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*Re: Essential Environmental Justice Strategies for the Natural and Working Lands Scoping Plan Scenarios*

Dear Executive Officers Fletcher and Sahota,

Thank you and your teams for the presentation of the Natural and Working Lands Scenarios on December 2, 2021, and for the opportunity to further shape these scenarios through public comment.

As part of the development of the Natural Resources Agency's Draft Natural and Working Lands Climate Smart Strategy and the 30x30 Strategy, many environmental justice organizations, such as Leadership Counsel,<sup>1</sup> submitted comments that are relevant guidance to the Air Resources Board's Natural and Working Lands Scenarios. Attention to the role of lands, particularly the role they play in climate, equity, environmental justice, and public health, is critical to achieving the multibenefit goals the state hopes to achieve. Throughout CARB's Scoping Plan process, we have agreed with the EJAC in emphasizing the interconnectedness of greenhouse gas (GHG) reduction and equity and justice, that public health considerations cannot be separated from the analysis of particular scenarios, and that equitable access to and management of lands is itself a climate issue. Below we provide some reflections and recommendations for the Natural and Working Lands scenarios for the Scoping Plan.

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<sup>1</sup> See this coalition letter RE: Recommendations on California Natural and Working Lands Climate Smart Strategy Draft. [https://drive.google.com/file/d/1pYFFIE\\_uQzcps5IH-wRUW9l0FAVRFwrv/view](https://drive.google.com/file/d/1pYFFIE_uQzcps5IH-wRUW9l0FAVRFwrv/view). 24 November 2021.

## **Indigenous Leadership and Stewardship**

We continue to agree that Indigenous individuals, communities and Tribal nations should be involved in and help lead the state's natural and working lands planning processes, which are rooted in an oppressive history of Indigenous land theft and genocide. At the recent workshop on Natural and Working Lands scenarios, we were disappointed that there was no acknowledgement of California's historic and continued role in violent colonization and land dispossession. Much of the climate crisis stems from these unhealed and unaddressed roots. What would it look like for CARB to consider and even integrate into the agencies' modeling process the GHG impact of strategies such as returning stolen lands to Indigenous ownership, Indigenous land stewardship, and repatriation? How could CARB better move from consultation to true partnership and deference to California Native Tribes and Indigenous communities?

## **Transition to and Invest in Agroecological Practices**

We are pleased to see the addition of organic farming in CARB's scenarios and appreciate some acknowledgement of the need for farms to transition away from business-as-usual systems that rely on toxic pesticides. We urge CARB to further include specific targets for pesticide reduction, in addition to including organic agriculture in all of the scenarios. We echo the comments that our colleagues at the Pesticide Action Network (PAN) have also submitted in this comment period, including the ask to model a progressive increase of sustainable management practices, including diversified organic agriculture, across various management practices rather than siloing each. As an alternative option, we also echo the call to include diversified organic agriculture in all modeling scenarios, rather than only Scenario 2 and 4, by including a target of 30% of total farmland transitioned to organic production by 2030, similar to the E.U. Farm to Fork Strategy.

As part of this Natural and Working Lands modeling process, pesticide reduction must be included in concert with various management strategies, policies and efforts that support an overall agroecological approach to farming. Agroecology includes but is not limited to farming practices that restore soils, reduce pesticides and other toxic inputs, and support health and work within the environment. It also includes inextricable principles of social justice, food sovereignty, farmer equity, and justice for those working the land. Agroecology, as a movement and practice, has been integral to many diversified, small-scale, BIPOC and Indigenous farms, where a *combination* of practices helps sequester carbon, reduce direct emissions, protect water use, protect air and water quality, and promote public health and wellbeing. Diversified access to land and long-term ownership—strategies which we urge CARB to model—have an impact on whether or not individual farmers feel and are equipped to manage that land for climate benefits using a combination of practices that may include cover cropping, reduced tillage with non-chemical pest management, intercropping, and more, which often take many years to bear measurable results. As CARB considers how scenarios will eventually influence policy discussions, the agency should keep in mind how diversification of agriculture is both an equity issue and a necessary climate strategy.

Additionally, we see little reference to methane or other greenhouse gasses—particularly short lived climate pollutants (SLCP) like the fumigant *Sulfuryl Fluoride* which is both a human health risk and a massive warming pollutant—in CARB’s Natural and Working Lands scenarios. CARB must integrate significant and direct methane, nitrous oxide, and other SLCP reductions into the modeling, given that methane from concentrated animal feeding operations (CAFOs) and nitrous oxide emissions from agricultural soil management practices, such as the applications of synthetic fertilizers, are significant contributors to GHG emissions. However, polluting and false solutions such as dairy digesters, as we have explained extensively in previous letters,<sup>2</sup> should not be present in the modeling scenarios as a continued strategy or be part of the state’s overarching SLCP reduction strategy. Direct emissions reductions, including reductions in dairy herd size, should be modeled, and a full lifecycle analysis should be conducted that accurately represents the emissions associated with dairies. For example, as described in a recent letter,<sup>3</sup> CARB’s quantification methodologies of the dairy digester program currently fail to consider upstream and downstream emissions associated with the methane production, conversion, and distribution components of the Dairy Digester Research and Development Program (DDRDP). Upstream emissions include production, storage of feed, and enteric emissions; downstream emissions are those associated with the application of manure to land. For these and more reasons abundantly explained in previous comments, dairy digesters are harmful to environmental justice communities, perpetuate the status quo of polluting large-scale CAFOs, and encourage increased consolidation and GHG emissions.

### **Invest in Community-based Ecosystem Restoration**

Ecosystem restoration such as urban greening, urban forestry, and restoring the capacity of our land and water systems to continuously and ecologically sequester carbon should be modeled across all Natural and Working Lands scenarios, due to the necessity of these strategies for long-term climate mitigation and resilience. Investing in community-based restoration of ecosystems is crucially needed, particularly in environmental justice communities and especially when considering the state of California’s current exploitative forest and wildfire management system that far from exemplifies just labor practices.<sup>4</sup>

Air quality, water quality, and climate mitigation are fundamentally interconnected. The Natural and Working Lands strategies must specifically prioritize ecosystem restoration, such as tending to the health of California’s riparian ecosystems, in order to address the climate crisis in a holistic manner. Increasing natural flows in California rivers through the Delta in particular will flush waters that are currently stagnant emitting significant methane due to the impaired flows resulting from excessive exports from these vital systems of waterways and wetlands.

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<sup>2</sup> See this coalition letter RE: Recommendations on Short-Lived Climate Pollutants in the Scoping Plan. <https://www.arb.ca.gov/lists/com-attach/29-sp22-slcps-ws-AWJWP1Q0BzgKZVcj.pdf>. 22 September 2021.

<sup>3</sup> See LCJA’s letter RE: Quantification Metrics for the Dairy Digester and Research Development Program. [https://drive.google.com/file/d/1ALV0L1dsrBvsA6JFK\\_PZi9yWKQUWU7Ki/view?usp=sharing](https://drive.google.com/file/d/1ALV0L1dsrBvsA6JFK_PZi9yWKQUWU7Ki/view?usp=sharing). 29 November 2021.

<sup>4</sup> *Putting California on the High Road: A Jobs and Climate Action Plan for 2030*. UC Berkeley Labor Center. <https://laborcenter.berkeley.edu/putting-california-on-the-high-road-a-jobs-and-climate-action-plan-for-2030/>. 9 September 2020.

We furthermore are strongly opposed to Bioenergy Carbon Capture and Storage (BECCS) as it is neither a safe nor harmless forest management strategy. We do support ecologically-based carbon sequestration through supporting restoration of healthy ecosystems that naturally sequester carbon, without commodifying nature or utilizing carbon credits or trading schemes.

These recommended investments in ecosystem restoration will not only reliably sequester greenhouse gases, as they have for centuries, but they also provide the Scoping Plan with an opportunity to invest directly in long neglected landscapes in California's most historically excluded communities. Such investments deliver a host of co-benefits to environmental justice communities by reducing climate-related public health risks like air pollution and the urban heat island effect, beautifying communities, and increasing property values in neighborhoods long injured by racist redlining and predatory lending practices.

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Thank you for your consideration of these comments on the Natural and Working Lands Scoping Plan scenarios. We welcome further discussion on these comments and look forward to providing environmental justice-grounded guidance as the final scenario is developed.

Sincerely,

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