



# CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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April 28, 2014

Honorable Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Proposed First Update to the Climate Change Scoping Plan: Building on the Framework (February 2014)

Dear Ms. Nichols:

The California Farm Bureau Federation would like to submit the following comments on the First Update to the Climate Change Scoping Plan.

### **Limited Market Compliant Reductions Available in the Agricultural Sector**

If ARB continues to state that there are a great number of emission reduction and carbon sequestration opportunities that could be realized in the agricultural sector, they need to clarify that these reductions would not be for AB 32 market compliance as offsets. Agricultural GHG emission reductions that meet the extensive requirement for market compliance are extremely limited in California operations. There are more opportunities nationally and internationally, but to continue to insist that the California agricultural sector has the potential for “many” GHG emission reduction opportunities is not accurate and is misleading.

California agricultural operations are some of the most efficient in the world. It is no small task to find a practice that growers are not already doing that is real, permanent and additional; scientifically quantifying it; develop a protocol; and then have CARB adopt the protocol before even a handful of growers start implementing the practice to insure it is additional. The potential for GHG reductions should not be oversold or unfair expectations will be created.

### **Mid-term and Long-term Goals**

ARB is proposing to develop mid-term (2030) and long-term (2050) emission reduction planning targets for agricultural operations in California. Knowing the lack of scientific data and repeatable results, we believe emission reduction goals for

agricultural operations are premature. We believe the ongoing efforts to reduce GHG emissions through voluntary measures is the strategy that should continue to be pursued. AB 32 gives statutory authority to ARB until 2020, developing any goals beyond that date are problematic.

We do not support mandating techniques used in agricultural operations as suggested in discussing management systems where “a host of agricultural management practices might be required”. With the scoping plan recommending that certain agricultural practices be required, there will be significant reluctance for a grower to utilize the California-specific tool that the interagency workgroup is tasked to develop in 2014. There will be privacy concerns about who has access to the information once a grower evaluates their operation for potential GHG reductions.

### **Farmland Conservation**

We applaud the Scoping Plan’s acknowledgment of the need to preserve California’s agricultural lands as a means to reach the state’s climate change reductions.

### **Sulfuryl fluoride**

It is our understanding that Sulfuryl fluoride was not added to the Kyoto Protocol but was instead briefly mentioned in the 2013 Intergovernmental Panel on Climate Change report. We would ask that ARB work closely with the Department of Pesticide Regulation who regulates fumigants and has put much time and effort into methyl bromide alternatives.

While these comments are limited we plan to work with you and your staff on the wide breadth of issues addressed in the scoping plan that will impact the agricultural community.

Sincerely,



Cynthia L. Cory  
Director, Environmental Affairs  
California Farm Bureau Federation