

**Comment 1 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Kirk  
Last Name: Gothier  
Email Address: kirkgothier@gmail.com  
Affiliation:

Subject: Executive Order B-30-15  
Comment:

Dear Air Resources Board Staff,

In updating the 2030 Target Scoping Plan, to "reflect the Governor's Executive Order B-30-15, which establishes a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030,"

Please consider and address the lack of CEC response to these docketed comments (link below), identify a clear path towards compliance with Senate Bill 1389, AB 32 and EO B-30-15, and prepare the appropriate environmental analysis of the risks, benefits and impacts of all energy producing technologies:

[http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-01/TN206418\\_20151023T095707\\_Kirk\\_Gothier\\_Comments\\_2015\\_IEPR\\_Update\\_Outline.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-01/TN206418_20151023T095707_Kirk_Gothier_Comments_2015_IEPR_Update_Outline.pdf)

Sincerely,

Kirk Gothier

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-23 11:36:05

No Duplicates.

**Comment 2 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: jan

Last Name: hopmans

Email Address: jwhopmans@ucdavis.edu

Affiliation:

Subject: wetland restoration and GHG emissions

Comment:

Notwithstanding the huge co-benefits of wetland restoration and land use change to wetlands, the benefits towards reduction of GHG emissions are minimal, and in fact GHG emissions through wetland conversion could increase. Anaerobic conditions such as occur in wetlands cause microbial production of methane gas, which is about 25 times more potent as a GHG than CO<sub>2</sub>. In many cases the beneficial buildup of carbon is countered by increased methane gas emissions.

Therefore, I would like to reinforce the notion that climate science is still a young science, and many aspects of it such as impacts, mitigation and adaptation to increasing temperatures and changing weather patterns are not all well understood. Hence, my comment, to ensure that policy decisions on reducing GHG emissions through Natural and Working Landscapes continue to be based on the latest science using California research activities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-23 16:29:16

No Duplicates.

**Comment 3 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Susan  
Last Name: Robinson  
Email Address: srmw@comcast.net  
Affiliation:

Subject: NATURAL AND WORKING LANDS MEETING  
Comment:

At this morning's FCAT meeting there were many public comments regarding the negative ecological and climate impacts of the widespread forest clearcutting AND tree plantations in California.

Because climate change is near or at the tipping point it is imperative that we get fewer forest emissions asap and also do all we can to sequester as much forest carbon as possible in the short term also. Clearcut logging which is widespread on California industrial timberlands is counter to all of the goals discussed today. It should be shocking to all working on climate change that clearcutting is still legal in California. Clearcutting and industrial tree plantations are against the principles of healthy resilient forests.

Soil health and biomass from forests - If we start removing biomass from forests at a high rates then the soils will deteriorate rapidly. In the Sierra this will have disastrous consequences because the soil layer is thin already. Instead of removing biomass and burning it why can't California figure out how to innovate and return these materials to the soils in forests or other degraded soils ... composting etc.

Calculation of emissions from forest practices in California - CA must have transparency in estimated emissions from timber harvest and estimated emissions from lost carbon sequestration due to industrial timber management processes. CAL FIRE calculations emissions methodologies and calculations should be independently reviewed by EPA and or or third party neutral experts.

Industrial timber companies should not be able to take credit for carbon sequestered on not for profit or public lands or in other forested areas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-24 08:47:20

No Duplicates.

**Comment 4 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

SEE ATTACHED

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-scoplan2030nwl-ws-VjNSPABtVihWMwNs.pdf>

Original File Name: EHL-Comments-2030ScopingDraft.pdf

Date and Time Comment Was Submitted: 2016-03-25 09:24:35

No Duplicates.

**Comment 5 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Reza

Last Name: Auasteh

Email Address: Reza.Aurasteh@dot.ca.gov

Affiliation:

Subject: Cost Analysis

Comment:

The goal of the AB 32 is to reduce greenhouse gas emissions in California to the 1990 levels. Since achieving this goal involves many measures by public agencies and the private sector, the preparation of the Environmental Analysis or the Initial Study should address the cost of implementing the necessary measures. From a cursory of the documents provided it appears an Initial Study is not available for review.

My email address is provided and I would like to be contacted regarding the costs of implementation of the Greenhouse Reduction Measures.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-25 09:16:29

No Duplicates.

**Comment 6 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Carlin

Last Name: Starrs

Email Address: carlinstarrs@berkeley.edu

Affiliation: UC Center for Forestry

Subject: Comments from Natural and Working Lands Sector Workshop (3/23/16)

Comment:

Please see the attached document for a written version of the comments given at the 3/23/2016 Workshop by Carlin Starrs from the University of California Center for Forestry and Center for Fire Research and Outreach.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-scoplan2030nwl-ws-UTxdOllhWGgCbARb.pdf>

Original File Name: March 2016 Forest Carbon Plan Comments Center for Forestry.pdf

Date and Time Comment Was Submitted: 2016-04-04 11:54:37

No Duplicates.

**Comment 7 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: John

Last Name: Amodio

Email Address: jamodio@msn.com

Affiliation: Yosemite-Stanislaus Solutions YSS

Subject: Comments on SCOPLAN2030NWL-WS

Comment:

Please find attached our comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-scoplan2030nwl-ws-BWRcOFdIWThVDAB5.docx>

Original File Name: AB32 YSS Natural lands comments 0403.docx

Date and Time Comment Was Submitted: 2016-04-04 22:23:58

No Duplicates.

**Comment 8 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Nazar  
Last Name: Kosmo  
Email Address: kosmosinu@gmail.com  
Affiliation: We are water / One water planet

Subject: Development of the 2030 Target Scoping Plan (ab 32; b-30-15)  
Comment:

Dear Enviromental Ca Agency.  
To achieve in the most fastest way reduction of the co2  
Is to establish light and sound quality implementation.  
Requiring;  
1. collective consciousness elevation(each can make earth  
beneficial choice )  
How: harmonizing old paradigm patterns;  
1. Reduction of artificial light pollution (waste of energy,  
harming human vision and preventing(disturbing) natural evolving  
process.  
2. Noise pollution (to adopt new safe level)  
Our behavior reflecting to surround environment  
3. To install publicly available Air quality live Meters station  
(measure and displaying current air chemical indigridients / all  
can see what quality we all breathing !  
4. Watet increasing higher standarts strict regulations for water  
violations  
6. More recycling awarnes  
7. Everyday to plant new trees (future communities healthy habit  
to adopt and apply.

Thank you for the consideration and to preserve Life  
We are One water Planet

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-06 00:07:27

No Duplicates.



**Comment 9 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Joshua  
Last Name: Hanthorn  
Email Address: jhanthorn@defenders.org  
Affiliation:

Subject: DoW NWL 2030 Scoping Plan Comment  
Comment:

Ms. Nichols:

Please see attached comment. Thank you for the opportunity to comment in this process.

Respectfully,

Josh Hanthorn  
Defenders of Wildlife

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-scoplan2030nwl-ws-VzNUPVchVFgDaARl.pdf>

Original File Name: DoW Mar 23 NWL Scoping Plan Comment.pdf

Date and Time Comment Was Submitted: 2016-04-06 08:19:28

No Duplicates.

**Comment 10 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Chris

Last Name: Trott

Email Address: ctbioenergy@gmail.com

Affiliation: YSS Collaborative

Subject: Comments on healthy Landscapes 2030: California's Climate Change Vision and Goals for...  
Comment:

Attached please find the pdf file that contains the comments from the Yosemite Stanislaus Solutions (YSS) collaborative. Thank you in advance for your consideration of our concerns.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-scoplan2030nwl-ws-BXxVIF0vU18BZgVn.pdf>

Original File Name: YSS AB32 YSS Natural Lands Comments 16-4-6.pdf

Date and Time Comment Was Submitted: 2016-04-06 11:45:18

No Duplicates.

## **Comment 11 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Norman

Last Name: Groot

Email Address: norm@montereycfb.com

Affiliation: Monterey County Farm Bureau

Subject: Healthy Landscapes 2030

Comment:

Thank you for the opportunity to provide comment on the Healthy Landscapes 2030: California's Climate Change Vision and Goals for Natural and Working Lands.

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. We strive to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

We recognize the importance of adequate planning at the State level for future contingencies such as climate change. We support planning that includes stakeholder involvement and input as part of any new regulatory process.

Reading the document provided, we are overwhelmed by the enormity of the issues and the complexity of the input we are being asked to provide.

For example, the following is a list of the laws, policies and plans mentioned in the Healthy Landscapes 2030 Discussion Paper:

- AB 32
- AB 32 Scoping Plan
- Executive Order B-30-15
- California Global Warming Solutions Act of 2006
- Intergovernmental Panel on Climate Change
- Safeguarding California: Reducing Climate Risk
- CARB Climate Change Scoping Plan
- Natural and Working Lands
- Agricultural Sector Implementation Plan
- California Five-Year Infrastructure Plan
- 2030 Target Scoping Plan Update
- California Water Action Plan
- State Wildlife Action Plan
- County Integrated Regional Watershed Management Plans
- Sustainable Communities Strategies
- Regional Advanced Mitigation Plans
- Natural Community Conservation Plans
- Habitat Conservation Plans
- Climate Change Action plans by each respective agency:
  - o Natural Resources Agency
  - o Department of Parks and Recreation
  - o Department of Conservation
  - o Department of Fish and Wildlife
  - o Department of Forestry and Fire Protection
  - o Department of Water Resources
  - o Wildlife Conservation Board
  - o State Conservancies (such as the State Coastal Conservancy)
- 2015 Healthy Soils Initiative
- Climate Smart Agriculture in California (an integrated approach to both achieving GHG reductions and ensuring food security in the face of climate change)

- Comet-Farm and Comet-planner tools that incorporate USDA NRCS technical guidelines will be valuable resources
- Draft Short-Lived Climate Pollutant Reduction Strategy

Few landowners in the Monterey area deal with forestry related issues. There may be a few private properties with timber, or some ranchers may have grazing leases on state or federal lands. If so, a landowner would also have to take into account these documents that were mentioned in Healthy Landscapes 2030:

- Forestry Climate Action Team
- California Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Change Climate (draft)
- Forest Carbon Plan
- Tree Mortality Task Force
- California Strategic Fire Plan
- Region 5 Forest Service Ecological Restoration Plan
- National Forest Resource Plans
- National Park Service Resource Plans
- BLM Resource Plans
- California Forest Improvement Program (CAL FIRE) Forest Stewardship Plans
- NRCS Environmental Quality Incentives Program Forest Stewardship Plans (voluntary)
- American Tree Farm Program

Additionally, these items noted in the document generate further questions:

- Each state Agency shall employ full-life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives as part of their climate change planning and investment decisions - will there be coordination between agencies when developing these cost reports? How will this information be shared with, and indeed vetted, with stakeholders?
- California Governor's Office of Planning and Research will establish a technical, advisory group to help state agencies incorporate climate change - when will this work product be available, and how can it be accessed?
- Is the California Water Action Plan the same as the California Water Roadmap for Action?

These are all of the laws, policies, plans, and implementation tools that were mentioned in Healthy Landscapes 2030 that we would need to digest before we are able to fully comprehend what the state is planning. This makes it extremely difficult to provide useful and cogent input into the questions outlined on Page 11 of the Healthy Landscapes 2030: California's Climate Change Vision and Goals for Natural and Working Lands.

Also note, Agriculture needs to be aware of climate change plans that have been written by agencies that were NOT mentioned in the Healthy Landscapes 2030 document:

- Cal-EPA
- Department of Pesticide Regulation
- CARB
- Department of Resources Recycling and Recovery
- Department of Toxic Substances
- Office of Environmental Health Hazard Assessment
- State Water Resources Control Board
- Central Coast Regional Water Quality Control Board
- California Coastal Commission
- Local climate action plans developed on municipal and county levels

Finally, please note that farmers and ranchers in the Monterey area must take into account climate change plans of federal agencies such as the National Oceanic and Atmospheric Agency, the Federal Emergency Management Agency, and the U.S. Fish and Wildlife Service.

Monterey County Farm Bureau is uncertain about the level of

awareness that exists throughout our agricultural community regarding the quantitative targets that are being developed by the State as part of the Healthy Landscapes 2030 Scoping Plan Update. We suspect that awareness is very low. Therefore, we propose that the state slow down and increase the level of outreach and awareness, providing clarity to the state's goals. Finally, the state needs to incorporate more agricultural community stakeholder involvement and input into every aspect of the development of quantitative targets and Land Use Valuation and Co-Benefits. Currently, it could be said that because of lack of awareness, quantification goals for measuring, monitoring and reporting are occurring in a vacuum.

Involvement of the agricultural community will not be easy or simple. Current water and land use regulatory trends, trajectories and implementations have created, perpetuated and exacerbated distrust between public, private and non-regulatory governmental organizational interests in this state. These regulatory processes are occupying a significant portion of the bandwidth that farmers and ranchers have available when not tending to their crops. The pressures of continued regulatory intensity are costly and may ultimately cause the smaller farming operations in our region to become financially unstable.

Only through methodical, thoughtful, inclusive, transparent, and integrative processes will the state be able to move forward on a solution-oriented path for success.

Monterey County Farm Bureau fully supports any effort towards cost analyses; we would welcome a robust review of impacts of state climate change initiatives on state and local economies. Full life-cycle cost accounting would be a great place from which to engage private interests in a robust and necessary dialog. We also would like to see a budgetary review of the government resources that are being dedicated to climate change and resource protection of natural and working lands.

Monterey County Farm Bureau would welcome the opportunity to provide more input on these issues. We encourage a more robust participatory process. We recognize that there is a lot of work to do in order to fully understand the issues. We must begin by reviewing the figurative and literal mountain of policies, reports and recommendations that have been created by the state before we could provide more detailed comment. We are hopeful that we will have that opportunity in the future.

Sincerely,

Norman C. Groot  
Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-06 12:06:22

No Duplicates.

**Comment 12 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: dmadson@sierrabusiness.org

Affiliation: ARCCA

Subject: ARCCA Comments on: Scoping Plan 2030 – Natural and Working Lands Discussion Paper  
Comment:

Please see attached comment letter from the Alliance of Regional Collaboratives for Climate Adaptation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-scoplan2030nwl-ws-VzZVIQdlAjJVMiUK.pdf>

Original File Name: ARCCA\_WorkingLandsDiscussionPaper\_CommentLetter\_2016\_04\_06.pdf

Date and Time Comment Was Submitted: 2016-04-06 12:21:35

No Duplicates.

**Comment 13 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Gabriella

Last Name: Roff

Email Address: groff@caltrout.org

Affiliation: California Trout

Subject: Comments for the 2030 Target Scoping Plan Update

Comment:

California Trout received Cap and Trade funding in 2015 to develop the science called for in the draft Healthy Landscapes 2030 - a methodology to quantify carbon sequestration through restoration. Monitoring GHG flux on 22 partner meadows across the Sierras, the goal of the Sierra Meadow Restoration and Research Partnership (now expanded to be the broader Sierra Meadow Partnership) is to integrate the measure of restoration and net carbon sequestration benefits, and vet the methodology for crediting revenue. After our first annual conference in February, we are pleased to report significant progress toward that goal. It is inspiring to see our conference discussion reflected in the principles of the Healthy Landscapes 2030 Draft and we commend the Air Resources Board, Natural Resources Agency, Department of Food and Agriculture, and the Governor's Office of Planning and Research for a job well done.

Our first comment regards the very important management and restoration objective to "build consensus around carbon sequestration and GHG emission quantification methodologies ... and establish a statewide inventory and accounting framework that is compatible with project- and/or program-scale accounting."

We believe in the application of robust science as a principle for investment, that the opportunity to leverage existing resource strategies is significant, and that a state-wide inventory and accounting framework is essential to establishing an ecosystem service economy and achieving our carbon reduction goals. Additionally, we respectfully suggest that this framework be built to integrate mitigation and carbon trade. As such, we recommend the Healthy Landscapes 2030 outlines the development of a common currency - an integrated system of measure that can value biological, physical, and climate adaptation gains. We suggest reviewing the Climate Community and Biodiversity Alliance standard (CCB) and the Gold Standard - tools to quantify the co-benefits of conservation.

Our second comment is to suggest that the targeted restoration of Wetlands and Riparian Areas should not be limited to the Delta but, incorporating a high-level view of resource systems and the connectivity of Sierra headwaters to the Delta, should include a restoration target for Sierra wetlands/riparian areas/meadows. We suggest reviewing the Greater Sierra Meadow Strategy and Prioritization Framework (draft) that sets out to establish integrated goals, strategies, actions and quantitative metrics for soil health and habitat benefits - on private and public lands - to advance the pace and scale of meadow restoration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-06 12:41:02

No Duplicates.



**Comment 14 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Diana  
Last Name: Madson  
Email Address: dmadson@sierrabusiness.org  
Affiliation:

Subject: Sierra CAMP\_Scoping Plan Natural and Working Lands Disc Paper\_Comment Letter  
Comment:

Please find Sierra CAMP's comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-scoplan2030nwl-ws-BnVdMlczBSQEcAVk.pdf>

Original File Name: Sierra CAMP\_ScopingPlan NatlWkgLands Disc Paper\_Comment Letter\_2016\_04\_06.pdf

Date and Time Comment Was Submitted: 2016-04-06 13:20:17

No Duplicates.

**Comment 15 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: George

Last Name: Lange

Email Address: glange@crpd.org

Affiliation: Mountains Rec. a& Conservation Authority

Subject: Scope Plan 2030 from MRCA

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-scoplan2030nwl-ws-Am8Hc1MxVmRXDlc5.pdf>

Original File Name: MRCA Natural and Working Lands Sector Plan Update Comments.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:41:53

No Duplicates.

**Comment 16 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Joseph

Last Name: Edmiston

Email Address: edmiston@smmc.ca.gov

Affiliation: Santa Monica Mountains Conservancy

Subject: From the Santa Monica Mount. Conservancy

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-scoplan2030nwl-ws-UyBVPlwwU2MBWFI8.pdf>

Original File Name: SMMC Nat and Working Lands.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:46:14

No Duplicates.

**Comment 17 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation:

Subject: 2016 Scoping Plan Update Concept Paper Comments

Comment:

On behalf of California ReLeaf and the California Urban Forests Council, we are submitting written comments for the 2016 Scoping Plan Update Concept Paper.

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-scoplan2030nwl-ws-VmQHMQQ0B2IHXgBz.pdf>

Original File Name: 2016 Scoping Plan Concept Paper Comments.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:46:54

No Duplicates.

**Comment 18 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Virginia  
Last Name: Jameson  
Email Address: vjameson@farmland.org  
Affiliation: American Farmland Trust

Subject: American Farmland Trust NWL Scoping Plan Comments  
Comment:

April 6, 2016

Ladies & Gentlemen:

American Farmland Trust hereby respectfully submits the attached white paper in response to the call for comments on the 2030 Target Scoping Plan Update for the Natural and Working Lands sector.

As outlined in our paper, minimizing the conversion of agricultural lands will have a significant climate benefit, and is essential to achieving California's greenhouse gas reduction goals.

We recommend that the Scoping Plan Update incorporate a goal of reducing the statewide farmland conversion rate - now 42,000 acres per year - by 50% by the year 2030 and by 75% by the year 2050. We estimate that achieving this goal would save almost 700,000 acres of California's irreplaceable farmland and avoid 315 million tons of greenhouse gas emissions by mid-century.

We appreciate your consideration of our comments and welcome the opportunity to further contribute to the formulation of California's climate targets.

Respectfully,

Edward Thompson, Jr.  
California Director  
American Farmland Trust

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-scoplan2030nwl-ws-BWRXN1MmU18EbAF2.zip>

Original File Name: AFT NWL Comments.zip

Date and Time Comment Was Submitted: 2016-04-06 15:53:25

No Duplicates.

**Comment 19 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Katherine

Last Name: Jones

Email Address: katherine.jones@tpl.org

Affiliation: The Trust for Public Land

Subject: Healthy Landscapes 2030: NWLs Discussion Paper Comments

Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-scoplan2030nwl-ws-UWNSZFdnVjMCWwY2.pdf>

Original File Name: 2016\_0406\_Healthy Landscapes 2030 Natural and Working Lands comment letter.pdf

Date and Time Comment Was Submitted: 2016-04-06 16:11:00

No Duplicates.

**Comment 20 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Agricultural Council of California

Subject: 2030 Scoping Plan Discussion Paper  
Comment:

Attached are comments from Ag Council and Farm Bureau on the discussion paper for natural and working lands in the 2030 Scoping Plan update.

Thank you to the staff for starting the dialogue with the discussion paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-scoplan2030nwl-ws-BWFdMIEjVmYDcFAj.pdf>

Original File Name: Discussion Paper N&WL 2030 Scoping Plan Comments\_April 6.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:59:42

No Duplicates.

**Comment 21 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Cory  
Last Name: Bullis  
Email Address: cory@csgcalifornia.com  
Affiliation:

Subject: Natural & Working Lands Discussion Paper Comments  
Comment:

Hello,

Please find Santa Clara Valley Open Space Authority's attached comments on the Healthy Landscapes Discussion Paper.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-scoplan2030nwl-ws-WzVUDVIkU2xVDAVh.pdf>

Original File Name: N&WL Discussion Paper SCVOSA Comments 4.6.16 .pdf

Date and Time Comment Was Submitted: 2016-04-06 16:27:41

No Duplicates.



**Comment 22 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Teresa

Last Name: Lang

Email Address: tlang@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Climate Action Reserve Comments

Comment:

Thank you for this opportunity to provide comments on the ARB's proposed second update to the Scoping Plan, particularly the Natural and Working Lands Sector. The Climate Action Reserve commends the State of California and the direction the team have taken in updating the Natural and Working Lands section of the Scoping Plan. Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-scoplan2030nwl-ws-UzAHbVE5VGpQN1Ak.pdf>

Original File Name: Climate Action Reserve Comment Letter on Scoping Plan Update - Natural and Working Lands.pdf

Date and Time Comment Was Submitted: 2016-04-06 16:47:34

No Duplicates.

**Comment 23 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Jeanne  
Last Name: Merrill  
Email Address: [jmerrill@calclimateag.org](mailto:jmerrill@calclimateag.org)  
Affiliation: CalCAN

Subject: CalCAN comments - Natural and Working Lands Discussion Draft  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-scoplan2030nwl-ws-VzRRNIU4ADBXMARq.pdf>

Original File Name: calcan.pdf

Date and Time Comment Was Submitted: 2016-04-08 13:17:34

No Duplicates.

**Comment 24 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Arthur  
Last Name: Boone  
Email Address: arboone3@gmail.com  
Affiliation:

Subject: Comments on the papers presented on March 23rd.  
Comment:

Arthur R. Boone  
1616 Harmon Street  
Berkeley, CA 94703  
510/910-6451

6 April, 2016

To: Planners writing the California Forest Carbon Plan Concept Paper

From: Arthur R. Boone, Founder and now chief provisioner, Sierra Club tree team, Oakland

Re: Comments on March 9, 2016 draft of FCAP.

I was present in the audience on March 23 in Sacramento and made spoken comments; this message extends my remarks. These are my personal remarks, not a Sierra Club statement. Urban forestry is, of course, a very small part of California's forestry world. With the drought, disease and wildfires, it's a wonder any attention to the urban forest is possible. But, as you recognize, 95% of California's people live in urban areas and the urban forest is more important than many consider. With that said, the existing language at pages 25-27 of the draft report is woefully inadequate. Two points simply: one is that at no point does your language acknowledge the high regard that trees are capable of playing in reducing CO2 emissions, and, two, the numerical goal to "increase statewide tree canopy in cities and towns by 5% by 2030" (page 26, Para. On ENHANCE) is a feather in a windstorm.

1. When Fred Keeling first began the careful measurement of global CO2 in 1960, he noted the consistent pattern of annual declines in the summer months equal to 75-80% of the annual increases in CO2 levels in the winter months. With a background in measuring forest oxygen production, he opined that the trees of the northern hemisphere (where 80% of the world's landmass and 80% of its trees are) was the cause. In 50 years no other scientist has created an alternative explanation of the annual decline, which has continued as regular as clockwork. When the Yale group published (Nature magazine (September, 2015)) the startling fact that the world's tree population had declined by 46% from the beginning of the industrial age, it wasn't rocket science to conclude that more trees would be a critical factor in controlling the increasing level of CO2 in the atmosphere. Although entrepreneurs have chased many high tech rainbows to reduce CO2 levels, the COP-21 in Paris has given great deference to trees as a mitigating factor to CO2 emission increases. Several states are revising their urban tree information with this in mind, but apparently not California, which seems to be stuck in some old time zone.

2. It's a well known fact that public trees are not randomly distributed in a community; numerous studies have documented that rich people's kids enjoy better teachers, have better health, have more access to public sports fields, etc., than poor ones. They also have more trees in their neighborhoods. In Oakland, where we work, the imbalance in public trees by council districts is immense, with CD#1 enjoying 9800 public trees while CD#7 has 3500 trees. (Data from a sidewalk study in 2008.) To bring the least treed districts up to par with the best will require 30,000 new trees to be planted in the flatlands of Oakland, a lot more than 5% would ever get you. Everything we know about other cities around the state suggests similar data. 5% new trees in 14 years is no goal at all; 50% more in eight years would be more appropriate.

The biggest problem here, of course, is that the content of this concept paper and these numbers suggest that the planners representing their various agencies who sat in the afternoon panel don't really know anything about the current role of trees in world CO2 reductions or in the urban scene in California where we have a major need for an environmental justice perspective in all tree work. The presentations were, in retrospect, both shocking and distressing.

Respectfully submitted,

Arthur R. Boone,

cc. Governor Jerry Brown  
John Melvin, CALFIRE Urban Forester  
James Scheid, North Coast Urban Forester  
Senator Kevin deLeon.  
Marie Rose Taruc, APEN  
Kemba Shakur, Bay Area member, CARB's EJ Advisory Committee  
Monica Wilson, Bay Area member, CARB's EJ Advisory Committee  
Kathryn Phillips, Sierra Club of California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-08 13:26:51

No Duplicates.

**Comment 25 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Reed

Last Name: Addis

Email Address: reed@caleec.com

Affiliation:

Subject: Comments from the Carbon Cycle Institute

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-scoplan2030nwl-ws-UTJQNVY+U18BZFI9.pdf>

Original File Name: CCI Comment Letter on Working Lands Discussion Paper.pdf

Date and Time Comment Was Submitted: 2016-04-11 13:47:21

No Duplicates.

**Comment 26 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Chris

Last Name: Trott

Email Address: ombcomm@arb.ca.gov

Affiliation: Yosemite Stanislaus Solutions

Subject: Comments on Healthy Landscapes 2030

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-scoplan2030nwl-ws-VC1QJQR2WFQDZgBv.pdf>

Original File Name: YSS Comments.pdf

Date and Time Comment Was Submitted: 2016-04-13 14:12:20

No Duplicates.

**Comment 27 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation: The Nature Conservancy

Subject: Comments in response to the Draft Healthy Landscapes 2030: Climate Vision and Goals  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-scoplan2030nwl-ws-VyNXP1w+UV0CagVy.pdf>

Original File Name: TNC\_NWLCClimateVision\_Comments.pdf

Date and Time Comment Was Submitted: 2016-04-28 10:28:28

No Duplicates.

**Comment 28 for Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) - 1st Workshop.**

First Name: Matt

Last Name: Fabry

Email Address: mfabry@smcgov.org

Affiliation: BASMAA

Subject: Natural and Working Lands Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-scoplan2030nwl-ws-B2VUMwByVmhRNgrl.pdf>

Original File Name: BASMAA comments on the Urban Greening and Green Infrastructure Section of the Natural and Working Lands Discussion Paper.pdf

Date and Time Comment Was Submitted: 2016-05-27 10:35:18

No Duplicates.



**There are no comments posted to Comment Log for Public Workshop on the Natural and Working Lands Sector to Inform the 2030 Target Scoping Plan Update URL: (scoplan2030nwl-ws) that were presented during the Workshop at this time.**