



California Program Office

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June 15, 2018

Shelby Livingston
California Air Resources Board
1001 I Street
Sacramento, CA 94814

RE: California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper

Dear Ms. Livingston,

On behalf of Defenders of Wildlife (Defenders) and our 1.8 million members and supporters in the United States, including approximately 180,000 Californians, we thank you for the opportunity to comment on the California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper. Defenders strongly supports the state's commitment to the conservation and restoration of natural and working lands for their greenhouse gas (GHG) reduction benefits as well as their numerous co-benefits to humans and wildlife.

However, we believe that the natural and working lands component is missing a significant opportunity by not including desert conservation and restoration as a resource with significant GHG sequestration and mitigation benefits, especially given that desert lands make up 28 percent (more than 29 million acres) of California's land mass. Though the scoping plan acknowledges a significant data gap regarding deserts, Defenders would like to see substantive efforts made to establish protocols for desert lands and include a research and monitoring component in future plans to further develop GHG sequestration data on these lands.

For more specific information on carbon sequestration on desert lands, please see attached our previously submitted comments on the Cap and Trade Triennial Investment Plan, Second Draft Investment Plan and California's Climate Change 2030 Vision and Goals Update for Natural and Working Lands. We are eager to see the state's next steps for incorporating deserts, California's second largest land type, into future natural and working land carbon sequestration efforts.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me at kdelfino@defenders.org if you have any questions.

Sincerely,

Kim Delfino
California Program Director