

## **Comment 1 for Draft Natural and Working Lands Implementation Plan (nwdraftplan-ws) - 1st Workshop.**

First Name: Kendra

Last Name: Moseley

Email Address: kmoseley79@gmail.com

Affiliation:

Subject: Baseline Data for Monitoring Restoration Success

Comment:

After reading through this implementation plan, I am still left wondering what the specific plan is to measure the success of the restoration and conservation work that is planned. There is not a lot of information about establishing the baseline ecological characteristics that formulate the proper ecological function and condition and expectation of the land that will be targeted for project work.

Too much restoration work is done without a solid understanding of what the end goal should look like and what is considered a success for that piece of land--and I believe if we are using tax payer dollars to do this important work, there needs to be more investment in understanding the baseline in order to understand if the project is indeed a success. There is a lot of work being done more recently in ecology on the importance of soil and site characteristics and their influence on vegetation expression and responses to disturbance, historical ecological understanding of the land, and how land uses have and do impact sites--however very little money is being spent on the upfront field work needed that will provide those soil-site-vegetation relationships and how they relate back to their disturbance regimes as a baseline predictor and tool for understanding the goals and objectives of a restoration project. So much of the work that needs to be done to understand the implications of climate change relate back to the soils and vegetation and yet very little actual data exists at the landscape and site level to back up much of the evaluations and assessments and models that are used. If we are to make real head way in understanding how to address climate change and the impacts of climate change, we must have a better inventory of what we already have--even at the base level. What is the soil profile, what vegetation typically grow on this type of soil, and how do the soil and site properties impact vegetation response (composition, production and structure). There have been previous efforts to relate soils and vegetation from the early 1970s in California and I believe an effort like that is warranted again, in order to gather the essential data for better baseline information to inform all of the crucial work outlined in this Implementation Plan. Otherwise, how will we know you have succeeded by 2030? What is your baseline for success? Plant community composition alone is not enough to evaluate true restoration success (it is only ONE piece of the soil-forming factors), and comparing apples to apples by delineating the expected results thru similar soil properties that result in similar vegetation assemblages and responses to disturbance would provide a much better tool for restoration and conservation success. I strongly encourage you to consider better

soil, site, vegetation inventory as part of this process. There are frameworks and groups (both state and federal) capable of doing this cooperatively across the state if properly motivated by a group such as this and the Governor.

Thank you for your time.

Kendra Moseley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-14 10:44:34

No Duplicates.

## **Comment 2 for Draft Natural and Working Lands Implementation Plan (nwldraftplan-ws) - 1st Workshop.**

First Name: jennifer

Last Name: wood

Email Address: jennifer.wood@ca.usda.gov

Affiliation: USDA-NRCS Pacific Soil Survey Office

Subject: Ecoregion base and rangeland compost application

Comment:

I am surprised to see you used the USFS Bailey Ecoregions of the United States as the ecological basis of your analysis. The EPA Ecoregion product is more updated and regularly maintained. <https://www.epa.gov/eco-research/ecoregions>

Also on the Ecoregion topic, while I recognize that your plan is necessarily coarse, a few more divisions might be warranted. For instance, the Sierra Nevada Foothills, Sierra Nevada Mountains, and Eastern Sierras are very distinct ecologically and have very different management needs.

I do appreciate that you only mention compost application in rangeland for the central and northern coast regions. Even for the somewhat low acreage that you target for rangeland compost application, the literature is lacking follow-up monitoring from the original study that evaluated that approach. And as far as I am aware, no other research in rangeland has been done besides on those original sites. So it is wise to tread lightly in that area.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-14 14:00:34

No Duplicates.

## **Comment 3 for Draft Natural and Working Lands Implementation Plan (nwldraftplan-ws) - 1st Workshop.**

First Name: Eleanor  
Last Name: MacMakin  
Email Address: emacmakin@gmail.com  
Affiliation:

Subject: Soil, Compost and fertilizer and Solano County  
Comment:

I am a land steward with a retreat on the headwaters of Ulati creek. In regard to SB 375 for sustainable communities planning grants and incentives best practices pilot program thru the department of conservation. A model using compost toilets to fertilize gardens is depicted in the diagram. Please expand on the carbon sequestering gained from using human product for fertilizer. The toilet community world wide has evolved to incorporate the UDDT Urine diverting dry toilet where water cannot be wasted. California have arrived at that time, where water cannot be wasted and humans must come to terms with their body functions and change the narrative of the flush. Food when considered full cycle in the human body exits in a format containing nitrogen, potassium and phosphorus all necessary elements for plant growth. The development currently is aimed at communities without toilets at all but the advantages of exploring how we could change the narrative for modern communities, is limitless. Unfortunately the biggest obstacle for any advancement towards a better future in Solano County is the entrenched leadership who operate as a dictatorship. To support this argument GreenPeace Alliance has been advocating for Solano county to adopt Prop 68 and continue to wait while the draft budget has been in development since Feb, 2018 and just last week the Planning Department cancelled a scheduled meeting because they are still working on it. As a land steward I would very much like to pilot the UDDT technology and be a case study for the advancement of this technology, but the administration does not allow "composting toilets". Please consider how this very progressive plan will need a change of mind set in entrenched leaders to be effective.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-31 15:28:40

No Duplicates.

**Comment 4 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: COMMENTS on January 2019 draft Natural and Working Lands Implementation Plan  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/6-nwldraftplan-ws-AmRTMFY1BQkCMQkn.docx](http://www.arb.ca.gov/lists/com-attach/6-nwldraftplan-ws-AmRTMFY1BQkCMQkn.docx)

Original File Name: Feb 5.docx

Date and Time Comment Was Submitted: 2019-02-05 12:35:16

No Duplicates.

**Comment 5 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Jeffrey

Last Name: Creque

Email Address: jcreque@carboncycle.org

Affiliation: Carbon Cycle Institute

Subject: CCI Comment on Draft Implementation Plan

Comment:

File attached

Attachment: [www.arb.ca.gov/lists/com-attach/7-nwldraftplan-ws-WzgFYFQ8BQIVMABv.pdf](http://www.arb.ca.gov/lists/com-attach/7-nwldraftplan-ws-WzgFYFQ8BQIVMABv.pdf)

Original File Name: CCI\_Comments\_2019 NWL Draft Plan.pdf

Date and Time Comment Was Submitted: 2019-02-07 20:11:39

No Duplicates.

**Comment 6 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Justin  
Last Name: Oldfield  
Email Address: justin@calcattlemen.org  
Affiliation:

Subject: California Cattlemen's Association Comments on Draft Implementation Plan  
Comment:

Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8-nwldraftplan-ws-BmVWM1AwUV1QMgR2.pdf](http://www.arb.ca.gov/lists/com-attach/8-nwldraftplan-ws-BmVWM1AwUV1QMgR2.pdf)

Original File Name: CCA Draft Natural and Working Lands Climate Change Implementation Plan 2-7-2019 - Copy.pdf

Date and Time Comment Was Submitted: 2019-02-07 20:22:31

No Duplicates.

**Comment 7 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: John

Last Name: Plaggmier

Email Address: [jplaggmier@sierrabusiness.org](mailto:jplaggmier@sierrabusiness.org)

Affiliation:

Subject: Natural and Working Lands - Consortium Letter

Comment:

Please see the attached comment letter on behalf of the Sierra Consortium.

Attachment: [www.arb.ca.gov/lists/com-attach/10-nwldraftplan-ws-UyAHaFI2UHFVIQFg.pdf](http://www.arb.ca.gov/lists/com-attach/10-nwldraftplan-ws-UyAHaFI2UHFVIQFg.pdf)

Original File Name: Sierra Consortium Comments CA Natural and Working Lands  
2019\_FNL.pdf

Date and Time Comment Was Submitted: 2019-02-08 00:03:01

No Duplicates.



**Comment 8 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: NWL DRAFT comments from NWL Stakeholders

Comment:

On behalf of the dozen+ non-profits signed on to the attached letter, we are pleased to offer comments on the NWL January DRAFT Implementation Plan. Thanks to ARB for this opportunity.

Attachment: [www.arb.ca.gov/lists/com-attach/11-nwldraftplan-ws-AW8FdFwxBwtSPVM+.pdf](http://www.arb.ca.gov/lists/com-attach/11-nwldraftplan-ws-AW8FdFwxBwtSPVM+.pdf)

Original File Name: NWL Imp Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2019-02-08 09:18:17

No Duplicates.

**Comment 9 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Julia  
Last Name: Kim  
Email Address: jkim@lgc.org  
Affiliation: ARCCA

Subject: ARCCA Comment Letter  
Comment:

Dear Air Resources Board Staff:

Please find attached a comment letter from the Alliance of Regional Collaboratives for Climate Adaptation in response to the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan.

Thank you for the opportunity to review and provide comments on this important plan. We welcome the opportunity to discuss any of our comments further.

Sincerely,

Julia Kim  
Local Government Commission

On behalf of the Alliance of Regional Collaboratives for Climate Adaptation

Attachment: [www.arb.ca.gov/lists/com-attach/12-nwldraftplan-ws-B2ZdKVw+V2cLbFQL.pdf](http://www.arb.ca.gov/lists/com-attach/12-nwldraftplan-ws-B2ZdKVw+V2cLbFQL.pdf)

Original File Name: ARCCA Comment Letter - CA 2030 Natural and Working Lands Climate Change Implementation Plan.pdf

Date and Time Comment Was Submitted: 2019-02-08 12:16:36

No Duplicates.

**Comment 10 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Barad

Email Address: daniel.barad@sierraclub.org

Affiliation: Sierra Club California

Subject: Center for Biological Diversity/Sierra Club California NWL Comments

Comment:

Please find The Center for Biological Diversity and Sierra Club California's joint comment letter attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/13-nwldraftplan-ws-BXYCZwZkBXhWM1c1.pdf](http://www.arb.ca.gov/lists/com-attach/13-nwldraftplan-ws-BXYCZwZkBXhWM1c1.pdf)

Original File Name: SCC.CBD NWL Draft 2.8.pdf

Date and Time Comment Was Submitted: 2019-02-08 13:15:17

No Duplicates.

**Comment 11 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Hughes  
Email Address: garyhughes.bfw@gmail.com  
Affiliation: Biofuelwatch

Subject: Comment on Draft NWL Implementation Plan  
Comment:

Please find attached a comment letter from Biofuelwatch.

Attachment: [www.arb.ca.gov/lists/com-attach/15-nwldraftplan-ws-WjgHaFI8ADVSIQNm.pdf](http://www.arb.ca.gov/lists/com-attach/15-nwldraftplan-ws-WjgHaFI8ADVSIQNm.pdf)

Original File Name: BiofuelwatchLtr\_NatWorkLandsDraftPlan\_8feb2019.pdf

Date and Time Comment Was Submitted: 2019-02-08 14:39:07

No Duplicates.

**Comment 12 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on Draft NWL Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/16-nwldraftplan-ws-AnJXNlczUV1XPwF2.pdf](http://www.arb.ca.gov/lists/com-attach/16-nwldraftplan-ws-AnJXNlczUV1XPwF2.pdf)

Original File Name: PGE\_NWL Plan Comments\_2-8-19.pdf

Date and Time Comment Was Submitted: 2019-02-08 14:54:49

No Duplicates.

**Comment 13 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Jeffrey

Last Name: Creque

Email Address: jcreque@carboncycle.org

Affiliation: Carbon Cycle Institute

Subject: CCI Comments NWL Draft Plan\_2019

Comment:

Please use this version of our comments on the Draft NWL Plan;  
thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/17-nwldraftplan-ws-VjVVMAZuBwsHYlc4.pdf](http://www.arb.ca.gov/lists/com-attach/17-nwldraftplan-ws-VjVVMAZuBwsHYlc4.pdf)

Original File Name: CCI Comments NWL Draft Plan\_2019.pdf

Date and Time Comment Was Submitted: 2019-02-08 14:51:33

No Duplicates.

**Comment 14 for Draft Natural and Working Lands Implementation Plan (nwldraftplan-ws) - 1st Workshop.**

First Name: Erica

Last Name: Williams

Email Address: erica.williams@tpl.org

Affiliation: Trust for Public Land (TPL)

Subject: TPL Comments on January 2019 Draft CA 2030 NWL Climate Change Implementation Plan

Comment:

On behalf of the Trust for Public Land, please accept these comments on the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/18-nwldraftplan-ws-BjRUYIFhUjgAWVdn.pdf](http://www.arb.ca.gov/lists/com-attach/18-nwldraftplan-ws-BjRUYIFhUjgAWVdn.pdf)

Original File Name: 2019\_0208 TPL Comments on Draft CA 2030 NWL Climate Change Implementation Plan .pdf

Date and Time Comment Was Submitted: 2019-02-08 16:45:02

No Duplicates.

**Comment 15 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Brittany

Last Name: Dyer

Email Address: [bdyer@americanforests.org](mailto:bdyer@americanforests.org)

Affiliation: American Forests

Subject: American Forests Comment on 2030 CA N&W Lands CCIP

Comment:

Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/19-nwldraftplan-ws-UTBcPARmVmoFbgFk.pdf](http://www.arb.ca.gov/lists/com-attach/19-nwldraftplan-ws-UTBcPARmVmoFbgFk.pdf)

Original File Name: AFComents-NWLCCIP.pdf

Date and Time Comment Was Submitted: 2019-02-08 16:06:12

No Duplicates.



**Comment 16 for Draft Natural and Working Lands Implementation Plan (nwldraftplan-ws) - 1st Workshop.**

First Name: Mark

Last Name: Gold

Email Address: mgold@conet.ucla.edu

Affiliation: UCLA Sustainable LA Grand Challenge

Subject: UCLA Sustainable LA Grand Challenge Comment Letter

Comment:

Please see attached comment letter. Thank you for your time and consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/20-nwldraftplan-ws-VjxQNwFuUnQDZAJw.pdf](http://www.arb.ca.gov/lists/com-attach/20-nwldraftplan-ws-VjxQNwFuUnQDZAJw.pdf)

Original File Name: JANUARY 2019 DRAFT California 2030 Natural and Working\_SLAGC\_Comment.pdf

Date and Time Comment Was Submitted: 2019-02-08 19:52:06

No Duplicates.

**Comment 17 for Draft Natural and Working Lands Implementation Plan  
(nwldraftplan-ws) - 1st Workshop.**

First Name: Noelle

Last Name: Cremers

Email Address: ncremers@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Natural and Working Lands Implementation Plan

Comment:

Please see the attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/21-nwldraftplan-ws-VjgHdgRpVVkCbVA9.pdf](http://www.arb.ca.gov/lists/com-attach/21-nwldraftplan-ws-VjgHdgRpVVkCbVA9.pdf)

Original File Name: NWL Implementation Plan Cmts 2-8-19.pdf

Date and Time Comment Was Submitted: 2019-02-08 20:45:15

No Duplicates.

**There are no comments posted to Draft Natural and Working Lands Implementation Plan (nwldraftplan-ws) that were presented during the Workshop at this time.**