PACIFIC FOREST TRUST
Private Forests. Public Treasures.

Chair Liane Randolph, Chair   June 24, 2022
California Air Resources Board
1001 I Street, Sacramento, CA 95814

By Electronic Submittal at: http://www.arb.ca.gov/lispub/comm/bclist.php

RE: Comments on Forests in the NWL Section of the Draft Scoping Plan Update

Dear Chair Randolph,

Pacific Forest Trust appreciates the substantially increased focus on forests and other natural and working lands in the current Scoping Plan Update. As underscored at the COP26 in Glasgow, restoring and conserving forests is essential for us to meet both our climate change and biodiversity loss crises. While the Draft SPU does acknowledge that such action is essential, which is excellent, it lacks the clear data analysis, clear implementation strategies and pathways and incorporation of the state's biodiversity goals and adaptation needs, that will be essential for success.

Restoring and maintaining healthy, resilient, carbon-rich landscapes is a critical part of addressing climate change. This requires that we invest significantly and consistently to restore -- and then maintain-- the more natural structure, composition and age structures in our forests that will increase the amount and the resilient stability of their carbon stocks. These forests are also providing myriad other irreplaceable climate benefits and ecosystem services—from adaptation to water supplies to our extraordinary biodiversity-- for all Californians. While the Draft Scoping Plan Update (SPU) proposes very ambitious levels of forest restoration towards this goal, neither the Draft SPU nor other current state actions suggest a realistic approach to achieving these targets.

It also lacks the essential and complementary conservation goals that would sustain the restoration gains. Further, the SPU does not have the analysis necessary to guide our path clearly in this regard. Simply, the Draft SPU modelling is insufficient to provide a realistic picture of how these actions will impact specific ecosystems/habitat types and their carbon stocks—or other forest functions-- over time. As such, it will be critical to refine the modelling to specific forest types and scenarios responsive to directed changes in management to achieve desired outcomes.

As ARB moves to finalize and implement the Scoping Plan Update, we offer the following recommendations:

1) **Provide a clear vision for how to achieve the bold targets for forests.** The Proposed Scenario is a 10x increase over current levels of action, but there is virtually no chance that the broad "Strategies for Success" will achieve that target without a far clearer vision for implementation.

2) **Incorporate State's "30x30" conservation and water security targets.** The fate of our state's globally outstanding biodiversity and the reliability of our water supplies are intertwined with the health and function of our forests. These forests also include some of the most naturally carbon-rich globally. These two elements—biodiversity and water impacts--are missing from the SPU. Gov. Newsom's Executive Order (N-82-20) commits California to conserving some six million additional acres by 2030. The SPU should reflect that commitment by identifying an appropriately ambitious and feasible conservation goal to match the restoration targets. The SPU is an important opportunity to reduce forest loss and fragmentation while also achieving permanent management improvements for long-term climate benefit through working forest and other working lands conservation easements.

3) **Continue to revise and refine the modeling.** California's natural systems can carry, and historically have carried, far greater carbon stocks, in more resilient and adaptive conditions than they do today. Comparing the stocks of carbon in soils and forests in relatively natural habitat as opposed to highly modified structure we see today clearly illustrates this. The NWL modeling needs additional stakeholder and expert engagement, especially since the technical documentation was only made available with the Draft SPU. ARB should commit, in a Board resolution, to a one-year process of engagement and refinement to address flaws highlighted below and also identified by a number of other stakeholders.

The attached comments provide more detailed recommendations. We welcome the opportunity for further discussion or if you have questions as to these.

Thank you for the opportunity to comment on the Draft SPU.

Sincerely,

Laurie A. Wayburn
President

Detailed PFT Comments on the Draft Scoping Plan Update 6.2022

1. Offer a clearer vision for how to achieve the bold targets for forests

The Proposed Scenario suggests annual interventions on 2.3 million acres of forest, shrubland, and grassland. This is 10x current levels, and more than twice what the state and Feds have committed to in the "1-million-acre strategy". Suggesting targets that are so far beyond our current levels – or even our current aspirational targets – requires meaningful, practical suggestions for how we will achieve this audacious goal. The Draft SPU *Strategies for Success for Forests, Shrublands, and Chapparal* as well as the *Crosscutting Items for all NWL* fundamentally amount to "do what we're doing now, just more so". That will not achieve the transformation and scale of action we need in forests.

While the SPU is a high-level document, it should include meaningful strategy suggestions that help make the bold target realistic and achievable. We suggest adding the following to the *Strategies for Success for Forests, Shrublands, and Chapparal to* achieve the targets and achieve durable climate gains:

- Identify regional high-priority landscapes where a combination of near-term interventions (i.e. forest thinning, Rx fire) can be combined with enduring commitments to climate-smart management to improve climate resilience and protect critical ecosystem services. This will also help achieve the state's 30x30 goals. (see below)
- Develop regional Implementation Plans for priority forested areas to guide permitting, funding, and annual action.

The headwaters of the Sacramento River is one such region with great opportunity to improve the amount and stability of large amounts of forest carbon, while also improving watershed health on which the reliability and security of California's water supply depends. Achieving the necessary pace and scale of restoration across the 7-million acres above the Oroville, Shasta, and Trinity dams will require a more focused and deliberate approach than has been pursued to date. Our November 17, 2021 comments on the Draft *Climate Smart Land Strategy* provide more detail on how the state can accelerate landscape restoration and climate action in this focal area.

2. Incorporate State's "30x30" conservation target

The draft SPU acknowledges the existence of Governor Newsom's Executive Order N-82-20 establishing the goal of conserving 30% of California's land and coastal waters by 2030, but then completely fails to incorporate this very substantial commitment into the NWL modeling, the Strategies for Success, or seemingly in any material way. CARB should treat this E.O. with the same gravity as others such as the ZEV target (E.O. N-79-20), fundamentally integrating the goal into the SPU.

The *Strategies for Success: Crosscutting Items for all NWL* section should include the following:

- Conserve 6 million acres of land and coastal waters by 2030, consistent with E.O. N-82-20. These should prioritise regions with important climate benefits including but not limited to carbon sequestration, notably the biodiversity and water benefits of these regions.

Anchoring improved landscape condition and management with permanent conservation easements that ensure that benefits persist into the future is critical to securing long term climate gains. In contrast, we caution that interventions that are not paired with permanent commitments to improved management are likely to be reversed in the future. These time-limited actions, such as thinning a forest to reduce fuel loads in the near term, result in emissions that can be re-absorbed and exceeded, *but only if the land is maintained in forest*. Forest which is unprotected can then be again harvested in 20 years, resulting in a double loss of carbon and reversing any temporary gains. The state should be very cautious when developing programs, including the SB 27 registry, that support these temporary actions that may be reversed when we can least afford the additional carbon emissions.

Strategic use of conservation easements can also help create landscapes where prescribed and managed fire can be used to maintain resilient conditions. Developing and maintaining continuous, unfragmented, well-managed landscapes where appropriate fire regimes can maintain desired conditions is essential to reaching the scale of safe, resilient landscape necessary to protect ecological function. These well-maintained landscapes also reduce risk to adjacent communities. Restored and conserved landscapes support safer communities.

3. **Continue to Revise and Refine the NWL Modeling**

We appreciate the substantially increased effort to model forests and other NWL in the 2022 SPU. However, the modeling needs additional refinement and engagement with stakeholders and experts, and we urge the Board to commit to a specific timeline for ongoing engagement and refinement of the modeling effort – going beyond the current SPU process. Reasons warranting this ongoing refinement:

1) The technical documentation for the NWL modeling was only made available with the Draft SPU on May 10. Given the timeline for completing the SPU by the end of 2022, there is no opportunity for meaningful change to the model. A number of the modelling approaches and assumption are too broad to be meaningful.
2) The lack of integration of the Administration's 30x30 conservation goal.
3) Some of the scenario assumptions are puzzling, such as the modest conservation goals. This warrants further explanation and discussion, especially given the Administration's established 30x30 conservation goals.

4) The need to augment the NWL modeling with regional case studies to better calibrate and validate whether the RHYSSys modeling seems to track with more refined efforts.
5) Recent peer-reviewed and published science on fire impacts on forest carbon loss do not appear to be incorporated, and this has enormous impacts.

We urge the Board to commit, through a Board Resolution, to continued refinement of the NWL modeling effort to address the issues above, with a report back to the Board in 1 year.

In sum, while we are pleased to see NWL incorporated in state climate planning in a more substantial way, and broadly agree with the scale of proposed forest restoration action, the plan needs to incorporate 30x30 conservation targets, improve the modeling and outline actual implementation pathways. Most importantly the state (CARB and CNRA) needs to articulate how we can reach these ambitious targets to achieve durable climate gains and protect ecosystem functions – the current approaches to restoration and conservation of natural and working lands are simply not capable of reaching the articulated targets.

We look forward to working with CARB and partner agencies to develop actionable strategies and accelerate our forest and watershed restoration efforts.