



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 • PHONE (916) 446-4647

February 8, 2019

Submitted electronically

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

To whom it may concern:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input into the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (NWL Implementation Plan). Farm Bureau represents more than 35,000 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 NWL Implementation Plan.

Farm Bureau is encouraged to see the continued coordination that has been ongoing with the California Air Resources Board (CARB), USDA Natural Resources 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 (GHG) emissions reduction planning targets with funding and technical assistance availability.

The NWL Implementation Plan sets ambitious goals to reduce GHG emissions and increase carbon sequestration. Given current data it is questionable that the goals included are achievable, particularly given the fact that no federal or private funding or actions will be recognized. For example, according to NRCS data¹, between 2016 and 2018 the average amount of hedgerows planted with assistance from the Environmental Quality Incentives Program (EQIP) annually was 936 feet. This is far less than the goal of 800-1,700 *acres* per year included in the NWL Implementation Plan. Further, in the same time period, NRCS reported² that an average of one acre per year was planted as riparian forest buffer, far below the goal of 800-1,700 acres per year. These are two practices that are less likely to occur without incentives provided. Given the implementation with federal incentives, it seems difficult to imagine vastly different rates of implementation with state incentives.

¹ E. Beardsley, personal communication, February 7, 2019

² *Ibid.*

There are other practices that are relatively more widespread in California's agricultural community, such as cover cropping. For example, NRCS reports³ that in 2010 over 20,000 acres of farmland had cover crops planted with EQIP incentive payments. However, that number has declined significantly in recent years to an average of 443 acres annually between 2016 and 2018. Those data can be read in a number of ways. One can take them to mean that EQIP incentives have gotten broad implementation of the practice so that farmers are no longer in need of incentives. Therefore, it will be difficult to increase the acreage planted with cover crops, making the goal difficult to achieve. It should be noted that under EQIP, payments are generally limited to no more than three years. EQIP payments will assist with initial implementation with the expectation that the practice will continue after payments stop. Or, farmers that have the ability to include cover crops into their cropping system have done so and increases in implementation rates are unlikely to improve. Either way, it seems difficult to achieve the goal of increasing by 10,400-20,800 acres per year. Finally, prescribed grazing is a fairly widespread practice on California rangelands, but it is likely that very little of the prescribed grazing occurring in California will count towards achieving the goal included in the NWL Implementation Plan because it happens on private land without state incentive payments. This illustrates the need to include private and federally funded actions when trying to achieve the proposed goals; and Farm Bureau strongly recommends that these actions be included in measuring actions taken to achieve the proposed goals.

One way to help achieve the prescribed grazing goal would be to allow prescribed grazing to occur on California State Parks. The California Rangeland Conservation Coalition, a coalition of agricultural and conservation organizations dedicated to conserving working California rangelands, proposed a managed grazing pilot program to State Parks to implement grazing managed to achieve ecosystem goals of specific State Park units. There has been little interest from the State to implement this proposal; however, if only actions funded by or occurring on state lands will count towards achieving the proposed goals it seems extremely difficult to achieve the goal of prescribed grazing without incorporating grazing onto some State Park units.

Farm Bureau appreciates the significant focus on improved forest management in the NWL Implementation Plan. California's forests are in need of massive effort to bring them back to a healthy state with a natural fire regime. Farm Bureau is hopeful that increased federal and state focus on the need for action will lead to much higher rates of treatment to remove biomass from our overstocked forests. CalFire has not met its recent targets⁴ for prescribed fire and other fuel reduction projects. If California is to achieve the goals set out in the NWL Implementation Plan, concerted effort will be necessary; and past failures illustrate the need for continued pressure to ensure the achievement of the important goal of improved forest management.

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

³ *Ibid.*

⁴ http://bofdata.fire.ca.gov/board_business/binder_materials/2018/1218mm/full/full_7_dec_2018_bof_director-s_report.pdf

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economic benefits these lands provide. Farm Bureau appreciates the opportunity to comment on the NWL Implementation Plan and looks forward to continued discussions as the state works to achieve the goals set forth in the plan.

Sincerely,

A handwritten signature in dark ink, appearing to read "Noelle Cremers". The signature is fluid and cursive, with the first name "Noelle" being more prominent than the last name "Cremers".

Noelle G. Cremers
Senior Policy Advocate