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December 16, 2016

Mary D. Nichols, Chair  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Discussion Draft of the 2030 Target Scoping Plan Update**

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

Thank you for the opportunity to comment on the discussion draft of the 2030 Scoping Plan Update. We appreciate the inclusion of natural and working lands in the SPU, as their inclusion is critical for meeting the state's long term greenhouse gas reduction goals. We also commend the effort to address the connections and influences between different sectors.

While our organizations will be submitting additional comments on our respective areas of expertise, we jointly offer these four overarching suggestions:

1. In addition to avoiding land conversion, the SPU should include proactive landscape conservation;
2. Prioritize actions that combine improved land management and stewardship with long-term conservation;
3. Ensure that the LBNL scenario model incorporates a broader range of management activities, including permanent land conservation, reforestation and improved forest management; and
4. Propose actionable goals for each land type that also align with adaptation goals.

**The SPU should include proactive landscape conservation beyond green field development.**

The discussion draft provides good recommendations to support land protection, with a focus on reducing the rate of green field development. We support this recommendation and at the same time, also urge ARB to explicitly include the protection and management of larger landscapes to sequester carbon and avoid emissions. This type of proactive conservation provides a strategic opportunity to advance additional adaptation efforts and other co-benefits, while also enhancing carbon sequestration.

**Prioritize actions that combine improved land management and stewardship with long-term commitments for conservation.**

The carbon sequestration benefits provided by natural systems will continue to provide reductions over time. As forests, farms, and other lands are managed and conserved to sequester carbon and be resilient, it is vital to ensure that these benefits will persist over time. The SPU should strongly favor policies, and include as a principle, conservation and management for durable climate benefits.

**Ensure that the LBNL scenario model incorporates a broad range of land management activities, including permanent land conservation**

We appreciate the December 14 workshop highlighting the analysis from the Lawrence Berkeley National Laboratory. It is an important first step toward understanding the contribution that natural and working lands can make toward the state's long-term climate goals. We have a number of questions about the model and look forward to learning more about key issues, such as what assumptions are reflected in the baseline, the mechanics of the model, and definitions of key terms. We will provide separate comments on the model, and hope there will be more vetting of the model and scenarios before the information is relied upon to inform the Scoping Plan Update.

It appears that the model simplifies the treatment of forest management, and we suggested a more nuanced treatment of the different forest management activities. For instance, reforestation of riparian areas or areas that were once forests, but are currently in a different use, do not appear to be included. In addition, it does not appear that improved forest management, where forests are managed to increase and maintain durable carbon stores over time (e.g., through easements) are included.

Similarly it appears that maintenance of urban forests are not included in the scenarios for GHG reduction potential. Yet, there is significant risk that urban forests will decline due to drought, disease, pest, lack of maintenance and lack of funds. Likewise, green infrastructure is also important for achieving greenhouse gas reductions. These activities should be clearly included in the scenarios for GHG reduction potential.

**Propose actionable goals for conservation of each land type that also align with adaption objectives**

The Scoping Plan Update should include actionable goals for durable conservation actions that mitigate GHG emissions, increase carbon stocks and advance other state goals for adaptation, wildlife, and water. Long-term conservation commitments, coupled with actions to ensure that lands are on a climate resilient and carbon-rich trajectory, are essential to ensuring that carbon stored in these natural systems is not released in the future by changes in landowner management priorities. This is particularly important as conservation is the best GHG sequestration outcome for many land types.

Thank you for the opportunity to provide comments on the SPU Discussion Draft - we look forward to further conversation as development of the plan moves forward.

Sincerely,

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Audubon California

Josh Hanthorn  
Defenders of Wildlife

Michelle Passero  
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