



2030 Scoping Plan Concept Paper comments:

July 8, 2016

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

Re: 2030 Scoping Plan Concept Paper [draft dated June 17, 2016]

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.

We appreciate the opportunity to provide input on the draft 2030 Scoping Plan concept paper and the framework it lays out for moving beyond 2020 to achieve additional greenhouse gas reduction goals to 2030 and beyond.

Sierra CAMP offers the following comments and questions, based on our organization's [Guiding Principles](#) for climate adaptation and mitigation in the Sierra region and our *Sierra CAMP Safeguarding California 2017 Update Policy Recommendations* (attached), which we hope can help strengthen and clarify portions of the concept paper in preparation for development of the draft 2030 Scoping Plan later this summer.

CAMP Guiding Principle: Facilitate Urban-Rural Connections

- p. 6, ***Integrated System***: we appreciate and strongly support the concept paper's statement that as we chart a path to achieving or post-2020 climate goals, we much "care for the whole." This echoes Sierra CAMP's goal of using a whole-system approach of integrated solutions that can strengthen connections between and leverage partnerships across California's urban and rural regions and sectors.
- pp. 13-14, ***Intergovernmental Collaboration***: we support the concept of planning and goal-setting at a regional scale as suggested in this section. This may be more easily achieved in areas that have Metropolitan Planning Organizations and approved Sustainable Communities Strategies; it may be more difficult to implement in rural areas that lack such regional planning entities. The draft 2030 Scoping Plan should include strategies for addressing this particular gap. For example, perhaps MPOs would be required to engage or consult with neighboring rural areas that contain resources the MPO regions rely on; or perhaps there is a supplementary state resource/technical assistance delivery mechanism that could parallel the urban-focused Sustainable

Communities Strategy process to achieve GHG reduction goals and provide important co-benefits for areas of the state lacking MPOs.

People from all parts of the state should be empowered to fully contribute and participate in solutions that will make the entire state stronger. That was the intent, if not the letter, of AB 32, and it appears to be the intent of Governor Brown, as expressed in his State of the State address and Executive Orders. California has a diversity of needs and circumstances. A statewide program of this magnitude must address and be made to work within the context of that diversity.

CAMP Guiding Principle: Promote Forest and Meadow Restoration

- pp. 5-6, **Progress**: we agree that California needs a natural and working lands carbon inventory and agreed-upon method of accounting for GHG emissions, emission reductions, and carbon storage, as soon as possible. The draft Concept Paper quotes Aristotle on p. 6 regarding the need for an integrated system whose “whole is greater than the sum of its parts.” We would additionally quote Aristotle, Voltaire, and others who caution not to let the perfect be the enemy of the good. We urge ARB to: a.) work quickly to find a reasonable methodology that can be improved over time as we collect more data, and b.) ensure that GHG/carbon accounting in this sector is not held to a higher standard than accounting for other sectors, such as High Speed Rail or urban forestry/urban greening. If we have any hope of maintaining our forests as carbon sinks rather than allowing them to become net emitters of carbon, we need to start investing in forest management and restoration right away. We can adopt a methodology now that will allow us to estimate and compare emission and carbon storage outcomes, and then build monitoring into those projects for use in groundtruthing results and adjusting the accounting protocols. This way we can start achieving GHG, public health, economic and other important benefits while using actual projects to help improve the accounting methodology.

The concept paper states that the Draft Scoping Plan will describe ARB’s progress and identify data gaps. How long after the progress report and gap analysis before we have an actual methodology? How many “other data sources and methodologies” will be needed to validate or support ARB’s own inventory? The fear is that this concept paper could perpetuate “analysis paralysis.” The draft Scoping Plan isn’t due out until November 2016 and won’t be approved by ARB until Spring 2017. Given the dangerous condition of our forests, we need to determine and adopt a methodology – that can be updated with new information as we go (as called for on p. 7 under the *Flexibility* subhead) – and begin launching projects on the ground long before that.

- p. 9, **Protecting, Enhancing, Innovating, and Increasing Sequestration in the Natural Environment**: various State climate-related documents have emphasized natural and working landscapes as a means of reducing GHG emissions and storing carbon, which will be necessary if we are to meet our post-2020 goals; yet we still seem very far removed from an accepted evaluation protocol for projects in this sector. If, as the concept paper states on p. 9, we know that storing carbon in trees, plants, aquatic vegetation and soil is “one of the most effective ways to remove GHGs from the atmosphere,” we should be able to determine how to measure that for purposes of choosing and evaluating projects. We need to get beyond “setting a direction toward a

vision” and actually choose a methodology we can use now – and refine as we get more data – so that we can implement actual projects and begin reaping benefits in this important sector.

The draft concept paper identifies the need to align with the IPCC (p. 4), so perhaps that could be a starting point. As far back as 2007, the IPCC’s Fourth Assessment Forest Sector chapter (https://www.ipcc.ch/publications_and_data/ar4/wg3/en/ch9.html) says: *Forestry can make a very significant contribution to a low-cost global mitigation portfolio that provides synergies with adaptation and sustainable development. However, this opportunity is being lost in the current institutional context and lack of political will to implement and has resulted in only a small portion of this potential being realized at present (high agreement, much evidence).*¹ As the IPCC Forest Sector report further states: *[w]hile the assessment in this chapter identifies remaining uncertainties about the magnitude of mitigation benefits and costs, the technologies and knowledge required to implement mitigation activities exist today.*²

In addition, the Governors’ Climate & Forests (GCF) Task Force (www.gcftaskforce.org/about), of which California is a founding member, conducted a study of different forest-related protocols (http://www.gcftaskforce.org/documents/GCTF-1000-2009-031_GCF_Protocol_Assessment.pdf). Appendix A of that study includes an extensive set of project criteria and standards that could be applied to forest projects in this sector. The GCF report also calls for initiating a pilot project program to choose and review representative pilot projects in GCF states to provide feedback for revisions to the criteria and standards – an approach we believe has great merit for California.

- pp. 12-13, ***Relying on Sound Science and Research***: after hearing an informational presentation by Strategic Growth Council staff on the carbon mapping project with UC Berkeley’s Lawrence Livermore Labs, we are encouraged that the rural forest sector may be approaching an evaluation system similar to that used by CalFIRE in its urban forestry program. That program uses data extrapolated from six reference cities to determine estimated carbon storage and biomass content for new urban forestry projects. In a rural corollary, CalFIRE operates eight Demonstration State Forests representing the most common forest types in the state. If data from these two sources can be brought together, perhaps that can lead us to a workable evaluation system for rural forest projects, as well.

Other sectors use proxies for evaluating benefits, such as avoided conversion for Sustainable Agricultural Land Conservation (even though there’s no way of ensuring those lands would have been converted to more carbon-intensive uses) or estimated VMT reductions from compact development or active transportation projects (even though there is no guarantee that people living in more compact communities will actually drive fewer miles or choose active transportation options). Rural forest projects

¹ Nabuurs, G.J., O. Masera, K. Andrasko, P. Benitez-Ponce, R. Boer, M. Dutschke, E. Elsiddig, J. Ford-Robertson, P. Frumhoff, T. Karjalainen, O. Krankina, W.A. Kurz, M. Matsumoto, W. Oyantcabal, N.H. Ravindranath, M.J. Sanz Sanchez, X. Zhang, 2007: Forestry. In Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)], Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. p. 543

² Ibid.

need to be afforded similar flexibility in the level of “proof” required for project assumptions and estimates of benefit.

CAMP Guiding Principle: Prioritize Integrated, Landscape-Level Approaches

- p. 13, ***Setting the Path to 2050***: the draft concept paper brings up an important concept about the need to plan for and implement projects in the near-term that can set the stage for achieving 2030 and 2050 goals in the longer-term. In 20 or 30 years we will have exhausted most of the gains that can be made in the larger transportation, industrial and electric power sectors and will need to count on more distributed, longer-lead-time GHG reduction measures available from the agricultural, natural resource, recycling/waste and other sectors to cumulatively achieve our post-2020 goals. At the same time, climate impacts will likely be felt more acutely 20 or 30 years from now. As a result, we strongly recommend that this 2030 Scoping Plan include near-term strategies for launching projects now that we know will need a longer time to achieve measurable benefits – such as those related to the natural and working lands – as well as strategies for supporting adaptation activities that will help ameliorate the increasing climate impacts expected in the post-2020 timeframe.

CAMP Guiding Principle: Ensure Regional/Rural Access to Grants and Funding

- pp. 11-12, ***Environmental Justice***: While we understand the rationale and obvious need to focus resources on the state’s most disadvantaged communities, we encourage ARB to look beyond just those disadvantaged communities identified by CalEnviroscreen (CES) to ensure that GHG reductions and co-benefits are felt by disadvantaged people throughout the state.

CES currently uses 19 indicators – 12 for health/pollution-oriented factors³ and 7 for population and socioeconomic factors⁴. This suite of indicators disfavors rural areas both because of the emphasis on certain pollutants – some of which don’t affect or aren’t measured extensively in rural areas – and because the 12 pollution criteria (63% of the total score) far outweigh the 7 population/socioeconomic indicators (37%). Rather than overhauling the CES tool, we recommend continuing to use it for identifying relative disadvantage in urban areas, but then directing additional resources to rural areas.

A directed rural fund would serve as a “floor” to ensure a minimum amount of rural investment, with the possibility of additional investment through the competitive process for non-directed funds. Any rural project would still have to achieve greenhouse gas emission reduction benefits – but having a companion rural program would help ensure a more equitable distribution of funds and resulting GHG reductions and co-benefits to disadvantaged people across the whole state by encouraging and making sure that rural projects qualify, as well. The SGC’s Affordable Housing and Sustainable Communities (AHSC) program offers an example – it has instituted such a strategy with

³ Pollution criteria: (1) ozone, (2) PM 2.5, (3) diesel PM, (4) drinking water contaminants, (5) pesticide use, (6) toxic released from facilities, (7) traffic density, (8) cleanup sites, (9) groundwater threats, (10) hazardous waste, (11) impaired waterbodies, and (12) solid waste sites/facilities

⁴ Population/Socioeconomic criteria: (1) children & elderly, (2) low birth-weight babies, (3) asthma, (4) educational attainment, (5) linguistic isolation, (6) poverty, and (7) unemployment

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its RIPA or Rural Innovation Project Areas program, which currently dedicates 10% of funding to underserved portions of the state not captured by the CES DAC definition.

CAMP Guiding Principle: Prioritize Multiple Benefits

- p. 6: **The Strategy**: since it is going to take engagement by all manner of stakeholders to achieve 2030 climate goals, the draft concept paper should address and include as many different types of participants as possible, urban to rural, large communities to small, affluent to in-need. To that end, we recommend that the list of recreational pursuits in the first sentence under *Integrated System* be expanded to include motorized uses, especially since motorized users constitute a group that is directly affected by one of the larger cap-and-trade program areas: vehicle fuel.
- p. 10, **Improving Public Health**: we expect the Draft Scoping Plan to address the root issue of air quality and public health impacts from wildfire smoke – as an “upstream” measure to reduce emissions – including ways to measure the benefits and co-benefits that can be gained from investments in forest management, restoration and forest bio-products, both as a means of reducing wildfire risk and to replace practices that cause more harm to public health, such as open pile burning of slash or use of fossil fuels for energy and other products.

And finally, we offer a few general comments about **Concepts 1 through 4**, pp. 21-30:

- Ensure that wildfire emissions, as the single largest contributor of black carbon emissions, are addressed in the Short Lived Climate Pollutant (SLCP) Strategy listed in each Concept. Since 90%+ of wildfires are human-caused, and it is human intervention in the form of forest management and restoration that can reduce the risk of future wildfire, we believe that wildfire is indeed an “anthropogenic” source of black carbon and must be addressed in the SLCP strategy.
- Please see previous comments regarding disadvantaged communities, rural communities and distribution of funds as it relates to Concept #1’s discussion of GGRF investments.
- We would also like to see more specific goals under the Natural and Working Lands sections in each Concept. The current goals appear vague in comparison to those listed for other sectors. If the Concepts can’t include actual numbers yet, we recommend at least identifying the process or potential source for developing the targets, such as the statewide carbon mapping by Lawrence Livermore Labs, etc.

We believe many of the issues and questions outlined in the draft concept paper and in the suggestions included above would benefit from a more focused discussion than what can be achieved through comment letters or even public workshops. To that end, we recommend that ARB host smaller-scale listening sessions, as were used for the *Safeguarding California* Implementation Plan process, and/or establish a short-term advisory group of some sort to facilitate two-way dialogue about these important issues and opportunities.

Thank you for your important work on this concept paper. We look forward to continued engagement as the process unfolds.

All best,

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- Karen Ferrell-Ingram, Land Conservation Specialist
- Rosemarie Smallcombe, Mariposa County Supervisor
- Scott Warner, Hydrogeologist