



101 Montgomery St.
Suite 900
San Francisco, CA
94104
t: 415.495.4014
f: 415.495.4103

tpl.org

VIA ONLINE SUBMITTAL

February 8, 2019

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

RE: Comments on the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan

Dear Chair Nichols:

Thank you for the opportunity to provide comments on the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan, which seeks to mitigate climate change impacts through improved conservation, restoration, and management of California's natural and working lands. We applaud your efforts to develop a comprehensive, coordinated plan that thoughtfully integrates natural and working lands into the State's climate strategy. These lands are often overlooked as a key tool for achieving climate solutions – thank you for elevating their role and importance. We strongly agree that natural and working lands have the power to provide significant environmental and other benefits through enhanced resilience, carbon sequestration, and reduction of greenhouse gas (GHG) emissions.

In June 2018, we submitted preliminary comments to the Concept Paper for the Implementation Plan. We are grateful to you for incorporating many of those comments into your Draft

Implementation Plan. Please consider the following additional comments as you work to finalize the Plan:

Executive Summary/Plan Assumptions and Methods:

The Executive Summary declares that, “[t]o make progress in achieving our long-term objective of maintaining resilient land-based carbon and ecosystems, the State needs to more than double the pace and scale of State-supported land activities by 2030 and beyond.” We agree that this is an important *first* step in implementing California’s climate strategy. However, we believe that the State must continue to provide bold leadership and to set its sights higher if it wishes to stay apace with climate change. Negative climate impacts, such as extreme heat, wildfire, drought, and sea level rise, are projected to increase exponentially.¹ Rather than doubling the pace and scale of State-supported land activities, we suggest the Plan ***set forth a more ambitious pace of activities that calls for exponential, not incremental, action*** to protect California’s natural and working lands.

Moreover, there is broad stakeholder agreement that the State should consider additional data to support more ambitious climate goals in this area. The Plan’s CALAND model has shortcomings with regards to transparency and the ability to track proposed activities in a spatially explicit manner. As the State continues to analyze the full GHG reduction potential of natural and working lands, we urge you to look beyond the CALAND model to ***incorporate additional peer-reviewed analyses and data*** into the Plan to support more meaningful and ambitious goals.

We believe it is also important in the Executive Summary and throughout the Plan to ***clarify that this is an interim plan***, subject to revision as the understanding of climate opportunities is refined in the coming year.

Section I. Introduction.

A. Need for Action (pp. 5-6):

We commend you for shining a bright light on natural and working lands as a key aspect of California’s climate strategy. These lands are critical to achieving the State’s goals of protecting carbon stocks, increasing carbon sequestration, and reducing GHG emissions (p. 6). We ask you to consider the additional goal of ***increasing public access*** to these lands, *where feasible*, to address issues of equity. To be successful, California’s climate strategy must have the broad and enthusiastic support of all Californians. When people develop a personal connection to natural and

¹ See, for example, California’s Fourth Climate Change Assessment. 2018. Retrieved from: <http://www.climateassessment.ca.gov/>. See also: <https://www.yaleclimateconnections.org/2018/10/climate-change-impacts-in-california-by-2100/>.

working lands, they are more likely to care about the fate of these lands and to make critical associations between policy mandates and beneficial, real-world impacts. Public access will not be appropriate for all natural and working lands, such as working farms, croplands, or where it might disincentivize property owners from pursuing conservation strategies. Certainly, however, public access should be a goal for urban greenspaces, and, where feasible, for forests, woodlands, and other natural lands. Articulating a thoughtful and appropriate “public access” goal statement upfront will bolster discussion in the appendices and elsewhere regarding public-oriented models such as Urban Greening and Urban Forests.

Section II. Natural and Working Lands Objectives, Vision, and Status.

A. Objectives and Vision (p. 9):

In keeping with the above, we suggest the addition of a fourth “vision” bullet point regarding “public access,” such as: “The State’s **vision** for California’s natural and working lands is to: *Expand opportunities for public access to natural and working lands, where appropriate, to promote equity and foster a deeper understanding of the importance and beneficial impacts of natural and working lands to California’s climate strategy.*” Urban greening and urban forestry are particularly good examples of this goal in action.

Section III. Natural and Working Lands 2030 Goal for State-Supported Action.

A. Scope of the 2030 Goal (p. 12)

We strongly support the 2030 goal of “accelerat[ing] near-term action by orienting many State-funded conservation and restoration programs towards strategies that provide long-term climate benefits through protecting carbon stocks, increasing carbon sequestration, or reducing GHG emissions from California’s natural and working lands, while enhancing their resilience to threats including worsening climate change impacts.” To that end, we propose adding language that encourages State agencies to give nonprofit partners flexibility and funding for planning activities, as well as funding for activities that promote public access and equity where appropriate. Currently, there is very limited agency funding available for planning, despite this being a critical prerequisite to implementation.

C. Pathways and Acreage Goals (p.15).

1. CONSERVATION: Land Protection (p. 15):

We agree with the four broad pathways you have identified to achieve climate change solutions. In regard to the Conservation pathway, we suggest the following additional (italicized) language in your discussion of “Land Protection” solutions:

“Protecting lands will help maintain carbon sinks within California’s land base, provide habitat for wildlife, and increase food security. ***Land conservation also can ensure that the benefits generated through investments in restoration and forest health initiatives are protected and not lost to conversion.*** Directing new growth to existing communities without displacing current residents can prevent the conversion of natural and working lands and foster compact development that reduces vehicle miles traveled.”

Figure 7. Implementation Acreage Goals: Conservation of NWL (p. 18):

To further improve implementation of the Plan, we encourage the inclusion of land conservation acreage “goals” or scenarios under “Conservation of Natural and Working Lands” in Figure 7. Without having clear targets such as acreage, it will be challenging to capture results. Is it possible to equate “50-75% reduction in annual rate of conversion by 2030” to acres? This statistic suggests there is a baseline. Perhaps it would make sense to correlate acres of conservation to the objectives under each subcategory (i.e., Forestry, Restoration, and Agriculture)?

It is important to note, of course, that any discussion of acreage goals, here and throughout the Plan, should include caveats about the interim implementation of these goals. The Plan’s acreage targets were the result of a relatively informal survey of agencies that conduct various types of land interventions. These targets represent two scenarios for modeling potential impacts and benefits, but they should reflect a rigorous and standardized analysis of what is possible (or necessary). In some cases, the regional targets are lacking ambition, in others they are wildly ambitious. For purposes of this interim Plan, we believe that regional targets should be used simply as scenarios for example purposes, rather than represented as state goals.

Section IV. Moving Forward.

A. Implementation Needs and Considerations.

Work with Multiple Partners: Assist Private Landowners (pp. 24-25):

We commend you for highlighting an important and often overlooked fact, which is that most non-federal forest, agricultural, and rangelands in California are privately owned. Given this reality, the State cannot meet 2030 GHG reduction goals by focusing solely on government-owned land; the private sector *must* participate in implementing climate solutions. We agree with your recommendation that private landowners must be incentivized to pursue conservation strategies. In particular, as you point out, farmers, ranchers, and forest owners need to be encouraged to manage their lands for increased carbon sequestration, i.e., through easements, working forests, and the like. We urge you to strengthen this part of the Plan by outlining additional new strategies, and by providing a range of creative options for moving the needle in this area (similar, for example, to

the State's efforts to encourage electric vehicle use through tax incentives, HOV lane access, etc.) To meet State climate goals, it is imperative that private owners of natural and working lands be offered new and creative conservation options, such as the financing of fire prevention measures on private property through State bond funds.

Coordinate Cross-Agency Implementation (p. 26):

Thank you for focusing on the need to expand collaborative efforts between agencies and to improve procedural efficiencies to meet Plan goals. We fully support all of the bulleted activities you have identified to address these issues. We ask you to consider two additional areas that are in need of streamlining: environmental review and appraisal review. Protracted and expensive CEQA litigation prevents the State from reaching its climate goals with respect to natural and working lands. To avoid this, CEQA language that allows local jurisdictions to purchase and protect lands must be brightlined. We would suggest codifying the guidelines for categorical exemptions of CEQA review for open space and parks. Putting those critical guidelines into the statute will clarify and strengthen the exemption for these conservation projects. Additionally, we would like to see the Department of General Services work with land protection partners to streamline internal processes and accelerate appraisal review and approval.

Recognize Restoration Economies and Build Workforce Capacity (p. 27):

Like you, we believe that State-supported land activities must take the restoration economy into account. We applaud you for identifying the important role of the economy in meeting climate goals, and we urge further integration and study. Steps should be taken immediately to work with local and state agencies and nonprofit organizations on workforce development strategies. Workforce development on natural and working lands not only directly benefits the environment and the economy, but also serves to strengthen the bonds between land and people that are so necessary to policy success and meaningful Plan implementation.

Section V. Appendix A: Description of Tools, Methods, and Modeled Activities

Table 4. Modeled Management Activities.

LAND PROTECTION: Avoided Conversion (pp. 40-43):

Acreage Goals: As discussed above, acreage "goals" or scenarios are needed for Land Protection models. These scenarios can specify that certain land use types are particularly important (e.g., forests, mountain meadows, riparian areas, etc.). We suggest including climate benefits such as protection of resources that enhance overall landscape resilience or contribute to connectivity. We also suggest that the models show adjacency or connectivity to other protected lands, recreational

amenities, and/or climate resilience benefits (e.g., landscape connectivity, wildlife corridor protection).

Notably, we suggest that minimal importance be placed on a property's risk of conversion. Even if not immediately threatened by conversion, few properties in California are immune to that risk given long-term population projections in California. By focusing on high conversion risk properties, California will not be able to take the long view that land conservation requires – which is on the timeline of in perpetuity – and will be in the position of paying more per acre for high conversion risk properties versus lower cost investments in properties further from development.

Meadow Conservation: We applaud the Plan's focus on mountain meadow restoration as a way to change carbon dynamics. Likewise, we believe that mountain meadow protection should be called out explicitly in the Plan. Meadow conservation goes hand in hand with restoration. More than 60% of California's developed water supply originates in the Sierra Nevada and these mountain watersheds provide all or part of the drinking water for 25 million people statewide.² Yet mountain meadows comprise less than one-tenth of the Sierra Nevada region.³ Development is a pressing threat to many of the largest meadow complexes on private land in the Sierra Nevada. Communities such as South Lake Tahoe keys, Grass Valley, and Placerville were each built on meadows in the Sierra.⁴ California's population is estimated to grow by 30% to over 50 million residents by 2060.⁵ Approximately 30,000 to 50,000 acres of privately held meadow habitat may be at risk of development in the Sierra, threatening the services provided by existing high-quality meadows and undermining the benefits secured through restoration activities. To better serve policy mandates and implementation efforts, we request that meadow conservation be specifically called out as a key "Land Protection" strategy here and elsewhere (i.e., in Appendix B, under Ecoregional Implementation).

Riparian Conservation: The Plan rightfully highlights the need to restore and maintain riparian areas to address climate, habitat, and water quality issues. We believe that conservation of riparian areas is equally important, and should be specifically addressed. Climate change is already having a profound impact on California water resources, exacerbating flood risks and threatening water supplies to existing riparian areas. Furthermore, restoration projects are more likely to occur on

² Sierra Nevada Conservancy. 2019. "California's Primary Watershed." Retrieved from: <http://www.sierranevada.ca.gov/our-region/ca-primary-watershed>.

³ Ratliff, R. D. 1985. Meadows in the Sierra Nevada of California: State of knowledge. Gen. Tech. Rep. PSW-84. Berkeley: U.S. Forest Service, Pacific Southwest Forest and Range Experiment Station. Retrieved from: https://www.fs.fed.us/psw/publications/documents/psw_gtr084/psw_gtr084.pdf.

⁴ National Fish and Wildlife Foundation. 2010. Sierra Nevada Business Plan, p. 8. Retrieved from: https://www.nfwf.org/sierranevada/Documents/Sierra_Meadow_Restoration_business_plan.pdf.

⁵ http://www.dof.ca.gov/Forecasting/Demographics/Projections/documents/P_PressRelease.pdf.

public land. Acquisition of riparian areas for public ownership is vital to the successful implementation of future restoration projects. As with mountain meadows, we ask that riparian conservation be explicitly called out as a key “Land Protection” strategy here and elsewhere (i.e., Appendix B, under Ecoregional Implementation).

Community Forests: Similarly, we believe that community forest initiatives should be highlighted as a “Land Protection” or “Forestry” strategy. Community forests serve climate goals, provide public access and recreational opportunities, expand landscape connectivity and wildlife corridors, and generate local economic benefits not always available through traditional forestry activities.

Section V. Appendix C: CNRA Board, Department, and Conservancy Implementation.
CNRA Bonds and Grants Division: Urban Greening (pp. 62-63):

On a minor note, the reference to the “Urban Greening Infrastructure Program” on page 63 should be changed to “Urban Green Infrastructure Program.” Note further that the programs outlined here are mostly one-time funded through Proposition 68 and do not have future funding rounds.

We respectfully submit these comments for your consideration, and thank you for your incredible leadership in addressing the power and potential of California’s natural and working lands.

Sincerely,

A handwritten signature in black ink, appearing to read "Guillermo Rodriguez". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Guillermo Rodriguez
California State Director