Edie Chang, Deputy Executive Officer

California Air Resources Board

1001 I Street

Sacramento, CA 95814

April 28th 2014

**RE: Comments on the Air Resources Board (ARB) Draft Update to the Climate Change Scoping Plan**

Dear Ms. Chang:

The Pacific Forest Trust (PFT) appreciates the opportunity to comment on the draft update to the Scoping Plan for implementation of the Global Warming Solutions Act.

PFT welcomes this version of the draft update to the Scoping Plan. We appreciate that the ARB has had a tremendous amount of input since last fall, and has made many significant improvements to the initial draft, especially relative to emissions reductions from forests and other natural systems.

Four specific recommended actions will markedly leverage this draft from a very good base to one that truly seizes existing opportunities and substantially advances biological carbon (biocarbon) reductions through California’s natural systems. Doing this will ensure that California does for carbon reductions through forests and other biological systems what it has done for fossil fuel based emissions reductions, setting the global standard for high quality, enduring and scalar emissions reductions.

There are two main sources of CO2 emissions: fossil fuels and forest loss and degradation. The latter accounts for an estimated 40% of all excess CO2 in the atmosphere. California contributed its share—and more, perhaps—with the loss of billions of tons of CO2 from the harvest of these most carbon rich forests in the world, and the subsequent loss of some 40% of its forests overall.

While the state has made enormous strides in CO2 reductions in the fossil fuels sector, promoting efficiencies and alternate sources of energy and fuels, it has barely scratched the surface with biocarbon. And yet the state has some of the most powerful biological emissions reductions tools, from forests to farmlands, grasslands and wetlands of any worldwide.

The fossil fuel sector mandates and investments are paying off. However, the marginal cost of decarbonizing our economy goes up as the “low hanging fruit” in the fossil fuel sector are picked off. Squeezing the last 33% of CO2 emissions reductions in the transportation and energy sectors is projected to require substantially more innovation and investment, as well as costing substantially more than the first 67%.

The opposite is projected for actions in the biocarbon sector, especially in forests and in greening our states infrastructure: emissions reductions increase over time from initial investments. These biocarbon investments also have multiple other benefits: in adaptation, in securing --and indeed increasing --water supplies, and in improving the overall quality of life in the state.

PFT makes the following four recommendations for revisions to the draft Scoping Plan update in order to leverage the suite of biocarbon related actions of the existing draft:

1) *Work with biocarbon systems, not in silos*

The Scoping Plan should call for one integrated Biocarbon Plan for the state, with specific sections for different types of land uses—forest, agricultural and urban lands, for example—and for the intersections between them. While the proposed update to the Scoping Plan notes that there *should* be actions in a variety of natural and working lands, from forests to agricultural and range lands to urban areas, it treats them all separately, and neglects their synergies and intersections.

These are linked systems, intertwined across the landscape. Wet meadows are within forests; most of our agricultural lands are woven in and out of forest; riparian forests link city centers to wild lands. Treating these in an integrated fashion will have myriad synergies: in adaptation, urban energy consumption reduction; and increase net resilience.

The Scoping Plan should be revised to include framing or “capstone” language preceding the agriculture, natural and working lands and transportation chapters that recognizes the importance of biocarbon in all of these chapters. Integrating the planning for biocarbon in the context of “green streets” and other urban infrastructure along with forested headwaters and agricultural lands will strengthen the Scoping Plan and ensure that it coherently addresses this important feature of California’s GHG reduction planning.

2) *Integrate with other state plans that are related to climate change*

The Scoping Plan should call for explicit integration of actions from other state plans that relate to climate change, including the Water Plan, Water Action Plan, State Wildlife Adaptation Plan, Safeguarding California and Scoping Plan. These updated plans all recognize the value and imperative of linkage in their verbiage, but are thin in specifics. A cross-sector Biocarbon Plan would facilitate better integration and prioritization of such activities.

3) *Establish a “blue ribbon” Panel* *to* *leverage state-based expertise with independent experts in an oversight entity for the Biocarbon Plan*

The revised draft Scoping Plan calls for inter-agency participation in various planning efforts, but neglects the world-class academic and innovator community in the state. These groups are essential for developing solutions outside the boxes and silos our agencies work in. The Scoping Plan should require that the Biocarbon Plan specifically include outside expertise from academia and innovators on an interdisciplinary blue ribbon Panel.

4) *Set Timely Investment Targets and Goals*

The revised Scoping Plan defers goal setting for the forest sector to 2016. However, we know that investments in the forest sector in particular will bear the most fruit from early investments.

Biocarbon in general is a high quality investment opportunity that yields more GHG benefits over time, even as reducing emissions in other sectors becomes harder and more expensive. Forest-based reductions are already known to be highly accountable and verifiable. The marginal cost of using forests to remove a ton of carbon from the atmosphere is less than reducing a ton of carbon emissions in many other sectors covered by the Scoping Plan. These relative marginal savings will become more pronounced as the state moves toward policies that aim to meet the 2050 goal of reducing GHG emissions to 20% of 1990 levels.

Moreover, multiple benefits from such investments increase as biocarbon sequestration is scaled up. A clear example of this is strategic forest watershed conservation and restoration. The co-benefits of resiliency, water security, and small-scale forest renewable energy all help make both local communities and state water supplies more secure as the overall watershed is managed for increased, resilient GHG sequestration.

We urge the Scoping Plan include near-term goals for forest sequestration by 2020 in addition to the “direction setting” medium-term and long-term goals. For example, the updated Scoping Plan could request that the blue ribbon Biocarbon Panel establish a strategy and targets for increasing resilient, enduring carbon in the state’s most critical forested watersheds with specific goals for 2020, 2030 and 2040.

Thank you for this opportunity to provide comment on the latest draft update to the Scoping Plan.

Sincerely,

Laurie Wayburn

President