



PACIFIC FOREST TRUST

Private Forests. Public Treasures.

January 29, 2016

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods

Dear Chairwoman Nichols and staff:

We appreciate the opportunity to provide comments on the January 15th workshop on the economic analysis for the 2030 Target Scoping Plan. Much has been done to quantify the costs of different policy options for many sectors in California's economy. However, forests and other natural lands are not included in the Pathways stock turnover model being used for much of the analysis. To help address this gap, we strongly recommend adding a natural and working lands specialist to the economic reviewers to assist in evaluating economic impacts of policies related to forests and other natural and working lands.

Including forests in the economic analysis for the 2030 Scoping Plan Update will allow for evaluation of policies that could be pursued to increase carbon storage in natural lands, while improving the resilience and stability of those carbon stores and achieving other important co-benefits such as wildlife habitat and water quality and security. For example, what are the economic implications of different types of policy actions that permanently change forest management to increase carbon stocks? Which of these actions are economically viable, while retaining a diversified and stable forest industry? It will be important to evaluate the feasibility of actions ranging from command/control regulation to incentives such as working forest conservation easements. In all cases we urge the evaluation of these actions and their benefits over a significant timeframe, perhaps out to 2050. The economic impacts of these policies could potentially be incorporated into existing work by including the costs and savings associated with forests and other natural lands as one of the "Other Monetized Costs/Savings" that goes into the REMI PI+ model.

We urge ARB to recruit additional expertise in the economic modeling of natural resource policies to ensure that natural and working land policies are evaluated in a meaningful manner. We look forward to working with you further as the 2030 Target Scoping Plan progresses.

Sincerely,

Paul Mason
Vice President of Policy and Incentives