

February 8, 2019

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: January 2019 Draft: CA 2030 Natural and Working Lands Climate Change Implementation Plan

Dear California Air Resources Board Staff,

The undersigned Sierra Nevada conservation and community sustainability organizations welcome the opportunity to provide comments on the January 2039 Draft of the California 2030 Natural and Working Lands Climate Change Implementation Plan (Plan). The undersigned strongly support the goals outlined in this plan that address the natural resource conservation, restoration, and management needs of the Sierra Nevada region.

We strongly support and commend the plan's explicit attention to achieving multiple co-benefits throughout the goals, strategies and actions. We suggest refining and adding the following modifications to achieve multiple objectives. Without these considerations, State agencies risk losing current and potential collaboration opportunities, leveraged funding opportunities, and long-term institutionalization and systemic changes in economic systems that enable these carbon emissions reduction activities to be sustained over time.

II.B. Status of California's Natural and Working Lands

1. On page 10, the Plan states that "it is important that farming and ranching remain robust and the rates of conversion diminish." We encourage the use of stronger language to express the need for an ambitious land conservation goal: natural and working land conversion must stop or nearly stop, be appropriately mitigated, generate offsets, or achieve a net zero loss of farm/ranchlands.

III.C. Pathway and Acreage Goals (page 15):

1. Include a goal for supporting private, federal, and local (e.g. non-State) activities. The plan states on page 12 that "non-State funded strategies enacted by federal agencies, local jurisdictions, and private entities are critical, they are not directed

by the State and thus are outside the scope of activities contemplated in the proposed pathways in this State Plan.” However, given the carbon sequestration goals identified in the Forest Carbon Plan (for example, on page 3 of the FCB federal land treatment goals are increasing approximately 250,000 acres/year to 500,000 acres/year), it is crucial that this implementation plan identify a set of collaborative activities and strategies that ensure a path towards achieving these goals on non-State land.

2. Co-benefits key: We suggest including and emphasizing the economic benefits of conservation, forestry, restoration, and agriculture activities in the co-benefits key and throughout this section. Supporting economic activity is crucial for maintaining self-sustaining systems that achieve the plan’s goals, as it builds long-term ability to continue the activity without reliance on state subsidies, grants, or other short-term and ultimately unreliable funding sources, as well as for maintaining the workforce necessary to carry out these activities over generations. In the Forestry section for example, each of these activities has the potential not only to improve public health and emissions but also create jobs and income in rural economies, especially biomass utilization:
 - i. C.2. Increased biomass utilization: the economic activity created by supporting wood waste byproduct industries can increase rural community capacity by creating new jobs, local government income, local distributed renewable energy for heat and electricity, technological investments and other co-benefits that increase a community’s overall financial capital, resilience and ability to thrive. Investing and supporting economic co-benefits in rural communities is necessary to achieve the short and long-term carbon sequestration and climate adaptation goals set forth by the state. Localized energy co-benefits reduce reliance on long-distance energy infrastructure susceptible to extreme weather events that disrupt energy supply and risk wildfire ignition, can provide more flexible and affordable energy, and reduce reliance on emissions-causing wood burning stoves. We suggest adding more detail and specific activities to support the localized biomass utilization economies.
3. C.2. Enhanced carbon in forested ecosystems: suggest adding the long-term carbon sequestration benefits created through forest thinning and prescribed burning activities. Forest thinning and prescribed burning over time decreases competition in trees for resources, allowing trees to grow taller and larger diameter; this old-growth ultimately will store more carbon than smaller diameter trees over time, though the short term reduction in overall number of trees may lead to a temporary loss in short-term carbon sequestration. Supporting both short-term sequestration activities and recognizing the long-term sequestration will help the state target and measure emissions reductions for the 2030 goal and the 2045 carbon neutrality goal.
4. Figure 7. Consistent with the goals of the Healthy Soils Initiative, we recommend a more ambitious conversion reduction goal of 75-100%. The current goal of 50-

75% reduction in annual rate of conversion by 2030 is not ambitious enough for achieving California's 2030 and 2045 carbon emissions reduction goals, as it allows local agencies to continue approving land use projects that convert critical ranch and farmlands and can lock them in to more carbon intensive uses. According to the 2015 California Farmland Conversion Report, irrigated farmland in California decreased by more than 91 square miles (58,587 acres) between 2010 and 2012. The highest-quality agricultural soils, known as Prime Farmland, comprised 81 percent of the loss. As the State's Healthy Soils Initiative states, "soils contain approximately 75% of the carbon pool on land—three times more than the amount stored in living plants and animals." Preserving this land from conversion is of the utmost priority, and this Plan should reflect this priority.

III.D. Implementation

1. List specific activities and desired regional targets linked to the Implementation Acreage Goals in each agency and program. This section covers in detail existing activities but does not explicitly direct how each agency will increase or expand existing activities to achieve the sector goals. For instance, each identified program should be linked to its current impact by acre and identify annual increased spending and acreage targets for this program that, when aggregated with other programs, results in achieving the overall annual target for each sector. The Sustainable Agricultural Lands Conservation program can be assigned an annual recommended target for achieving the 2030 lands conserved goal, in conjunction with other programs.

III.E Tracking Progress and Outcomes

1. The plan references incorporating new activities, data, collaboration and methods as needed; We suggest identifying the steps the State/agencies will or are undertaking to facilitate this within the plan, and a schedule or timeline, so that public stakeholders may have clarity on how to continue to stay involved and support this process. For example, on page 23, the plan states "The State will continue to evaluate and improve the tools for quantifying the impacts and benefits of the activities that are called for in this Plan and incorporate new activities, data, and methods as needed." The plan should at the very least reference activities, such as public workshops, that will be used to support ongoing evaluation and updates.

IV. Moving Forward

1. Recognize in greater detail a commitment to support and coordinate with the State's outdoor recreation economy related to natural and working lands, which faces potentially substantial losses related to wildfire and other climate impacts, but also represents solutions towards maintaining and improving communities' economic capacities, forest health and emissions reductions. On pages 27-28 the plan references a restoration economy and building workforce capacity, but does not reference the significant impact of outdoor recreation and tourism on natural

and working lands. Activities such as forest thinning and prescribed fire activities, for example, must also co-exist with the recreation and tourism activities of rural and natural resource-based towns; for example, forest treatments should both prioritize treating land that impacts recreational activities, such as hiking, camping, and mountain biking, *and* also minimize adverse impacts on these industries – a prescribed fire may be much-needed on a state park near a gateway town and would result in long-term benefit, but if conducted during peak tourism season, this lack of coordination could result in potentially avoidable economic losses and hardship in small rural towns.

Recreation economies are the backbones of small towns throughout California, and robust tourism income expands the capacity for these towns to invest in local agency and private actions that fall both inside and outside of State funding areas or direct control. California's outdoor recreation economy generates 691,000 direct jobs, spurs \$92 billion in consumer spending, and \$30.4 billion in wages and salaries and the Sierra Nevada landscape is where a significant portion of these activities take place. *Without this income, small towns lack the ability to invest in additional fuel treatments, landowner incentives, and other mechanisms that can leverage State and Federal actions.*

This commitment should be greater emphasized and detailed throughout the plan – though the State references supporting “recreation opportunities” many times throughout the plan, no discussion or detail is given to recognizing how State activities will actually achieve these recreation benefits, or how the State can reduce adverse impacts to recreation economies through activities like fuel treatments or prescribed burns.

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further. We look forward to supporting the implementation of the Plan in the Sierra Nevada region.

Sincerely,



Jeff Darlington
Executive Director
Placer Land Trust



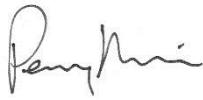
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