

April 6, 2016

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

RE: Scoping Plan 2030 – Natural and Working Lands Discussion Paper

Dear Chair Nichols:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Natural and Working Lands discussion paper, dated March 17, 2016.

ARCCA is a network of existing regional collaboratives from across California. ARCCA's members represent leading regional collaboratives that are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region's most innovative and successful strategies; and determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships.

We appreciate the opportunity to comment on these visions and goals for California's natural and working lands, and to participate in the discussion on how they can be best protected and managed to help the State meet its goals to achieve long-term climate and emissions reductions going into the future. We also appreciate the paper's emphasis on the relationship between urban and rural areas, natural and working lands, and the many other air quality, water quality, economic, and recreational benefits they provide.

We are glad to see that the visions outlined in this discussion paper include a landscape or watershed level of coordination that brings together many other sector plans and efforts in order to achieve state goals in emissions reduction. This coordination will allow for the best use of funds to meet individual sector goals, as well as the goals promoted by AB 32 and EO B-30-15. Additionally, we are pleased to see goals for linking natural lands in urban areas such as urban forests and green infrastructure to broader GHG reductions. We believe the implementation of the Land Protection & Land Use vision could provide clearer

objectives for achieving conservation beyond the most vulnerable agricultural land, and could strengthen its language for the protection of other land types including forests, wetlands, oceans, and coastal areas.

We support the need for consensus in quantification methodologies used to determine the effectiveness of carbon sequestration and GHG reduction projects, as highlighted in the vision to manage and restore land. This is important for measuring the progress in meeting State's goals, and for creating viability in many restoration projects, especially in California's forested areas. The planned implementation of this vision across landscape types is a pragmatic approach to addressing barriers in reducing GHG emissions based on land ownership, especially in terms of private ownership in agricultural areas. However, this is less apparent in the discussion of restoration in forested areas. We recommend broadening the goals for forest restoration to include more specific benchmarks similar to the goals for wetlands and riparian areas, or agricultural lands.

Regarding the decision to present the draft goals in terms of reducing the rate of land converted to development, we question the assertion that the current state of the science surrounding quantification and assessment should preclude the establishment of goals expressed in tons of greenhouse gas emissions reduced or sequestered. Indeed, at the recent Natural Climate Solutions Symposium held in Sacramento on March 10, 2016, multiple panelists, including Ellie Cohen of Point Blue Conservation Science, made a compelling argument that there is sufficient accumulated scientific knowledge to justify a sense of urgency in project implementation. This would be facilitated by inclusion of at least a preliminary set of more specific GHG sequestration goals.

In addition, we are concerned that simply reducing the rate of land conversion may in some cases be insufficient to ensure the availability of land for future sequestration needs, and that the achievement of the state's overall goals may in fact require the acceleration of current rates of land conservation. As such, recognizing that community land conservation efforts are constrained by multiple factors, we recommend guidance surrounding the ratio of land conservation acres required for development mitigation of *at least* 1:1 as a prudent addition to the "Land Protection and Land Use" Implementation items.

To address the discussion questions at the end of the paper, we believe the best approach for gathering input would be to facilitate discussion through listening sessions or with an advisory group on this topic.

Finally, we would also like to affirm that ARCCA, which encompasses the metropolitan areas of Los Angeles, Sacramento, San Diego, and the San Francisco Bay Area, and the rural

Sierra Nevada and portions of the Southern Cascade, is keen to recognize the interdependence of California's urban and rural regions. The climate resilience of our urban regions directly depends on healthy, well-managed natural and working lands (through local agriculture, reduced wildfires, clean water), which in turn supports the resilience of rural communities. It is important to emphasize that sustainable natural and working lands are not rural issues alone, but issues for all Californians.

We hope these comments are helpful and welcome the opportunity to provide additional clarification or support the development of specific language as desired. We'd like to thank the Air Resources Board for the hard work that has resulted in the Natural and Working Lands discussion paper and look forward to future opportunities for engagement as this process develops.

Sincerely,



Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative



Amy Hutzel
Bay Area Regional Collaborative



Allison Wood
ARCCA Vice-Chair
San Diego Regional Climate Collaborative



Kerri Timmer
Sierra Climate Adaptation & Mitigation Partnership



Zoe Elizabeth
The Los Angeles Regional Collaborative for Climate Action & Sustainability



Kate Meis
Local Government Commission