

February 8, 2019

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: January 2019 Draft: CA 2030 Natural and Working Lands Climate Change Implementation Plan

Dear California Air Resources Board Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the January 2039 Draft of the California 2030 Natural and Working Lands Climate Change Implementation Plan (Plan).

ARCCA is a robust network of regional climate collaboratives – each encompassing a diverse, multi-sector network of agencies and organizations working together to accelerate climate adaptation throughout their region and to catalyze on-the-ground resiliency-building initiatives. As a statewide network, ARCCA brings together thought leaders and practitioners to advocate for equitable and effective adaptation principles and policies, to collaborate towards innovative and holistic solutions, and to build a culture of prioritizing climate and community resiliency. Our member regional collaboratives represent the following regions: North Coast, Sierra Nevada, Capital Region, Bay Area, Central Coast, Los Angeles Region, and San Diego Region. We are actively working to support the formation of regional collaboratives in the San Joaquin Valley and Inland Empire.

We greatly appreciate the collaborative process undertaken by numerous state agencies and stakeholders to develop an integrated plan to prioritize California’s natural and working lands. We strongly support and commend the Plan’s explicit attention to achieving multiple co-benefits through the goals, strategies, and actions identified. We offer a few comments and recommendations for consideration to achieve the objectives of the Plan.

Executive Summary

1. We recommend greater emphasis and attention to non-State lands including addressing local land use decisions and patterns, federal lands, private lands, and the continued conversion of farmland and rangeland. While we appreciate the goals for increased investment in state-led and state-controlled projects, it is entirely unclear if the concepts raised in the Plan will achieve State objectives without broader support from non-State landowners and alignment across various land types and uses. While the Plan states that “success will require research, investments, and actions from agencies and landowners beyond the State’s jurisdiction,” it

does not describe how that action will occur or suggest any pathways for the state to lead this important work. The Plan could also provide more specificity around efforts to mobilize private capital effectively (e.g. through resilience bonds) to augment state funding.

2. We recommend greater consideration of how the Plan can support the long-term institutionalization of natural and working lands management, carbon emissions reduction, and resilience-building practices at the community level. Greater attention to the changes needed in economic systems, funding practices, and ongoing operations can lead to additional opportunities to ensure that progress is sustained over time. The strategies identified should also identify how they will improve the capacity of communities throughout California to leverage and support State goals through clearly defined economic benefits, outdoor recreation benefits, and more.

I. Introduction

3. On pages 7-8, there is acknowledgement that carbon neutrality must be achieved in the 2040 to 2045 timeframe, and that the State “know[s] that natural and working lands must play an important role in meeting this new goal.” We recommend expanding this discussion to include the urgent need to preserve greenfields and reverse the continued conversion of farmland and ranchland. The absence of recognizing this urgent need and the important relationship between sprawl, urban density, and mobility sends the wrong signal to local jurisdictions and the role that they must play in achieving State goals. This is particularly important considering the failure to meet regional GHG reduction goals under SB-375. Several conservation-related policies and programs, including the California Farmland Conservancy Program, the Agricultural Protection Planning Grant Program, the Farmland Mapping and Monitoring Program, the Williamson Act, and codes governing Resource Conservation Districts, support the urgent need to preserve greenfields. The Plan should be reflected to align with these existing state directives and to elevate the urgency of addressing the conversion of farmland and ranchland.

II. Natural and Working Lands Objectives, Vision, and Status

4. On page 10, the Plan states that “it is important that farming and ranching remain robust and the rates of conversion diminish.” We encourage the use of stronger language to express the need for natural and working land conversion to stop, generate offsets, or achieve a net zero loss of farm/ranchlands until emissions from the transportation sector are addressed.
5. The preservation of natural and working landscapes is not only key to reducing GHG emissions, but also to California’s future water supplies and flood management. We recommend elevating both groundwater recharge and flood management as key objectives

of the Plan. Land important to groundwater recharge and carbon sequestration continues to be lost to impermeable development. Additional guidance on groundwater recharge to local land use decision makers would make the Plan more valuable to its audience. Some progress is already being made at the local level in the preservation of working landscapes by a few water districts, flood control districts, irrigation districts, and other local agencies. Several local agencies have developed Storm Water Resource Plans prioritizing multi-benefit projects (including flood management and groundwater recharge) to guide future implementation. Innovations in local policies and programs should be recognized as part of the Plan, such as the partnership between the Pajaro Valley Water Management Agency, UC Santa Cruz, and the Santa Cruz County Resource Conservation District to pay landowners for the water they return to the aquifer.

III. Natural and Working Lands 2030 Goal for State-Supported Action

6. **Scope of the 2030 Goal:** We recommend including a goal and set of strategies for supporting and collaborating with private, federal, and local jurisdictions' carbon sequestration activities on non-State lands and outside of State funds. On page 12, the Plan states that "non-State funded strategies enacted by federal agencies, local jurisdictions, and private entities are critical, they are not directed by the State and thus are outside the scope of activities contemplated in the proposed pathways in this State Plan." However, given the carbon sequestration goals identified in the Forest Carbon Plan (e.g. federal land treatment goals to increase by approximately 250,000-500,000 acres per year), it is crucial that the Plan identify a set of collaborative activities and strategies that ensure a path towards achieving these goals on non-State land. For example, state agencies can and should set collaboration-based targets, such as working directly with the U.S. Forest Service on planning activities that build a pathway for the State to measure the emissions reduction benefits of federal investments in forested lands.
7. **Pathways and Acreage Goals:** We recommend including and emphasizing the economic benefits of conservation, forestry, restoration, and agricultural activities in the Pathways and Acreage Goals discussion (page 15-17). Supporting economic activity is a crucial component for establishing and maintaining self-sustaining systems that achieve the Plan's goals as it builds long-term capabilities to continue activities without reliance on state subsidies, grants, or other short-term and ultimately unreliable funding sources.
 - a. We encourage highlighting local economic development opportunities that are complimentary, such as the use of agriculture and forestry products (e.g. wood products, rice straws, etc.), to reduce embedded carbon in structures and develop

markets for waste products. The feasibility of planned use of compost should also be addressed as it is scarce and costly, new facilities are difficult to site, and contamination continues to present issues for some producers depending on their markets.

- b. We suggest including specific activities to support the localized biomass utilization economies in rural communities that steward California’s forested lands. The economic activity created by supporting wood waste byproduct industries can yield direct benefits to communities by creating new jobs, local government income, local distributed renewable energy for heat and electricity, technological investments, and other co-benefits that increase a community’s overall financial capital, resilience and ability to thrive. Biomass activities and strategies that do not create or support these co-benefits for local economies further reduce the ability of local communities to maintain their workforce and infrastructure needed to manage natural and working lands over time while increasing the vulnerability to natural disasters such as wildfire. Investing in and supporting economic co-benefits in rural communities is necessary to achieve the short and long-term carbon sequestration and climate adaptation goals set forth by the state. Localized energy co-benefits reduce reliance on long-distance energy infrastructure susceptible to extreme weather events that disrupt energy supply and risk wildfire ignition, can provide more flexible and affordable energy, and reduce reliance on emissions-causing wood burning stoves. Co-benefits from innovations like cross-laminated timber (CLT) can improve building resilience to weather and wildfire, as CLT has been found to have a higher wildfire resilience rating than both steel and concrete.
- c. We suggest adding the long-term carbon sequestration benefits created through forest thinning activities. Forest thinning over time decreases competition in trees for resources, allowing trees to grow taller and larger diameter; this old-growth ultimately will store more carbon than smaller diameter trees over time, though the short-term reduction in overall number of trees may lead to a temporary loss in short-term carbon sequestration. Supporting both short-term sequestration activities and recognizing the long-term sequestration will help the state target and measure emissions reductions for the 2030 goal and the 2045 carbon neutrality goal.
- d. We recommend including an icon for economic benefits in the Co-Benefits Key and in the sections that follow.

8. **Figure 7 (page 18):** We recommend considering a more ambitious conversion reduction goal of 75-100% to align with the goals of the Healthy Soils Initiative. The current goal of 50-75% reduction in annual rate of conversion by 2030 is not ambitious enough to achieve California’s 2030 and 2045 carbon emissions reduction goals. According to the 2015 California Farmland Conversion Report, irrigated farmland in California decreased by more than 91 square miles (58,587 acres) between 2010 and 2012. The highest-quality agricultural soils, known as Prime Farmland, comprised 81 percent of the loss. As the State’s Healthy Soils Initiative states, “soils contain approximately 75% of the carbon pool on land—three times more than the amount stored in living plants and animals.” Preserving this land from conversion is of the utmost priority, and this Plan should reflect this priority.
9. **Implementation:** We recommend expanding the discussions in this section to include more specific implementation activities for state agencies, as well as for local jurisdictions that need to play a role in supporting the achievement of State goals.
 - a. We recommend listing specific activities and desired targets linked to the Implementation Acreage Goals for each agency and program. While this section covers in detail existing activities, it does not explicitly direct how each agency will increase or expand existing activities to achieve sector goals. For instance, each identified program should be linked to its current impact by acre and identify annual increased spending and acreage targets for the program.
 - b. On page 22, the Plan mentions the TerraCount product developed and piloted in Merced County but does not provide an explanation of how this could be used within local government planning processes and how it would incorporate updates to the NWL Inventory. We suggest including tools and processes for local governments as its own focus area. It’s important to note that the State doesn’t achieve its goals without support from local jurisdictions and addressing land use (e.g. within CEQA for any project, LAFCo proceedings). When there is decision-making authority over land use, there should also be a requirement to report the carbon implications of those decisions and reconcile both to align with State objectives.
 - c. On page 22, the Plan states that “regional land use conservation planning and finer-grained, consensus-based localized plans will provide more detailed blueprints for implementation.” However, the Plan does not go into detail about how these localized plans may or may not align with the 2030 state target nor does it define regional targets that are necessary for achieving the implementation goals. The Plan

should provide a clear, holistic picture of how all these efforts should ultimately fit together, linking each regional blueprint to specific regional targets.

10. **Tracking Progress and Outcomes:** We suggest identifying concrete steps that state agencies will undertake or are undertaking to facilitate the implementation of the Plan. While the Plan references incorporating new activities, data, collaboration and methods as needed, it is unclear how the State will approach this. We suggest expanding this discussion to identify actionable steps and to include a schedule or timeline for public stakeholders to understand how they can continue to stay involved and support implementation efforts. For example, the Plan should reference specific activities (e.g. public workshops, listening sessions, surveys, or webinars) that will be conducted to “evaluate and improve the tools for quantifying the impacts and benefits of the activities that are called for in this Plan and incorporate new activities, data, and methods as needed.”

IV. Moving Forward

11. We recommend elevating the State’s commitment to support and coordinate with the State’s outdoor recreation economy related to natural and working lands, which faces substantial losses related to wildfire and other climate impacts but also presents opportunities to support the achievement of State goals.
 - a. On page 27-28, the Plan references a restoration economy and building workforce capacity but does not reference the significant impact of outdoor recreation and tourism on natural and working lands. Activities such as forest thinning and prescribed fire activities, for example, must also support and co-exist with the recreation and tourism activities of rural and natural resource-based towns. For example, forest treatments should both prioritize treating land that impacts recreational activities, such as hiking, camping, and mountain biking, and also limit creating adverse impacts to these industries – a prescribed fire may be much-needed on a state park near a gateway town, but if the prescribed fire creates public health concerns and prevents recreational tourism during peak tourism season, this lack of coordination with the recreation economy results in real economic losses and hardship in small rural towns.

Recreation economies are the backbones of small towns throughout California, and robust tourism income expands the capacity for these towns to invest in local agency and private actions that fall both inside and outside of State funding areas or direct control. Without this income, small towns lack the ability to invest in additional fuel treatments, landowner incentives, and other mechanisms that can leverage State and

Federal actions. Supporting and coordinating with outdoor recreation economies builds rural capacity to fill state and federal gaps in natural and working lands management activities.

This commitment should be greater emphasized throughout the Plan. While the Plan references supporting “recreation opportunities,” no substantive discussion or detail is given to recognizing how State activities will achieve these recreation benefits, or how the State can avoid adverse impacts to recreation economies through activities like fuel treatments or prescribed burns.

12. We recommend the inclusion of regional climate collaboratives as partners. The Plan states an intention to work with multiple partners to support technical assistance providers, leverage local funding, expand collaboration, coordinate across jurisdictions, integrate and empower tribal perspectives, and more. The Plan fails to recognize existing regional and cross-sector collaboration efforts that regional climate collaboratives throughout the state continue to facilitate. Regional climate collaboratives represent diverse partnerships that coordinate and provide technical and capacity building activities for local climate mitigation and adaptation efforts that are regionally-specific and at the landscape scale. Collaboratives can also help to bridge urban and rural interests, which is critical to achieving the goals of the Plan and SB-375 objectives. Explicitly committing to supporting these efforts will leverage existing funding and activities while highlighting the need for far greater investment in these efforts.

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further and to provide draft language for consideration. Please do not hesitate to reach out to Julia Kim at jkim@lgc.org or 916-448-1198 x304 if you have any questions or if you would like to schedule a call to discuss our comments further.

We look forward to supporting the implementation of the Plan throughout the state.

Sincerely,



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