

June 15, 2018

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

RE: Comments by The Nature Conservancy on the 2030 Natural and Working Lands Climate Change Implementation Plan

Dear Ms. Livingston,

The Nature Conservancy (TNC) appreciates the opportunity to comment on the 2030 Natural and Working Lands Climate Change Implementation Plan, Concept Paper. We strongly support the effort of California Air Resources Board (CARB) and the Natural Resources Agency (CNRA) efforts to establish a long-term climate goal and supporting implementation plan for the state's natural and working lands. As stated by the Air Board staff last December, "we can't ignore this sector." It's critical for the state to include its natural and working lands (NWL) in its 2030 and 2050 climate goals to, at a minimum, maintain them as a healthy net sink and where possible, increase carbon sequestration. With this in mind, we offer the following constructive comments in support of a goal and plan for this sector:

Base the mitigation goal for natural and working lands on prospective forecasts of greenhouse gas reduction potential

On page 7, the Concept Paper seems to suggest that the goal for NWL will be avoiding emissions and protecting existing carbon stocks if the inventory indicates that the land base is a net source of emissions and the goal will be increasing sequestration if the inventory indicates that the land base is a net sink. The Conservancy suggests additional consideration of current published analyses and those underway (e.g., CALAND, USGS-TNC, COMET Planner) before making such a determination, as it may be possible to set a goal to advance the land base as a greater net sink irrespective of current conditions.

Baseline and business as usual should be the same and scenario approach should be clarified

Further clarification of the baseline definition and method is needed. For example, will the baseline serve as the reference scenario against which GHG reduction progress will be assessed? If so, is the baseline an extrapolation of historic trends or is it based on different

future assumptions? There is international precedent for using historic trends as a foundation for a baseline reference scenario.

The use of the term “business as usual” for a second scenario can be easily confused with a baseline, as this is a term commonly used to refer to a GHG baseline scenario. Rather than using this term, we suggest using different terms, such as “baseline, moderate and ambitious” or something similar.

Develop more ambitious GHG reduction scenarios

TNC strongly recommends developing GHG reduction scenarios that include more ambitious action. The current baseline scenario (which should be renamed) reflects a no funding scenario, which would likely result in reductions that are lower than the current “baseline” or business as usual conditions. This is an informative scenario to include, not as a goal, but to help explain what the state risks losing if it does not continue to fund natural and working lands through existing programs. The currently named “business as usual” scenario, appears to be the baseline scenario, leaving room for at least two additional scenarios that should include (at least) 1) a moderate increase in activities and funding scenarios and 2) more ambitious scenario that demonstrates the upper limits of GHG reduction potential of land-based activities. It is critical, as part of this exercise, to understand what the full GHG reduction potential of the state’s natural and working lands when funding is not a constraint so stakeholders and decision makers can fully understand how material the contribution could be.

Provide additional clarification regarding activities and intended reductions

The implementation plan should clearly explain the GHG accounting boundaries, where the intended reductions of a particular activity will be captured and how reductions will be monitored over time. For example, certain management and restoration activities, like restoration and improved forest managed, will conserve, avoid certain emissions, and sequester biological carbon. These reductions would, presumably, be attributed to the “land sector” and could be monitored through land carbon inventory data and some form of landowner reporting.

The Concept Paper also identifies other GHG reduction activities related to downstream uses of wood products (e.g., biomass energy, wood product substitution, etc.). In these instances, will the reduction be counted in the energy sector? Land sector? Both? How will the GHG benefits be monitored? If the reductions are captured through energy emission savings, it may be most appropriate to attribute this reduction (or this part of the reduction in the accounting chain) to the energy sector since the state has separate goals for renewable energy.

Include specific policies that would advance land-based GHG reductions and optimize reductions in other sectors

The Concept Paper provides a good starting point for identifying the kinds of land-based activities that could be implemented to advance overall reductions in the natural and working land sector and potentially other sectors. In the next iteration of the plan, we recommend including specific programs (existing and new) that could receive additional funding or be developed to achieve the overall goal for the sector. This would make the final plan more actionable. For instance, such programs should include those that are already being funded through the Greenhouse Gas Reduction Fund (Healthy Forests, Healthy Soils, Sustainable Agricultural Land Conservation, etc.). Potential new programs should also be identified.

As mentioned in the June 14, 2018 letter submitted by ClimatePlan, Sequoia River Lands Trust and Planning and Conservation League, the “Vibrant Communities and Landscapes: A Vision for California in 2050,” should be included in the Plan with specific ideas for implementation. It was included in the 2017 Scoping Plan (Appendix C) and presents an opportunity to advance multi-sector strategies that can optimize reductions for the NWL sector, as well as other sectors like transportation.

Once again, TNC appreciates the opportunity to comment on this Concept Paper and supports the State’s overall effort. The State won’t be able to meet its long-term climate goals without including this sector. If you have any questions, please contact Michelle Passero at mpassero@tnc.org.