



January 5, 2022

California Air Resources Control Board
P.O. Box 2815
Sacramento, CA 95812

Re: 2022 Scoping Plan Update – Natural and Working Lands

Chair Randolph and Members of the Board:

Agricultural Council of California (Ag Council) represents over 15,000 farmers and farmer-owned businesses across California, and we appreciate the opportunity to provide comments regarding the 2022 Scoping Plan Technical Workshop on Natural and Working Lands on December 2, 2021.

California is on the forefront of achieving the most ambitious environmental goals in the world, and it is imperative the state continues to invest in environmentally transformational practices to attract industry partnerships and to avoid putting farmers in California at a disadvantage. To this end, Ag Council strongly discourages the California Air Resources Board (CARB) from considering Scenarios 1 and 4. Scenarios 1 and 4 propose to maximize soil carbon stocks and perennial biomass carbon while maximizing climate smart agricultural practices and nutrient cycling. These scenarios rely on assumption that perennial crop production will remain or increase, and do not consider drought, the effects of the Sustainable Groundwater Management Program (SGMA), or urban sprawl.

Specifically, Scenario 1 proposes to model conversion based on existing conversion rates and SGMA. With the implementation of SGMA, acreage will be fallowed and certain working lands will need to be repurposed for other uses. Many agricultural land use decisions will be made and incentivized to either remain or move into other cropping patterns. For example, repurposing land into rangeland or to create a groundwater recharge project would have positive impacts on the communities impacted by SGMA. However, if this is not done strategically, the effects of SGMA may negatively impact some of California's most economically disadvantaged areas. The changes in California's agricultural landscape paired with the ongoing drought are not addressed in Scenarios 1 and 4. For these reasons, Ag Council urges a rejection of Scenarios 1 and 4.

However, Scenarios 2 and 3 present more practical goals. These scenarios propose increases in climate smart practices. Ag Council believes that the state must partner with agriculture through climate smart programs is the most meaningful way to reduce carbon emissions and sequester carb on working lands. This is consistent with our previous support of the passage of the Cap-and-Trade program reauthorization in 2017 because incentives for the agricultural community were a critical component to reduce emissions.



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of California

Cap-and-Trade funds critical carbon sequestration efforts on working lands, including the Healthy Soils program and the State Water Efficiency and Enhancement Program (SWEEP). In addition, the successful FARMER program is a collaboration between the state and farmers to replace older agricultural equipment with cleaner burning engines to benefit local communities by slashing emissions. These investments have been made in projects that are otherwise cost-prohibitive, therefore transforming segments of the agricultural sector due to these climate-smart agricultural practices. The Cap-and-Trade program solidifies California as a global leader on climate issues, is cost effective, and helps prevent leakage of our economy to other states and nations. In the 2022 Scoping Plan, the agricultural community continues our support of voluntary incentive programs that have proven near-term and long-term climate benefits.

Furthermore, Scenario 2 focuses on increasing climate smart practices focused on drought resilience. Ag Council encourages this approach over the approach in Scenario 3, which focuses on biodiversity. Water availability dictates the success of on-farm climate smart adoption; therefore, CARB must consider drought resilience to achieve an increase in climate smart practices.

Ag Council also appreciates that draft Scenarios 2 and 3 do not incorporate an anti-crop protection agenda. Crop protection tools help farmers protect the global demand for food from pests and disease, while reducing waste, maximizing yields, and improving efficiency. Pesticides are not within the scope of AB 32. Given this, Ag Council encourages CARB to maintain its focus on the identified practices that achieve the goals set forth in AB 32.

Scenarios 2 and 4 propose an increase in organic agriculture. While we support organic agriculture, Ag Council aligns itself with the comments from the agricultural coalition regarding the challenges associated with a state acceleration of organic agricultural production. We encourage the state to allow organic agriculture to increase “organically.”

Ag Council appreciates the work of CARB to partner with us to achieve statewide climate goals. Thank you for your time and consideration of our comments. Should you have any questions, please call me at (916) 443-4887. Ag Council looks forward to a collaborative effort.

Sincerely,

A handwritten signature in blue ink that reads "Danielle Diele".

Dani Diele
Membership & Public Policy Coordinator