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April 4, 2022

Shelby Livingston
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2022 Scoping Plan Update - Initial Modeling Results Workshop

Dear Ms. Livingston,

The Nature Conservancy (TNC) is grateful for the opportunity to submit comments to the California Air Resources Board (CARB) in response to its recent Initial Modeling Results Workshop for the 2022 Scoping Plan Update. Emission reductions from the natural and working lands (NWL) sector are essential if California is to reach carbon neutrality by 2045, and we commend CARB for considering detailed scenarios and land management activities that can help to achieve this and the State's other climate goals.

With these scenarios, the Scoping Plan Update has the potential to catalyze needed action in the NWL sector. It is important that these scenarios suitably cover the range of potential pathways for emission reductions and that results from modeling are clearly conveyed so that the State – as well as local practitioners – can undertake informed climate action.

With this in mind, we offer the following suggestions to support this effort:

- **Modeling results and the scientific literature should be used to develop an overall goal for the NWL sector.** The scenarios being considered are important in helping to determine the potential mitigation benefits that can be achieved from various land management, restoration, and conservation actions, and are an important complement to the broader body of scientific literature that quantifies the potential carbon impacts of different land management strategies.

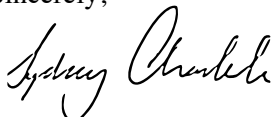
While mitigation potential is an important metric, goals and targets are also important in helping to drive tangible outcomes. Together, the mitigation potential from CARB's modeling results and scientific findings from CARB's literature survey should be used to develop an overall GHG reduction goal for the NWL sector and to help drive action.

- **Scenarios should inform priority policy recommendations.** The Scoping Plan creates a unique opportunity to drive climate action in California. At the same time, other planning documents are being developed by other state agencies, like the Climate Smart Land Strategy and 30 X 30 strategy. The actions described in CARB's modeling scenarios should be linked to these other strategy documents and identify opportunities for optimizing outcomes for GHG mitigation, adaptation, and biodiversity protection. Including some spatial analysis with the estimates provided (where possible) could also help to connect modeling scenarios to opportunities for action.

- **Total potential emissions reductions associated with NWL should be aggregated and estimated compared to a “business-as-usual” scenario to illustrate the overall emissions reduction potential of the NWL sector and inform the prioritization of certain policy recommendations.** We understand that a climate goal for NWL may be identified based on a potential carbon sequestration amount (5-year average) relative to zero emissions for purposes of assessing carbon neutrality. It is equally important to estimate and publish estimated total emissions reductions relative to a business-as-usual scenario (or estimated average) BAU. This has been done for other sectors like energy and transportation, and it is important for purposes of informing the kinds of interventions and policies that may be needed to both reduce emissions and sequester additional carbon. It also helps illustrate to the public and decision-makers how NWL, and their stewardship and protection, are so important for climate health.
- **Consider showing outcomes for scenarios beyond 2045.** While some land management actions show immediate climate mitigation benefits, other activities like ecological forest restoration (e.g., prescribed burns and mechanical thinning) accrue net carbon benefits over long time horizons that may take up to 50+ years. Consequently, it would be helpful for CARB to portray changes in carbon stocks and emissions in model outputs over longer time periods that extend at least to 2075.
- **Role of land use change and land conversion should be clearly elucidated.** It would be helpful if the BAU LULC change rates and management rates (and data sources) were presented with the modeling results or made available. The amount of developed land increase on ag land or natural vegetation was not in the materials, nor was information on harvest or prescribed burning. Also, why in the BAU scenario for grassland was land conversion not incorporated? And more generally, the role that avoided conversion can play – in terms of emission reductions – is a possible area of investigation.

Thank you for the opportunity to provide feedback. Please feel free to reach out with any questions. We look forward to continuing to work with CARB on the Scoping Plan process.

Sincerely,



Sydney Chamberlin
Project Manager, Climate and Nature-Based Solutions
The Nature Conservancy