



June 15, 2018

Comments to
Joint Agency Workshop
California Natural and Working Lands Climate Change Implementation Plan Concept Paper

SMUD appreciates the opportunity to comment on the California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper. We look forward to continued development of the land-based carbon sequestration “pillar” in California’s Climate Strategy, and better integration of this form of carbon reduction into local land use planning.

As a publicly-owned electric utility with compliance obligations under California’s AB32, we recognize the benefits of carbon reduction throughout multiple sectors within the region we serve. We have taken active steps to expand awareness of the potential for carbon storage in the land base. In 2017, with a number of local and state partners, we completed an initial study of the landscape carbon storage potential within Sacramento County. This assessment included estimates of storage capacity under multiple growth scenarios, which underscored the importance of compact growth and preservation of specific local inventories of high carbon intensity. Because expanded urban density & compact development patterns will also facilitate other building and transportation electrification initiatives, we view expansion of the state’s plans for land based carbon sequestration as a very important complement to energy sector carbon reduction goals.

The Concept Paper lays out a solid “plan for a plan” including future opportunities for stakeholder comment on the Implementation Plan itself. Because this is exclusively focused on tracking state dollars (on public and private land), we recommend adding at least an estimated assessment of the projects, dollars and tonnage being sequestered with private funds, so that there can be understanding of the full breadth and reach of this work. We note the plan to track acres protected, GHG reduction outcomes and “carbon co-benefits, including linkages to existing resources management plans.” We recommend that the State also track economic co-benefits and the development of new markets for agricultural and other products, such as Fibershed’s “climate beneficial” fiber, sustainable forest outputs, etc. Capturing this information will help demonstrate economic opportunity and public interest in the end results of these programs, which will perhaps provide incentives to additional landowners to undertake carbon sequestration management activities.

Finally, as they are implemented and findings documented, the various funding programs that will be managed and tracked by the state will yield rich new knowledge about the elements required to make these management activities successful. There would be great benefit in consolidating key findings, issues identified, best practices, supportive local government policies and other practical guidance that can facilitate integration with local land use practices, faster technology transfer and growth in tons sequestered.