



# CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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December 16, 2016

Ms. Rajinder Sahota  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Submitted electronically via: [www.arb.ca.gov/cc/scopingplan/scopingplan.htm](http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm)

## **RE: 2030 Target Scoping Plan Update Discussion Draft**

Dear Ms. Sahota,

The California Farm Bureau Federation appreciates the opportunity to comment on the Air Resources Board's (ARB) 2030 Target Scoping Plan Update Discussion Draft which outlines a strategy for how to achieve greenhouse gas (GHG) reductions of 40 percent below 1990 levels by 2030. Our comments are very preliminary due to the lack of environmental, economic and AB 197 analyses and the Natural and Working Lands (NWL) inventory. We look forward to being able to provide further input once that information is available and request that we be given more time to review the January Proposed Scoping Plan and relevant workshops are planned to not fall on the same day the comments are due.

### **Natural & Working Lands**

Farm Bureau is pleased to see that ARB recognizes the importance and diversity of California's NWL's that include forests, rangelands, farms, wetlands and soils. We agree with the need to balance carbon sequestration with other co-benefits in any of these sectors. We are very interested in the Lawrence Berkley National Laboratory (LBNL) analysis to develop business-as usual net carbon sequestration rates and encourage more stakeholder discussions as this research progresses. At the December 14, 2016 workshop where the California LANDs Carbon Model was discussed, it is clear that more input data will be needed to get a clear baseline or target. There are many more potential conservation practices that should be included beyond sequestration, no-till and cover crops. The ability to bundle the practices will provide additional emission benefits that would otherwise be underestimated if only quantified as single activities. Such bundling needs to be included as a modelling option.

We understand that Figures II-1 and II-2 are initial projections from the LBNL modeling work and will guide ARB's near and long-term policies to ensure net sequestration in the NWL's and maintain them as resilient carbon sinks. As these policies are developed, it will be important to directly tie the GHG emission reduction planning targets for 2030 and 2050, that ARB states they intend to develop, with funding and technical assistance availability. We agree with land protection, enhanced carbon sequestration and biomass utilization being identified as key activities to initially secure these goals.

### Scoping and Tracking Progress

The need to collaborate with other state agencies is noted in the discussion draft and we highly encourage the continued coordination that has been ongoing with ARB, USDA Natural Resource Conservation Service (NRCS), California Department of Food and Agriculture (CDFA) and other agencies. We strongly urge ARB to utilize Comet-Planner, continuing the fine tuning of these tools to fit California agriculture as NRCS and CDFA has been working with Colorado State University to accomplish. Comet-Planner has undergone extensive refinements and is a solid, conservative tool that growers would understand and utilize. There are 34 NRCS Conservation Practice Standards that California farmers and ranchers are already employing with federal incentive funding that are quantified to sequester carbon. Growers are familiar with and comfortable using these and we need to build from this platform for implementing the Healthy Soil Initiative and not attempt to develop a completely different tool that would take significant financial sources and delay implementation.

Farm Bureau has extensive experience communicating with the agricultural community and understand that given the amount of paperwork growers must complete to keep their operation in compliance with state, federal and international requirements, any request for information must be concise and easily understood or the participation rate will be extremely low. ARB needs to stop treating NWL like industrial sources. These voluntary reductions are not a part of the cap and trade program and should not be developed with that same approach. These are living ecosystems where voluntary conservation practices with extremely conservative GHG emission reductions will be applied. It would be tragic to have ARB spend months developing an alternative platform that growers cannot adopt because of the difficulty and complication resulting in little to no GHG reductions obtained.

### Protect Land from Conversion

The importance of restricting urban sprawl is mentioned numerous times in the discussion draft, including the Transportation section and Environmental Justice Advisory Committee Recommendations. Farm Bureau has worked relentlessly for decades to preserve farmland. We continue to be highly committed to the California Land Conservation Act (Williamson Act) that has been beneficial in helping to establish and conserve recognized areas of agriculture and open space. But the stewards of the farmland must remain economically viable to insure the land remains in open space and continues to contribute to our nation's food security.

A key problem in California has been the siting of schools on existing farmland and then trying to restrict crop production activities because of the close proximity of the school and farm, despite the farm being there first. Farm Bureaus sponsored SB 313 (Bill Monning, 2015-16) would have provided for more transparency when a school district decides to override a county or city zoning ordinance and locate a school on agriculturally zoned land. Under California law, school siting does not have to be coordinated with local general plans, and a school board can exempt itself from compliance with local zoning ordinances by a two-thirds vote of the board. This has resulted in schools being located on agricultural land on the outskirts of town, or on land within a community that is not properly coordinated with existing housing and transportation infrastructure. SB 313 would have ensured that findings already contained in existing law would be provided in writing to local governments 30 days prior to exercising the two-thirds vote trigger, to make local zoning inapplicable. Input would also be included from County Agricultural Commissioners about potential conflicts of the school being placed on working farmscapes. Unfortunately, the residential home builders were able to stop SB 313, as developers want nothing impeding their interests.

With a \$9 billion school construction bond recently approved on the November 2016 ballot, thoughtful school siting is more important and timely than ever. The discussion draft states “compact, lower vehicle miles travelled (VMT) development patterns are essential to achieving the State’s GHG reduction, public health, equity, economic, and conservation goals.” Insuring that schools are properly located will help meet the Transportation Sustainability Sector goals of increasing the proportion of trips taken by foot and bicycle with the co-benefit of healthier students.

#### High-Speed Rail

Farm Bureau encourages the development of cost-effective, local mass transit. As such, we support the concept of high-speed rail in California. However, Farm Bureau is opposed to the High-Speed Rail Authority’s 2012 Plan, as it conflicts with local land use priorities and it would encourage urbanization and sprawl. This particular project faces insurmountable financial changes and environmental approval obstacles as a matter of federal, state and local review. Finally, our membership has expressed opposition to the rail’s alignment as it has developed in the current plan, which appears inconsistent with the underlying bond authorization.

### **Draft Scoping Plan Scenario & Alternative Modeling Description**

While this document will likely be discussed at the December 16, 2016 workshop, there will be not time to include an informed response after the workshop since the comment deadline is COB on that same date. Given that timeframe, there are two points that need clarification since this document summarizes input assumptions and data sources for the scoping plan.

Page 23 states that a 22% reduction in N<sub>2</sub>O emissions can be achieved with the optimized application of fertilizers. There are two literature citations, one done on corn in Michigan and the other cannot be read, except for the abstract, unless paid for. We ask that further discussion with stakeholders be held before this reduction assumption is used for modelling purposes. While semi-permeable polymers or nitrification inhibitors might have a role in reducing N<sub>2</sub>O, further discussion is needed to understand how and if this translates in California production systems. We cannot assume the same reductions would occur on our farms and ranches with our climate which dramatically differs from Michigan's operations and conditions.

Page 24 lists emission reduction targets that are in SB 1383 and the Short-Lived Climate Pollutant Strategy. Manure methane emissions are listed as a 65% reduction which does not reflect SB 1383 or the SLCP strategy which has a goal from manure of 40%. This should be changed or an explanation why it does not reflect SB 1383 or the SLCP strategy is needed.

### **The Strategy to 2030**

While Farm Bureau has continued to not support the California-only climate change legislative mandates, we understand the need to work within the state's regulatory framework. It is difficult to provide a response on the three concepts given the lack of an economic and implementation analysis. But based on the discussion draft, we believe the best scenario is to continue the Cap-and-Trade program with declining caps.

While Cap-and-Trade seems to be the least harmful of the three concepts, we continue to have significant problems with it which warrant further evaluation:

- The GHG reporting is very onerous for small agricultural processors. If cap and trade is continued, a review of unintended consequences from criminalizing reporting and compliance obligation errors needs to be addressed. The additional staff requirements to conduct record keeping and certification of measurement equipment is burdensome to smaller capped entities.
- The reduction of electrical usage in combination with the mandates of the renewable portfolio standard is a double whammy that has significant impact. The full effects of the significant increase in current renewable procurement requirements on utility customers have not been evaluated. Although the increase affects the operations of the procuring utilities, the ultimate cost falls upon the customers of the utilities. In addition to such pass-through costs, those customers are facing significant operational impacts from changing time-of-use periods for electric rates driven by the extensive procurement of solar generation. (See CPUC Docket No. R.15-12-012)

- The state is conducting many GHG emission reduction complementary measures at once. Various State agencies are not acknowledging the compliance burden to manage these various efforts required at facilities with limited staff.

We do not support further limiting the offsets. As it is, agricultural food processors have limited opportunity to take advantage of offsets as they cannot compete with larger capped entities. Offsets are a proven and cost-effective means of meeting AB 32 compliance obligations. They are also an effective means of achieving significant GHG emissions reductions in California and globally, since carbon dioxide pollution knows no boundaries. ARB's criteria that offsets be real, additional, quantifiable, permanent, verifiable, and enforceable are the world's gold standard. It is important that California maintain and build a strong offset program. We should not continue to restrain the ability of offsets to reduce emissions. ARB should expand and expedite the use of offsets, which is consistent with ARB's statutory obligation to achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

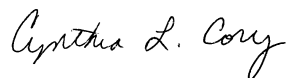
Farm Bureau opposed AB 197, so the additional direct GHG reductions from mobile, large stationary and other unidentified sources is of great concern. California refineries are already the most efficient in the world, but now they must also implement fuel switching, boiler electrification and install more energy technologies on top of participating in cap and trade. AB 197 is a recipe for leakage. It is far more likely that California refineries will simply expand in other states and nations. If they decide to stay, since agriculture cannot operate without fuel, we will have to absorb the increased costs these new mandates will impose on refineries as they have no choice but to pass the costs along.

## **Closing**

We believe the opportunity to voluntarily reduce GHG emissions in production agriculture will not be realized unless there are sufficient incentives and technical assistance that are available in a concise, streamlined format. We ask that ARB and all other agencies working to implement the state's GHG program recognize the other mandates agricultural producers are already subject to and not minimize the progress that has been and continues to be made related to on-farm conservation practices.

I appreciate your consideration and the opportunity to comment.

Sincerely,



Cynthia L. Cory  
Director, Environmental Affairs