



October 16, 2015

Mary Nichols, Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95812
(submitted via AB 32 Scoping Plan web portal comment form for *2030targets*)

Re: Comments on 2030 Targets AB 32 Scoping Plan Workshop, October 1, 2015

Dear Chair Nichols:

Sierra Business Council (SBC) – a non-profit network of more than 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada – is pleased to provide comments on the 2030 Target Scoping Plan update.

Most importantly we are grateful to see explicit recognition, both within the scoping concepts as well as in the Governor’s October 1 workshop remarks, that achieving 2030 and 2050 targets will require immediate action across all sectors, and that this scoping update is the mechanism for dealing with the difficult issues that have hindered progress in some sectors to date. SBC hopes this process can, indeed, produce clear goals and quantification methods for GHG emission reductions, short-lived climate pollutant reductions and maximization of co-benefits, especially in the natural and working lands sector, but also across all sectors.

To help achieve that goal, we recommend development of a comprehensive multi-agency rural strategy addressing eligibility thresholds, evaluation criteria, program delivery mechanisms and other program elements to better account for regional differences and ensure that a) all areas and individuals in-need can contribute to the solution and have access to the benefits of GHG emission reductions and associated co-benefits, and b) rural regions don’t become unnecessarily burdened by, for example, ideas like a “mileage fee.”

We offer the following suggestions for scoping concepts presented so far:

- 1) Review and adjust scheduling so that the many sector-specific plans currently underway, such as the Forest Carbon Plan and others, can effectively inform this third generation of the scoping plan. It will be difficult to meet the scoping goal of coordination and synergies across sectors if sector-specific plans are developed in a vacuum, and vice versa.
- 2) Identify and address barriers to achieving goals in various sectors. One example is the difficulty in getting certain utilities to accept and distribute alternative energy produced from biomass, thereby making it difficult to restart existing biomass facilities or develop new opportunities to increase the use of biomass for energy production.

Another is the perceived lack of scientific support or accepted methodologies for quantifying GHG emission reduction benefits and co-benefits, especially in the natural and working lands, energy and public health sectors, which makes it difficult to compare and prioritize actions and funding distribution within and across sectors.

- 3) Don't limit tools – for example, under the implementation tools to “Protect” natural and working lands (slide #43), be sure to include voluntary fee title acquisition, in addition to Forest Legacy Program/SALC conservation easements, as a means of protecting natural and working lands from conversion to higher-GHG-emitting or short-lived pollutant-causing uses. Also explicitly list fire fuel reduction, in addition to just reforestation, as an implementation tool to “Enhance” natural and working lands (slide #44). This not only allows for more opportunities to achieve GHG emission reduction and carbon sequestration goals, but it facilitates cross-sector benefits to energy, public health, water supply/quality and local economic sustainability.
- 4) Accelerate the use of existing technologies while also testing new and innovative technologies to lay the groundwork for future GHG reduction benefits. In addition, ensure that climate-related projects include necessary research and monitoring to build a body of real-time data to improve quantification and evaluation of GHG reduction benefits and co-benefits.

SBC appreciates the co-convening agencies' recognition, in advance, of many of these issues, as presented in and discussed at the scoping plan kickoff workshop earlier this month. We would like to work with you, especially related to addressing rural issues, and look forward to participating in the continuing discussion about how to make achievement of the state's post-2020 climate goals meaningful to all Californians.

Sincerely,



Kerri Timmer
Government Affairs Director