



June 7, 2022

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

*Via Electronic Submission*

**Re: 2022 Scoping Plan Update Natural and Working Lands Proposed Scenario**

Dear Chair Randolph and Board Members:

Thank you for the opportunity to comment on the Natural and Working Lands component of the 2022 Scoping Plan Update. California's working lands are the foundational economic pillar of the State. They are also the most promising and cost-effective solution to the impacts and realities of climate change. This coalition of agricultural and land trust organizations represent the interest of the State's working land holders, particularly agricultural lands, and strive to protect and improve the ability of farmers and ranchers to provide a reliable supply of food, flora and fiber through resource stewardship.<sup>1</sup> We offer these comments in response to the proposed draft Scoping Plan Update released May 10<sup>th</sup>, 2022.

Among other things, the proposed scenario within the draft Scoping Plan suggests that the Air Resources Board (ARB) should conserve approximately 6,000 acres of cropland per year until 2045. That would result in the protection of 132,000 acres of California's nearly 9 million acres of irrigated cropland. We would like to express support for the inclusion of agricultural land protection and conservation as a critical tenant to scale natural and working lands' ability to mitigate for the impacts of and combat climate change.

Over the last 30 years, more than one million acres of California farmland have been removed from agriculture, half of which is prime. While we recognize that California has a housing affordability crisis and additional development is necessary, if current trends continue, another 1.4 million acres of farmland will be lost by 2045.<sup>1</sup> And with the advent of the Sustainable Groundwater Management Act and a prolific drought, we expect to see at least another 10% of irrigated farmland to come out of production by 2040.<sup>2</sup> To combat these trends and forecasts and secure the land base necessary to effectuate the scoping plan, agricultural land protection is essential. And the benefit of protection farmland is multi-fold—protecting carbon stocks and enabling sequestration, encouraging compact development, providing ecosystem services (including biodiversity, habitat, water, and air quality/supply improvements), and facilitating a less-risky environment for farmers and ranchers to implement climate smart practices. But

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<sup>1</sup> American Farmland Trust. (September 2018). *Greener Fields: California Communities Combating Climate Change*. [https://s30428.pcdn.co/wp-content/uploads/sites/2/2019/09/AFT\\_CA-GrFields-web3\\_0.pdf](https://s30428.pcdn.co/wp-content/uploads/sites/2/2019/09/AFT_CA-GrFields-web3_0.pdf)

<sup>2</sup> Hanak, E., Escriva-Bou A., Gray, B., Green, S., Harter, T., et al. (February 2019). *Water and the Future of the San Joaquin Valley*. Public Policy Institute of California. <https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-february-2019.pdf>

before the state can benefit from these variables, preserving working land is the first step. We believe, unequivocally, the best pathway forward is encouraging voluntary participation in agricultural conservation easements, facilitated by land use partner organizations, including ourselves.

While the 6,000-acre cropland annual goal proposed in the draft Scoping Plan is laudable, we believe that more may be achieved through an ambitious and broader goal. Firstly, the proposed goal only includes protection of croplands. We agree that conservation of this land type has value and believe in their capacity to draw down carbon, which is enhanced with climate smart management practices. However, based on our understanding of both the capacity of land trusts and need of the farming community, we believe that the acre protected annually should be at least at the rate of general farmland loss in California. Additionally, we would like to express concern that the current farmland protection goal only applies to “cropland.” It’s unclear whether croplands are an overarching term to include permanent and row crops. Nor does the draft plan specify what are the mechanisms for protection—agricultural conservation easements, conservation easements, or other tools. Finally, we are disappointed that the agricultural land protection goal does not extend to rangeland. While we understand the draft plan includes a goal for 2-3 million acres of forests, shrublands and grasslands, this may not include the active management and protection of California’s rangelands from an agricultural perspective. Given that they are a large apportionment of the working land portfolio that is used for grazing practices, we encourage ARB to consider broadening the refugia eligible for protection and expand the acreage goal.

California’s farmers and ranchers experience the frontlines impacts of climate change impacts, like drought, wildfires, diminishing soils, pest proliferation, and severe weather events. These climate-driven challenges are compounded by regulatory and market conditions, land use changes and labor challenges. And yet, the state’s agricultural community offers an invaluable service to the world—providing an abundant, healthy, safe, and affordable food supply. It also offers an unprecedented opportunity to use working lands to serve as affirmative climate responses. Through enhanced agricultural land protection, by agricultural conservation easements and long-term contracts, ARB can make a down payment on the state’s future work to scale nature-based solutions on working landscapes.

On behalf of the agricultural community and its partners, we thank you again for the opportunity to provide comment. We hope to continue a positive partnership between agriculture and ARB staff and leadership moving forward.

Sincerely,

Taylor Roschen, California Farm Bureau

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The California Farm Bureau Federation is a non-governmental, non-profit organization representing nearly 32,000 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.

Charlotte Mitchell, California Farmland Trust

The mission of the California Farmland Trust is to help farmers protect the best farmland in the world. The California Farmland Trust is a private, non-profit 501(c)(3), regional land trust working in Sacramento, San Joaquin, Stanislaus, Contra Costa, Madera, and Merced Counties of California. The organization works to conserve farmland through the purchase of agricultural conservation easements from willing landowners. We envision a future in which California can accommodate population growth and urban development while preserving the most productive agricultural lands, thus creating and maintaining our irreplaceable farmland and high-quality environment for future generations.