



April 21, 2008

Mary Nichols
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Chairman Nichols:

Subject: The Agricultural Sector's Role in the AB 32 Scoping Plan

Agriculture plays an important part in California's economy and new innovations in this sector should play an important role achieving the reductions in greenhouse gas emissions required by AB 32. New methods of agricultural production, land management, energy efficiency and waste processing could be key drivers of California's low-carbon economy. We believe that, in implementing AB 32, CARB should focus on greenhouse gas offset opportunities in the agricultural sector while developing targeted incentive programs to drive additional emissions reductions.

Farms and rangelands have great potential to sequester carbon and preserving these lands can reduce emissions from other sectors. Agricultural land can sequester 6 MMTCO₂E of carbon through soil and farmscape sequestration¹ and creates a natural barrier to urban growth, which helps to lower vehicle miles traveled (VMT) and associated GHG emissions. All policies developed under AB 32 that affect the agricultural sector should be developed with the goal of enhancing the vitality of California agriculture and facilitating the creative, cost-effective reductions in greenhouse gas pollution.

EDF recommends that the agricultural sector participate in mandatory and voluntary greenhouse gas markets through the creation of offset opportunities. Providing credible offsets into the market allows the agricultural sector to remain a robust sector in the economy while enhancing food security and preserving lands as barriers to unsustainable growth. The regulations should require that the offsets are quantifiable, additional, verifiable, real, permanent, and enforceable.

To maximize agriculture's potential to reduce greenhouse gas emissions, CARB should develop and expand incentive programs and economic opportunities. For example, CARB could publish a guidebook for dairies seeking to develop methane capture projects, including optimal flow rates, types of projects that fit various farm sizes and their approximate costs, information on how to access consultants, types of successful projects in California and GHG benefits, and ways to find other projects for aggregation. CARB should also explore policies to encourage greater substitution of manure for synthetic fertilizer throughout the state to reduce net nitrous oxide

¹ ETAAC Final Report, page 6-1

emissions.

CARB should continue to fund and to provide incentives for studies on the emissions and emissions reductions possible from the agricultural sector. Accurate, transparent data and accounting practices form the basis of successful offset and incentive programs. As more information becomes available about cost-effective emission reductions in agriculture, complementary regulatory policies should be considered.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Navarro", with a long horizontal flourish extending to the right.

Lauren Navarro
Climate Policy Analyst

If you have any questions, please do not hesitate to call or email me.

Lauren

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