700 Seacoast Drive, #108
Imperial Beach, CA 91932

June 7, 2018

CA Air Resources Board, CA Natural Resources Agency, et al.
c/o California Air Resources Board
1001 I Street
Sacramento, CA 95814

Sent via email to: https://arb.ca.gov/cc/natandworkinglands/natandworkinglands.htm

RE: Comments on California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper (May 2018)

Dear ARB, et al.:

The Southwest Wetlands Interpretive Association (SWIA) is an environmental organization established over 40 years ago whose mission is to conserve wetlands and other sensitive natural habitats, primarily in San Diego County and southern California. SWIA is encouraged to see the paper's acknowledgement of and expectation that wetlands will be a tool for addressing climate change. While the focus for wetlands is their potential to sequester carbon (reduce GHGs), they are also important for protecting and adapting coastal areas as sea level rises. Wetlands are only a part of the larger capacity for carbon sequestration by natural and working lands (NWL) and we also fully support the upland-based approaches, particularly where they augment wetlands.

SWIA concurs with the referenced concept paper's approach and initial implementation focus to achieve conformance with the currently expected reduction of 15-20 MMMTCO2e as specified in the 2017 Scoping Plan Update: The strategy for achieving California's 2030 greenhouse gas target.

The paper acknowledges that substantial carbon sequestration already occur from past preservation and management of natural and working lands (the "baseline") and that recent efforts to increase carbon sequestration (business-as-usual) have increased sequestration. It is extremely important that the NWL Implementation Plan fully accounts for past and ongoing efforts, tracks all changes (positive and negative relative to sequestration) from the baseline and BAU, and accurately models and confirms the effects from implementing all new measures. Also, it must be clear which entities (state, local, private, federal) are responsible for (and/or expected to be) implementing, tracking and reporting on each implementation measure. The final Implementation Plan must identify the expected sequestration

gains from each measure (for various level of anticipated implementation), their relative costs and benefits (summarized as MMTCO2e/$ or other relevant measures), and the metrics that will be used to monitor/report actual achievements.

Our specific comments follow.

Page 4, Paragraph 3. Please provide a clearer explanation of the time period – and acreage involved – during which the forest-based activities sequestered 19,640,603 MMTCO2e (as of 2018); how much has been spent to achieve these reductions; and, are these forests/measures still expected to sequester greater amounts of carbon in the "ambitious" scenario?

Page 4, Box 1. The various identified programs that are calculated to produce a total of 4.27 MMTCO2e over their lifetime at an initial (or total program/projects(?)) cost of $600 million. Is this an indication of the relative GHG reduction benefit-to-cost for NWL programs and projects?

Page 6. Table 1 identifies the primary categories (land or ecosystem type) and measures (conservation, restoration and management activities) that comprise the NWL approach. The table, which presumably will be expanded and detailed in the final Implementation Plan, appears to address the major land categories and activities that should be the focus of the NWL approach.

In the San Diego Region, and in several other southern California regions, local governments – in conjunction with state and federal agencies - have made significant investments in land conservation and management with the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) programs. Those programs were not established or intended as carbon sequestration programs, though their protected lands certainly sequester carbon. How does the Implementation Plan intend to address NCCP/HCP lands – both previously protected and to be protected in the future? For instance, as more funding becomes available for carbon sequestration, it seems that the NCCP/HCP lands could be appropriate for receiving some of those funds – if there are realistic gains in carbon sequestration that could be achieved by additional actions as an augmentation to the essential biological conservation goals of the NCCP/HCP.

Similarly, SWIA has been involved in coastal wetlands restoration projects whose primary objectives are the creation of additional wetland habitat, not carbon sequestration. To the extent practicable, SWIA and other entities that are involved in coastal wetland habitat restoration would be very interested in seeing some additional funding made available to increase the carbon sequestration capacity of those projects. For example, we are working with the Port of San Diego on its Master Plan Update, Sea Level Rise (SLR) Vulnerability Assessment, and Climate Action Plan and have recommended that as part of its planning it should – in certain tidelands - accommodate SLR and allow for the creation of wetlands and shallow submerged lands. Access to carbon sequestration funds would be an important part of the impetus to pursue that approach.

Here is a recent article that highlights the importance of coastal wetlands to carbon capture/GHG reductions: http://www.carolinacoastonline.com/tideland_news/news/article_2f39e654-025d-11e2-a56c-001a4bcf887a.html

We also are working with other groups to help local governments increase their urban tree canopies (UTC). We support the inclusion of urban forests as potential carbon sequestration sites, particularly because they also provide a host of co-benefits for people.

Pages 6-7. We concur with the NWL approach to use/improve on existing modeling tools for the purposes of establishing the land use emissions inventory and identifying the value/potential for each identified carbon sequestration measure. The three-scenario sequestration approach seems reasonable, particularly if the "ambitious" scenario includes an assessment of likelihood of implementation or a general assessment of anticipated timelines for their implementation.

An issue that must be fully addressed in the final NWL Implementation Plan is how the NWL approach will deal with the possibility that some measures will not actually produce the calculated/anticipate GHG reductions, even when the measures are implemented using best available science/practices. Also, how will the program effectively track implementation to ensure that once the projects are initiated and the GHG reductions accounted, the specific projects continue to meet their ongoing commitments? An existing and accepted program, implemented through the Forest Stewardship Council (https://us.fsc.org/en-us), has developed a reasonably rigorous process specifically for forests, but its basic elements could apply to other land use/cover types.

Pages 8-11. The next steps that are outlined appear to be appropriate, and we assume that the state is capable of completing them in time to meet its proscribed deadline (November 2018).

Appendix. The list of primary activities (e.g., Ecological Restoration, Land Protection, Restoration of Coastal areas) and implementation measures encompass the spectrum of areas/ecosystems and methods that could be used to achieve the goals of the Implementation Plan. The listing of "Implementing Agencies" is not the full set of state, regional and local entities and organizations that would likely be implementing the NWL plan; we recommend that the legend be changed to state this is only an example of the entities that could be involved.

Thank you for the opportunity to comment on the concept paper. Please contact Bill Tippets (billtippets@gmail.com) to discuss our comments and recommendations.

Sincerely,

Michael A. McCoy, President

Bill Tippets, Board Member

Cc: SWIA Board