



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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June 13, 2018

California Natural Resources Agency
California Air Resources Board
California Department of Food and Agriculture
Sacramento, CA 95814

**RE: California 2030 Natural and Working Lands Climate Change Implementation Plan
Concept Paper**

To whom it may concern:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input for consideration as the Implementation Plan for Natural and Working Lands portion of the Scoping Plan is updated. Farm Bureau represents more than 39,000 members as it strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Farm Bureau's members own and manage lands throughout California that will play a role in improving the carbon sequestration potential of working lands. Farm Bureau appreciates the opportunity to comment on the Concept Paper for California 2030 Natural and Working Lands Climate Change Implementation Plan.

Farm Bureau is encouraged to see the continued coordination that has been ongoing with The California Air Resources Board (CARB), USDA Natural Resource Conservation Service (NRCS), California Department of Food and Agriculture (CDFA) and the Natural Resources Agency. Going forward, more input data will be needed to get a clear baseline or target, and as policies are developed, it will be important to directly tie the greenhouse gas emissions reduction planning targets with funding and technical assistance availability.

The state has set ambitious carbon sequestration goals for natural and working lands. It is important that all activities be considered when analyzing whether these lands are meeting the goal. Efforts should be made to gather data on federally funded activities that reduce carbon emissions or increase carbon sequestration. Significant investment has been made through numerous Farm Bills to fund management activities on working lands that improve carbon sequestration as well as protect land from conversion to more intensive uses. These data should be gathered from NRCS and incorporated into the effort. There has also been private investment into these efforts, which should be considered as well. While these data are likely harder to gather, there is information on the amount of land protected by conservation easements, which prevent land conversion to urban and suburban uses. Farm Bureau would urge the incorporation of non-state funded management activities and recording of easements into the Scoping Plan.

The concept paper includes a statement that "implementation will also seek to include land management activities not currently included in modeling efforts and activities for which the

carbon flux science is still emerging¹.” Farm Bureau appreciates inclusion of this statement as there are numerous activities that provide carbon benefits that are not currently captured in the models. For example, Farm Bureau would like to see the Implementation Plan recognize the carbon sequestration value that working lands provide when compared to idled or fallowed land. The increased growing season that farming provides to California’s Mediterranean climate, is expected to increase the sequestration potential of these lands. This is an especially important consideration given the expectation that significant acreages of working lands will be idled due to the requirements put in place by the State Groundwater Management Act (SGMA). Some experts estimate as many as 300,000 acres of California farmland could be idled due to the requirements of SGMA². These idled lands are not expected to have significant potential for carbon sequestration.

Farm Bureau appreciates the inclusion of COMET Planner as a tool to measure carbon sequestration potential of agricultural practices. Use of COMET Planner will allow for a more accurate depiction of agricultural activities than other available models; and Farm Bureau appreciates and supports its inclusion. However, despite the inclusion of COMET Planner, Farm Bureau is concerned with including specific acreage targets for management practices in the Implementation Plan. Inclusion of targets is a sensitive concept. If we fail to meet the acreage targets set forth in the Implementation Plan, what happens next? Do certain management practices get mandated upon farmers, ranchers, and forest landowners?

In addition to farmers and ranchers, Farm Bureau has many members who own and manage forestland in California. These actively managed forests provide significant carbon sequestration and their management helps reduce wildfire risks, which release high levels of black carbon. It is important that the Implementation Plan promote active management of forests, as it is the forests with limited management that create the greatest risk of catastrophic wildfire and the associated black carbon emissions. Towards this point, Farm Bureau would recommend using the term “Enhanced Forest Management” instead of “Less Intensive Forest Management”³ as there is intensive management that can provide carbon benefits. Farm Bureau also supports efforts to incentivize mass timber usage in local building codes as well as working to ensure that there aren’t disincentives to the use of wood in building standards and sustainability standards for buildings.

Farm Bureau is supportive of the inclusion of “Land Protection” as a proposed management activity in the Implementation Plan. Avoiding the conversion of California's natural and working lands both preserves the carbon sequestration potential of these lands and places an importance on restricting urban sprawl, which supports infill development and its benefits. These benefits are crosscutting, with the potential to reduce vehicle miles traveled as well.

¹ California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper, page 5

² <http://www.sacbee.com/news/state/california/water-and-drought/article46665960.html>

³ California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper, page 16

June 13, 2018

Page 3

The state has set ambitious goals to reduce carbon emissions. Natural and working lands can play a valuable role by increasing carbon sequestration rates. However, working lands provide additional benefits to the economy beyond just their carbon sequestration potential. It is important that efforts to increase carbon sequestration are also balanced with the societal and economic benefits these lands provide. Farm Bureau appreciates the opportunity to comment on the Concept Paper and looks forward to continued discussions as the Implementation Plan is developed.

Sincerely,

A handwritten signature in cursive script that reads "Noelle Cremers". The signature is written in black ink and is positioned above the typed name.

Noelle G. Cremers
Senior Policy Advocate