CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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July 22, 2005

James D. Boyd, Commissioner
California Energy Commission
1516 Ninth Street, MS 34
Sacramento, CA 95814-5512

Dear Commissioner Boyd:

The California Farm Bureau Federation appreciates being invited to participate as a member of the Governor's California Energy Commission Climate Change Advisory Committee to offer an agricultural perspective. We understand that the Advisory Committee was asked to advise the CEC and Governor Schwarzenegger's Administration on appropriate policy actions regarding a comprehensive climate change strategy for California.

Finding consensus from such a wide range of business, environmental, local government, and academic sectors is often hard to achieve. To avoid any confusion, we believe it is important to clarify our position on a number of policy concepts or statements that we do not support that are included in a number of reports and presentations that are a product of the Advisory Committee process:

1) California-only mandatory cap and trade program for greenhouse gas emissions. (Cross-cutting subcommittee report, page 3)

2) Mandatory reductions considered for inclusion in the 2005 IEPR such as carbon caps and California-only CAFÉ standards. (Transportation subcommittee report, page 1)

3) Requiring specific tillage or land management practices (i.e. no-till) for the state's agricultural community. (CCAP report- Activities and Policies to Enhance Forest and Agricultural Carbon Sinks in California)

4) Reducing methane from liquid livestock waste through the use of biogas recovery using lagoon or digester technology appears to be cost-effective.

   (Note: Farm Bureau made a presentation to the Advisory Committee on 4/6/05 addressing our concerns about the assumptions used in the ICF Consulting cost analysis. CCAP and CEC staff used the ICF analysis in their determination that biogas recovery appears to be cost-effective. We appreciate that it was noted that NOx emission controls were not included in the analysis, but there are a number of other factors cited in the 4/6/05 presentation that have not been included or addressed sufficiently.

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> While CFBF supports further research into this technology, we believe broader scientific review of this analysis is needed before policy can be accurately determined. (Manure Management Potential Policy Approaches slide (1) presented July 11, 2005 in the Multi-Sector Strategies for Reducing GHG Emissions in California by CCAP and Global Climate Change and California, Staff Final Report, June 2005, CEC-600-2005-007-SF, pg 25).

Given the recent announcement of Executive Order S-3-5, we understand that there will be further discussion by a number of state agencies, including the CEC, on how California can meet the greenhouse emission targets established by Governor Schwarzenegger. We look forward to participating as this issue continues to be discussed by a wider range of interests.

We greatly appreciate the work of you and your staff in meeting the challenge you were tasked with in Public Resource Code section 25730(f). Thank you again for including the agricultural community in the CEC California Climate Change Advisory Committee.

Sincerely,

Cynthia L. Cory

Cynthia L. Cory
Director, Environmental Affairs

cc: Susan Brown, Fuels and Transportation Division, CEC