



October 16, 2015

The Honorable Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento CA 95812

RE: COMMENTS ON THE 2030 TARGET SCOPING PLAN

Dear Chair Nichols:

Agricultural Council of California (Ag Council) appreciates the opportunity to submit comments based on October 1, 2015, Joint-Agency discussion regarding the update of the 2030 Target Scoping Plan.

Ag Council is a member-supported organization advocating for more than 15,000 farmers across California, ranging from farmer-owned businesses to the world's best-known brands. Ag Council works tirelessly to keep its members productive and competitive, so that agriculture can remain California's number-one industry and members can continue to produce the highest quality food for the entire world.

We respectfully submit the following brief comments:

ECONOMIC ANALYSIS

We appreciate the inclusion of an economic analysis section in the presentation and that the goal is to evaluate the economic impact of options for achieving the 2030 GHG target. Addressing the costs and benefits of climate change are important to the agricultural sector in the state.

As explained by the Air Resources Board, the Scoping Plan's economic analysis provides us two models for determining the costs and benefits of emission-reducing technologies: the Energy and Environmental Economics pathway Model and the Regional Economic Models, Inc. Ag Council encourages the Air Resources Board to also evaluate the marginal costs of the strategies proposed and associated benefits.

We believe that state policy makers and regulators would benefit from an analysis of costs and benefits of the climate change program and associated regulations; and how alternative approaches would affect the California economy and our living environment. In particular, an analysis of whether the regulations have exacerbated or prevented emissions or economic leakage outside our borders is crucial.



Agricultural Council
of California

It is promising that the advice offered five years ago by the 16-member Economic and Allocation Advisory Committee (EACC) appointed by Chairwoman Mary Nichols to assist ARB in its analysis of AB 32 economic impacts has the potential to be addressed with a new set of economic and technology advisors. EACC reported in 2010 that the economic analysis should focus on the interim years, not just the future. They also noted the limitations and suitability of the economic models that ARB has thus far utilized and advised that a full integration of the two models would provide a stronger assessment.

AGENCY COORDINATION

We appreciate the objective to coordinate across government agencies. The nature of California's climate change policies necessitates that state agencies other than the Air Resources Board play a critical role in implementing AB 32 regulations and laws to help us achieve GHG emission reduction targets. Ag Council respectfully requests that ARB develop a more a transparent, publicly available accounting of how the funding to implement climate change policies is being coordinated among state agencies to prevent duplicative spending and project efforts. Having a section of your website devoted to presenting this information to the public in an easily accessed forum would be a huge benefit. We also ask that the Air Resources Board work closely with the California Department of Food and Agriculture and California Energy Commission to identify funding gaps and implement and fund the Healthy Soils Initiative and the Water Energy and Technology program.

In closing, it is critical that when looking at GHG reductions in specific sectors, that cost-effectiveness and technological feasibility be considered. There are very broad, overarching goals mentioned throughout the presentation in all focus areas, however, there is lack of detail of how those actual emissions will be achieved. We look forward to providing more in-depth comments as this process continues to move forward.

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,

A handwritten signature in black ink that reads "Emily Rooney".

Emily Rooney
President