SIERRA
BUSINESS COUNCIL

November 21, 2016

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

**RE: 2030 Target Scoping Plan Update – Scenarios, Natural and Working Lands, Public Health**
[submitted via electronic Workshop Comments Log at: sp2030scenarios-ws]

Dear Chair Nichols:

Sierra Business Council (SBC) thanks you for the opportunity to comment on the AB 32 2030 Scoping Plan Update policy scenarios and Natural & Working Lands and Public Health Analyses. SBC is a non-profit network of more than 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada.

As a means of achieving both regional and direct local greenhouse gas (GHG) reduction benefits, we support the Reference or Draft Scoping Plan Policy Scenario that incorporates existing commitments, a new refinery measure and a post-2020 Cap-and-Trade Program. We believe this mix of components provides maximum flexibility, guarantees emission reductions over time given the shrinking cap, and allows California to play a leadership role in sub-national/international climate change collaborations that a carbon tax does not allow.

We also appreciate the 2030 Update's emphasis on natural and working lands (NWL) projects for achieving 2030 targets. We strongly believe that all sectors – including natural and working lands – must be engaged if we are to achieve the Scoping Plan's objectives. This is especially true now, given California's heightened leadership role as a result of anticipated changes to national climate policy and implementation under the incoming federal administration.

SBC has been advocating for some time and is glad to see that the 2030 Target Scoping Plan Update directs the state to 1.) include NWL in GHG emission and carbon storage baselines, 2.) acknowledge full lifecycle and supply chain costs when comparing different alternatives, and 3.) analyze additional project benefits (eg. public health, reliable clean water supply, local economic stability, etc.) when making decisions about where to invest in climate action. We also support the proposal to evaluate the NWL sector using IPCC guidelines. As mentioned in a 2030 Scoping Plan Concept Paper comment letter dated July 8,2016, from the Sierra Climate Adaptation & Mitigation Partnership (Sierra CAMP), the IPCC's Fourth Assessment Forest Sector chapter (https://www.ipcc.ch/publications_and_data/ar4/wg3/en/ch9.html) says: *Forestry can make a*

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*very significant contribution to a low-cost global mitigation portfolio that provides synergies with adaptation and sustainable development.*[1]



As the IPCC Forest Sector report further states: *[w]hile the assessment in this chapter identifies remaining uncertainties about the magnitude of mitigation benefits and costs, the technologies and knowledge required to implement mitigation activities exist today*.[2]

We also support the update's emphasis on local and regional climate action, including local climate action planning and other means of engaging local government at all levels. As we've stated in previous comments, it will indeed take an "all hands on deck," regionally-specific approach to meet the extended and more stringent GHG reduction goals for 2030 and 2050; and to do so will require involving and showing benefit to all Californians, including those in rural and hard-to-reach regions that don't have the resources to pursue GHG reduction actions without enhanced incentives and services. It's not enough to "encourage" local policies to meet statewide goals (which can be easily disregarded as yet another unfunded mandate); the state must show value for local action, as provided through more equitable access to funding and benefits resulting from GHG reduction projects.

To help identify disadvantaged communities across more regions, we again recommend augmenting the urban-focused CalEnviroscreen tool by employing a separate regional approach or approaches for directing resources to rural and hard-to-reach areas. A directed rural or regional fund, similar to the Rural Innovation Project Area (RIPA) program under the Affordable Housing Sustainable Communities program, would serve as a "floor" to ensure a minimum amount of rural/regional investment, with the possibility of additional investment through the competitive process for non-directed funds. Any project under such a directed fund would still have to achieve GHG emission reduction benefits – but having a companion program would help ensure more equitable distribution of funds, GHG reduction benefits, and co-benefits to disadvantaged people across the entire state.

We offer the following additional suggestions that we believe would make the scoping plan most effective in meeting multiple statewide goals out to 2030 and beyond:

1. Include, measure and address wildfire emissions, <u>including black carbon</u> (since wildfires are the single-largest source of black carbon emissions) – in terms of both business-as-usual emission levels and air quality and carbon storage benefits to be gained by reducing wildfire risk through healthy forest management activities; more than 90% of wildfires are human-caused, and the interventions to reduce the risk of large, damaging wildfire are human actions whose benefits can be modeled; therefore, as one of the "known commitments" upon which all policy scenarios are built, the Forest Carbon Action Plan must include black carbon as an anthropogenic source.

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[1] Nabuurs, G.J., O. Masera, K. Andrasko, P. Benitez-Ponce, R. Boer, M. Dutschke, E. Elsiddig, J. Ford-Robertson, P. Frumhoff, T. Karjalainen, O. Krankina, W.A. Kurz, M. Matsumoto, W. Oyhantcabal, N.H. Ravindranath, M.J. Sanz Sanchez, X. Zhang, 2007: Forestry. In Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)], Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. p. 543

[2] Ibid.

2. In addition to aligning with IPCC protocols, the Governors' Climate & Forests (GCF) Task Force (www.gcftaskforce.org/about), of which California is a founding member, conducted a study of different forest-related protocols (http://www.gcftaskforce.org/documents/GCTF-1000-2009-031_GCF_Protocol_Assessment.pdf). Appendix A of that study includes an extensive set of project criteria and standards that could be applied to forest projects in this sector.

3. The GCF report also calls for initiating a pilot project program to choose and review representative pilot projects in GCF states to provide feedback for revisions to the criteria and standards – an approach we believe has great merit for California, as it would allow us to launch projects now to help address dangerous and declining forest health conditions and get work done on the ground that may take longer to achieve GHG benefits, while simultaneously monitoring, groundtruthing and improving modeling and evaluation assumptions as we go.

4. We request that non-federal forest management/restoration goals be placed in context with federal goals. As an example, the USDA Forest Service has identified a goal of treating 500,000 acres of public land a year, presumably in addition to the 60,000 – 175,000 acres/year of non-USFS lands listed in the Scoping Plan low/high scenarios. It would help the reader to better understand the scope of the problem and proposed solution if federal lands were also discussed. To that end, the federal land goals should include a complementary low/high range so that the total area proposed for activity can be understood together, across both scenarios.

5. We ask the same for mountain meadow figures. In addition, we request an increase in the Scoping Plan low/high scenario goals for mountain meadow restoration. The low scenario goal of an additional 10,000 acres over the next 14 years (by the year 2030) is too low, given that the California Water Action Plan already sets a goal of restoring 10,000 acres within five years (2014-2018). To provide context, the National Fish & Wildlife Foundation's *Sierra Nevada Meadow Restoration Business Plan* (2010)[3] states there are approximately 330,000 acres of meadow in the Sierra alone. Of that amount, between 60-70%, or roughly 200,000 acres, is degraded, with approximately half of that on non-Forest Service land. To gain the maximum GHG and carbon benefit, we should increase the low and high scenario goals to better meet the need and opportunity.

We appreciate the Air Board's leadership on this issue, and we hope our comments help as you deliberate on how best to reach 2030 climate goals that benefit all citizens of California.

All best,

Kerri Timmer
Government Affairs Director

[3] http://www.nfwf.org/sierranevada/documents/sierra_meadow_restoration_business_plan.pdf, p. 11.