CALIFORNIA FARM BUREAU FEDERATION
GOVERNMENTAL AFFAIRS DIVISION
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October 30, 2017

Mary D. Nichols
Air Resources Board, Chair
California Environmental Protection Agency
1001 "I" Street
Sacramento, CA 95814

RE: Natural and Working Lands Climate Change Implementation Plan and CALAND Model Development

Dear Ms. Nichols:

The California Farm Bureau Federation (Farm Bureau) appreciates the opportunity to comment on the Natural and Working Lands Climate Change Implementation Plan and development of the CALAND Model. Farm Bureau represents more than 48,000 members as it strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Having a strong and accurate model to accurately forecast carbon sequestration potential and carbon emissions is important and Farm Bureau appreciates the efforts the Air Resources Board is making to strengthen the CALAND Model.

Natural and working lands (NWL) encompass a broad diversity of land uses and land cover types as evidenced by the CALAND Model's expansion of land categories from 45 to 940 between versions one and two. However, not all land uses and land cover sites will provide similar opportunities for carbon sequestration or carbon emission reduction potential. Forested lands will provide, by far, the greatest potential for carbon sequestration and efforts should be focused on this land category to improve management to protect the carbon sequestration potential.

Forests owned and managed by the federal government are at significant risk for contributing carbon emissions due to catastrophic wildfire. It is important for the CALAND Model to differentiate between ownerships and management practices on California forestland. Management of our national forests is limited and significant investment is necessary to reduce the risk of catastrophic wildfire and the black carbon emissions that accompany those fires. ARB estimates that wildfires may result in as much as 86.7 million metric tons of CO^2 equivalents of black carbon emissions annually[1]. This figure only accounts for black carbon emissions, it does not include other greenhouse gases emitted from forest fires. Reducing emissions from large forest fires should be the primary focus of any effort to reduce emissions from natural and working lands in California.

Efforts to reduce major wildfires should focus on improved forest management and should not include further regulatory restrictions on working lands. The current regulatory costs associated

[1]Short-lived Climate Pollutant Reduction Strategy, March 14, 2017

with forest management in California are significant and act as a disincentive for small forest landowners to actively manage their forests. The CALANDS Model should recognize the current regulations and the disincentives they create for active management. The CALANDS Model could provide valuable insight by incorporating regulatory improvements that could create further incentives to increase active management of private forests.

We are concerned that a preliminary intervention-based goal for sequestering and avoiding emissions by at least 15-20 MMT by 2030 has been set before there is a complete emission inventory for the NWL sector. While we support your intention to adjust the goal if further analysis shows the need to do so, we believe it is premature to set a goal at this time.

We will be actively involved in all steps of the Implementation Plan. Do not hesitate to reach out to us as representatives of the NWL sector, as any land use and management interventions that could be proposed by ARB will directly impact our farmer, ranch and forestry members.

Sincerely,

Noelle Cremers
Director, Natural Resources and Commodities

Cynthia L. Cory
Director, Environmental Affairs