January 4, 2022

Chair Liane M. Randolph
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: CHCPC Comment on the December 2, 2021 ARB Scoping Plan Natural and Working Lands Workshop

Dear Chair Randolph:

On behalf of the California Habitat Conservation Planning Coalition (CHCPC), thank you for your continued effort to engage stakeholders and the public across the state to advance climate action with nature-based solutions. Habitat Conservation Plans (HCP) and Natural Community Conservation Plans (NCCP) were created with the state's support and participation for the conservation and protection of land, species, and habitat, which allow for growing regions across the state to thrive sustainably. These Plans are ready, willing, and have the long-term infrastructure to acquire, restore, and uplift land that can deliver on the state's goal to achieve carbon neutrality and build climate resilience while promoting biodiversity and access to open space. Through land acquisition, fully implemented Plans will permanently manage and protect well over 2 million acres of carbon sequestering habitat.

CHCPC applauds the State's commitment to developing a comprehensive strategy to inventory and implement nature-based solutions to the impacts of climate change. However, we remain concerned regarding the dangerous oversimplification of landscape types and proposed treatments that remain in the Scoping Plan discussions.

The following comments highlight opportunities for the California Air Resources Board to focus its approach to a climate-resilient future.

Thank you for your time and consideration. Please do not hesitate to contact me, should you require additional information. CHCPC looks forward to the continued partnership.

Sincerely,

John Hopkins
Director
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Below: CHCPC Comments

CHCPC Comments on CARB's December 2nd Workshop for the 2022 Scoping Plan Update
Natural and Working Lands Component

A] Modeling section

There is a single modeling category for forests, shrublands and grasslands. [We assume that forests includes woodlands and riparian areas as well as conifer forests.] Slides 10 and 11 detail a single modeling approach. Inputs include the treatments "Clearcut, Harvest, Thinning, Mastication, Mechanical, Bio/Chem/Herb, Prescribed Fire". This may be convenient for modelers. However, the ecology, management needs, fire issues and more for these landscapes are very different to forests and to each other. Woodlands, shrublands, grasslands and riparian areas must all be individual categories, separate from forests and from each other.

We note the California Natural Resources Agency's (CNRA)'s 2019 Natural and Working Lands Implementation Plan excluded chaparral and shrubland management and restoration from modeling "due to an insufficient understanding of their effects on carbon dynamics." Does CARB believe that CNRA's determination has changed since 2019? CARB must be deliberate in its modeling approach if the treatments ultimately included in the Scoping Plan are to be successful.

B] The scenarios section

The five scenario alternatives separate out grasslands from forests. But they continue to lump chaparral / shrubland, and woodlands [also we assume riparian areas] with forests.

Management of shrublands, including chaparral and coastal scrub, woodlands and riparian areas must each be addressed separately. They must be based on the ecology, fire issues, and overall management needs that ensure the conservation of the different vegetation types and their health and resilience.

Note that the State has a three-component vision for Natural and ~~and~~ Working Lands. The final scenario should follow this vision:

> A] Protect land from conversion to more intensified uses by increasing conservation incentives and pursuing local planning processes that maximize development where it already exists;
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> B] Enhance the resilience of and potential for carbon storage and sequestration on lands through management and restoration, including expansion and management of green space in urban areas, and reduction of GHG and black carbon emissions from wildfire and management activities; and
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> C] Innovate biomass utilization such that harvested wood and excess agricultural and forest biomass can be used to advance statewide objectives for renewable energy and fuels, wood product manufacturing, agricultural markets, and soil health, increasing the resilience of rural communities and economies and avoiding GHG emissions relative to traditional utilization pathways through these activities.