assuming a 100 ft Setback and Current Application Rate

| Year | Total <br> Cost |
| :--- | ---: |
| 2017 | $\$ 1,425,081$ |
| 2018 | $\$ 1,546,033$ |
| 2019 | $\$ 1,020,278$ |
| 2020 | $\$ 1,471,936$ |



Figure 1. Total Annual Cost of Proposed Regulation: 2017-2020

## Methods and Data

Detailed methods can be found in the June 21, 2022, report. Changes in the application of Method 1 relative to its application in the June 21, 2022, report are presented here. The differences that characterize the application of Method 2 from the June 21, 2022, report are the same as the differences for Method 1. The data are the same as in the June 21, 2022, report.

## Changes in the application of Method 1: Changes in application methods to retain 100foot distance to occupied structures

The updated proposed regulation introduces regional differences in the application tables for 1,3-D. For each region there are seasonal maximum block sizes if occupied structures are near the application site for all non-tarped and some tarped fumigation methods. As in the June 21, 2022, report, this analysis assumes that all applications would have to choose an application method and/or split applications into multiple blocks in order to comply with the maximum block size specified in the proposed regulation for the observed application rate and a $100-\mathrm{ft}$ setback. The new setbacks and maximum acres for 12 -in, 18 -in, $24-\mathrm{in}$, drip, and TIF tarp application methods proposed by DPR are presented by time period and region in tables in Appendix A. These tables were provided to CDFA by DPR on February 2, 2023.

As stated in the June 21, 2022, report,
When choosing an application method, growers balance multiple factors; ideally, they want to minimize setbacks to occupied structures and costs while maximizing block size and maintaining pest control efficacy. Season, application rate, application method, occupied structure distance, and block size can all be adjusted to get the most cost-effective result. We make a series of assumptions about grower actions to estimate the cost. We assume that:

- Growers will not change application rates; application rates are determined by what is effective for pest control for that crop so applying at a lower rate for any given method is largely not an option. Appendix B presents more detailed information on pest management. Growers will not switch to TIF tarp application methods due to cost. Adding TIF tarp is currently estimated to cost around $\$ 1,150$ an acre, including tarp removal. Additionally, currently there is not a sufficient supply of TIF tarp to allow all crops to use it. If there were a substantial shift to increased TIF, the price could increase.
- Growers using shallow injection and TIF tarp will switch to deep injection and TIF tarp when shallow injection applications would lead to greater setbacks.
- Growers will not increase the setback to occupied structures because in many cases that would lead to leaving a section of the field untreated. These sections would have to planted to nematode-resistant plants or left fallow. Nematodes are mobile in the soil and can infect a field from one untreated section. For perennial crops like almonds, having an untreated section would risk significant long-term yield loss. For annual crops like sweet potato the margins are too small to absorb a loss of acreage or yield for the year. We look at the potential lost acreage in the Method 2 analysis. Appendix B presents more detailed information on pest management.
- Growers will choose the least costly application method that maximizes block size. Blocks that exceed the maximum size based on application method, application rate, and occupied structure setback are split into smaller blocks that are within the size requirements. In other words, growers will not shift to an alternative application method or rate in order to increase the maximum block size, even if that would be sufficient for an existing application to meet the proposed requirements. Using TIF tarps would allow growers to maintain 80 -acre blocks but comes at a cost. In comparison to the $\$ 1,150$ per acre cost of TIF, the maximum estimated cost to split an 80 -acre block (derived below) is $\$ 1,480$, which amounts to $\$ 18.50$ per acre on average. There is likely heterogeneity in the cost to split a block across fields and growers.
- Growers using chemigation (FFM 1209) will add TIF tarps at the cost of $\$ 1,150$ /ac and keep using chemigation. This is more expensive than switching to deeper injection. However, if a field is set up to use chemigation, it would likely require significant time and effort to re-do that field to instead use deep injection.

The updated seasonal regulation addressed in the first addendum to the report added additional considerations.

- When planting time is flexible, growers will choose to apply in the MarchOctober timeframe instead of splitting blocks if their desired application does not meet the November-February restrictions. We assume that planting time for annual crops is not flexible, and that they will comply with the new restrictions for the season in which the application was made, including splitting a field into smaller blocks. For tree and vine crops, there is more flexibility in when they can plant. For this analysis, we assume that applications
to tree and vine crops that violate the November-February restrictions would move to March-October.

It is worth noting that particularly hot weather in March would be problematic in the current scenario. A grower waiting until March to plant an orchard, which is the assumption in this report, could end up having to wait until the fall or even following March if the desired planting time was during a severe heat wave. This serves as a caveat that applies to this addendum and the prior one but not to the June 21, 2022, report.

As stated in the June 21, 2022, report,
We first identified any application statewide in our study period that would not have been in compliance under the proposed regulation, assuming they had to comply with the combinations of application rate, application method and maximum block size required in order to maintain a 100 ft setback from an occupied structure, regardless of whether or not one is present. Use rates are rounded up to the next level (i.e., an application with a use rate of $101 \mathrm{lbs} / \mathrm{ac}$ would be bound by the $110 \mathrm{lbs} / \mathrm{ac}$ rules). Given the assumptions above and DPR's updated fumigations tables, applications were separated into three sets: already compliant with the proposed regulation, able to comply by changing application method, and requiring splitting to comply.

We estimate two types of costs: application method costs and costs associated with splitting fields into smaller blocks. Based on stakeholder input, we set the cost of converting from 12-in or 18-in injection to $24-$ in injection depth at $\$ 10$ per acre due to increased fuel costs ${ }^{3}$. At the time of this report, adding TIF tarp cost around $\$ 1,150$ an acre including tarp removal, as noted above. Any costs that could be associated with additional soil preparation operations such as deep tillage, if required under some conditions, are not considered. Given that, and due to the small magnitude of the increase in fuel cost, 24 -in injection depth is the lowest-cost application method for untarped and tarped applications if the method must be altered for compliance with the proposed regulations.

As described in the June 21, 2022, report, growers incur a time cost when fields must be split in order to not exceed the maximum block size for a given rate and the lowest-cost application method. We obtained an estimated cost per split of $\$ 185.92$. Accordingly, the change in cost for a field requiring splitting will be the change in application method cost ( $\$ 10$ per acre for $24-\mathrm{in}$ injection) plus the splitting cost (\$185.92 per split).

## Results for Alternative Proposed Regulation

## Discussion of the results is separated by method.

[^2]Method 1: Economic analysis of changes in application methods to comply with 100 ft setback distance for all 1,3-D applications

Table 4/5 summarizes the number of violations when the proposed requirements are applied to historical data, affected acreage, and the cost of the proposed requirements in total and disaggregated by application rate categories by year. Low applications had rates below 150 lbs per acre, medium had 150-300 lbs per acre, and high had over 300 lbs per acre.

The number of inland acres that would have been affected annually by the proposed regulation ranged from 11,263 to 13,197 for low-rate applications, 1,268 to 2,411 for medium-rate applications, and 20,468 to 24,095 for high-rate applications (Table 4). A total of 33,607-37,882 inland acres per year would have been affected. The number of inland fields out of compliance with the new proposed regulations ranged from 188 to 223 for low-rate applications, 34 to 80 for medium-rate applications, and 848 to 986 for high-rate applications. A total of 1,087 to 1,287 inland fields per year would have been out of compliance.

The number of coastal acres that would have been affected annually by the regulation ranged from 3,712 to 4,291 for low-rate applications, 517 to 1,203 for medium-rate applications, and 373 to 879 for high-rate applications (Table 5). A total of $4,872-6,372$ coastal acres per year would have been affected. The number of coastal fields out of compliance with the new proposed regulations ranged from 103 to 140 for low-rate applications, 23 to 45 for medium-rate applications, and 20 to 33 for high-rate applications. A total of 159 to 208 coastal fields per year would have been out of compliance.

Under the proposed seasonal tables, the addition of TIF tarp for chemigation is the biggest driver of cost increases for inland low-rate fields (Table 4). About 76\% of the estimated change in cost is due to the addition of TIF tarp in the low-rate category. For the medium-rate fields, deeper injection is the biggest driver, accounting for $79 \%$ of the cost increase. For the high-rate category, field splits accounted for slightly under half of the cost increase (45\%) and deeper injection accounted for slightly over half (55\%). The number of splits required varied across application rate categories. Low-rate applications required 29 to 42 splits and medium-rate applications require 15 to 43 splits annually to bring them into compliance. High-rate blocks require 777 to 1,106 splits with a cost of $\$ 144,460$ to $\$ 205,628$.

The addition of TIF tarp for chemigation is a big driver of cost increases in coastal region, particularly in the low and medium rate categories (Table 5). The number of splits required varied across application rate categories. Low-rate applications required 12 to 21 splits with a cost of $\$ 2,231$ to $\$ 3,904$. Medium-rate blocks required 0 to 11 splits with a cost of $\$ 0$ to $\$ 2,045$. Highrate blocks required 25 to 69 splits, costing $\$ 4,648$ to $\$ 12,828$, annually to bring them into compliance. For the high-rate fields, the vast majority of which are tree and vine crops, around
$58 \%$ of the estimated change in cost is due to the logistical costs of splitting fields into smaller blocks. Applications requiring splits could incur higher costs if applicators decide to charge more per acre for smaller blocks and/or charge for mileage. As stated in the June 21, 2022, report:

Additionally, it is possible that some new maximum block sizes are so small that if all applications were divided into such blocks applicators simply wouldn't have the time or resources to treat all of them in time for planting, particularly if the affected fields are geographically dispersed. That scenario could likely be resolved by increased hiring and investment in equipment by applicators but does present a potentially very damaging situation in the short term if growers struggle to meet planting times and must leave fields fallow.

In total, annual compliance costs for inland regions ranged from $\$ 349,812$ to $\$ 691,136$ for lowrate applications, from $\$ 17,890$ to $\$ 32,108$ for medium-rate applications, and from $\$ 348,334$ to $\$ 446,574$ for high-rate applications (Table 4). For all crops, annual compliance costs for inland region are estimated at $\$ 721,020-\$ 1,162,738$ (Table 4). Annual compliance costs for coastal regions ranged from $\$ 64,811$ to $\$ 500,976$ for low-rate applications, from $\$ 11,836$ to $\$ 201,272$ for medium-rate applications, and from $\$ 8,373$ to $\$ 21,616$ for high-rate applications (Table 5). For all crops, annual compliance costs for coastal regions are estimated at \$252,329-\$534,428 (Table 5).Costs disaggregated by crop and year are available in Appendix B.

Table 4. Additional Annual Cost Due to 1,3-D Restrictions, Inland Region: 2017-2020

| Use Rate Category | Year | \# of <br> Violations | \# of Fields with violations | Affected Acres | \# of Splits | $\begin{array}{r} \text { Split } \\ \text { Cost }(\$) \end{array}$ | $\begin{array}{r} \text { Deep } \\ \text { Injection } \\ \text { Cost }(\$) \end{array}$ | TIF Cost | Total Cost (\$) | Share of cost due to splits (\%) | Share of cost due to deepinjection (\%) | Share of cost due to <br> TIF 1209 <br> Injection |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Low | 2017 | 225 | 223 | 13,197 | 42 | 7,809 | 128,285 | 424,201 | 560,294 | 1 | 23 | 76 |
| Low | 2018 | 230 | 223 | 11,787 | 29 | 5,392 | 112,884 | 572,861 | 691,136 | 1 | 16 | 83 |
| Low | 2019 | 195 | 188 | 11,277 | 29 | 5,392 | 110,740 | 233,680 | 349,812 | 2 | 32 | 67 |
| Low | 2020 | 215 | 205 | 11,263 | 31 | 5,764 | 108,935 | 424,500 | 539,198 | 1 | 20 | 79 |
| Medium | 2017 | 81 | 80 | 2,411 | 43 | 7,995 | 24,113 | 0 | 32,108 | 25 | 75 | 0 |
| Medium | 2018 | 79 | 78 | 2,001 | 27 | 5,020 | 20,008 | 0 | 25,028 | 20 | 80 | 0 |
| Medium | 2019 | 81 | 74 | 2,009 | 15 | 2,789 | 20,085 | 0 | 22,874 | 12 | 88 | 0 |
| Medium | 2020 | 37 | 34 | 1,268 | 28 | 5,206 | 12,685 | 0 | 17,890 | 29 | 71 | 0 |
| High | 2017 | 884 | 859 | 21,238 | 939 | 174,579 | 212,383 | 0 | 386,961 | 45 | 55 | 0 |
| High | 2018 | 1,027 | 986 | 24,095 | 1,106 | 205,628 | 240,946 | 0 | 446,574 | 46 | 54 | 0 |
| High | 2019 | 883 | 852 | 20,468 | 777 | 144,460 | 203,875 | 0 | 348,334 | 41 | 59 | 0 |
| High | 2020 | 889 | 848 | 21,076 | 973 | 180,900 | 210,760 | 0 | 391,660 | 46 | 54 | 0 |
| Total | 2017 | 1,190 | 1,162 | 36,847 | 1,024 | 190,382 | 364,781 | 424,201 | 979,364 | 19 | 37 | 43 |
| Total | 2018 | 1,336 | 1,287 | 37,882 | 1,162 | 216,039 | 373,838 | 572,861 | 1,162,738 | 19 | 32 | 49 |
| Total | 2019 | 1,159 | 1,114 | 33,754 | 821 | 152,640 | 334,700 | 233,680 | 721,020 | 21 | 46 | 32 |
| Total | 2020 | 1,141 | 1,087 | 33,607 | 1,032 | 191,869 | 332,380 | 424,500 | 948,749 | 20 | 35 | 45 |

Table 5. Additional Annual Cost Due to 1,3-D Restrictions, Coastal Region: 2017-2020

| Use Rate Category | Year | \# of Violations | \# of <br> Violated <br> Fields | Affected Acres | \# of Splits | Split Cost <br> (\$) | Deep <br> Injection Cost (\$) | TIF Cost | Total <br> Cost (\$) | Share of cost due to splits (\%) | Share of cost due to deepinjection (\%) | Share of cost due to TIF 1209 Injection (\%) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Low | 2017 | 193 | 140 | 4,291 | 12 | 2,231 | 26,578 | 472,167 | 500,976 | 0 | 5 | 94 |
| Low | 2018 | 154 | 126 | 4,171 | 21 | 3,904 | 20,867 | 187,427 | 212,198 | 2 | 10 | 88 |
| Low | 2019 | 174 | 114 | 4,076 | 15 | 2,789 | 25,797 | 36,225 | 64,811 | 4 | 40 | 56 |
| Low | 2020 | 117 | 103 | 3,712 | 19 | 3,532 | 21,959 | 256,013 | 281,505 | 1 | 8 | 91 |
| Medium | 2017 | 49 | 45 | 1,203 | 11 | 2,045 | 9,791 | 0 | 11,836 | 17 | 83 | 0 |
| Medium | 2018 | 35 | 35 | 634 | 0 | 0 | 5,421 | 105,800 | 111,221 | 0 | 5 | 95 |
| Medium | 2019 | 23 | 23 | 517 | 1 | 186 | 3,678 | 171,925 | 175,789 | 0 | 2 | 98 |
| Medium | 2020 | 38 | 36 | 788 | 1 | 186 | 5,310 | 195,776 | 201,272 | 0 | 3 | 97 |
| High | 2017 | 30 | 23 | 879 | 69 | 12,828 | 8,788 | 0 | 21,616 | 59 | 41 | 0 |
| High | 2018 | 22 | 20 | 717 | 61 | 11,341 | 7,167 | 0 | 18,508 | 61 | 39 | 0 |
| High | 2019 | 33 | 33 | 541 | 34 | 6,321 | 5,408 | 0 | 11,729 | 54 | 46 | 0 |
| High | 2020 | 21 | 20 | 373 | 25 | 4,648 | 3,725 | 0 | 8,373 | 56 | 44 | 0 |
| Total | 2017 | 272 | 208 | 6,372 | 92 | 17,105 | 45,157 | 472,167 | 534,428 | 3 | 8 | 88 |
| Total | 2018 | 211 | 181 | 5,522 | 82 | 15,245 | 33,455 | 293,227 | 341,927 | 4 | 10 | 86 |
| Total | 2019 | 230 | 170 | 5,134 | 50 | 9,296 | 34,883 | 208,150 | 252,329 | 4 | 14 | 82 |
| Total | 2020 | 176 | 159 | 4,872 | 45 | 8,366 | 30,994 | 451,789 | 491,150 | 2 | 6 | 92 |

Method 2: Spatial analysis of fields impacted by $100 \mathrm{ft}, 200 \mathrm{ft}$, and 500 ft occupied structure setback distances in three counties: Fresno, Kern and Stanislaus
There were 1,711 1,3-D applications in the three focal counties in total for the years 2017 and 2018. For these counties in total, the estimated costs obtained using Method 1 were $\$ 430,951$ in 2017 and $\$ 236,356$ for 2018 (Table 6). Limiting the analysis to the actual fields and acreage affected by the regulations reduces costs by 32\% in 2018 and $42 \%$ in 2017 (Table 6). Note that all three counties would be subject to the inland requirements under the revised proposed regulation. Table 6 compares costs from the first analysis (Method 1) and the spatial analysis (Method 2), disaggregated into costs from splitting blocks, using deeper injection, and using TIF. It also reports the spatial costs as a share of the first analysis by cost component. Comparing the sources of the costs obtained from the two methods, the cost of 24 in-injection under Method 2 is a significantly higher percentage of the total cost under Method 1 than is the case for the cost of block splitting across both years and counties. Limiting the analysis to the actual fields and acreage affected by the regulations gave estimated costs that were \$249,491 in 2017 and \$160,167 in 2018 (Table 6).

Table 6. Comparison across Methods of Estimated Cost of Complying with Proposed Regulations on Occupied Structure Setbacks, Application Methods and Rates, and Maximum Block Size

|  | Year | Method 1 Costs (\$) |  |  |  | Method 2 Costs (\$) |  |  |  | Method 2 Cost as a Share of Method 1 Cost (\%) |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Split | Deep Inj. | TIF | Total | Split | Deep Inj. | TIF | Total | Split | Deep Inj. | TIF | Total |
| Fresno | 2017 | 29,375 | 64,066 | 0 | 93,441 | 17,848 | 56,409 | 0 | 74,257 | 61 | 88 | 0 | 79 |
| Kern | 2017 | 28,074 | 58,656 | 202,400 | 289,130 | 9,482 | 45,393 | 80,500 | 135,374 | 34 | 77 | 0 | 47 |
| Stanislaus | 2017 | 13,758 | 34,622 | 0 | 48,380 | 8,180 | 31,679 | 0 | 39,860 | 59 | 92 | 0 | 82 |
| Total | 2017 | 71,207 | 157,344 | 202,400 | 430,951 | 35,511 | 133,480 | 80,500 | 249,491 | 50 | 85 | 0 | 58 |
| Fresno | 2018 | 21,753 | 60,934 | 0 | 82,686 | 12,271 | 51,308 | 0 | 63,578 | 56 | 84 | 0 | 77 |
| Kern | 2018 | 31,792 | 59,574 | 0 | 91,367 | 6,135 | 44,648 | 0 | 50,783 | 19 | 75 | 0 | 56 |
| Stanislaus | 2018 | 20,451 | 41,852 | 0 | 62,303 | 11,155 | 34,650 | 0 | 45,805 | 55 | 83 | 0 | 74 |
| Total | 2018 | 73,996 | 162,360 | 0 | 236,356 | 29,561 | 130,606 | 0 | 160,167 | 40 | 80 | 0 | 68 |

Table 7, reproduced from the June 21, 2022, report, shows the number of fields with occupied structures within $100 \mathrm{ft}, 200 \mathrm{ft}$, and 500 ft . There were 268 fields in 2017 and 353 in 2018 with no occupied structures within 500 ft . This is $33 \%$ and $39 \%$ of fields, respectively.

Table 7. Number of Fields with Occupied Structures within $100 \mathrm{ft}, 200 \mathrm{ft}$, and 500 ft Setbacks: 2017 and 2018

| Year | Setback (ft) | Fields with <br> structures within <br> setback |
| :--- | ---: | ---: |
| 2017 | 100 | 147 |
|  | 200 | 223 |
|  | 500 | 179 |
| 2018 |  |  |
|  | 100 | 155 |
|  | 200 | 226 |
|  | 500 | 160 |

Fields with occupied structures within 200 ft would have to use the 100 ft setback rules in Appendix A. This was estimated to cost $\$ 88,591$ in 2017 and $\$ 85,709$ in 2018, which is 36 and $54 \%$ of the total cost in each year (Table 8).

Applications that did not comply with the proposed regulations on fields with occupied structures between 200 and 500 ft would need to use deeper injection applications to comply with the proposed regulations but would be able to use the 200 ft setback rules (Appendix A). This was estimated to cost $\$ 34,243$ in 2017 and $\$ 23,740$ in 2018 , which is $14 \%$ and $15 \%$ of the total cost in each year, respectively (Table 8). As noted earlier, we do not address the added 300 ft and 400 ft setbacks.

Applications that did not comply with the proposed regulations on fields with no occupied structures within 500 ft would switch to deeper injection but would be able to use the 500 ft setback rules in the proposed regulations (Appendix A). This was estimated to cost $\$ 126,657$ in 2017 and $\$ 50,717$ in 2018, which is $51 \%$ and $32 \%$ of the total cost in each year, respectively (Table 8). The higher cost of compliance in 2017 was due to some fields having to add TIF tarp. There was no TIF added in 2018 in these three counties

The total estimated cost for the three focal counties to comply with the proposed regulation using the spatially explicit approach was $58 \%$ (2017) and $68 \%$ (2018) of the total estimated cost using the assumption that all fields had a structure within 100 ft (Table 6). Most of the reduction
in estimated costs is due to fewer splits being required with the larger setback distances. As stated in the June 21, 2022, report:

Note that these three counties and two years may or may not be representative for all counties in all years. In particular, none of these are coastal counties where there are more fields using application methods that would require TIF to be added. However, it does indicate that it is appropriate to treat our estimates from the first analysis as an upper bound. For growers with blocks farther than 200 ft from an occupied structure, splitting costs will be lower than what is estimated for all counties on average.

Table 8. Estimated Costs by Year and Occupied Structure Setback Distance in Focal Counties

| Setback <br> $(\mathrm{ft})$ | Year | \# of <br> Violations | Affected <br> Acres | \# of <br> Splits | Split Cost <br> $\mathbf{( \$ )}$ | Deep Injection <br> Cost (\$) | TIF <br> $\mathbf{1 2 0 9}$ | Total Cost <br> $(\mathbf{\$})$ | \% of Total <br> Cost |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| 100 | 2017 | 273 | 6,182 | 144 | 26,772 | 61,819 | 0 | 88,591 | 36 |
| 100 | 2018 | 292 | 6,228 | 126 | 23,426 | 62,283 | 0 | 85,709 | 54 |
|  |  |  |  |  |  |  |  | 14 |  |
| 200 | 2017 | 96 | 2,848 | 31 | 5,764 | 28,479 | 0 | 34,243 | 14 |
| 200 | 2018 | 95 | 2,132 | 13 | 2,417 | 21,324 | 0 | 23,740 | 15 |
|  |  |  |  |  |  |  |  |  | 51 |
| 500 | 2017 | 86 | 4,388 | 16 | 2,975 | 43,182 | 80,500 | 126,657 | 51 |
| 500 | 2018 | 100 | 4,700 | 20 | 3,718 | 46,999 | 0 | 50,717 | 32 |
|  |  |  |  |  |  |  |  |  | 100 |
| Total | 2017 | 455 | 13,418 | 191 | 35,511 | 133,480 | 80,500 | 249,491 | 100 |
| Total | 2018 | 487 | 13,061 | 159 | 29,561 | 130,606 | 0 | 160,167 | 100 |

## Appendix

Appendix A. DPR Tables for Application Block Size Limits

Appendix A1. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Untarped Application Methods Using 12-in Injection (FFMs 1201, 1202, 1203, 1204, and 1205), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 10 ac | 20 ac | 65 ac | 4 ac | 5 ac | 15 ac |
| 90 | 5 ac | 15 ac | 50 ac | 3 ac | 5 ac | 15 ac |
| 100 | 5 ac | 10 ac | 40 ac | 3 ac | 4 ac | 10 ac |
| 110 | 5 ac | 10 ac | 35 ac | 3 ac | 4 ac | 10 ac |
| 120 | 4 ac | 5 ac | 30 ac | 2 ac | 4 ac | 5 ac |
| 130 | 4 ac | 5 ac | 25 ac | 2 ac | 3 ac | 5 ac |
| 140 | 4 ac | 5 ac | 20 ac | 1 ac | 3 ac | 5 ac |
| 150 | 3 ac | 5 ac | 15 ac | 1 ac | 3 ac | 5 ac |
| 160 | 3 ac | 5 ac | 15 ac | Not allowed | 2 ac | 5 ac |
| 170 | 3 ac | 4 ac | 15 ac | Not allowed | 2 ac | 5 ac |
| 180 | 3 ac | 4 ac | 10 ac | Not allowed | 2 ac | 4 ac |
| 190 | 2 ac | 4 ac | 10 ac | Not allowed | 2 ac | 4 ac |
| 200 | 2 ac | 4 ac | 10 ac | Not allowed | 1 ac | 4 ac |
| 210 | 2 ac | 4 ac | 10 ac | Not allowed | 1 ac | 4 ac |
| 220 | 2 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 230 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 240 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 250 | 1 ac | 3 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 260 | 1 ac | 3 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 270 | 1 ac | 3 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 280 | Not allowed | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 290 | Not allowed | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 300 | Not allowed | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 310 | Not allowed | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 320 | Not allowed | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 332 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |

Appendix A2. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Untarped Application Methods Using 12-in Injection (FFMs 1201, 1202, 1203, 1204, and 1205), Coastal Region

|  | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| Application Rate | March to October |  | November to February |  |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 5 ac | 10 ac | 25 ac | 3 ac | 5 ac | 10 ac |
| 90 | 4 ac | 5 ac | 20 ac | 3 ac | 4 ac | 10 ac |
| 100 | 4 ac | 5 ac | 15 ac | 3 ac | 4 ac | 5 ac |
| 110 | 3 ac | 4 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 120 | 3 ac | 4 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 130 | 3 ac | 4 ac | 5 ac | 1 ac | 3 ac | 5 ac |
| 140 | 2 ac | 3 ac | 5 ac | 1 ac | 2 ac | 4 ac |
| 150 | 2 ac | 3 ac | 5 ac | Not allowed | 2 ac | 4 ac |
| 160 | 2 ac | 3 ac | 5 ac | Not allowed | 2 ac | 4 ac |
| 170 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 180 | 1 ac | 2 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 190 | 1 ac | 2 ac | 4 ac | Not allowed | 1 ac | 3 ac |
| 200 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 210 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 220 | Not allowed | 1 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 230 | Not allowed | 1 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 240 | Not allowed | 1 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 250 | Not allowed | 1 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 260 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 270 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 280 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 290 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 300 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 310 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 320 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 2 ac |
| 332 | Not allowed | Not allowed | 3 ac | Not allowed | Not allowed | 1 ac |

Appendix A3. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Application Methods Using 18-in Injection (FFMs 1206, 1207, 1208, 1210, and 1211), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | Not allowed | Not allowed | Not allowed | 40 ac | 65 ac | Not allowed |
| 90 | Not allowed | Not allowed | Not allowed | 30 ac | 45 ac | Not allowed |
| 100 | Not allowed | Not allowed | Not allowed | 20 ac | 35 ac | Not allowed |
| 110 | Not allowed | Not allowed | Not allowed | 15 ac | 25 ac | 70 ac |
| 120 | 60 ac | Not allowed | Not allowed | 10 ac | 20 ac | 55 ac |
| 130 | 45 ac | Not allowed | Not allowed | 10 ac | 15 ac | 45 ac |
| 140 | 35 ac | 65 ac | Not allowed | 5 ac | 10 ac | 40 ac |
| 150 | 30 ac | 50 ac | Not allowed | 5 ac | 10 ac | 35 ac |
| 160 | 25 ac | 45 ac | Not allowed | 5 ac | 10 ac | 30 ac |
| 170 | 20 ac | 35 ac | Not allowed | 5 ac | 5 ac | 25 ac |
| 180 | 15 ac | 30 ac | Not allowed | 4 ac | 5 ac | 20 ac |
| 190 | 15 ac | 25 ac | 75 ac | 4 ac | 5 ac | 20 ac |
| 200 | 10 ac | 25 ac | 65 ac | 4 ac | 5 ac | 20 ac |
| 210 | 10 ac | 20 ac | 60 ac | 4 ac | 5 ac | 15 ac |
| 220 | 10 ac | 15 ac | 50 ac | 3 ac | 5 ac | 15 ac |
| 230 | 5 ac | 15 ac | 45 ac | 3 ac | 5 ac | 15 ac |
| 240 | 5 ac | 15 ac | 45 ac | 3 ac | 4 ac | 10 ac |
| 250 | 5 ac | 10 ac | 40 ac | 3 ac | 4 ac | 10 ac |
| 260 | 5 ac | 10 ac | 35 ac | 3 ac | 4 ac | 10 ac |
| 270 | 5 ac | 10 ac | 35 ac | 3 ac | 4 ac | 10 ac |
| 280 | 5 ac | 10 ac | 30 ac | 2 ac | 4 ac | 10 ac |
| 290 | 5 ac | 10 ac | 30 ac | 2 ac | 4 ac | 10 ac |
| 300 | 5 ac | 5 ac | 25 ac | 2 ac | 4 ac | 5 ac |
| 310 | 4 ac | 5 ac | 25 ac | 2 ac | 3 ac | 5 ac |
| 320 | 4 ac | 5 ac | 25 ac | 2 ac | 3 ac | 5 ac |
| 332 | 4 ac | 5 ac | 20 ac | 2 ac | 3 ac | 5 ac |

Appendix A4. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Application Methods Using 18-in Injection (FFMs 1206, 1207, 1208, 1210, and 1211), Coastal Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 25 ac | 35 ac | 80 ac |
| 90 | 55 ac | 80 ac | 80 ac | 15 ac | 30 ac | 65 ac |
| 100 | 40 ac | 65 ac | 80 ac | 15 ac | 20 ac | 55 ac |
| 110 | 30 ac | 50 ac | 80 ac | 10 ac | 15 ac | 40 ac |
| 120 | 25 ac | 40 ac | 80 ac | 10 ac | 10 ac | 35 ac |
| 130 | 20 ac | 30 ac | 75 ac | 5 ac | 10 ac | 30 ac |
| 140 | 15 ac | 25 ac | 65 ac | 5 ac | 10 ac | 25 ac |
| 150 | 10 ac | 20 ac | 55 ac | 5 ac | 5 ac | 20 ac |
| 160 | 10 ac | 15 ac | 45 ac | 5 ac | 5 ac | 20 ac |
| 170 | 10 ac | 15 ac | 40 ac | 4 ac | 5 ac | 15 ac |
| 180 | 5 ac | 10 ac | 35 ac | 4 ac | 5 ac | 15 ac |
| 190 | 5 ac | 10 ac | 30 ac | 4 ac | 5 ac | 10 ac |
| 200 | 5 ac | 10 ac | 25 ac | 4 ac | 5 ac | 10 ac |
| 210 | 5 ac | 10 ac | 25 ac | 3 ac | 4 ac | 10 ac |
| 220 | 5 ac | 5 ac | 20 ac | 3 ac | 4 ac | 10 ac |
| 230 | 5 ac | 5 ac | 20 ac | 3 ac | 4 ac | 5 ac |
| 240 | 4 ac | 5 ac | 15 ac | 3 ac | 4 ac | 5 ac |
| 250 | 4 ac | 5 ac | 15 ac | 3 ac | 4 ac | 5 ac |
| 260 | 4 ac | 5 ac | 15 ac | 2 ac | 3 ac | 5 ac |
| 270 | 4 ac | 5 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 280 | 3 ac | 5 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 290 | 3 ac | 4 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 300 | 3 ac | 4 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 310 | 3 ac | 4 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 320 | 3 ac | 4 ac | 10 ac | 1 ac | 3 ac | 5 ac |
| 332 | 3 ac | 4 ac | 5 ac | 1 ac | 2 ac | 5 ac |

Appendix A5. Maximum Block Size (Acres) for Application Rate- Occupied Structure Distance Pairs for Untarped Application Methods Using 24-in Injection (FFMs 1224, 1225, and 1226), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 65 ac | 80 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 50 ac | 75 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 40 ac | 60 ac | 80 ac |
| 180 | 80 ac | 80 ac | 80 ac | 35 ac | 55 ac | 80 ac |
| 190 | 80 ac | 80 ac | 80 ac | 30 ac | 45 ac | 80 ac |
| 200 | 80 ac | 80 ac | 80 ac | 25 ac | 40 ac | 80 ac |
| 210 | 80 ac | 80 ac | 80 ac | 20 ac | 35 ac | 80 ac |
| 220 | 80 ac | 80 ac | 80 ac | 20 ac | 30 ac | 75 ac |
| 230 | 70 ac | 80 ac | 80 ac | 15 ac | 25 ac | 70 ac |
| 240 | 60 ac | 80 ac | 80 ac | 15 ac | 25 ac | 60 ac |
| 250 | 55 ac | 80 ac | 80 ac | 10 ac | 20 ac | 55 ac |
| 260 | 45 ac | 80 ac | 80 ac | 10 ac | 20 ac | 50 ac |
| 270 | 40 ac | 70 ac | 80 ac | 10 ac | 15 ac | 45 ac |
| 280 | 35 ac | 60 ac | 80 ac | 10 ac | 15 ac | 40 ac |
| 290 | 35 ac | 55 ac | 80 ac | 5 ac | 15 ac | 40 ac |
| 300 | 30 ac | 50 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 310 | 25 ac | 45 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 320 | 25 ac | 40 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 332 | 20 ac | 40 ac | 80 ac | 5 ac | 10 ac | 30 ac |

Appendix A6. Maximum Block Size (Acres) for Application Rate- Occupied Structure Distance Pairs for Untarped Application Methods Using 24-in Injection (FFMs 1224, 1225, and 1226), Coastal Region

|  | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Application Rate | March to October |  | November to February |  |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 75 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 55 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 45 ac | 70 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 35 ac | 55 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 30 ac | 45 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 25 ac | 40 ac | 80 ac |
| 180 | 70 ac | 80 ac | 80 ac | 20 ac | 35 ac | 80 ac |
| 190 | 60 ac | 80 ac | 80 ac | 20 ac | 30 ac | 75 ac |
| 200 | 50 ac | 80 ac | 80 ac | 15 ac | 25 ac | 65 ac |
| 210 | 45 ac | 70 ac | 80 ac | 15 ac | 25 ac | 60 ac |
| 220 | 35 ac | 60 ac | 80 ac | 10 ac | 20 ac | 50 ac |
| 230 | 35 ac | 50 ac | 80 ac | 10 ac | 20 ac | 45 ac |
| 240 | 30 ac | 45 ac | 80 ac | 10 ac | 15 ac | 40 ac |
| 250 | 25 ac | 40 ac | 80 ac | 10 ac | 15 ac | 40 ac |
| 260 | 25 ac | 35 ac | 80 ac | 10 ac | 15 ac | 35 ac |
| 270 | 20 ac | 35 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 280 | 20 ac | 30 ac | 75 ac | 5 ac | 10 ac | 30 ac |
| 290 | 15 ac | 30 ac | 65 ac | 5 ac | 10 ac | 30 ac |
| 300 | 15 ac | 25 ac | 60 ac | 5 ac | 10 ac | 25 ac |
| 310 | 15 ac | 25 ac | 55 ac | 5 ac | 10 ac | 25 ac |
| 320 | 10 ac | 20 ac | 55 ac | 5 ac | 5 ac | 25 ac |
| 332 | 10 ac | 20 ac | 50 ac | 5 ac | 5 ac | 20 ac |
|  |  |  |  |  |  |  |

Appendix A7. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for TIF Application Methods Using Shallow Injection (FFMs 1243, 1245, and 1259), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 65 ac | 80 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 50 ac | 80 ac | 80 ac |
| 180 | 80 ac | 80 ac | 80 ac | 45 ac | 70 ac | 80 ac |
| 190 | 80 ac | 80 ac | 80 ac | 35 ac | 60 ac | 80 ac |
| 200 | 80 ac | 80 ac | 80 ac | 30 ac | 50 ac | 80 ac |
| 210 | 80 ac | 80 ac | 80 ac | 25 ac | 45 ac | 80 ac |
| 220 | 80 ac | 80 ac | 80 ac | 25 ac | 40 ac | 80 ac |
| 230 | 80 ac | 80 ac | 80 ac | 20 ac | 35 ac | 80 ac |
| 240 | 80 ac | 80 ac | 80 ac | 15 ac | 30 ac | 80 ac |
| 250 | 80 ac | 80 ac | 80 ac | 15 ac | 30 ac | 70 ac |
| 260 | 80 ac | 80 ac | 80 ac | 15 ac | 25 ac | 65 ac |
| 270 | 70 ac | 80 ac | 80 ac | 10 ac | 20 ac | 60 ac |
| 280 | 60 ac | 80 ac | 80 ac | 10 ac | 20 ac | 55 ac |
| 290 | 55 ac | 80 ac | 80 ac | 10 ac | 20 ac | 50 ac |
| 300 | 50 ac | 80 ac | 80 ac | 10 ac | 15 ac | 45 ac |
| 310 | 45 ac | 80 ac | 80 ac | 10 ac | 15 ac | 45 ac |
| 320 | 40 ac | 70 ac | 80 ac | 5 ac | 15 ac | 40 ac |
| 332 | 35 ac | 65 ac | 80 ac | 5 ac | 10 ac | 35 ac |

Appendix A8. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for TIF Application Methods Using Shallow Injection (FFMs 1243, 1245, and 1259), Coastal

Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 75 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 60 ac | 80 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 50 ac | 75 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 40 ac | 60 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 35 ac | 50 ac | 80 ac |
| 180 | 80 ac | 80 ac | 80 ac | 30 ac | 45 ac | 80 ac |
| 190 | 80 ac | 80 ac | 80 ac | 25 ac | 40 ac | 80 ac |
| 200 | 80 ac | 80 ac | 80 ac | 20 ac | 35 ac | 80 ac |
| 210 | 75 ac | 80 ac | 80 ac | 20 ac | 30 ac | 70 ac |
| 220 | 60 ac | 80 ac | 80 ac | 15 ac | 25 ac | 65 ac |
| 230 | 55 ac | 80 ac | 80 ac | 15 ac | 25 ac | 55 ac |
| 240 | 45 ac | 75 ac | 80 ac | 10 ac | 20 ac | 50 ac |
| 250 | 40 ac | 65 ac | 80 ac | 10 ac | 20 ac | 45 ac |
| 260 | 35 ac | 60 ac | 80 ac | 10 ac | 15 ac | 45 ac |
| 270 | 35 ac | 55 ac | 80 ac | 10 ac | 15 ac | 40 ac |
| 280 | 30 ac | 45 ac | 80 ac | 10 ac | 15 ac | 35 ac |
| 290 | 25 ac | 40 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 300 | 25 ac | 40 ac | 80 ac | 5 ac | 10 ac | 35 ac |
| 310 | 20 ac | 35 ac | 80 ac | 5 ac | 10 ac | 30 ac |
| 320 | 20 ac | 30 ac | 80 ac | 5 ac | 10 ac | 30 ac |
| 332 | 15 ac | 30 ac | 75 ac | 5 ac | 10 ac | 25 ac |

Appendix A9. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Drip Application (FFM 1209), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 40 ac | 75 ac | 80 ac | 5 ac | 15 ac | 40 ac |
| 90 | 30 ac | 50 ac | 80 ac | 5 ac | 10 ac | 30 ac |
| 100 | 20 ac | 40 ac | 80 ac | 5 ac | 5 ac | 25 ac |
| 110 | 15 ac | 30 ac | 80 ac | 4 ac | 5 ac | 20 ac |
| 120 | 10 ac | 25 ac | 70 ac | 4 ac | 5 ac | 15 ac |
| 130 | 10 ac | 20 ac | 60 ac | 3 ac | 5 ac | 15 ac |
| 140 | 5 ac | 15 ac | 50 ac | 3 ac | 4 ac | 10 ac |
| 150 | 5 ac | 15 ac | 40 ac | 3 ac | 4 ac | 10 ac |
| 160 | 5 ac | 10 ac | 35 ac | 2 ac | 4 ac | 10 ac |
| 170 | 5 ac | 10 ac | 30 ac | 2 ac | 4 ac | 10 ac |
| 180 | 4 ac | 10 ac | 30 ac | 2 ac | 3 ac | 5 ac |
| 190 | 4 ac | 5 ac | 25 ac | 2 ac | 3 ac | 5 ac |
| 200 | 4 ac | 5 ac | 20 ac | 1 ac | 3 ac | 5 ac |
| 210 | 4 ac | 5 ac | 20 ac | 1 ac | 3 ac | 5 ac |
| 220 | 3 ac | 5 ac | 15 ac | 1 ac | 3 ac | 5 ac |
| 230 | 3 ac | 5 ac | 15 ac | Not allowed | 2 ac | 5 ac |
| 240 | 3 ac | 5 ac | 15 ac | Not allowed | 2 ac | 5 ac |
| 250 | 3 ac | 4 ac | 15 ac | Not allowed | 2 ac | 5 ac |
| 260 | 3 ac | 4 ac | 10 ac | Not allowed | 2 ac | 5 ac |
| 270 | 2 ac | 4 ac | 10 ac | Not allowed | 2 ac | 4 ac |
| 280 | 2 ac | 4 ac | 10 ac | Not allowed | 2 ac | 4 ac |
| 290 | 2 ac | 4 ac | 10 ac | Not allowed | 2 ac | 4 ac |
| 300 | 2 ac | 4 ac | 10 ac | Not allowed | 1 ac | 4 ac |
| 310 | 2 ac | 4 ac | 10 ac | Not allowed | 1 ac | 4 ac |
| 320 | 2 ac | 3 ac | 10 ac | Not allowed | 1 ac | 4 ac |
| 332 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |

Appendix A10. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for Drip Application (FFM 1209), Coastal Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 20 ac | 30 ac | 75 ac | 5 ac | 10 ac | 25 ac |
| 90 | 10 ac | 20 ac | 55 ac | 5 ac | 5 ac | 20 ac |
| 100 | 10 ac | 15 ac | 40 ac | 4 ac | 5 ac | 15 ac |
| 110 | 5 ac | 10 ac | 35 ac | 4 ac | 5 ac | 10 ac |
| 120 | 5 ac | 10 ac | 30 ac | 3 ac | 4 ac | 10 ac |
| 130 | 5 ac | 5 ac | 20 ac | 3 ac | 4 ac | 10 ac |
| 140 | 4 ac | 5 ac | 20 ac | 3 ac | 4 ac | 5 ac |
| 150 | 4 ac | 5 ac | 15 ac | 2 ac | 3 ac | 5 ac |
| 160 | 4 ac | 5 ac | 15 ac | 2 ac | 3 ac | 5 ac |
| 170 | 3 ac | 5 ac | 10 ac | 2 ac | 3 ac | 5 ac |
| 180 | 3 ac | 4 ac | 10 ac | 1 ac | 3 ac | 5 ac |
| 190 | 3 ac | 4 ac | 10 ac | 1 ac | 2 ac | 5 ac |
| 200 | 3 ac | 4 ac | 10 ac | 1 ac | 2 ac | 4 ac |
| 210 | 2 ac | 4 ac | 5 ac | Not allowed | 2 ac | 4 ac |
| 220 | 2 ac | 3 ac | 5 ac | Not allowed | 2 ac | 4 ac |
| 230 | 2 ac | 3 ac | 5 ac | Not allowed | 2 ac | 4 ac |
| 240 | 2 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 250 | 2 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 260 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 4 ac |
| 270 | 1 ac | 3 ac | 5 ac | Not allowed | 1 ac | 3 ac |
| 280 | 1 ac | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 290 | 1 ac | 2 ac | 5 ac | Not allowed | Not allowed | 3 ac |
| 300 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 310 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 320 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |
| 332 | Not allowed | 2 ac | 4 ac | Not allowed | Not allowed | 3 ac |

Appendix A11. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for TIF Application Methods using Broadcast and Strip (FFM 1242, 1247, and 1249), Inland Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 180 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 190 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 200 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 210 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 220 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 230 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 240 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 250 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 260 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 270 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 280 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 290 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 300 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 310 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 320 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 332 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |

Appendix A12. Maximum Block Size (Acres) for Application Rate-Occupied Structure Distance Pairs for TIF Application Methods using Broadcast and Strip (FFM 1242, 1247, and 1249) Coastal Region

| Application Rate | Maximum Application Block Size (ac) and Occupied Structure |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | March to October |  |  | November to February |  |  |
|  | 100 ft | 200 ft | 500 ft | 100 ft | 200 ft | 500 ft |
| 80 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 90 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 100 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 110 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 120 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 130 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 140 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 150 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 160 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 170 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 180 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 190 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 200 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 210 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 220 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 230 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 240 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 250 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 260 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 270 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 280 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 290 | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac | 80 ac |
| 300 | 80 ac | 80 ac | 80 ac | 75 ac | 80 ac | 80 ac |
| 310 | 80 ac | 80 ac | 80 ac | 65 ac | 80 ac | 80 ac |
| 320 | 80 ac | 80 ac | 80 ac | 60 ac | 80 ac | 80 ac |
| 332 | 80 ac | 80 ac | 80 ac | 55 ac | 80 ac | 80 ac |

Appendix B1. Estimated Costs by Crop and Year: Inland Region

| Commodity | Year | Fields not in <br> compliance | Acres not in <br> compliance | Splits <br> needed | Split costs ( $\mathbf{\$})$ | Deeper injection <br> Costs ( $\mathbf{\$})$ | TIF <br> $\mathbf{1 2 0 9}$ | Total cost <br> $(\mathbf{\$})$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| ALMOND | 2017 | 369 | 9,111 | 238 | 44,249 | 91,107 | 0 | 135,356 |
| ALMOND | 2018 | 483 | 11,153 | 272 | 50,570 | 111,530 | 0 | 162,100 |
| ALMOND | 2019 | 386 | 8,824 | 206 | 38,300 | 88,241 | 0 | 126,540 |
| ALMOND | 2020 | 394 | 9,277 | 238 | 44,249 | 92,772 | 0 | 137,021 |
| APPLE | 2018 | 2 | 19 | 0 | 0 | 190 | 0 | 190 |
| APPLE | 2019 | 2 | 23 | 0 | 0 | 225 | 0 | 225 |
| APRICOT | 2017 | 4 | 61 | 1 | 186 | 609 | 0 | 795 |
| APRICOT | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| APRICOT | 2020 | 3 | 65 | 2 | 372 | 650 | 0 | 1,022 |
| ASIAN PEAR | 2019 | 1 | 7 | 0 | 0 | 65 | 0 | 65 |
| BEAN DRIED | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BEET | 2017 | 1 | 5 | 0 | 0 | 50 | 0 | 50 |
| BEET | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BITTER MELON | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BITTER MELON | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BITTER MELON | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BLUEBERRY | 2017 | 2 | 111 | 4 | 744 | 1,107 | 0 | 1,851 |
| BLUEBERRY | 2018 | 2 | 178 | 7 | 1,301 | 1,780 | 0 | 3,081 |
| BLUEBERRY | 2019 | 1 | 40 | 1 | 186 | 400 | 0 | 586 |
| CANTALOUPE | 2017 | 3 | 336 | 3 | 558 | 3,360 | 0 | 3,918 |


| CANTALOUPE | 2018 | 2 | 240 | 2 | 372 | 2,400 | 0 | 2,772 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| CANTALOUPE | 2019 | 2 | 279 | 2 | 372 | 2,790 | 0 | 3,162 |
| CANTALOUPE | 2020 | 2 | 181 | 2 | 372 | 1,810 | 0 | 2,182 |
| CARROT | 2017 | 116 | 7,094 | 19 | 3,532 | 70,943 | 0 | 74,475 |
| CARROT | 2018 | 102 | 6,230 | 14 | 2,603 | 62,300 | 0 | 64,903 |
| CARROT | 2019 | 109 | 6,621 | 15 | 2,789 | 66,215 | 0 | 69,003 |
| CARROT | 2020 | 105 | 6,351 | 16 | 2,975 | 63,512 | 0 | 66,487 |
| CHERRY | 2017 | 15 | 338 | 8 | 1,487 | 3,377 | 0 | 4,864 |
| CHERRY | 2018 | 17 | 378 | 10 | 1,859 | 3,782 | 0 | 5,641 |
| CHERRY | 2019 | 10 | 222 | 5 | 930 | 2,223 | 0 | 3,153 |
| CHERRY | 2020 | 10 | 174 | 4 | 744 | 1,735 | 0 | 2,479 |
| CITRUS | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CORN FOR/FOD | 2017 | 1 | 27 | 1 | 186 | 270 | 0 | 456 |
| DAIKON | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| EGGPLANT | 2017 | 2 | 60 | 0 | 0 | 600 | 0 | 600 |
| EGGPLANT | 2018 | 3 | 52 | 0 | 0 | 524 | 0 | 524 |
| EGGPLANT | 2019 | 3 | 85 | 0 | 0 | 849 | 0 | 849 |
| EGGPLANT | 2020 | 1 | 20 | 0 | 0 | 200 | 0 | 200 |
| FALLOW OR IDLE LAND | 2018 | 1 | 37 | 1 | 186 | 370 | 0 | 556 |
| GF-GROUND COVER | 2019 | 1 | 43 | 2 | 372 | 432 | 0 | 804 |
| GP-VINE | 2018 | 1 | 78 | 3 | 558 | 778 | 0 | 1,336 |
| GRAPE | 2017 | 64 | 2,180 | 67 | 12,457 | 21,802 | 0 | 34,258 |
| GRAPE | 2018 | 47 | 1,691 | 49 | 9,110 | 16,914 | 0 | 26,024 |
| GRAPE | 2019 | 42 | 1,644 | 42 | 7,809 | 16,444 | 0 | 24,253 |
| GRAPE | 2020 | 67 | 1,715 | 42 | 7,809 | 17,150 | 0 | 24,959 |
| GRAPE, RAISIN | 2017 | 14 | 351 | 8 | 1,487 | 3,514 | 0 | 5,001 |
|  |  |  |  |  |  |  |  | 0 |


| GRAPE, RAISIN | 2018 | 16 | 331 | 9 | 1,673 | 3,314 | 0 | 4,987 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| GRAPE, RAISIN | 2019 | 16 | 345 | 9 | 1,673 | 3,448 | 0 | 5,121 |
| GRAPE, RAISIN | 2020 | 17 | 436 | 11 | 2,045 | 4,355 | 0 | 6,400 |
| GRAPE, WINE | 2017 | 12 | 288 | 6 | 1,116 | 2,881 | 0 | 3,996 |
| GRAPE, WINE | 2018 | 22 | 1,183 | 46 | 8,552 | 11,825 | 0 | 20,378 |
| GRAPE, WINE | 2019 | 21 | 653 | 20 | 3,718 | 6,528 | 0 | 10,247 |
| GRAPE, WINE | 2020 | 23 | 1,369 | 47 | 8,738 | 13,690 | 0 | 22,428 |
| GRAPEFRUIT | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| GRAPEFRUIT | 2019 | 1 | 14 | 0 | 0 | 135 | 0 | 135 |
| HONEYDEW MELON | 2017 | 3 | 315 | 3 | 558 | 3,150 | 0 | 3,708 |
| HONEYDEW MELON | 2018 | 1 | 129 | 1 | 186 | 1,290 | 0 | 1,476 |
| HONEYDEW MELON | 2019 | 3 | 400 | 3 | 558 | 4,000 | 0 | 4,558 |
| HONEYDEW MELON | 2020 | 3 | 303 | 2 | 372 | 3,030 | 0 | 3,402 |
| KIWI | 2018 | 1 | 12 | 0 | 0 | 118 | 0 | 118 |
| KIWI | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LEMON | 2017 | 2 | 50 | 1 | 186 | 500 | 0 | 686 |
| LEMON | 2018 | 7 | 90 | 0 | 0 | 902 | 0 | 902 |
| LEMON | 2019 | 4 | 142 | 4 | 744 | 1,422 | 0 | 2,166 |
| LEMON | 2020 | 1 | 7 | 0 | 0 | 66 | 0 | 66 |
| LETTUCE HEAD | 2018 | 3 | 193 | 0 | 0 | 1,930 | 0 | 1,930 |
| LETTUCE HEAD | 2020 | 1 | 34 | 0 | 0 | 340 | 0 | 340 |
| LETTUCE HEAD SEED | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LETTUCE LEAF | 2017 | 2 | 148 | 0 | 0 | 1,481 | 0 | 1,481 |
| LETTUCE LEAF | 2018 | 1 | 150 | 1 | 186 | 1,500 | 0 | 1,686 |
| LETTUCE ROMAINE | 2019 | 2 | 144 | 0 | 0 | 1,443 | 0 | 1,443 |
| MELON | 2019 | 1 | 76 | 0 | 0 | 760 | 0 | 760 |
|  |  |  | 31 |  |  |  | 0 | 0 |


| N-OUTDOOR FLOWER | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| N-OUTDOOR PLANT | 2017 | 7 | 68 | 3 | 558 | 682 | 0 | 1,240 |
| N-OUTDOOR PLANT | 2018 | 10 | 91 | 4 | 744 | 913 | 0 | 1,657 |
| N-OUTDOOR PLANT | 2019 | 2 | 17 | 2 | 372 | 165 | 0 | 537 |
| N-OUTDOOR PLANT | 2020 | 2 | 17 | 2 | 372 | 167 | 0 | 539 |
| N-OUTDOOR TRANSPL | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-OUTDOOR TRANSPL | 2018 | 1 | 8 | 0 | 0 | 75 | 0 | 75 |
| N-OUTDOOR TRANSPL | 2019 | 2 | 12 | 0 | 0 | 121 | 0 | 121 |
| N-OUTDOOR TRANSPL | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| NECTARINE | 2017 | 19 | 258 | 6 | 1,116 | 2,582 | 0 | 3,697 |
| NECTARINE | 2018 | 18 | 202 | 1 | 186 | 2,024 | 0 | 2,210 |
| NECTARINE | 2019 | 16 | 158 | 1 | 186 | 1,578 | 0 | 1,764 |
| NECTARINE | 2020 | 14 | 182 | 3 | 558 | 1,823 | 0 | 2,380 |
| NURSERY SOIL | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OLIVE | 2017 | 3 | 92 | 3 | 558 | 922 | 0 | 1,479 |
| OLIVE | 2018 | 9 | 272 | 8 | 1,487 | 2,724 | 0 | 4,211 |
| OLIVE | 2020 | 1 | 22 | 1 | 186 | 219 | 0 | 405 |
| ONION DRY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ONION DRY | 2019 | 1 | 4 | 0 | 0 | 40 | 0 | 40 |
| OP-FLOWERING PLANT | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OP-FLOWERING PLANT | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OP-FLOWERING PLANT | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OP-ROSE | 2017 | 2 | 13 | 0 | 0 | 0 | 127 | 0 |
| OP-ROSE | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 127 |
| OP-ROSE | 2019 | 1 | 81 | 1 | 186 | 0 | 0 | 186 |
| OP-ROSE | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|  |  |  | 32 |  |  | 0 | 0 |  |


| OP-VINE | 2017 | 4 | 211 | 5 | 930 | 2,109 | 0 | 3,038 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| OP-VINE | 2018 | 5 | 316 | 5 | 930 | 3,160 | 0 | 4,090 |
| OP-VINE | 2019 | 4 | 306 | 6 | 1,116 | 3,064 | 0 | 4,180 |
| ORANGE | 2017 | 5 | 87 | 2 | 372 | 869 | 0 | 1,241 |
| ORANGE | 2018 | 7 | 200 | 6 | 1,116 | 1,998 | 0 | 3,113 |
| ORANGE | 2019 | 2 | 33 | 0 | 0 | 325 | 0 | 325 |
| ORANGE | 2020 | 4 | 62 | 1 | 186 | 618 | 0 | 804 |
| ORANGE NAVEL | 2019 | 1 | 10 | 0 | 0 | 100 | 0 | 100 |
| ORANGE NAVEL | 2020 | 2 | 50 | 1 | 186 | 497 | 0 | 683 |
| OT-DEC. TREE | 2017 | 6 | 47 | 0 | 0 | 473 | 0 | 473 |
| OT-DEC. TREE | 2018 | 3 | 23 | 0 | 0 | 232 | 0 | 232 |
| OT-DEC. TREE | 2019 | 4 | 27 | 0 | 0 | 267 | 0 | 267 |
| OT-DEC. TREE | 2020 | 2 | 12 | 0 | 0 | 115 | 0 | 115 |
| PEACH | 2017 | 58 | 703 | 7 | 1,301 | 7,034 | 0 | 8,335 |
| PEACH | 2018 | 40 | 444 | 2 | 372 | 4,442 | 0 | 4,814 |
| PEACH | 2019 | 36 | 416 | 6 | 1,116 | 4,159 | 0 | 5,274 |
| PEACH | 2020 | 32 | 412 | 7 | 1,301 | 4,117 | 0 | 5,418 |
| PEACH PROCESSING | 2017 | 13 | 140 | 1 | 186 | 1,399 | 0 | 1,585 |
| PEACH PROCESSING | 2018 | 8 | 92 | 1 | 186 | 921 | 0 | 1,107 |
| PEACH PROCESSING | 2019 | 4 | 32 | 0 | 0 | 316 | 0 | 316 |
| PEACH PROCESSING | 2020 | 2 | 13 | 0 | 0 | 132 | 0 | 132 |
| PEAR | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PEAR | 2019 | 1 | 7 | 1 | 186 | 68 | 0 | 254 |
| PEAR, ASIAN | 2017 | 1 | 13 | 0 | 0 | 127 | 0 | 127 |
| PECAN | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PEPPER FRUITING | 2017 | 12 | 358 | 0 | 0 | 800 | 319,815 | 320,615 |
|  |  |  | 33 |  |  |  |  |  |
|  |  |  |  |  | 0 | 0 | 0 | 0 |


| PEPPER FRUITING | 2018 | 19 | 515 | 0 | 0 | 3,830 | 151,225 | 155,055 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| PEPPER FRUITING | 2019 | 17 | 544 | 3 | 558 | 3,770 | 192,280 | 196,608 |
| PEPPER FRUITING | 2020 | 20 | 432 | 0 | 0 | 1,000 | 382,088 | 383,088 |
| PEPPER FRUITING SD | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PEPPER FRUITING SD | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pepper, Bell | 2020 | 7 | 369 | 1 | 186 | 3,693 | 0 | 3,878 |
| PERSIMMON | 2018 | 1 | 8 | 0 | 0 | 80 | 0 | 80 |
| PISTACHIO | 2017 | 1 | 13 | 0 | 0 | 130 | 0 | 130 |
| PISTACHIO | 2020 | 4 | 69 | 1 | 186 | 691 | 0 | 876 |
| PLUM | 2017 | 9 | 86 | 0 | 0 | 864 | 0 | 864 |
| PLUM | 2018 | 10 | 81 | 0 | 0 | 807 | 0 | 807 |
| PLUM | 2019 | 11 | 145 | 3 | 558 | 1,449 | 0 | 2,007 |
| PLUM | 2020 | 3 | 26 | 0 | 0 | 260 | 0 | 260 |
| POTATO | 2017 | 16 | 795 | 6 | 1,116 | 7,952 | 0 | 9,068 |
| POTATO | 2018 | 27 | 1,090 | 1 | 186 | 10,900 | 0 | 11,086 |
| POTATO | 2019 | 24 | 1,073 | 1 | 186 | 10,732 | 0 | 10,917 |
| POTATO | 2020 | 1 | 70 | 6 | 1,116 | 700 | 0 | 1,816 |
| POTATO SEED | 2018 | 1 | 85 | 1 | 186 | 850 | 0 | 1,036 |
| PREPLANT/SOIL FUM | 2017 | 215 | 5,242 | 454 | 84,408 | 52,422 | 0 | 136,830 |
| PREPLANT/SOIL FUM | 2018 | 226 | 4,553 | 452 | 84,036 | 45,533 | 0 | 129,569 |
| PREPLANT/SOIL FUM | 2019 | 242 | 5,294 | 334 | 62,097 | 52,936 | 0 | 115,033 |
| PREPLANT/SOIL FUM | 2020 | 234 | 5,082 | 427 | 79,388 | 50,817 | 0 | 130,205 |
| PRUNE | 2017 | 8 | 360 | 13 | 2,417 | 3,602 | 0 | 6,019 |
| PRUNE | 2018 | 13 | 338 | 9 | 1,673 | 3,377 | 0 | 5,050 |
| PRUNE | 8 | 106 | 1 | 186 | 1,063 | 0 | 1,249 |  |
| PRUNE | 2019 | 3 | 133 | 5 | 930 | 1,335 | 0 | 2,264 |
|  | 2020 |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  | 04 |  |


| RASPBERRY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :--- | :--- | :--- | ---: | :--- | ---: | ---: | ---: | ---: |
| RASPBERRY | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RASPBERRY | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RESEARCH COMMODITY | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RESEARCH COMMODITY | 2019 | 1 | 5 | 0 | 0 | 50 | 0 | 50 |
| RESEARCH COMMODITY | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RUTABAGA | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SOIL FUMI/PREPLANT | 2017 | 5 | 117 | 14 | 2,603 | 1,172 | 0 | 3,775 |
| SOIL FUMI/PREPLANT | 2018 | 3 | 33 | 4 | 744 | 332 | 0 | 1,076 |
| SOIL FUMI/PREPLANT | 2019 | 3 | 26 | 2 | 372 | 260 | 0 | 632 |
| SOIL FUMI/PREPLANT | 2020 | 6 | 212 | 19 | 3,532 | 2,124 | 0 | 5,656 |
| SQUASH | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH, SUMMER | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH, SUMMER | 2018 | 1 | 16 | 0 | 0 | 158 | 0 | 158 |
| SQUASH, SUMMER | 2019 | 1 | 18 | 0 | 0 | 180 | 0 | 180 |
| SQUASH, SUMMER | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH, WINTER | 2019 | 1 | 34 | 0 | 0 | 340 | 0 | 340 |
| STONE FRUIT | 2020 | 1 | 7 | 0 | 0 | 70 | 0 | 70 |
| STRAWBERRY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| STRAWBERRY | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| STRAWBERRY | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| STRAWBERRY | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SWEET POTATO | 2017 | 61 | 2,834 | 8 | 1,487 | 28,341 | 0 | 29,828 |
| SWEET POTATO | 2018 | 65 | 2,886 | 9 | 1,673 | 28,862 | 0 | 30,536 |
|  |  |  | 35 |  |  |  | 0 | 0 |


| SWEET POTATO | 2019 | 45 | 2,246 | 10 | 1,859 | 22,461 | 0 | 24,320 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| SWEET POTATO | 2020 | 72 | 3,154 | 7 | 1,301 | 31,540 | 0 | 32,841 |
| TANGELO | 2017 | 1 | 19 | 0 | 0 | 191 | 0 | 191 |
| TANGELO | 2019 | 1 | 25 | 1 | 186 | 246 | 0 | 431 |
| TANGERINE | 2017 | 7 | 133 | 2 | 372 | 1,329 | 0 | 1,701 |
| TANGERINE | 2018 | 18 | 200 | 1 | 186 | 1,998 | 0 | 2,184 |
| TANGERINE | 2019 | 20 | 341 | 6 | 1,116 | 3,409 | 0 | 4,524 |
| TANGERINE | 2020 | 9 | 196 | 5 | 930 | 1,961 | 0 | 2,890 |
| TANGERINE, SEEDLESS | 2017 | 7 | 264 | 25 | 4,648 | 2,643 | 0 | 7,291 |
| TANGERINE, SEEDLESS | 2018 | 8 | 254 | 36 | 6,693 | 2,544 | 0 | 9,237 |
| TANGERINE, SEEDLESS | 2019 | 18 | 654 | 30 | 5,578 | 6,537 | 0 | 12,114 |
| TANGERINE, SEEDLESS | 2020 | 9 | 343 | 51 | 9,482 | 3,431 | 0 | 12,913 |
| TOMATO | 2017 | 17 | 1,463 | 10 | 1,859 | 14,633 | 0 | 16,492 |
| TOMATO | 2019 | 1 | 80 | 0 | 0 | 798 | 0 | 798 |
| TOMATO | 2020 | 1 | 86 | 1 | 186 | 861 | 0 | 1,047 |
| TOMATO PROCESSING | 2017 | 2 | 194 | 2 | 372 | 1,938 | 0 | 2,310 |
| TOMATO PROCESSING | 2020 | 3 | 224 | 1 | 186 | 2,240 | 0 | 2,426 |
| UNCULTIVATED AG | 2017 | 38 | 899 | 46 | 8,552 | 8,988 | 0 | 17,541 |
| UNCULTIVATED AG | 2018 | 37 | 1,095 | 125 | 23,240 | 10,948 | 0 | 34,188 |
| UNCULTIVATED AG | 2019 | 33 | 1,090 | 63 | 11,713 | 10,898 | 0 | 22,611 |
| UNCULTIVATED AG | 2020 | 42 | 1,243 | 89 | 16,547 | 12,426 | 0 | 28,973 |
| WALNUT | 2017 | 60 | 1,787 | 57 | 10,597 | 17,873 | 0 | 28,470 |
| WALNUT | 2018 | 80 | 2,490 | 80 | 14,874 | 24,898 | 0 | 39,772 |
| WALNUT | 2019 | 52 | 1,370 | 41 | 7,623 | 13,704 | 0 | 21,326 |
| WALNUT | 2020 | 38 | 1,172 | 38 | 7,065 | 11,715 | 0 | 18,780 |
| WATERMELON | 2017 | 2 | 91 | 0 | 0 | 0 | 104,386 | 104,386 |


|  |  |  |  |  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| WATERMELON | 2018 | 12 | 367 | 0 | 0 | 0 | 421,636 | 421,636 |
| WATERMELON | 2019 | 2 | 41 | 0 | 0 | 47 | 41,400 | 41,447 |
| WATERMELON | 2020 | 1 | 37 | 0 | 0 | 0 | 42,412 | 42,412 |
| WHEAT | 2017 | 1 | 83 | 1 | 186 | 830 | 0 |  |
| WHEAT | 2018 | 3 | 79 | 2 | 372 | 786 | 0 | 1,016 |
| WHEAT FOR/FOD | 2020 | 1 | 52 | 2 | 372 | 520 | 0 |  |

Appendix B2. Estimated Costs by Crop and Year: Coastal Region

| Commodity | Year | Fields not in <br> compliance | Acres not in <br> compliance | Splits <br> needed | Split costs | Deeper injection <br> costs | TIF <br> 1209 | Total cost |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| APPLE | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| APPLE | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BEET | 2017 | 1 | 10 | 0 | 0 | 100 | 0 | 100 |
| BLACKBERRY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BLACKBERRY | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BLACKBERRY | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BLACKBERRY | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BLUEBERRY | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BROCCOLI | 2017 | 4 | 113 | 3 | 558 | 1,130 | 0 | 1,688 |
| BROCCOLI | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BROCCOLI | 2019 | 2 | 60 | 0 | 0 | 602 | 0 | 602 |
| BROCCOLI | 2020 | 1 | 33 | 0 | 0 | 333 | 0 | 333 |
| BRUSSEL SPROUT | 2017 | 89 | 1,802 | 0 | 0 | 18,021 | 0 | 18,021 |
| BRUSSEL SPROUT | 2018 | 70 | 1,350 | 0 | 0 | 13,495 | 0 | 13,495 |
| BRUSSEL SPROUT | 2019 | 85 | 1,616 | 0 | 0 | 16,160 | 0 | 16,160 |
| BRUSSEL SPROUT | 2020 | 38 | 820 | 0 | 0 | 8,200 | 0 | 8,200 |
| BRUSSEL SPROUT SEED | 2020 | 1 | 17 | 0 | 0 | 170 | 0 | 170 |
| CABBAGE | 2017 | 5 | 56 | 0 | 0 | 557 | 0 | 557 |
| CABBAGE | 2018 | 1 | 10 | 0 | 0 | 95 | 0 | 95 |
| CABBAGE | 2019 | 1 | 11 | 0 | 0 | 110 | 0 | 110 |
| CABBAGE | 2020 | 1 | 14 | 0 | 0 | 140 | 0 | 140 |
| CARROT | 2017 | 15 | 572 | 6 | 1,116 | 5,717 | 0 | 6,833 |
| CARROT | 2018 | 16 | 327 | 1 | 186 | 3,265 | 0 | 3,451 |
|  |  |  | 38 |  |  |  | 0 | 0 |


| CARROT | 2019 | 21 | 460 | 0 | 0 | 4,602 | 0 | 4,602 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| CARROT | 2020 | 8 | 481 | 3 | 558 | 4,808 | 0 | 5,366 |
| CAULIFLOWER | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CAULIFLOWER | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CAULIFLOWER | 2020 | 10 | 152 | 0 | 0 | 1,523 | 0 | 1,523 |
| GRAPE, WINE | 2017 | 22 | 809 | 67 | 12,457 | 8,090 | 0 | 20,547 |
| GRAPE, WINE | 2018 | 16 | 658 | 58 | 10,783 | 6,575 | 0 | 17,358 |
| GRAPE, WINE | 2019 | 13 | 334 | 25 | 4,648 | 3,336 | 0 | 7,984 |
| GRAPE, WINE | 2020 | 8 | 213 | 16 | 2,975 | 2,133 | 0 | 5,107 |
| LEMON | 2018 | 1 | 10 | 1 | 186 | 102 | 0 | 288 |
| LEMON | 2019 | 1 | 20 | 1 | 186 | 196 | 0 | 382 |
| LEMON | 2020 | 1 | 48 | 4 | 744 | 483 | 0 | 1,226 |
| LETTUCE HEAD | 2017 | 1 | 15 | 0 | 0 | 150 | 0 | 150 |
| LETTUCE HEAD | 2020 | 1 | 20 | 0 | 0 | 200 | 0 | 200 |
| LETTUCE LEAF | 2020 | 1 | 34 | 0 | 0 | 343 | 0 | 343 |
| LETTUCE ROMAINE | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-OUTDOOR FLOWER | 2017 | 1 | 5 | 0 | 0 | 0 | 5,463 | 5,463 |
| N-OUTDOOR FLOWER | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-OUTDOOR FLOWER | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-OUTDOOR FLOWER | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-OUTDOOR PLANT | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| NAPA CAB(TGHT HD) | 2017 | 60 | 600 | 0 | 0 | 5,995 | 0 | 5,995 |
| NAPA CAB(TGHT HD) | 2018 | 35 | 379 | 0 | 0 | 3,790 | 0 | 3,790 |
| NAPA CAB(TGHT HD) | 2019 | 46 | 451 | 0 | 0 | 4,513 | 0 | 4,513 |
| NAPA CAB(TGHT HD) | 2020 | 43 | 536 | 0 | 0 | 5,360 | 0 | 5,360 |
| OF-BULB | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|  |  |  | 39 |  |  |  | 0 | 0 |


| OF-BULB | 2019 | 1 | 6 | 0 | 0 | 62 | 0 | 62 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| OP-BULB | 2017 | 14 | 121 | 0 | 0 | 1,212 | 0 | 1,212 |
| OP-FLOWERING PLANT | 2017 | 5 | 57 | 1 | 186 | 572 | 0 | 758 |
| PARSLEY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PEAS | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PEPPER FRUITING | 2017 | 3 | 169 | 0 | 0 | 1,448 | 28,175 | 29,623 |
| PEPPER FRUITING | 2018 | 3 | 188 | 1 | 186 | 1,882 | 0 | 2,067 |
| PEPPER FRUITING | 2019 | 5 | 171 | 0 | 0 | 1,710 | 0 | 1,710 |
| PEPPER FRUITING | 2020 | 5 | 173 | 0 | 0 | 0 | 198,375 | 198,375 |
| POTATO SEED | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| POTATO SEED | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PREPLANT/SOIL FUM | 2017 | 19 | 202 | 1 | 186 | 2,018 | 0 | 2,204 |
| PREPLANT/SOIL FUM | 2018 | 34 | 351 | 2 | 372 | 3,511 | 0 | 3,883 |
| PREPLANT/SOIL FUM | 2019 | 34 | 359 | 9 | 1,673 | 3,592 | 0 | 5,265 |
| PREPLANT/SOIL FUM | 2020 | 35 | 365 | 5 | 930 | 3,650 | 0 | 4,580 |
| RASPBERRY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RASPBERRY | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RASPBERRY | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RASPBERRY | 2020 | 2 | 25 | 0 | 0 | 0 | 28,888 | 28,888 |
| RESEARCH COMMODITY | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| RESEARCH COMMODITY | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SOIL FUMI/PREPLANT | 2017 | 1 | 7 | 0 | 0 | 67 | 0 | 67 |
| SOIL FUMI/PREPLANT | 2018 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SQUASH, SUMMER | 2018 | 4 | 74 | 0 | 0 | 740 | 0 | 740 |
| STRAWBERRY | 2017 | 31 | 1,827 | 14 | 2,603 | 0 | 438,530 | 441,132 |
| STRAWBERRY | 2018 | 31 | 2,177 | 19 | 3,532 | 0 | 293,227 | 296,759 |


| STRAWBERRY | 2019 | 21 | 1,646 | 15 | 2,789 | 0 | 208,150 | 210,939 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| STRAWBERRY | 2020 | 19 | 1,679 | 15 | 2,789 | 1,044 | 224,526 | 228,359 |
| TOMATO | 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOMATO | 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOMATO | 2020 | 1 | 205 | 2 | 372 | 0 | 2,417 |  |
| UNCULTIVATED AG | 2017 | 1 | 8 | 0 | 0 | 80 | 0 | 80 |
| UNCULTIVATED AG | 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| UNDECLARED COMM | 2020 | 1 | 56 | 0 | 0 | 564 | 0 | 564 |


[^0]:    *This research was conducted prior to Spalding's employment at USDA and does not represent official USDA determination or policy.

[^1]:    ${ }^{1}$ Goodhue, R., K. Mace, S. Blecker, Y. Zheng, J. Rudder, A. Spalding, T. Tolhurst, H. Wei, B. Gress, and J. Steggall. 2022a. Economic and pest management evaluation of proposed 1,3-Dichloropropene. University of California, Davis and California Department of Food and Agriculture Report, June 21, 2022.
    ${ }^{2}$ Goodhue, R., K. Mace, S. Blecker, Y. Zheng, J. Rudder, A. Spalding, T. Tolhurst, H. Wei, B. Gress, and J. Steggall. 2022b. Addendum to the June 2022 economic and pest management evaluation of proposed 1,3Dichloropropene regulation. University of California, Davis and California Department of Food and Agriculture Report, June 23, 2022.

[^2]:    ${ }^{3}$ These fuel cost estimates were obtained prior to the 2022 increases in the cost of fuel.

