



October 30, 2017

Ms. Claire Jahns
Assistant Secretary for Natural Resources Climate Issues
California Natural Resources Agency
1416 Ninth St., Suite 1311
Sacramento CA 95814

Submitted electronically at

https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=nwlplan-caland-ws&comm_period=1

**Re: Comments on Natural and Working Lands Joint Agency Workshop
(CALANDs carbon modeling)**

Esteemed Ms. Jahns:

On behalf of Friends of the Earth – United States (FOE-US) this letter is provided as comment on the *Natural and Working Lands Joint Agency Workshop (Workshop)*, which was an opportunity to receive an update on the carbon modeling efforts under the auspices of “CALANDs.” As with previous submissions, this letter is by no means comprehensive. We appreciate the enormity of the task put before the agency staff for developing an economically just, ecologically literate, and scientifically defensible plan for the State of California to meet greenhouse gas emissions reductions goals. This brief letter highlights a few concerns and considerations that we believe merit extra attention in future efforts.

Carbon Sequestration Is Meaningless for Climate Change Mitigation Without Permanence

There is a lot that California can do to reduce our state’s climate impact, and our organization concurs that addressing greenhouse gas emissions from land use, from land use change, and from deforestation and forest degradation in California is an imperative. Nevertheless, the ongoing reluctance of California state agencies to address the issue of permanence in the context of carbon sequestration in land based ecosystems remains a glaring inadequacy in the efforts surrounding the Natural and Working Lands Element of the Scoping Plan Update. The modeling efforts are important, and yet the importance of permanence of carbon stocks remains a scientific fundamental that responsible agencies are simply failing to incorporate into their development of land-based climate change mitigation strategies.

How is California Integrating the Natural and Working Lands Element into Efforts of the Governor’s Climate and Forest Task Force?

There seems to be a great deal of attention being paid by the state of California to opportunities to work with sub-national jurisdictions on the questions of forests and climate – yet the workshop failed completely to even mention this engagement by our state in the international climate diplomacy theater. We encourage the Natural Resources Agency, CalFIRE, and the Air Resources Board to be transparent in describing similarities and differences between what is expected of other participants in the Governor’s Climate and Forest Task Force; for instance, the questions of assessing and modeling changes in carbon density is one that many sub-national jurisdictions are addressing. How does California see its efforts progressing in relation to other jurisdictions? Are there shortcomings, for instance in regards the high levels of uncertainty in carbon stock estimations, that are consistent among many jurisdictions that may indicate limits in what can be expected of land based ecosystems like forests for climate policy?

Friends of the Earth – US
2150 Allston Way, Suite 360
Berkeley, CA 94704 USA

Thank you for your attention to this letter. Our organization will remain engaged with and attentive to ARB leadership in developing climate policy in our state that provides global and national leadership.

Respectfully,

A handwritten signature in black ink that reads "Gary Graham Hughes". The signature is written in a cursive style with a large initial "G".

Gary Graham Hughes
Senior California Advocacy Campaigner
ghughes@foe.org
510-900-8807