June 12, 2015

California Air Resources Board
1001 I Street,
Sacramento CA 95814
Submitted Electronically: http://www.arb.ca.gov/lispub/comm/bclist.php

RE: **Short-Lived Climate Pollutant Reductions Strategy, Concept Paper**

The Agriculture Council of California (Ag Council) and the California Farm Bureau Federation would like to submit the following comments on behalf of our members. Ag Council represents approximately 15,000 farmers across the state of California, ranging from small, farmer-owned businesses, to some of the world's best-known brands. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 57,000 agricultural, associate and collegiate members. Both Ag Council and Farm Bureau strive 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.

We appreciate the opportunity to comment on the Short-Lived Climate Pollutants (SLCPs) concept paper. We wanted to voice our initial concerns on several points, with the understanding that there are many more complex and wide-reaching issues that will have significant impact on the agricultural community. We will not attempt to address all of the issues at this stage, since many of our thoughts are outlined in the California Department of Food and Agriculture's SLCP workgroup recommendations, in which we participated.

Methane Emission Reduction Concepts
Despite a petition to ARB from a stakeholder group to control animal agricultural emissions of methane via mandatory regulation, we strongly urge ARB to maintain the voluntary, incentivized approach to all greenhouse gas (GHG) and methane emissions reductions from agriculture.

Manure Management
Manure management best practices should be integrated into livestock systems to improve existing practices to reduce SLCPs, capture methane as an energy source, and optimize nutrient utilization for crop production by managing and removing barriers to action with a view toward enhancing food supply and sustainable development. An important co-benefit of better manure management is the improved soil quality and fertility, leading to increased production of food and feed and thus contributing to improved food security and livelihoods. Good manure management also reduces the need for phosphorus and synthetic fertilizers.,

Digesters
Anaerobic dairy digesters represent a unique opportunity to significantly reduce agricultural GHG emissions, especially methane. Dairy digesters also offer a tremendous investment opportunity for State Cap and Trade Allowance proceeds, returning more GHG reduction "bang-for-the-buck" than virtually all other currently funded programs. A cooperative voluntary program could reduce dairy GHG emissions by more than 60 million tons over the life of these projects, in addition to other indirect air and water quality improvements.

In addition to incentive funding, we will need to improve the energy procurement and interconnection process to further facilitate and encourage project development in California. We will also need to work jointly to expand opportunities for transportation fuel and fertilizer by-product development.

In situations where digesters don't make sense, we recommend that additional research is needed to examine other manure management technologies. This is critical if we want to achieve those long-term emission reductions.

Black Carbon Emission Reduction Concepts
As outlined in the Short-lived Climate Pollutant Reduction Strategy Concept Paper, California has achieved ninety percent reductions in black carbon emissions since the 1960s, due to efforts to control emissions on combustion engines and other sources such as agricultural burning.

Agricultural Equipment Rule
The 2007 San Joaquin Valley 8-Hour Ozone State Implementation Plan approved by the U.S. Environmental Protection Agency contained a commitment for ARB staff to present to the Board in 2013 a regulation for mobile agricultural equipment that helped meet ambient air quality standards for the San Joaquin Valley by utilizing the cleanest available technologies. Using federal and state incentive funding, significant voluntary emission reductions were obtained by replacing older farm equipment. To get credit for these reductions, in October 2013, the Board approved the SIP Credit from Mobile Agricultural Equipment Regulation which provides the administrative mechanism for emission reductions resulting from mobile agricultural equipment program projects funded by the Carl Moyer Program to be eligible for SIP credit. This regulation complements the San Joaquin Valley Air Pollution Control District's Rule 9610 that will ensure emission reductions achieved through local, State, and federal voluntary incentive programs from mobile agricultural equipment projects are eligible for SIP credit.

In addition, a new SIP for the new 8-hour ozone standard for the San Joaquin Valley will be developed in 2015 for submittal to U.S. EPA in 2016. The SIP will address additional reductions needed to attain the new 8-hour ozone standard by 2032 including strategies that will rely on the deployment of the cleanest technologies (primarily Tier 4 final engines) in the mobile agricultural equipment sector. Thus it

should be acknowledged that additional black carbon reductions will come from mobile agricultural equipment sources to meet future SIP requirements.

Pump Electrification
There are potential GHG reductions from diesel to electric pump conversions. The Ag-ICE program, funded through the CA Public Utilities Commission, was implemented approximately 10 years ago, converted over 2,400 IC engines to electric motors, and achieved substantial GHG and criteria pollutant reductions. The existing program is not taking on any new applicants and electricity rate provision for participant sunsets in 2016. The cost of conversion is expected to increase by roughly 40%. This increase in cost is associated with the cost of electrical hook-up, line extensions, and distribution upgrades. More research is needed to identify future conversion prospects and a cost/benefit analysis. We suggest that going forward ARB consider the affects of electricity rate increases, fair accounting of GHG credits and protections in case of outside factors such as well failure.

The agricultural sector should continue to accomplish GHG reductions using incentives that allow voluntary changes in practices and technologies. We have proven over time that incentive funding is an effective way to obtain ecosystem improvements without putting the agricultural community at a competitive disadvantage with other states and countries who do not have the same level of environmental protection requirements.

Opportunities Beyond California's Borders
We support ARB's stated intent to explore and foster partnerships beyond its borders. With less than 1% (and falling) of global emissions coming from California, GHG reductions in California are not enough. For that reason, California should remember its goal is not ultimately just to reduce emissions but to create a model for others, and therefore the state should strongly consider making new requirements conditional on action by others outside California.

California should avoid unilateral commitments to long term targets without binding commitments from major emitting political entities. California only had 0.36 billion tons of CO2 emissions in 2012 out of a total of 39.7 billion tons of global CO2 emissions. Our state's leadership needs to recognize that it cannot by itself make a substantial dent in global carbon emissions, even if it achieves all of its aggressive energy and climate goals.

California is in a position of demonstrating leadership and direction, and to do so our policies must include protections for our businesses and consumers at home in that other jurisdictions must follow suit before our own stringent policies attain the force of law. The policies must be scalable so that they can in fact serve as templates that others can adopt. We need to be clear on our goal of inspiring global action, and evaluate and adjust depending on whether others are following.

In closing, thank you for the opportunity to comment on the SLCP Concept Paper, and we look forward to continuing to work with ARB as this process moves forward.

Should you have any questions regarding these comments, please feel free to contact us. Sincerely,

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