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February 7, 2018

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: DRAFT California 2030 Natural and Working Lands Climate Change Implementation Plan

Dear Chair Nichols,

The California Cattlemen's Association (CCA) appreciates the opportunity to comment on the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (Plan). California ranchers are committed stewards of the land and voluntarily invest significant time and resources to the preservation and conservation of California's working landscapes. Ranchers operate on roughly 34.1 million acres of California rangeland and, in addition to producing safe, nutritious, and sustainable protein, also provide numerous environmental benefits to the people of California.

The Plan appropriately recognizes the contributions that active grazing lands play in reducing greenhouse gas emissions through soil carbon sequestration. Rangelands cover 31% of the land surface area of the United States.[1] U.S. grazing lands, including managed pasturelands, have the potential to remove an additional 198 million tons of carbon dioxide (CO2) from the atmosphere per year for 30 years.[2]

The Plan identifies several strategies voluntarily implemented by ranchers across the state in partnership with the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS) and through other local, state, federal, and private partnerships. In addition to outlining those strategies, the Plan proposes "annual rate of implementation" objective. Although the proposed acreage per year for each practice is laudable, the Plan should recognize that the "annual rate of implementation" is subject to voluntary participation by farmers and ranchers. We concur that significant progress has already been made through the Healthy Soils Program, the Environmental Quality Incentive Program (EQIP) and other public–private partnerships. These programs are largely successful because they are voluntary programs in which ranchers work with agency staff and technical experts to achieve desired results on the ground.

CCA is strongly supportive of increasing the pace and scale of numerous "modeled management activities" identified in the Plan. Specifically, ranchers desire to see a significant increase in the removal of dead trees and excess fuel loads that have contributed to the deadly and catastrophic wildfires that have ravaged

[1] Havstad, K., D. Peters, B. Allen-Diaz, J. Bartolome, B. Bestelmeyer, D. Briske, J. Brown, M. Brunson, J. Herrick, L. Huntsinger, P. Johnson, L. Joyce, R. Pieper, T. Svejcar, and J. Yao. 2009. The Western United States Rangelands: A Major Resource. pp.75-93. In: W.F. Wedin, and S.L. Fales[eds.]. Grasslands: Quietness and Strength for a New American Agriculture. Soil Science Society of America: Madison, WI, USA.

[2] Follett, R.F., J.M. Kimble, and R. Lal [eds.]. 2001. The potential of U.S. grazing lands to sequester carbon and mitigate the greenhouse effect. Lewis Publishers, CRC Press: Boca Raton, FL, USA. 422 pp.

California. In addition, ranchers and private landowners strongly support an increase in the use of prescribed fire to reduce fuel loads and significantly reduce the intensity of wildfires in future years. It is well-recognized that catastrophic wildfires not only pose a public safety risk but also represent a substantial source of greenhouse gas emissions that can be mitigated through active landscape management.

Academic research also demonstrates that prescribed grazing is a primary tool in the toolbox that can be used to effectively manage fuel loads. Grazing can result in fires that burn at lower intensity, can increase the 'patchiness' of fires, decreases the rate at which fire spreads, and increases the survival of plants after fire. Grazing can reduce fire spread and intensity by removing understory vegetation, reducing the amount of fuel and accelerating the decay of litter through trampling.[3]

Furthermore, CCA applauds the Plan for identifying California Department of Parks and Recreation (CDPR) as an "implementing agency" for prescribed grazing. Most state-owned lands, including State Parks, were formerly actively managed and grazed. Today, thousands of acres of state-owned lands sit idle with no active management to reduce fuel loads. As such, wildlife habitat has deteriorated, invasive species and brush have proliferated and fuel loads have increased exponentially. CCA strongly urges CDPR in collaboration with the California Department of Food and Agriculture to partner with ranchers to develop and implement an effective and viable grazing program for State Parks to achieve rangeland health objectives. CCA fully recognizes that any program will require a comprehensive planning effort to determine financing mechanisms to repair and reconstruct rangeland infrastructure that has long been neglected in order to facilitate grazing. In addition, CCA recognizes that any effort will require a financial commitment on the part of ranchers and a significant in-kind contribution in time and labor. We strongly urge the California Air Resources Board to pursue this management actively with CDPR in order to reduce greenhouse gas emissions and increase soil carbon as outlined in the Plan.

CCA again appreciates the opportunity to comment on the Plan and we look forward to collaborating further to achieve healthy working landscapes.

Sincerely,

Justin Oldfield
Vice President, Government Affairs

[3] Strand, Eva; Launchbaugh, Karen; Limb, Ryan; Torrell, L. Allen. Livestock Grazing Effects on Fuel Loads for Wildland Fire in Sagebrush Dominated Ecosystems. *Journal of Rangeland Applications*. Volume 1, 2014. Pp. 35-57.