



April 3, 2017

Chair Mary Nichols
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95812

RE: Request to Include Goal for Natural and Working Lands in Scoping Plan

Dear Chair Nichols, Members of the Board and ARB staff:

The undersigned organizations commend the California Air Resources Board (CARB) for its ongoing leadership to address climate change, and we are writing to strongly encourage CARB to include a clear and quantifiable climate goal for the natural and working lands¹ sector in the 2017 Scoping Plan Update. Based on an initial analysis, coupled with peer-reviewed data, we believe that natural and working lands can achieve at least 5 million metric tons of reductions in carbon dioxide equivalent (MMTCO₂e) annually by 2030.

While CARB did not include the forest sector as part of the State's 2020 GHG cap, it included forests as part of the 2020 greenhouse gas (GHG) reduction target.² Similarly, we request that CARB include the natural and working lands sector as part of the state's 2030 target (vs. the cap). The latest draft 2017 Scoping Plan Update identifies that the implementation of "known commitments" leaves a gap of approximately 50 million metric tons of CO₂ equivalent to be achieved through other policy mechanisms to meet the 2030 target.³ The Scoping Plan Update should also include the natural and working lands sector to help fulfill this need.

We recommend that CARB include a GHG reduction goal for natural and working lands to achieve at least 5 MMTCO₂e in 2030. Based on a preliminary analysis,⁴ this would be a relatively conservative goal for this sector. This goal could be achieved through activities such as managing forests to increase carbon stocks, urban forestry, reforestation, wetland restoration, avoided conversion, and a variety of rangeland and agricultural land management activities, among others.

Once again, we appreciate CARB's pioneering work on climate change and hope you will consider our recommendation. We would be happy to follow up with additional information.

Sincerely,

Bonnie Holmes-Gen

American Lung Association in California

Pablo Garza

Environmental Defense Fund

Peter Miller

NRDC

Rico Mastrodonato

Trust for Public Land

Paul Mason

Pacific Forest Trust

Juan Altamirano

Audubon California

Kim Delfino

Defenders of Wildlife

Michelle Passero

The Nature Conservancy

Chuck Mills

California ReLeaf

¹ Natural and working lands includes urban forests, forests, rangelands, wetlands, deserts and agricultural lands.

² See p. 64. https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

³ See p. 37. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

⁴ The Nature Conservancy of California. Internal Analysis of GHG Reduction Potential for Natural and Working Lands. 2017

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Anne Fenkner
Sacramento Urban Forests Council

Deborah Weinstein Bloome
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Mark Kenyon
North East Trees

Viviana Franco
From Lot to Spot

Isabel Wade
Just One tree

Gail Church
Tree Musketeers

David Wilkinson
Woodland Tree Foundation

Doug Wildman
Friends of the Urban Forest

Catherine Martineau
Canopy

Jean Nagy
Huntington Beach Tree Society, Inc.

Lani Houck
Roseville Urban Forest Foundation

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Tree San Diego

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Ken Knight
Your Children's Trees

Bryan Tassej
Tree Partners Foundation

Rhonda Berry
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