



March 30, 2021

The Honorable Robert Rivas
Assembly Agriculture Committee, Chair
State Capitol, Rm 362
Sacramento, CA 95814

Re: AB 1289 (Kalra)—Oppose

Dear Chair Rivas:

The coalition of agricultural interests, representing all commodities produced in California, including livestock, dairy, “plant-based” agriculture, respectfully write in opposition to AB 1289 (Kalra). This bill proposes to establish the Smart Climate Agriculture Program at the Department of Food and Agriculture to transition livestock, dairy and feed producers to plant-based agriculture. In addition to referencing inaccurate findings and declarations, the Program proposed by AB 1289 is based on a flawed premise that transition from animal husbandry practices to an alternative is possible for all land types and suffers from practical issues. Market forces and land use considerations effectively and efficiently drive these decisions currently. Bottom line, AB 1289 is unworkable, unnecessary and counterproductive.

Firstly, AB 1289 makes several concerning references in the bill’s findings and declarations to statistics that have no application to California agriculture. As one example, the bill states that California has seen a notable increase in land dedicated to growing livestock feed. This statement is inaccurate. According to California’s 2020 Agricultural Statistics Review, the state ranks 32nd in the Nation of grain and corn production, only some of which is used for animal feed. In fact, feed crops, such as haylage, have seen a notable decreases (23%) in 2020, and feed crops aren’t even within the top ten commodities produced in or exported from California.¹ Moreover, soy is not a common dairy feed in California and alfalfa has been significantly replaced in favor of byproducts that have no additional water, land, energy or climate footprint. Likewise, AB 1289 references defaming comments regarding the supremacy of plant-based diets and emissions from dairy and livestock operations. Yet it omits any positive mentions of the value of this agricultural sector. Dairy and livestock production, beyond providing high-protein, nutritious food sources for human consumption, help control wildfire risk from vegetative fuel loads in the environment, promote biodiversity through suppression of non-native and noxious weed species, provide high quality fiber, inputs for composting and biofuel, assist in the management of organic waste and agricultural byproducts, make valuable use of suboptimal (nonprime) agricultural lands, and provide economic and job opportunities for tens of thousands of families and businesses that depend on a thriving livestock and dairy sector. While it would be simple to dismiss these statements as non-binding, findings and declarations are important guiding principles for the Legislature and regulatory agencies and should be reviewed as such.

AB 1289 is also counterproductive. Demand for dairy products continues to increase in the U.S. and globally. If AB 1289 were to result in a decrease in dairy production in California, the production would simply occur in another

¹ California Department of Food and Agriculture, 2020. [California Agricultural Statistics Review 2019-2020](#).

part of the world where the climate and environmental footprint of dairy production is much higher. As a result, AB 1289 will lead to potentially significant climate impacts, not benefits as claimed by proponents.

The Program contemplated in AB 1289 is also built upon false assumptions that land dedicated for ranching or dairying can be readily transitioned into row crops, such as lettuce or strawberries, or permanent crops, like tree nuts or pom fruits. Farmers weigh many factors when determining what to produce on any one parcel including weather, pest pressures, soil type, land quality, resource availability (like water access), commodity prices, production costs, labor availability and proximity to adjacent services, like processing facilities and packing houses. These factors and more lead landowners to pursue production that is the highest and best use of a parcel. AB 1289 assumes that farmers have not considered any of these criteria and instead, myopically pursued livestock rearing and dairying. Even if a farmer would ideally like to transition from livestock or dairying to plant agriculture production, acreage that hosts California's livestock populations are typically not irrigated, do not have access to water, appropriate soil quality, a readily-available labor supply, or cost/revenue margins that can support alternative production. It's for these reasons, California's agricultural diversity is geographically dramatic—from the pasture lands of Northern California and the Inland Empire, to the rich soils of the Salinas Valley and Central Coast, the microclimates of Napa and Sonoma Valley, and the hot, Mediterranean weather of the Central Valley. All areas are uniquely situated for crops that thrive under these circumstances. AB 1289 fails to consider these challenges and opportunities.

Finally, setting aside the agronomic issues, the Smart Climate Agriculture Program contemplated by AB 1289 raises practical issues and questions. The bill currently defines “plant-based agriculture” as farming that is lower water use and not livestock, dairying or production of feed crops. The bill, however, provides no reference of what is a lower water use crop and what to index water use to. Would this be water use in comparison to production of feed crop or cattle? What if a producer transitions to grow a product that is processed and the byproduct, like nut hulls, rice straw or grape pumice, is used to feed cattle—is this considered a feed crop? The bill requires the Department to develop best management practices to facilitate the transition from livestock to plant production—this would be a potentially exhaustive effort, as California produces over 400 different commodities and individualized varieties. Finally, under the Program considered, a farmer would be required to produce the declared transitional plant for an unspecified time. This rigidity will not accommodate typical rotations of different crop types, annual resource constraints that dictate crop selections, like water availability or market demands, and could force farmers to remain unprofitable while they wait for their trees or vines to reach maturity and begin producing product. These are just some of the concerns and questions this coalition have on the Program proposed in AB 1289.

Upon review of AB 1289, this coalition encourages the Committee consider these issues and respectfully request a no vote.

Thank you,



Taylor Roschen
California Farm Bureau Federation



Tricia Geringer
Agricultural Council of California



Roger Isom
California Cotton Ginners and Growers Association
Western Agricultural Processors Association



Trudi Hughes
California League of Food Producers



Bill Mattos
California Poultry Federation



Michael Boccadoro
Agricultural Energy Consumers Association



Chris Zanobini
California Grain and Feed Association
Pacific Coast Rendering Association



Association of California Egg Farmers
Pacific Egg and Poultry Association



Darrin Monteiro
California Dairies, Inc.



Kevin Abernathy
Milk Producers' Council



Lynne McBride
California Dairy Campaign



Melvin Mederios
Dairy Farmers of America-Western Area

CC: The Honorable Ash Kalra
Members, Assembly Committee on Agriculture
Victor Francovich, Consultant, Assembly Committee on Agriculture
Calvin Rusch, Consultant, Assembly Republican Caucus