



CALIFORNIA FARM BUREAU FEDERATION  
GOVERNMENTAL AFFAIRS DIVISION  
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Agricultural Council  
of California

April 6, 2016

Mary D. Nichols  
Air Resources Board Chair  
California Environmental Protection Agency  
1001 "I" Street  
Sacramento, CA 95814

RE: 2030 Target Scoping Plan Update; Healthy Landscapes 2030: California's Climate Vision Goals for Natural and Working Lands

Dear Ms. Nichols:

The California Farm Bureau Federation and Agricultural Council of California (Ag Council) appreciate the opportunity to comment on the discussion document and inform the development of the 2030 Target Scoping Plan Update. The draft goals and strategies for natural and working lands presented for California's climate change vision, are reasonable and reflect the limited baseline data available at this time.

## **Vision**

*Protect farmland, rangeland and forests from conversion so that these landscapes can continue to provide carbon storage, jobs, food, fiber, wildlife habitat, and clean water and air. Protection strategies will differ by land type and region, as each faces localized productivity, stability and development threats.*

California's farmland is a critical resource that provides over 400 diverse commodities and has multiple benefits including food security and economic strength. Farmland also has a critical role in California's climate change mitigation and adaptation strategies.

Consideration of how to reduce the rate of land conversion to development is a good starting point. Private landowners will be encouraged to implement best practices to improve soil biomass carbon sequestration rates if the proper incentives are in place and targets are developed that allow the state to measure progress as opposed to a prescriptive approach that - if not achieved - will result in regulatory backlash.

## **Guiding Principles**

*Maximize funds for natural and working land strategies through alignment and*

*leveraging of federal, state and private funds for public and private land conversion, infrastructure, and development.*

This final principle is especially important and the agricultural community has achieved great success using this model when the state and local air districts, in combination with the federal government, apply financial assistance to help accelerate the use of conservation practices.

For example, during 2015, California's farmers, working with the United States Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS), voluntarily entered into contracts, matched agency incentives and applied conservation practices such as treating unpaved farm roads to reduce dust and replacing older, higher polluting off-road mobile farm equipment with newer, cleaner models to reduce criteria pollutants.

This will be a natural alliance since it has been recognized that combining the work already accomplished by USDA NRCS using their Conservation Practice Standards, in combination with the Comet-Farm and Comet-Planner tools, will be a valuable resource for implementing the farmland and ranch goals. Not only are growers familiar with and comfortable using the USDA NRCS practice standards, but the years of work that have gone into these quantification tools will provide a GHG quantification platform that would take the California Air Resources Board (ARB) years and significant financial resources to try and develop on their own.

### **Farmlands and Ranchland Draft Goals**

*Fulfill the Healthy Soils Initiative, an interagency plan announced by Governor Brown in 2015, to reduce GHG emissions and improve drought resiliency by updating farm and ranchland practices to build soil organic matter.*

Focusing on fulfilling the Healthy Soils Initiative and promoting farm and ranch management practices to sequester carbon and reduce greenhouse gases (GHGs) is the right approach as it combines the flexibility needed for living ecosystems and the large diversity of crops grown in California

*Promote on-farm and ranch management practices that sequester carbon or reduce GHGs.*

The USDA Building Blocks for Climate Smart Agriculture and Forestry should also be utilized as an approach as ARB looks for more direction to measure progress for adoption of practices. As the U.S. government is using a 2005 baseline, we urge ARB to adopt the same baseline for the 2030 quantification efforts so federal and state efforts align. A review of the adoption of key NRCS practice standards in California that have known GHG reduction benefits indicate a preliminary target for agricultural lands could be 750 MT CO<sub>2</sub>e by 2030 using a 2005 baseline. This goal considers past

adoption rates, legacy effect and no backsliding and could only be achieved with a full commitment of incentives from state and federal sources.

## **Innovate**

The list of implementation actions in this section is well conceived and thorough. However, it is imperative that as this discussion draft gets built out that the goals for employing practices and emission reductions technologies at dairies remain voluntary.

A cooperative voluntary program could reduce dairy GHG emissions by several million tons of carbon dioxide equivalent GHG emissions annually, in addition to other indirect air and water quality improvements, criteria pollutant reductions and benefits to disadvantaged communities.

In closing, we recognize the importance of reducing emissions with incentives and building up substantial carbon in soils while continually evaluating cost-effectiveness and feasibility. This is important for measuring accurate progress in meeting State's goals as well as coordination between state agencies to avoid regulatory duplication. Please take into account the numerous other climate programs and mandates farmers are subject to as this is just one piece of the larger climate narrative and farmers have made much progress related to on-farm conservation practices.

We appreciate your consideration and the opportunity to comment. Should you have any questions or need anything further from us, please contact Cynthia Cory at [ccory@cfbf.com](mailto:ccory@cfbf.com) and Rachael O'Brien at [rachael@agcouncil.org](mailto:rachael@agcouncil.org).

Sincerely,



Cynthia L. Cory  
Director, Environmental Affairs  
California Farm Bureau



Emily Rooney  
President  
Agricultural Council of California

cc: Jennifer Lester Moffitt, CDFA