



February 8, 2019

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Draft Natural and Working Land Climate Change Implementation Plan**

Dear Chair Nichols:

Our organizations strongly support an implementation plan that ensures California's natural and working lands are a significant and critical part of the state's goal to address climate change and achieve carbon neutrality. The state cannot meet its long-term climate change commitments without including its forests, urban forests and parks, rangelands, agricultural lands, wetlands and deserts. We appreciate the extensive work on the draft Natural and Working Land Climate Change Implementation Plan developed by the Air Resources Board (ARB) staff and partner agencies, and we endorse and are very pleased to see the overarching principle that California needs to approach the restoration, conservation, and improved management of lands with the same transformational zeal as energy production and transportation.

In light of the carbon neutrality executive order (B-55-18), we urge the ARB and state agencies to build on this initial plan and pursue next steps as articulated by the Chair at the November 16, 2018 ARB meeting - specifically, the direction to staff to come back to the Board with an assessment of the full greenhouse gas reduction needs and opportunities for interventions across California's natural and working lands, at the scale required, not just framed by current program capacity or constrained by potential costs. This is an essential to understand the scale, capacity and range of opportunities our lands provide to meet California's overall goals for climate resilience and carbon neutrality. We look forward to working with ARB staff and the other agencies on this critical assessment.

With regards to the Draft Plan we offer the following suggestions for modifications before finalizing this document:

- 1 **Clarify that this is an interim plan**, subject to revision as the understanding of climate opportunities is refined in the coming year.

- 2 **Include the appropriate caveats about the interim implementation acreage goals.**  
These acreage targets were the result of a relatively informal survey of agencies that conduct various types of land interventions. These acreage targets represent two scenarios for modeling potential impacts and benefits, but they should reflect a rigorous and standardized analysis of what is possible (and necessary). In some cases, the regional targets are quite conservative, in others they are wildly ambitious. For purposes of this *Interim* Plan they should simply be used as two scenarios for example purposes, rather than represented as state goals.
- 3 **Incorporate additional peer-reviewed analyses and data to support natural and working lands goals to achieve carbon neutrality.** There is broad stakeholder agreement that the state should consider additional data to support more ambitious climate goals for the state's natural and working lands, as the CALAND model has shortcomings with regards to transparency and the ability to track the proposed activities in a spatially explicit manner. As the state continues to analyze the full GHG reduction potential of the state's natural and working lands, we urge you to look beyond the CALAND model to other peer reviewed models and studies to inform a more ambitious goal and plan that will ultimately be needed.
- 4 **Emphasize need for strategic and timely implementation by several agencies.** We support the ambitious implementation goals presented in Figure 7 and stand ready to support state agencies in crafting strategies to achieve these goals through existing programs and new efforts. We recommend that the Draft Plan highlight where new policies, programs, and interagency action may be needed, such as to achieve the "avoided conversion" goal.
- 5 **Seek land conservation approaches that harmonize with the governor's ambitious housing construction targets.** We appreciate the Draft Plan's recognition that directing growth to existing communities without displacing existing residents is a beneficial GHG-reduction strategy, because it simultaneously reduces pressure to convert natural and working lands and supports more-robust transit, biking and walking options. We recommend the Draft Plan build on this statement by emphasizing coordination with local land use plans that facilitate the higher-density, more-affordable residential development Californians need.

Again, many thanks to your staff for helping to articulate the critical role of conservation, restoration, and the improved management of natural and working lands in meeting our GHG mitigation and climate adaption goals. We look forward to continuing to partner with you to advance the timely and strategic implementation of these efforts.

Sincerely,

Michelle Passero  
Nature Conservancy

Paul Mason  
Pacific Forest Trust

David Zisser  
Housing California

Matthew Baker  
Planning & Conservation League

Kim Delfino  
Defenders of Wildlife

Chuck Mills  
California ReLeaf

Katie Patterson  
American Farmland Trust

Adam Livingston  
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