



CALIFORNIA FRESH FRUIT ASSOCIATION



PACIFIC COAST RENDERERS ASSOCIATION



July 9, 2021

California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: *Public Workshop Series to Commence Development of the 2022 Scoping Plan Update to Achieve Carbon Neutrality by 2045*

Chair Randolph and Members of the Board:

On behalf of the listed agricultural organizations, we appreciate the opportunity to provide comments regarding the Public Workshop Series to Commence Development of the 2022 Scoping Plan on June 8 – 10, 2021.

California is on the forefront of achieving the most ambitious environmental goals in the world, and it is imperative the state continues to invest in environmentally transformational practices to attract industry partnerships and avoid putting farmers in California at a disadvantage. We thank the California Air Resources Board (CARB) for continuing to invest in the statewide Cap-and-Trade program and recognizing the potential leakage that can happen as a result of this and other regulations. We support continuing this program with the recognition of potential business leakage as part of the next scoping plan.

Importantly, AB 32 and SB 32 specify that California's carbon goals are statewide, and former Governor Brown's 2045 carbon neutrality goal (Executive Order B-55-18) is also statewide. We understand a review of industry sectors must occur, and agriculture continues to do its part to attain major carbon reduction milestones to accomplish the statewide goal. However, we caution against efforts to single out and focus on one sector, such as agriculture, because agriculture works with various other sectors, including energy, industrial and mobile equipment. Accounting emissions reductions sector-by-sector would artificially inflate or deflate the numbers, which could result in greater impacts to the agricultural community and exacerbate leakage.

Instead, it is essential that CARB maintain an all-inclusive whole economy focus to spur innovation through incentives and achieve greater statewide emissions reductions while avoiding negative consequences in any one sector.

The agricultural sector appreciates the California Department of Food and Agriculture (CDFA) for hosting the Farmer- and Rancher-Led Climate Solution Listening Sessions (listening sessions) to inform the Climate Change Scoping Plan and the 30x30 Executive Order. The ag community also appreciates the acknowledgement and success of Climate Smart Agricultural Programs. We encourage CARB and CDFA to seek more outreach, guidance, and collaboration with self-identified farmers and ranchers on agriculture-specific public engagement. Additionally, we encourage the continued investment in the University of California Agricultural and Natural Resources (UCANR) cooperative extension to navigate research and outreach.

The listening session themes included the need for voluntary incentives to reach climate solutions, the climate change benefits of keeping land in agricultural use, and the need for financial support for investments in newer equipment and technology. We continue to support these concepts, which are consistent with our previous support of the passage of the Cap-and-Trade program reauthorization in 2017 because incentives for the agricultural community were a critical component to reduce emissions in the current regulation as well. As a result of our work during the reauthorization of Cap-and-Trade, multiple collaborative efforts were established between the state and the agricultural community through investments from the Greenhouse Gas Reduction Fund. These revenues boosted or established key programs to ensure a long-term partnership to attain the state's goals.

California's investments in manure methane management practices are a great example of emissions reductions, through the Dairy Digester Research and Development Program (DDRDP) and the Alternative Manure Management Program (AMMP). Dairy digesters continue to be one of the most effective tools in reducing methane emissions. Through the development of digesters alone, California dairy farmers will reduce more than 2.2 million metric tons of greenhouse gasses per year.

The Cap-and-Trade program also funds critical carbon sequestration efforts on working lands, including the Healthy Soils program and the State Water Efficiency and Enhancement Program (SWEEP). Further, Cap-and-Trade incentive funds have improved air quality in disadvantaged and low-income communities through the Food Production Investment Program (FPIP) by reducing energy use and lowering emissions at food processing facilities. In addition, the successful FARMER program is a collaboration between the state and farmers to replace older agricultural equipment with cleaner burning engines to benefit local communities by slashing emissions. These investments have been made in projects that are otherwise cost-prohibitive, therefore transforming segments of the agricultural sector due to these climate-smart agricultural practices.

The Cap-and-Trade program solidifies California as a global leader on climate issues, is cost effective, and helps prevent leakage of our economy to other states and nations. In the 2022 Scoping Plan, the agricultural community continues our support of voluntary incentive programs that have proven near-term and long-term climate benefits.

We also urge CARB to consider building a more robust offset program to synchronize investments likely made at USDA under the Biden Administration. Federal and state cost-shares in voluntary incentives could help agriculture “double down” on our emissions reductions if the programs are harmonized. We look forward to finding ways to improve and build off of our existing program.

On slide 30 of the Natural and Working Lands presentation, CARB quotes the Chinese proverb which states, “The best time to plant a tree was 20 years ago. The second-best time is now.” The almond industry, as well as others, planted trees and vines 20 years ago and California remains a global leader in the production of fruits, nuts and many other agricultural commodities, which benefit the environment.

In the 30x30 California Nature Executive Order Scoping Plan update, the agricultural industry appreciates the acknowledgement of California’s nine and a half million acres of croplands as a leading global producer of agricultural goods while having significant opportunity for carbon sequestration. Specifically, the acknowledgment of perennial crops, including orchards, that store significant amounts of biomass carbon is vital and should be considered in reaching the state’s goals.

We agree with the Almond Alliance that support should remain for voluntary easements to keep agricultural land in production and to minimize the loss of farmland to urbanization. Our coalition encourages the protection of agricultural lands through programs such as the Sustainable Agricultural Land Conservation (SALC) Program. SALC is funded by Cap-and-Trade and not only minimizes carbon emissions, but also supports California’s food security and local economies.

Given the agricultural community is regulated under the Sustainable Groundwater Management Act (SGMA), many land use decisions will be made and incentivized to either remain or move into other cropping patterns, which could provide a win/win in some regions of California. The Scoping Plan can help incentivize certain transitions if warranted and coordinated with Department of Water Resources (DWR) and local Groundwater Sustainability Agencies (GSAs).

The agricultural sector also supports the use of on-farm composting as a means to reduce emissions on various fronts. Historically, agriculture has confronted significant regulatory barriers in this practice. We urge CARB to work with CDFA to optimize this practice as part of the Scoping Plan discussions.

Regarding transportation, ag commodities will face great difficulty with further emphasis being placed on the electrification of medium- and heavy-duty trucks throughout the state. Currently, many of our raw products are hauled from the field to the point-of-first-processing through the use of numerous

independent owner-operators, who operate with the help of a single truck or a small fleet. Over the past several years, these small companies have made significant investments to upgrade their fleets to meet current truck emissions standards enacted through the Truck and Bus Regulation. We fear the increased cost for ZEV Medium-and Heavy-Duty trucks, as well as the cost for charging infrastructure and the increasing cost associated with powering this equipment, will adversely impact the number of these businesses in operation as well as the availability to move food products from the field to processing facilities. As a result, we ask the administration to consider providing incentives or financial assistance for operations to purchase specific equipment.

Energy affordability must also be a major consideration when drafting the Scoping Plan. We agree with the Agricultural Energy Consumers Association that RNG mandates are not economically feasible. Still, we continue to support the use of instate biomethane from dairies, wastewater facilities and landfills as renewable low- or negative-carbon transportation fuel.

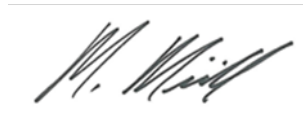
In addition, wildfire mitigation efforts have led to public safety power shutoffs, which leave numerous California producers and processors without energy to power their operations. At this time, many agricultural producers and processors rely on diesel generators as their backup power source, as generators are the most reliable source of power when energy is lost. As California grows its reliance on electricity, we agree with the Wine Institute that the state must research and further invest in alternative power sources when electricity is lost.

The agricultural community appreciates the work of CARB to partner with us to achieve statewide climate goals. Thank you for your time and consideration of our comments.

Sincerely,



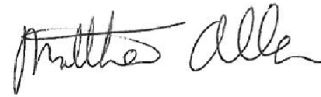
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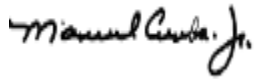
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