

Sent on behalf of Aaron Hake, Interim Regional Conservation Deputy Executive Director for the Western Riverside County Regional Conservation Authority:

On behalf of the Western Riverside County Regional Conservation Authority (RCA), thank you for your effort to engage stakeholders and the public across the state to advance climate action with nature-based solutions. Habitat Conservation Plans (HCP) and Natural Community Conservation Plans (NCCP) currently exist for the preservation, conservation, and protection of land, species, and habitat which allow for growing regions like Riverside County to sustainably thrive. These Plans are ready, willing, and have the long-term infrastructure to acquire, restore, and uplift land that can deliver on the state's goal to achieve carbon neutrality and build climate resilience. To that end, the Multiple Species Habitat Conservation Plan (MSHCP) in western Riverside County, one of the largest HCPs in the nation, has 82% of the planned 500,000 acres preserved. With the state's support and investment, we can complete the 500,000 acre preserve and help achieve SB 32 targets through science-based uplift, restoration, and land management.

RCA representatives attended the Natural and Working Lands Technical Workshop for the 2022 Scoping Plan Update on July 20, 2021, and we have concerns regarding the exclusion of landscape loss due to development, from the Natural and Working Lands Inventory to measure carbon sequestration progress on natural and working lands.

RCA understands CARB's concept of tracking how carbon stocks are affected by climate change, but it disregards the negative impacts of landscape carbon loss due to development. Regions such as Inland Southern California continue to see increased landscape loss due to development, driven by our land availability and affordability relative to coastal urban areas. The deep-rooted chaparral systems within the western Riverside MSHCP accounts for 35% of the Plan area's vegetation coverage and is estimated to fix an average of 36,000 tons of carbon per year.

As land use trends in Inland Southern California continue to support housing and logistics development, HCPs and NCCPs have a critical role to play to ensure balanced and sustainable growth. And, CARB's Scoping Plan must account for this loss and any avoided loss.

RCA therefore requests that CARB reconsider how avoided emissions and enduring natural carbon sequestration are factored into the Scoping Plan, or else the climate-exacerbating damage of lost carbon stock and carbon sequestration will not be captured by the Scoping Plan until these natural lands are fully developed and it is too late. Landscape carbon loss due to development must be incorporated into the Scoping Plan, and HCPs and NCCPs stand ready to partner.

Thank you for your time and consideration. Please do not hesitate to contact me, should you require additional information. RCA looks forward to the continued partnership.



Aaron Hake

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Effective January 1, 2021, RCTC is the managing agency of RCA.