



March 25, 2016

VIA INTERNET SUBMITTAL

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

**RE: 2030 Target Scoping Plan Update; Healthy Landscapes 2030: California's
Climate Change Vision and Goals for Natural and Working Lands**

Gentlepersons:

Endangered Habitats League (EHL) generally supports this draft, with comments on specific sections as noted. For your reference, EHL is Southern California's only regional conservation group.

Vision

Protect farmland, rangeland and forests from conversion so that these landscapes can continue to provide carbon storage, jobs, food, fiber, wildlife habitat, and clean water and air. Protection strategies will differ by land type and region, as each faces localized productivity, stability and development threats.

We suggest adding "other habitat lands" to the list of land types to be protected from conversion. This broader list is consistent with the rest of the document. The current language is too narrow because forests and rangelands are a *subset* of the habitat lands that are at risk of conversion, sequester carbon, and provide the targeted benefits. By themselves, "farmland, rangeland and forests" do not capture the vision. Indeed, other habitat lands may be superior to farmland and rangeland in that they are net carbon sinks, whose soils are not plowed up, releasing carbon, or accompanied by mechanized equipment or methane-producing livestock.

Guiding Principles

The articulated principles are sound. They recognize the importance of carbon storage on natural lands and the crucial importance of assembling the funds to necessary protect these resources. We also note the proper emphasis on regional scale planning.

Goals: Land Protection and Land Use

Objective: Increase protections on natural and working lands to reduce the rate of conversion to intensified uses, to both preserve lands' sequestration potential and promote infill and compact development.

We concur with this well-stated overall objective.

Implementation

The list of implementation actions is well conceived and thorough. It captures the basic needs for better land use planning and proactive conservation investment. We call out two sections for more specific comment and also suggest an *additional* implementation action.

Prioritize state conservation investments in working lands and habitat conservation that are identified in county and regional conservation plans, including Sustainable Communities Strategies, Regional Advanced Mitigation Plans, Natural Community Conservation Plans, and Habitat Conservation Plans.

We concur that Natural Community Conservation Plans and Habitat Conservation Plans are priorities for investments. There are prime vehicles for implementation due to their landscape approach, preexisting partnerships, and numerous co-benefits.

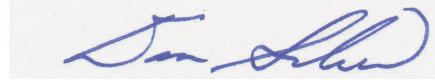
Increase habitat acreage protected or restored by 5% above 2015 levels by 2020 for all habitat types identified in the State Wildlife Action Plan, as outlined in that Plan. This acreage may include farmlands, rangelands or working forest lands that have habitat values consistent with the objectives identified in the State Wildlife Action Plan.

The State Wildlife Action Plan should be considered a subset of habitat-related objectives and not otherwise relied upon. The plan is not a comprehensive but rather designed to meet specific requirements for receipt of federal funds. The plan selects certain habitats types – essentially as examples – and excludes others. For example, coastal sage scrub, which is under intense threat of conversion and contains much of California's endemic flora and fauna, is not included. Furthermore, the percent conservation targets are standardized and lack an underlying methodology. We suggest clarifying that the State Wildlife Action Plan is not inclusive of habitat objectives.

We also suggest an *additional* implementation action, that is, to undertake research and scientific study to better document and develop metrics for carbon storage on habitat lands, in particular sequestration of carbon in the soil. This emerging knowledge has great relevance. For example, soil carbon is largely immune from the carbon-releasing effects of the catastrophic wildfires which are increasingly prevalent.

Thank you for considering these comments.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is shown on a light gray rectangular background.

Dan Silver
Executive Director