



December 15, 2022

Chair Liane Randolph  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph:

Agricultural Council of California (Ag Council) represents over 15,000 farmers across California, ranging from small, farmer-owned businesses to some of the world's best-known brands. On behalf of our members, Ag Council appreciates the opportunity to comment and provide feedback on the 2022 Scoping Plan (Plan).

There is no question that California is the world's leader in advancing climate-friendly policies. The state must continue investing in environmentally transformative practices while collaborating with industry partners to ensure successful outcomes at the statewide and local levels.

The goals of the 2022 Scoping Plan are ambitious, and we are concerned available technology does not meet the needs of the desired final outcomes. This raises feasibility concerns within the agricultural community, and we urge the California Air Resources Board (CARB) to continue to support climate smart agricultural programs to help bridge the gap.

We fully understand there are significant budget constraints heading into 2023. And at the same time, the agricultural community has demonstrated we will successfully participate in climate smart ag programs if cost share incentives continue to be made available. Successful examples include (but are not limited to):

- Food Production Investment Program, which has reduced GHG emissions from food processors by 2,905,201 MTCO<sub>2</sub>e as of May 2022 (CEC estimate).
- Dairy Digester Research and Development Program (DDRDP) and the Alternative Manure Management Program (AMMP), which assist dairy producers in meeting their methane reduction goals. Digesters alone contribute an estimated 4MMT of CO<sub>2</sub>e reductions annually. Therefore, CARB must continue to advocate for DDRDP, AMMP, and the inclusion of digesters in the LCFS market to provide incentive for adoption.

Other cost share incentive programs such as the Funding Agricultural Replacement Measures for Emission Reduction (FARMER) program, State Water Efficiency and Enhancement Program (SWEEP), Healthy Soils and others have been extremely fruitful programs, and we urge CARB to continue to voice support for all of these programs heading

into our tightened budget year. We will not meet these ambitious goals without continued investments in these cost share programs.

Ag Council appreciates that the Scoping Plan recognizes public and private sector dollars must work together to achieve the state's goals. However, we caution against efforts to finance climate-smart technologies through low-cost credit or credit support programs. An incentive-based approach has proven successful when partnering with the private sector. We encourage CARB to continue this strategy to achieve its goals.

Ag Council is further concerned by the quantification methods in the scenarios provided by the 2022 Scoping Plan. Scenarios should more accurately separate the different land management strategies to give land managers better tools to evaluate affordability and feasibility of various practices best suited to their products and land types. We urge CARB to continue to work with the California Department of Food and Agriculture (CDFA) on Natural and Working Lands (NWL) and other land management strategies in the Scoping Plan and other regulatory efforts. We should collectively work to define methods of quantifying carbon inventories. Investments in research and quantification methods will make significant progress in this area. Well-defined quantification methods and distinct estimates of the costs and benefits for individual land management practices would help land managers and producers measure progress toward objectives set by CARB for NWL.

We acknowledge that immense advancements have been made on zero emission vehicles (ZEV), including funding for research of new ZEV technologies, as well as incentives. Our members in urban areas are ready and willing to take on the ZEV challenge. However, questions arise around stability of the grid and energy rates. We are hesitant to become 100% reliant on this technology as we head into harvest season as many crops must be processed within a few hours of harvest. Being held up for several hours or even days could create significant challenges during harvest. Our members in more rural areas lack the infrastructure to realistically participate in the ZEV program and rough terrain and other environmental issues cause steep challenges for existing technology. CARB may need to consider whether rural locations meet the feasibility threshold included in the Executive Orders.

Additionally, agricultural lands and croplands make up only 90 of the 5,340 MMT of carbon stocks in NWL. Therefore, careful considerations should be made to not place a disproportionate regulatory burden on annual and perennial crop producers. This underscores the vital need in investing in research and development, and in climate smart ag programs.

With our members deeply concerned regarding the feasibility and impact of adopting the technology necessary to meet the goals in the 2022 Scoping Plan, we are asking that a strong and noticeable effort be made by CARB to include agricultural producers and food processors (farms, dairies, food processing industry, etc.) on the Expert Advisory



Committee to be established by CARB and the California Natural Resources Agency (CNRA) as dictated by AB 1757. This will create opportunity for input from producers and processors on how the industry can achieve the goals outlined in the plan. We also believe participation by these industries can help identify challenges to adoption and implementation of technologies necessary to meet GHG emissions goals. Ag Council is willing to participate, or help identify participants, on the Expert Advisory Committee in any capacity available.

Thank you for your time and consideration of our comments. We look forward to working with CARB to achieve the Scoping Plan goals while maintaining a robust and productive agricultural industry in California. If you have any questions, feel free to contact us at: [emily@agcouncil.org](mailto:emily@agcouncil.org) or [jacob@agcouncil.org](mailto:jacob@agcouncil.org).

Sincerely,



Emily Rooney  
President



Jacob DeFant  
Membership & Public Policy Coordinator

