



June 23, 2017

JR DeLaRosa
Assistant Secretary for Climate Change and Energy
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Submitted electronically to: climate@resources.ca.gov

Subject: Draft Report, Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy

Dear Mr. DeLaRosa,

Agricultural Council of California (Ag Council) and the California Farm Bureau Federation (CFBF) appreciate the opportunity to comment on the California Natural Resources Agency’s Draft Report, Safeguarding California: 2017 Update (Draft Report).

Our organizations strive to protect and improve the ability of California agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources. California’s natural and working lands can and do provide significant environmental and public health benefits, and support state and local economies. As an essential part of California’s farming heritage, our members understand the importance of protecting the land, water and air for their families, their communities and future generations.

We are glad to see a focus on California agriculture in the Draft Report, put out in May 2017. The Resources Agency’s plan for helping the agriculture sector adapt to a changing climate highlights some of the vulnerabilities and the areas that we need to make more resilient. As the Draft Report points out, “Water availability and changing temperatures, as well as changes in the prevalence of pests, pollinator life cycles, diseases, and beneficial species directly impact crop development and livestock productions.”¹ Due to these challenges, farmers are already using state of the art technology such as satellites, drones, sensors, and laser-guided tractors to collect thousands of data points about the environmental conditions in a field, such as temperature, humidity, soil composition, or slope of the land. Using these

¹ Draft Report, Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy (pg. 69)

“precision agriculture” techniques, farmers could reduce their environmental footprint by matching land management practices to the unique environments on their farm.

Precision agriculture is helping farmers stay ahead of the curve and we agree that the state can also play a role by developing tools, data and incentives to increase resiliency on-farm. However, we are concerned about the state’s desire to take on a more active role in determining the best locations of crop plantings. The Draft Report states, “As the climate changes, the state will need to assist farmers in assessing what crops can be grown in which regions of California.”² Farmers are already growing crops that are best suited for environmental conditions and market opportunities. Having the state step in to dictate what crops should be grown due to environmental impacts, disregards investments made in infrastructure, proximity to food processing capabilities and contracts held in the marketplace. By disregarding these factors, the Resources Agency could require farms to truck their products further distances for processing, therefore increasing the climate footprint by increasing transportation miles.

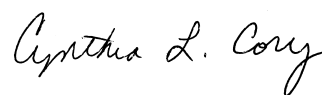
The Draft Report hits on some important recommendations and practices for climate smart agriculture such as incentivizing advanced water management and supporting dairies as key partners in climate resilience. The five key recommendations fit in nicely with programs already being executed by the California Department of Food and Agriculture. However, we recommend the Draft Report also recognize future areas of on-farm climate action and savings through possible incentives. Missing from the Draft Report is an appropriate recognition of the potential for effective utilization of agricultural biomass materials. Environmental benefits of energy created from biomass include reducing carbon emissions, diverting waste from landfills and reducing the demand for fossil fuels. As currently structured, the biomass industry’s electric generation facilities provide an important outlet for over one million tons of biomass material from agricultural operations. However, the need for an outlet of agricultural materials is greater than the available facilities. Agricultural materials can and do combine with materials from urban and forest biomass to optimize the efficacy of the facilities. The state should make efforts to retain the existing available facilities as well as create opportunities for additional types of outlets for the materials.

We appreciate your consideration and the opportunity to comment. Should you have any questions or need anything further from us, please feel contact Rachael O’Brien at (916) 443-4887 or via email at Rachael@agcouncil.org.

Respectfully,



Emily Rooney
President
Agricultural Council of California



Cynthia L. Cory
Director, Environmental Affairs
California Farm Bureau Federation

² Draft Report, Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy (pg. 69)