



November 5, 2020

Mr. Gavin McCabe
Chair, Compliance Offsets Protocol Task Force
1001 I Street
Sacramento, CA 95814

RE: COMPLIANCE OFFSETS PROTOCOL TASK FORCE INITIAL DRAFT RECOMMENDATIONS - COMMENTS

Dear Mr. McCabe,

On behalf of the California Native Plant Society, I would like to thank you for your work in developing the Compliance Offsets Protocol Task Force (Task Force) Initial Draft Recommendations (Draft Recommendations) released on October 7, 2020, and the opportunity to provide comments.

The California Native Plant Society (CNPS) is a non-profit environmental organization representing more than 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. Since 1965, CNPS has worked closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices and has been working to represent the public's interest in protecting California's beautiful native plants and their habitats.

Given the work that we do, we were pleased with the passage of AB 293 (E. Garcia) and excited to see the Task Force more proactively develop offset protocols for managing and conserving the state's natural and working lands. We believe that this is core to a successful and comprehensive climate strategy, and dovetails well with Executive Order N-82-20, which was recently issued by the Governor to ensure protection the state's natural and working lands and rich biodiversity.

That being said, as you continue to refine the Draft Recommendations, we encourage you to refer to Executive Order N-82-20 as a framework and consider the interplay between the proposed protocols and the overall health of the state's biodiversity. As it relates to the recommendation surrounding grasslands and the application of compost on page 113 specifically, we suggest clarifying that that compost should only be applied on grasslands where this treatment has been determined to be appropriate. Application of compost in many grasslands may be inappropriate in that its beneficial effects may be exceeded by its negative effects on native plants, habitats, and animals. Furthermore, we support an effort to analyze, categorize and map the state's grasslands to identify where the application of compost is appropriate and beneficial.

As an organization committed to protecting the state's natural resources and each unique habitat and species that contributes to our rich biodiversity, we know that tailoring conservation strategies is essential. We encourage the Task Force to consider this and promoting biodiversity benefits when feasible as the Draft Recommendations are revised.

Thank you again for the opportunity to provide comments and please let me know if we can be of any assistance in your work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Jensen', with a long horizontal flourish extending to the right.

Nick Jensen
Lead Conservation Scientist
California Native Plant Society