



December 16, 2016

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

RE: Discussion Draft – 2030 Target Scoping Plan Update

Dear Chair Nichols:

The undersigned members of the Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP) are pleased to submit comments on the Discussion Draft – 2030 Target Scoping Plan Update, dated December 2, 2016.

Sierra CAMP is a public-private, cross-sector partnership dedicated to promoting climate action and resilience in the Sierra Nevada region. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor's Office of Planning and Research, and is hosted as a project of the Sierra Business Council.

Sierra CAMP appreciates the emphasis this discussion draft places on the Natural and Working Lands Sector, and especially on the intersection of forest health, water and the innovative utilization of biomass material to create energy and other products (page 60, lines 22-23). Specifically, the push to work regionally and at landscape levels aligns with Sierra CAMP's guiding principles. The suggested approach of managing biomass fuels, goals and product markets on the regional level may also help overcome many of the existing barriers to creating sustainable markets for woody biomass from restoration (page 68, lines 15-20).

Sierra CAMP also offers the following general comments to help strengthen and increase access to this funding opportunity:

Disadvantaged Community Emphasis (pages 26-30, Environmental Justice section): while Sierra CAMP appreciates the focus on aiding disadvantaged populations in adapting to the impacts of climate change, the emphasis on disadvantaged communities should go beyond those solely defined by CalEnviroScreen. CalEnviroScreen 2.0 focuses primarily on urban areas through an emphasis on pollutants and other criteria that are not measured or do not occur in rural communities. This tool precludes virtually all disadvantaged populations in the Sierra Nevada, preventing eligibility to funding sources because they do not live in CalEnviroScreen-defined disadvantaged communities.

Actions Relying on Metropolitan Planning Organizations (MPOs) and Sustainable Community Strategies (SCSs) (page 10, lines 20-21): Many of the actions suggested in the discussion draft rely on transportation and land use decisions made locally to support livable densities, and connective, active transportation options. These priorities can benefit rural and urban areas equally. MPOs carry out a majority of this type of planning for many areas across of the state. Unfortunately, many rural areas in California do not fall into the jurisdiction of an MPO; consequently, rural areas outside of an MPO have less access to planning or funding options to help realize several of the actions suggested by this discussion draft.

phone: 530.214.0575
fax: 530.582.1230

Sierra Climate Adaptation and Mitigation Partnership
Sierra Business Council
mailing address: P.O. Box 2428 Truckee, CA 96160

website: www.sbsierracamp.org
email: dmadson@sierrabusiness.org

Sierra CAMP Comment on Discussion Draft – 2030 Target Scoping Plan Update

Relying on the Forest Carbon Plan for Action (page 67, line 5): many of the issues raised in the discussion draft fairly summarize the right direction toward integrating forest health with potential carbon sequestration benefits in California's forests. However, the plan set forth in this draft for quantifying potential carbon sequestration, and for measuring other greenhouse gas emissions from forests, seems to rely on forthcoming information in the Forest Carbon Plan and other appendices. In order to preserve the carbon sink that is California's forests and natural working lands, it is critical that the Forest Carbon Plan is released in conjunction with the Scoping Plan and that it provides robust guidance on forest carbon quantification methods and investment priorities.

All the best,



- Karen Ferrell-Ingram, Land Conservation Specialist
- Rosemie Smallcombe, Mariposa County Supervisor
- Scott Warner, Hydrogeologist