



To: California Air Resources Board
Re: Comments on Climate Change Draft Scoping Plan
Date: July 31, 2008

Introduction

American Farmland Trust is a nonprofit conservation organization dedicated to preserving farmland and encouraging environmentally beneficial farming practices. We have operated in California since 1983 and have approximately 5,000 members in the state.

AFT has an interest in climate change for several reasons: First, global warming poses a significant threat to California agriculture. More extreme weather will take a serious toll on farms, and the loss of winter snow pack will play havoc with the water systems that so many farmers rely on. Accordingly, we are interested in supporting measures that will help forestall or avoid these impacts. Agriculture will also be affected by the policy measures aimed at limiting global warming. We are interested in shaping those policies to assure both that agriculture contributes what it can and that agriculture, and the consumers who depend on it, are well served by those choices.

The Climate Change Draft Scoping Plan clearly strives to be a coherent vision shared across the various agencies of the administration. To date, the Draft Scoping Plan is the most comprehensive plan put forward by any state. Much of the plan is ambitious and well conceived. We can commend you for a plan well begun.

We are concerned, however, that there are several weak or missing links that need attention. Both the land use and agriculture sections, in particular, would benefit from substantial strengthening. We are pleased to have the opportunity to share our thoughts on how this might be accomplished.

I. Land Use & Transportation Patterns

A cornerstone of any meaningful strategy to ensure the long term viability of agriculture is to protect the land base, because without that there is no agriculture. Since the single biggest threat to the agricultural land base is urban conversion, AFT has an interest in programs that encourage more compact urban development – which is also a solution to greenhouse gas reduction. So we are disappointed that the Draft Scoping Plan sets an extremely modest target for reconfiguring land use patterns to reduce reliance on vehicle trips, and proposes few measures to take advantage of the full potential of this approach to climate mitigation.

The land use measures are located in the section entitled “Local Government Actions and Regional Targets.” Our concerns start with the numbers. The Draft plan only counts reducing 2 million metric tons (MMT) of carbon equivalent per annum by 2020 from actions in this section. That is only a little more than 1% of the total reductions.

Sacramento As An Example of the Potential

To put this into perspective, consider that the Sacramento Area Council of Governments (SACOG) blue print, if implemented in full, would reduce carbon emissions by roughly 1 MMT by 2020, according to the final EIR for the project, though SACOG today has only about 1/15th of the state’s population. To be sure, the SACOG Blue Print is a good example of smart growth planning, but it isn’t radical. It was adopted by unanimous vote including representatives from every city and county in the region.

Last year, the state appeared ready to embrace a statewide goal that is roughly proportional to the SACOG targets. The report “Climate Action Team Proposed Early Actions to Mitigate Climate Change in California, Draft for Public Review” (CalEPA, April 2007), assigned 18 MMT by 2020 to “regional transportation/smart growth land use measures.” The question now arises: Why did CARB finally settle on just 2 MMT for the Draft Scoping Plan. The 2 MMT figure is so close to business as usual that it is almost meaningless.

What is at stake is more than just 16 MMT of additional carbon reductions, or even some intermediate amount based on a reasonable compromise figure, but also all of the associated benefits. Here again the EIR for the SACOG blue print offers instructive figures.

The SACOG plan succeeds by subtly changing development patterns to emphasize development of communities with a greater range of housing and transportation choices. Under the status quo scenario, in 2050 more than two-thirds of Sacramento region housing would be single family homes on large lots. Under the Blueprint scenario, most housing would still be detached single family, but 17% would be single family on smaller lots in walkable neighborhoods. For attached homes, the status quo projects 25% in that category, while the Blueprint scenario raises that number to 35%. As a result of the more compact development pattern, only 304 square miles of agricultural land would be converted to urban uses under the Blueprint scenario, compared to 661 square miles under the status quo.

In addition to saving a lot of farm and ranch land, the Blueprint scenario would provide other environmental and public health benefits on a significant scale. The blueprint scenario would encourage considerable infill development designed to improve transportation and housing choices in existing neighborhoods and new green field development that is designed to provide these choices up front. Consequently, under the Blueprint scenario, 69% of Sacramento region residents would live in pedestrian friendly communities by 2050, while under the status quo only 34% would live in such

neighborhoods. The implications for public health are significant, and frankly, should be considered within the Scoping Plan analysis of public health issues.

It should also be noted that smart growth is good for real estate. In the last year, foreclosures have hit sprawling neighborhoods in the Sacramento region far more than the more walkable neighborhoods. This pattern has been replicated else where in the state too. There is certainly an economic rationale for that, since the high cost of driving, likely a fixture of the future, is a significant handicap for auto dependent subdivisions. The Scoping Plan should acknowledge the savings for house holds and businesses associated with communities that require less driving.

We acknowledge that saving farmland is our priority, but it seems that if you can get all of these other benefits with a strategy that happens to save a lot of farmland, it is folly not to fully exploit the opportunity.

Public Health Opportunity

CARB's analysis of the public health benefits of transportation efficiency measures focuses exclusively on respiratory medicine and on the economic benefits of reduce respiratory disease. This analysis provides powerful support for the vehicle and fuel improvements called for in the scoping plan. But there are substantial public health benefits to other transportation efficiency measures that are overlooked in the plan.

Obesity, diabetes and heart disease all rob too many Californians of their quality of life and even of their lives. These are not rare diseases, but rather true public health menaces, and they can be responsive to strategies that the Scoping Plan could embrace more aggressively. Auto dependant neighborhoods contribute significantly to the incidence of all of these diseases, while smart growth can be a significant mediating influence. Strategies aimed at reducing vehicle miles traveled will help with these diseases. On the other hand, vehicle and fuel improvements do little to address them.

A more thorough public health analysis hence would indicate a better balance of vehicle and fuel improvements on the one hand and land use changes to reduce driving on the other, to reduce green house gasses and improve public health. We would like to see the public health analysis improved accordingly.

The public health analysis should also explore the issues of food security. In neighborhoods that lack access to healthy food choices, residents are forced to choose between relying on expensive locally available junk food and traveling long distances to secure more healthy fare. That long distance travel obviously produces global warming emissions. There are a variety of appropriate policy responses including establishing farmers markets and promoting siting of local grocery stores in such neighborhoods. The emissions benefits of providing better access to healthy food may be modest, but the public health benefits can be significant, and will largely go unattended to unless new resources are found to address the issue. Climate change policy represents an opportunity for low income communities that are now food deserts to get attention that might not

otherwise be available. In this context, including food security issues in the scoping plan is important.

The gaps in the public health analysis in the draft plan could be filled by consulting more closely with the California Department of Public Health and the larger public health community during the process of revising the draft.

Land Use Emission Reduction Measures

The land use measures specified in the plan include funding for planning and technical assistance organized around the regional blue prints. We agree with this approach, and recommend that you reference in full the historic objectives of the Blueprint planning grants, which include explicitly planning to avoid conversion of prime farmland.

The big challenge with the blueprints has always been implementation. As long as the blueprints are voluntary measures, the goal will be to get more development to follow the blueprint than not. Though the state has not yet done so, it should pay head to the old country saying that development follows infrastructure like cattle follow feed trucks. It should back the blueprints with incentives by aligning state infrastructure spending with the blueprints.

In addition to helping with the regional plans, the state can also play an important role in developing model policies that local government can adopt. For example, one of the most effective market signals that could be used to promote compact, transit-oriented development is a mitigation requirement based on the efficiency of new development in terms of how much land is consumed per person. The nexus to greenhouse gas reduction is that more compact development is closely correlated with vehicle miles traveled and, hence, with a principal source of greenhouse gas emissions. An efficiency-based mitigation scheme might work like this: If a residential subdivision averages only two dwellings per acre of land converted, versus, say, 8 DU/ac, it is only one-fourth as efficient, creating a demand for the conversion of 3 additional acres of farmland to house the same number of people. The lower density development should, therefore, be required to mitigate for this opportunity cost of its inefficiency. The mitigation fee would be benchmarked against an overall community development efficiency standard linked to greenhouse gas reduction goals or, perhaps, a set of goals that also includes the conservation of irreplaceable agricultural resources. An additional advantage of this approach would be that the proposed mitigation scheme would have a minimal effect on higher density low- and moderately-priced housing.

II. Agriculture

While California agriculture is a relatively minor contributor to greenhouse gas emissions, it would appear to have significant potential to offset the emissions of other sectors of the state economy by amending farming practices and by sequestering carbon in the soil and growing plants. We urge CARB to work with the California Department of Agriculture and Department of Conservation to fully explore and realize this potential.

We also would encourage consideration both of the direct and indirect emissions. Not only is the carbon sequestration potential of the land lost when agricultural land is converted to urban uses, it is also replaced by GHG emitting dwellings, commercial structures and, above all, the demand for additional vehicle travel between them. Thus, one of the most important things that could be done, both to conserve agricultural land by minimizing its conversion to urban uses and to reduce greenhouse gas emissions from vehicle travel, is to promote more compact, efficient, transit-oriented urban development.

We believe that any effort to avoid conversion of prime farmland will be aided considerably by efforts to maintain the profitability and sustainability of the agricultural enterprises that use the land for production. Greenhouse gas emission reduction strategies that rely on carbon sequestration, for example, could offer agricultural produces a supplemental source of income to help farm profitability. This potential should be explored as a key part of the Ag Vision strategic planning process now being undertaken by CDFA and stakeholders such as the California Roundtable for Agriculture and the Environment could also play a key role.

Local Food

We also think that there is an opportunity to link good land use with local food systems to reduce emissions associated with food transportation, while providing a premium for farmers selling locally and improving public access to healthy foods. Our sense is that offering ordinary citizens more access to California grown foods will prove a popular strategy.

One of the distinct advantages California enjoys by virtue of the incredible agricultural cornucopia that exists in its fertile valleys is the ability to feed itself from local sources. Unlike in most areas of the county, food does not have to travel an average of 1,500 miles from farm to the dinner table of Californians. While nobody seems to have taken the measure of how much locally-produced food is, in fact, consumed in the state, it is undoubtedly a significant amount – and it could be even more significantly increased through concerted action, encouraged by the state.

We recommend that the Department of Food & Agriculture, in collaboration with CARB and other interested agencies, establish a system for tracking and measuring "food miles traveled" and, with the results in hand, explore ways in which the distance food commodities must be transported from producer to consumer could be reduced, and the GHG implications of the reduction. This could include an analysis of current conditions and rates of return on production for local versus national or global markets, of opportunities for and barriers to local marketing of locally-produced commodities, more efficient transportation options, etc. Again, AFT would be willing to assist in this analysis.

Steps that state and local government could take to increase access to local foods include direct investments, incentives and public private partnerships to develop infrastructure (packing, processing, distribution and retail) needed to increase consumer and

institutional access to regionally grown and processed foods. A particular emphasis should be placed on providing retail opportunities in "food desert" communities, where healthy and fresh foods are not readily available, as for instance by promoting corner markets, small scale neighborhood grocery stores, mobile grocery services, farmers markets and produce stands. Consumers living in these communities are dependent on cars and public transportation to shop for grocery outside their community. By locating more food based retail in these communities that is accessible by walking or conveniently within people's existing car trips (example while they travel to from work) you reduce the number of car based trips for purchasing food. Further, by investing in local food system infrastructure you help protect farm land by ensure a near by market for small and mid-sized farmers who are most likely to locate their farming operations along the urban fringe. Such a program could be managed through a partnership between local governments and the California Economic Development Department, California Department of Public Health, the California Department of Food and Agriculture, and other departments and agencies as determined appropriate.

We thank CARB and its staff for all the hard work that went into the Scoping Plan. We will be glad to discuss our suggestions in more detail and work with you in bringing them to fruition as improvements that could not only avoid the harsh results of climate change, but also contribute to the quality of life of Californians in so many other ways, among them, the maintenance of the state's incomparable agricultural resources and a healthy agricultural economy.

Respectfully,

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