



June 24, 2022

Liane Randolph  
Chair  
California Air Resources Board (CARB)  
Per electronic submission

**Re: Comments regarding CARB's May 10<sup>th</sup> Draft 2022 Climate Change Scoping Plan**

Dear Chair Randolph,

The California Forest Carbon Coalition (CFCC) appreciates the opportunity to comment on CARB's Draft 2022 Climate Change Scoping Plan (Scoping Plan) published May 10<sup>th</sup>. The CFCC represents a diverse array of California forest landowners including Native American tribes, conservation groups and industrial timberland managers working to educate policy-makers on California forest's unique space in climate policy and to advocate for progressive forest carbon issues. Together, the coalition's members have committed thousands of working hours developing and managing projects representing over 20 million tons of carbon dioxide reduced across more than 1 million acres in California since 2012.

The CFCC appreciates the hard work CARB put into the Draft Scoping plan. In particular, CARB's new Natural and Working Lands (NWL) greenhouse gas (GHG) inventory and mitigation scenarios will help the state develop a more comprehensive view of the NWL sector, which is a historically complicated sector to model.

The CFCC agrees with CARB's general NWL's GHG mitigation goal "*... to restore carbon in places where it has been lost and reduce carbon losses and other GHG emissions from our natural and working lands.*"<sup>1</sup> It is important here to remember that climate science demands substantial carbon sequestration from forests and other natural and working ecosystems. Keeping temperature increases below the 1.5°C goal called for by the International Panel on Climate Change (IPCC) will require forest restoration and improved forest management on natural and working landscapes at an unprecedented scale. We also know that forests help purify and secure our water supply, provide critical habitat for fish and wildlife, provide recreational opportunities and sustain well-paid jobs.

However, attaining the Proposed Scenario targets in the Scoping Plan will take significant funding and creativity for implementing the main mitigation measure of treating 2.5 million acres of forestland a year by 2045. It will also take closer collaboration with the state's land management agencies than occurs today to manage for carbon mitigation, fire management, biodiversity

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<sup>1</sup> CARB Draft 2022 Scoping Plan, Pg. 200

protection and other state priorities. Future success will require utilizing creative financing tools, like the cap and trade program, to help achieve these goals. It will also require a significant effort to increase workforce development, infrastructure expansion, and permit efficiencies.

Below are three CFCC comments on the Scoping Plan.

**1. CARB's Proposed Scenario correctly identifies the massive need for more forest management now**

CARB's NWL mitigation scenarios predict significant wildfire GHG emissions over the next twenty years and recommends increasing land management from today's 283,000 acres today to 2.3 million acres by 2025.<sup>2</sup> State and Federal land managers have already committed to a 1 million acre forest management target by 2045. CARB's spotlight on forest management as a key GHG mitigation and pollution reduction need is a welcome endorsement to hopefully prioritize the funding, staffing and regulatory attention this efforts requires.

Improved forest management is directly linked to CARB's forest offset program where project developers enhance forest stocks for carbon and reduce the risk of wildfire on their lands. These projects are small in comparison to California's vast landscape and include state, federal, local, Tribal and private ownership where fire does not distinguish amongst ownership boundaries. A state-wide forest management effort is the only way to ensure all landscapes, including those linked with the cap and trade program, minimize future fire risks.

The Scoping Plan also recognizes the complexity for California to actually realize the NWL Proposed Scenario:

*"To address these interconnected risks of extreme fire and invasive expansion due to climate stress requires more ecological and holistic approaches to carbon, water, plant and animal species management at the landscape level, and so California's approach to climate action in the natural and working lands sector is not solely focused on maximizing carbon stocks but instead on supporting carbon management that fosters ecosystem health, resilience, provision of overall climate function and other co-benefits.*

*Natural systems operate on a longer timescale than the energy and industrial sectors, and benefits from climate action on our lands can take decades to accrue, so California recognizes that climate action may lead to less total carbon on the landscape than we currently have in order to ensure ecosystem benefits in the long run. Scaling climate smart land management in California requires taking action now and playing the "long game" by establishing and maintaining consistent, patient approaches and programs. Plants, soils, and trees operate on decadal time scales, and to achieve climate benefits over time we must act today."<sup>3</sup>*

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<sup>2</sup> CARB 2022 Draft Scoping Plan: Appendix I – Natural and Working Lands Technical Support Document, Pg. 22, Table 7. <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-i-nwl-modeling.pdf>

<sup>3</sup> CARB Draft 2022 Scoping Plan , Pg. 197

## **2. CARB and the California Board of Forestry's(BOF) NWL GHG inventories have very different GHG estimates. In the future, these should be better aligned.**

Tracking and measuring NWL GHG emissions and sinks is a complicated task that still includes large areas of uncertainty for different types of above and below ground carbon sinks. What is not in doubt is that California's NWL sector stores massive amounts of carbon estimated at approximately 5,340 MMT of carbon across all land types in 2014.

CARB's NWL inventory is based on an extensive literature looking at NWL GHG inventories. CARB's Summary slides<sup>4</sup> and specific GHG inventory tables estimate that from 2000-2018 that NWL's were **a net source** of GHG emissions of roughly 19.5 MMT CO<sub>2</sub>e/year. The 2021 BOF 2021 Carbon Inventory report for 2019<sup>5</sup> states "*Based on the 2019 CA AB 1504 reporting period, California's forests **remain net sinks**, sequestering 25.2 MMT CO<sub>2</sub>e/year.*"

This is a large difference in assessing whether California's forests are a net source or sink of emissions that have major ramifications for future California forest management policy. The Board of Forestry discussed these differences in their June 2022 Board meeting<sup>6</sup> and appears to be having productive discussions with CARB, but the message remains the same – two state agencies have very different carbon estimates for the same plots of land during the same periods.

For the final Scoping Plan, CARB should explain the differences between the two inventories and work to jointly secure more funding to increase the frequency and scale of the U.S. Forest Service's forest inventory efforts for California that lie at the foundation for both NWL inventory studies. This will have the additional benefit of improving data used by forest carbon projects within the cap and trade program.

## **3. The cap and trade program should be extended beyond 2030 to help implement the Scoping Plan's NWL Proposed Scenario**

The Scoping Plan outlines a broad strategy to reach 2045 carbon neutrality targets using NWL without any connection to how its own cap and trade program can fund these efforts. The cap and trade program has already helped the state reach its existing GHG mandates since 2012 from planting trees, extending typical harvest periods, creating conservation easements and other activities that would not have happened without the program.

Now, the CFCC supports, first and foremost, all efforts to reduce all pollution at their source to benefit frontline communities across California. The CFCC also supports CARB's promise to update the cap and trade regulation next year to improve how carbon allowances are utilized and distributed amongst polluters and to update the U.S. Forest Offset protocol (see CFCC's

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<sup>4</sup> CARB Scoping Plan workshop on preliminary modeling results: Pg. 28, workshop slides <https://ww2.arb.ca.gov/sites/default/files/2022-03/SP22-Model-Results-CARB-NWL-ppt.pdf>

<sup>5</sup> AB 1504 California Forest Ecosystem and Harvested Wood Product Carbon Inventory: 2019 Reporting Period DATA UPDATE. The California Board of Forestry, 2021. [https://bof.fire.ca.gov/media/beddx5bp/6-final\\_forest\\_ecosys\\_hwp\\_c\\_2019\\_feb2021\\_all\\_ada.pdf](https://bof.fire.ca.gov/media/beddx5bp/6-final_forest_ecosys_hwp_c_2019_feb2021_all_ada.pdf)

<sup>6</sup> Nadia Tase Presentation to the Board of Forestry, June 4???, 2022, [https://bof.fire.ca.gov/media/cg5pu4ii/full-15-nwl\\_bof\\_forest\\_c\\_inventory\\_comparisons\\_v3.pdf](https://bof.fire.ca.gov/media/cg5pu4ii/full-15-nwl_bof_forest_c_inventory_comparisons_v3.pdf)

recommendations to the Independent Emissions Market Advisory Committee on recommended changes<sup>7</sup>) that has not been updated in seven years.

California's forest carbon offset program is the only program in the world that enlists forest landowners to grow carbon at scale under strict regulatory guidance. CARB's US Forest Projects Protocol is the most rigorous regulatory standard for forest carbon sequestration in the world. The CARB Protocol has achieved real and verifiable carbon sequestration along with considerable enhancements to the conservation and sustainable management of California's iconic forests. The offset projects our groups have developed, among other things, have allowed tribes to reacquire ancestral territory, conserved forested watersheds that provide drinking water and critical salmon habitat, increased fire resiliency in rural communities, and created jobs in economically disadvantaged areas.

In light of the successes achieved through the forest offset protocol, the CFCC encourages CARB to extend the cap and trade program beyond 2030, in partnership with the California Legislature, to further incentivize land-based climate mitigation across California's varied ecosystems, in support of California's commitment to sequester carbon in its natural and working lands.

We appreciate the CARB considering our comments and look forward to the next iterations of the Scoping Plan. Thanks to you and your staff for your work.

Sincerely,



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Director  
California Forest Carbon Coalition

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<sup>7</sup> CFCC, COMMENTS ON THE 2021 ANNUAL REPORT OF IEMAC, January 2022:  
<https://caforestcarbon.com/wp-content/uploads/2022/02/CFCC-Comments-on-IEMAC-2021-report-1.31.22-.pdf>