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January 5, 2022

Chair Liane Randolph
California Air Resources Board
Sacramento, CA 95812

Re: 2022 Scoping Plan Update - Natural and Working Lands Scenarios Technical Workshop

Dear Chair Randolph,

The Nature Conservancy (TNC) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) in response to the recent Natural and Working Lands Scenarios Technical Workshop (Workshop).

Across the state, more than 28 million acres of California's lands are available to help the state reduce its greenhouse gas emissions and increase carbon stocks to minimize the negative impacts of climate change.¹ Time is of the essence for these natural and working lands (NWL): recent studies suggest that without intervention, our lands are likely to become a net source of emissions, rather than a net sink due to climate impacts and how we use and manage our lands.² Putting our NWL on a trajectory of being a resilient and healthy net sink of carbon will require careful consideration of land management practices, restoration, and land use, in addition to reducing emissions from wildfire.

The high-level and brief overview of scenarios presented in the Workshop was insightful, and with more detail, we can provide additional constructive input. We are glad to see CARB begin to consider detailed scenarios and management activities for the NWL sector. These scenarios should be informed by robust science that is clearly elucidated, including details on the modeling and land management assumptions that are used to create them. These details should include:

- How scientific analyses and studies, such as those on the reduction potential associated with different management actions, are being used to inform and compare scenarios.
- Quantifiable metrics and definitions to help compare different scenarios (e.g., whether land use change rates across land use types are sampled from the same set of historical data or different data).
- How the business-as-usual (BAU) projections will be developed and used to inform alternative scenarios (i.e., how and to what degree is BAU being used to assess

¹ Chamberlin, S. J., Passero, M., Conrad-Saydah, S., Biswas, T., and Stanley, C. K. *Nature-based Climate Solutions: A Roadmap to Accelerate Action in California*. 2020. https://www.nature.org/content/dam/tnc/nature/en/documents/TNC_Pathways12-4.pdf

² Sleeter, B. M., Marvin, D. C., Cameron, D. R., Selmants, P. C., Westerling, A. L., Kreidler, J., Daniel, C. J., Liu, J., and Wilson, T. S. *Effects of 21st-century climate, land use, and disturbances on ecosystem carbon balance in California*. *Glob. Change Biol.* **25** (10), 2019: 3334-3353. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6851753/>

opportunities for decreasing emissions and/or increasing carbon stocks, will be BAU be an extrapolation of the 2000 – 2014 trend, etc.?).

- Definitions that make explicitly clear what management actions are being described (e.g., “afforestation” vs. “reforestation”, “frequency of harvest”, etc.).

We are eager to engage further with CARB to gain additional clarity and help inform this critical work to ensure the state achieves the deep climate opportunities afforded by its NWL. We will reach out for additional follow-up.

Sincerely,

A handwritten signature in black ink, appearing to read "Sydney Chamberlin". The signature is fluid and cursive, with the first name "Sydney" written in a larger, more prominent script than the last name "Chamberlin".

Sydney Chamberlin
Project Manager, Climate and Nature-Based Solutions
The Nature Conservancy in California