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The Honorable Chair Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via Electronic Submission

**Re: 2022 Scoping Plan Update Introductory
Presentation Comments**

Dear Chair Randolph and Board Members:

The California Farm Bureau Federation (“Farm Bureau”) would like to thank you for the opportunity to provide comment on the public workshop series in commencing the development of the update of the 2022 Scoping Plan. Farm Bureau is a non-governmental, non-profit organization representing nearly 30,000 farming members, whose purpose is to protect and promote agricultural interests throughout the State and to find solutions to the problems facing agricultural businesses and the rural community. Our members, California’s farms and ranches are on the frontlines of climate change impacts with worsening drought and water scarcity, diminishing prime soils, pest proliferation, and severe weather patterns. These constraints are furthered by increased regulation, greater domestic and international competition, changing consumer preferences and labor shortages. The agricultural community has and will continue to stand ready and able to help the state meet its ambitious climate goals, but asks for recognition of the challenges of our shared future.

Farmer/Rancher Community Outreach

Farm Bureau appreciates the work of the Department of Food and Agriculture (CDFA) to convene the Farmer-Rancher Led Solutions listening sessions and the opportunity it provided to share challenges and identify demonstrable policy and practice changes that can be initiated to scale carbon sequestration and emission reduction practices on the natural and working lands. We hope the Natural and Working Lands Climate Smart Strategy, soon to be convened by the California Natural Resources Agency (CNRA), will be another opportunity to not only identify what has been accomplished thus far, but help guide the agencies to practical solutions that are self-sustaining. We look forward to the Air Resources Board (ARB) incorporating these recommendations into the next update of the Scoping Plan and using them as markers on the road to carbon neutrality.

With that said, we encourage ARB to not solely rely on these venues and reports to characterize the commentary from the agricultural community. As this Governor is fond of articulating, we encourage ARB and staff to “meet people where they are.” Due to California’s agricultural variability of production type, style, size, ownership structure and pressures (both economically and agronomically), each region and community has distinct needs and challenges. As such, we encourage ARB to consider the work of CDFA and CNRA as complimentary but not supplementary. We encourage ARB

host agricultural-centric meetings and workshops to solicit true feedback from farmers, ranchers, foresters and dairying operations responsible for making progress towards these goals. Farm Bureau's network of County Farm Bureaus are advantageous, self-organized entities to help staff explore these nuances.

Encourage Long-Term Incentives and Offsets

One theme repeatedly noted in the Farmer-Rancher Led Solutions listening sessions and amongst Farm Bureau's members is the need for access to voluntary incentives by private natural and working landholders to implement climate solutions. Funding from the Greenhouse Gas Reduction Fund, though historically inconsistent, has been essential to establishing key programs aimed to reduce greenhouse gas emissions and sequester carbon on natural and working lands. Investments in agriculturally based climate programs have been met with overwhelming enrollment and have had direct and immediate climate benefits. They have been focused to help facilitate the replacement of older agricultural equipment with cleaner technologies¹, better manage dairy and livestock manure², improve water and energy efficiency³, increase soil carbon sequestration⁴, and ensure agricultural land conservation⁵. State action has also been complimented by federal action through the U.S. Department of Agriculture's Natural Resource Conservation Service (USDA-NRCS) and significant amounts of private investments from landholders themselves. Incentive funding is and will continue to be necessary for farmers, embroiled in an inherently risk-laden industry, to complete a proof of concept. Particularly given that many approved management practices do not provide a return on investment (such as increased yield, lower production costs, etc.) and in fact require additional capital to implement, incentive funding allows farms "breathing room" to implement them in a manner that are cost-neutral and explore their worth as long-term practices. Farm Bureau continues to be supportive of voluntary incentive programs and encourages ARB to identify financial support pathways to achieve any natural and working lands' target.

Farm Bureau also encourages ARB to consider building a more significant offset program, than currently in place. We recognize the challenges of offset incorporation and its constraints, but as incentives serve as proof of concept, a robust offset program can monetize larger-scale action and enable enduring sequestration activity statewide. As the Biden Administration considers the role of offsets and potentially makes unprecedented climate-response investments in the natural and working lands' sector, synergy with the state program is encouraged and achievable.

Proper Accounting is Essential to Goal Setting and Implementation

The collective attention through various federal, state, local and private level action in the natural and working lands sector provides an opportunity to focus and prioritize investment activity. As such, as ARB evaluates actions to date, capacities for 2030 and develops processes to track advancement, Farm Bureau encourages they look to inventory emission reduction strategies and carbon removal action across all acreage. Proper accounting will allow for practicable target setting, direct appropriate funding levels, and all action, including early adopters, to be recognized. Accounting for emissions

¹ Funding Agricultural Replacement Measures for Emissions Reduction Program

² Dairy Digester Research and Development Program & Alternative Manure Management Program

³ State Water Efficiency and Enhancement Program

⁴ Healthy Soils Program

⁵ Sustainable Agricultural Land Conservation Program

and carbon sinks between natural lands and working lands will also be a challenge if ARB pursues a sector-by-sector approach to achieve carbon neutrality or its carbon emissions goals, rather than on a statewide basis. Considering the magnitude of emissions from severe wildfires and the continuous loss of California’s carbon sequestration capacity in forests, attempting to achieve carbon neutrality or net negative emissions in the state’s remaining natural and working lands sector will be near impossible. We encourage ARB to recognize this in identifying scenarios to meet the 2045 climate goals.

Bake in Flexibility and Adaptation

While “agriculture” is often viewed monolithically, it is significantly complex and diverse across the state. California is home to more than 400 different commodities, including permanent and seasonal crops, livestock, and nurseries, microclimates, production styles, and farm sizes. Each operation must also respond to diverse challenges—water availability, pest pressures, crop conversions, land use changes, wildfires—many of which cannot be controlled year to year. As ARB considers developing targets for the natural and working lands sector, Farm Bureau encourages a structure that is rooted in flexibility—one that is agile to adapt to extenuating circumstances, like natural disasters, significant resource or public health disasters such as this year that have traumatic effects on farm capacity. These factors will influence private landholders to make year over year decisions to scale up or scale down practice implementation.

Address Potential Regulatory Barriers and Roadblocks

Finally, we encourage ARB to take a comprehensive approach to enabling climate action on natural and working lands. This includes an internal evaluation of systems, policies and regulations that may inhibit practice implementation on a broad scale. For example, forest resilience projects may not be possible or cannot be expedited at the clip necessary to mitigate for more substantial wildfire events because of existing regulatory barriers. Likewise, as the San Joaquin Valley and other areas of the state look to alternative means for organic waste management, reevaluating the capacity for biomass facilities is warranted. Along with reducing regulatory barriers, streamlining access to and improving navigability of existing programs, especially to those most natural and working landholders most in need of assistance, will be critical.

Thank you for the opportunity to provide comment and we look forward to reviewing the specifics of ARB’s scoping plan and participating earnestly in the upcoming Natural and Working Lands technical workshop on July 20th.

Respectfully,



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California Farm Bureau Federation