



April 6, 2016

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Scoping Plan 2030 – Natural and Working Lands Discussion Paper

Dear Chair Nichols:

The Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP) is a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor's Office of Planning and Research, and is hosted as a project of the Sierra Business Council. Sierra CAMP is pleased to provide comments on the Natural and Working Lands discussion paper, dated March 17, 2016.

We appreciate the opportunity to comment on this discussion paper and the vision and goals that it lays out for how natural and working lands can contribute to meeting the State's near and longer-term climate and emission reduction goals. We especially appreciate the paper's recognition of the important connection between natural/working lands and the critical environmental, social and economic benefits they provide, such as water supply, habitat, clean air and energy production, as well as carbon storage and other values.

Sierra CAMP offers the following comments and questions to help strengthen and clarify portions of the discussion paper:

p.2 – Vision: suggest adding increased use of green infrastructure in *natural areas*, as well as urban areas, to enhance carbon sequestration, improve water capture and storage and provide other benefits. This fits with the Governor's call in EO B-30-15 for agency planning and investment to *prioritize natural infrastructure solutions* (#7).

p. 3 – Draft Goals: recommend adding the Sierra Nevada Conservancy's (SNC) Watershed Improvement Program (WIP) to the list of other natural resource management plans cited in the second paragraph. The WIP is particularly germane to this discussion both because of the area it covers (the Sierra and portions of the southern Cascade, which contain the majority of the state's forested lands and headwaters to much of the state's developed water system) and because of its strong partnership with the USDA Forest Service, responsible for management of much of the forested land in the state.

p. 4 – Draft Goal categories: per comment above on the Vision, suggest adding *Wildland* to beginning of 4th bullet, so it reads: *Wildland and urban forestry and green infrastructure*.

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p. 4 – Land Protection and Land Use/Implementation: regarding the 4th bullet, many rural areas throughout the state are not covered by Sustainable Communities Strategies, Regional Advanced Mitigation Plans, NCCPs or HCPs. Nor do they necessarily have county or regional conservation plans. Suggest broadening this bullet to include conservation plans by local NGOs or other entities to recognize the differences across various regions of the state. Regarding the 6th bullet, we understand the need to prioritize; but there also may be opportunities to conserve important agricultural or forest land that is not necessarily under the greatest threat of conversion but that might offer other beneficial outcomes, and at a cheaper cost. We don't want to see this bullet misconstrued to mean that only the most threatened lands can be considered for conservation investment.

p. 5 – Enhance/Management and Restoration: the Objective calls for managing and restoring land to increase carbon storage over time. How will the timeframe be defined? In some cases natural lands, like forests, need more time to show the benefit of management or restoration actions. Recommend measuring benefit over the life of a defined project period vs. the life of specific legislation such as AB 32. This concern should also be addressed in the development of quantification methodologies and accounting framework mentioned in the 4th bullet under Objective.

p. 5 – Wetlands and Riparian Areas: under “Draft Goals,” add the California Water Action Plan (CWAP) goal of restoring 10,000 acres of mountain meadow habitat in the Sierra Nevada and Cascade ranges as a means of increasing carbon storage and providing additional benefits such as water storage and habitat. This would be the mountain version of the goal already included for restoring an additional 10,000 acres of managed wetlands in the Sacramento-San Joaquin Delta. Include the CWAP goal in Figure 1, as well, as an example of existing restoration goals.

p. 6 – Forests: there is one “Draft Goal,” and it seems to call only for forest activities to be included in or “brought under” plans oriented toward forest health, rather than calling for specific outcomes to be achieved through forest management and restoration activities on the ground. Getting projects included in plans is one step, but there needs to be a goal – similar to the goals under the wetland and riparian section – that requires measurable conservation and restoration outcomes through project implementation. Recommend also including the Sierra Nevada Conservancy's WIP as a current example, along with the Governor's Tree Mortality Task Force, of a regional program to coordinate activities on both federal and nonfederal forest lands and the landscape scale.

p. 8 – Innovate: the objectives and goals under the “Innovate” category call for improved technology and buildout of facilities to achieve the 50MW of forest-fueled bioenergy mandated by SB 1122; however this will not occur unless there is a change in the power industry. Recommend including a strategy or strategies for ensuring that utilities purchase the power generated by forest biomass facilities. The co-benefits of forest biomass energy, including fire risk mitigation, treatment of areas affected by tree mortality, reduced forest-related GHG emissions, support of local communities and economies, etc., need to be built into the lifecycle accounting for the cost of producing energy from this source.

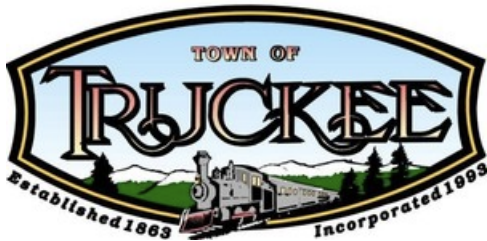
Regarding the discussion questions, we believe they would be more effectively addressed in a discussion format, either through listening sessions, as were used for the *Safeguarding California* Implementation Plan process, or through some sort of advisory group. We

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recommend that ARB undertake such a process to allow for two-way dialogue about these important issues and opportunities.

Thank you for your important work on the Natural and Working Lands discussion paper. We look forward to continued engagement as the process unfolds.

All best,



- Karen Ferrell-Ingram, Land Conservation Specialist
- Scott Warner, Hydrogeologist