



August 31, 2015

Attn: Mr. Michael Tollstrup
California Air Resources Board
PO Box 2815
Sacramento, CA 95812

Mr. Tollstrup,

The Natural Resources Defense Council would like to commend the California Air Resources Board, the California Department of Food and Agriculture, and the California Natural Resources Agency for your efforts to move forward on a Healthy Soils Initiative. We offer these comments for reaching your climate goals within the Natural and Working Lands program.

We have two recommendations as you develop the Natural and Working Lands Program goals. First, we recommend responsible management of organic waste, in a way that promotes GHG reduction and soil health. As you know, organic matter sent to landfills contributes to the production of methane. Composting and use of anaerobic digesters will keep organic waste from landfills, but it is also important to close the loop by directing that waste to its highest and best ecological use. Food scraps and other materials should be composted or digested in a way that maximizes their potential use as soil amendments and sources of nutrients. California's recently enacted laws AB 1826 and AB 1594 will prohibit or disincentivize significant quantities of organic materials from being sent to landfill, but a robust organics recycling infrastructure and markets for compost will be required to ensure not only avoidance of disposal, but treatment of those materials in a way that prioritizes improving soil structure and soil health.

Second, we recommend setting goals for increased cover crop adoption. Cover crops can help to reduce GHG emissions by sequestering carbon and reducing the need for synthetic fertilizers. Our calculations have shown that growing cover crops on just half of California's field crop acres could capture over 194,000 metric tons of greenhouse gas emissions each year—the equivalent of taking nearly 41,000 cars off of the road.¹ Cover crops also can help prepare California's agricultural sector for extreme weather events, which will become both more intense and frequent due to climate change.

We unreservedly approve of a GHG reduction strategy that includes an investment in soils and working lands as sinks for atmospheric carbon. Healthy soil is a valuable tool for reducing emissions, sequestering carbon, and water

¹ Calculated using the NRCS-USDA [COMET-Planner tool](#) with data from the *2012 Census of Agriculture*.

use efficiency - a high priority during this time of extreme drought in California. We appreciate the leadership California is demonstrating in this regard, and hope other states will follow this example.

Sincerely,

Lara Bryant
Soil Health Fellow, Natural Resources Defense Council
lbryant@nrdc.org

Darby Hoover
Senior Resource Specialist, Natural Resources Defense Council
dhoover@nrdc.org