

April 4, 2022

Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph,

We appreciate the effort you and the California Air Resources Board (CARB) have committed to modeling natural and working lands for purposes of capturing carbon, improving resiliency, and other purposes captured in the four scenarios. We believe there is a genuine desire from CARB to be more inclusive of these valuable resources, and strongly support such goals. Unfortunately, the modeling shared with stakeholders and the Board falls short of reflecting such goals. Specifically, our brief comments are directed at the Developed Lands and Forest modeling.

### **Developed Lands**

Last year, CARB provided five draft scenarios under “Settlements” that included one of two recommendations to plant some trees or plant lots of trees. We submitted written comments on January 5 that offered numerous suggestions on how these scenarios could be modified to be more transformational and inclusive of such critical issues as environmental justice and long-term protection of the urban forest. Those comments are included here as an appendix.

The new and presumably final model does include the need to maintain the urban forest. It does so by providing four scenarios under the revised heading of “Developed Lands” that now focuses less on increased canopy and more on increased investment. In fact, the modeling speaks only to increased investments in urban forestry, coupled with decreased water usage to sustain them.

### **This raises several questions that even top minds in this field with whom we’ve consulted do not have answers, including:**

1. What is the expected canopy increase based on this sliding scale of investment of 2% - 2000%?
2. What portion of these investments will be used to maintain the existing urban forest (which is currently zero at the state level)?
3. How do you achieve reduced water usage beyond 100%? One of our most trusted colleagues concluded that a 1000% reduction would essentially eliminate irrigation for any outdoor use and result in widespread mortality of urban trees - the State has invested over \$30 million in these same trees in the last year alone.
4. Is the investment increase based on business as usual (BAU) as applied to other sectors, or is it built on truly current funding. If it is the former, then the State has already blown by the numbers represented in all scenarios but number one (based on the FY 21 Budget of \$30 million to CAL FIRE’s Urban and Community Forestry Program in comparison to the BAU figure of approximately \$15 million). If the latter, then scenario number one would translate into an annual investment of about \$900 million to this Program alone. This assumes CAL FIRE remains the state authority for urban forestry.

These questions, coupled with additional concerns that lumping urban forests with other developed lands (i.e. wildland urban interface or WUI) appears counterintuitive -- given it would be far more

common to manage to reduce tree canopy in the WUI since a majority of them are overstocked. And, citing urban forests as “Other Effective Area-Based Conservation Measures” in the Policy Pathways document reinforces concerns previously stated that there is a significant marginalization of this critical resource within this framework.

### **Forests, Shrublands, and Grasslands**

We are glad to see that landscapes have been differentiated to align with those classifications outlined in the Climate Smart Land Strategy; however, more specificity is needed in how many acres of each landscape type are being analyzed. Specifically, we feel that the following concerns should be addressed:

- It is unclear how the targets of each scenario were determined (varying between 1M-5.5M acres) and what the specific carbon goals are for each landscape classification.
- It would be helpful to first analyze the carbon stock potential of each landscape type, and provide a breakdown of how each scenario’s goals are expected to be met through management.

Additionally, Scenario 3 briefly mentions restoration and climate resilient carbon stocks, but, other than changes in acreage, there is no difference in the description between this Scenario and Scenario 4. It is important to understand how “restoration” is defined, and whether or not these acreage goals would be feasible under that definition.

Finally, research indicates that prescribed fire of chaparral environments increases the risk of type conversion to grassland, which provides less carbon sequestration than chaparral. If prescribed fires in chaparral environments are to be included, a scientifically-defensible justification of how these prescribed fires will assist in CARB’s goals for Natural and Working Lands.

These scenarios will help guide California natural resources planning efforts and infrastructure investments needed to meet the ambitious greenhouse gas (GHG) reduction targets set forth in Executive Order B-30-15 and SB 32. And, as the Administration noted more than four years ago, the 2030 GHG reduction targets established under the Executive Order (and codified in SB 32) are “the most aggressive benchmark enacted by any government in North America to reduce dangerous carbon emissions over the next decade and a half.” The 2022 Scoping Plan will be the pivotal piece of that roadmap to success for maximizing the GHG reduction values of our rural and urban forests. We are hopeful this forthcoming document will probe deeper into these values and set a stronger stage for supporting these resources.

Thank you for the opportunity to provide written comments.

Sincerely,



Manny Gonez  
Director of Policy Initiatives  
TreePeople