TreePeople

June 24, 2022

Ms. Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chair Randolph,

Five years ago, The California Air Resources Board (CARB) released its 2017 Scoping Plan that included a placeholder for natural and working lands. The 6½-page placeholder encouraged Californians to "look to the future" and deferred largely to the Natural and Working Lands Climate Change Implementation Plan that was in development. Perhaps most important, the Plan committed to statewide emission projections that would support natural and working lands achieving "NWL climate objectives and the statewide goals of at least 15-20 MMTCO2e emissions sequestering and avoidance from the NWL sector by 2030." Unfortunately, that remains a promise unfulfilled.

The Draft 2022 Scoping Plan released in May instead offers that "The Proposed Scenario is estimated to result in additional NWL emissions of 8 MMTCO2e annually from 2025–2045. The Reference Scenario is estimated to result in annual emissions of 9 MMTCO2e over the same time period, and so the Proposed Scenario slows the rate of emissions and provides an approximate 1 MMTCO2e in additional annual sequestration relative to the Reference Scenario." In short, CARB has concluded over the last five years that natural and working lands are a sequestration liability rather than asset or carbon sink.

This single assertion summarizes the multiple challenges conservation groups across California have highlighted with the Draft Plan – many of whom have coalesced around a group letter urging CARB to convene a scientific advisory group composed of external experts in modeling for the NWL sector, and with this group, engage in ongoing review and discussion to improve and refine the outputs. As TreePeople co-drafted and signed this letter, we will limit our comments here to sector specific observations regarding wildlands and urban forests.

<u>Wildlands</u>

CARB has responded to previous stakeholder comments about the need to differentiate between forests and shrublands while analyzing the carbon interaction of these unique ecosystems; however, while carbon stock potential is analyzed for each classification, assumptions of management priorities are the same for both forests and shrublands. For instance, the Draft 2022 Scoping Plan professes that, "Both types [shrublands and forests] are distinct, with their own ecological dynamics and management strategies, and are modeled within a single model that is calibrated to treat them uniquely." Yet the Scoping Plan continues, "These landscapes are fire-adapted, and historical tribal management of these lands fostered ecosystem health and resilience. Over the past century, these lands have been severely impacted by fire exclusion, including exclusion of indigenous people's management and past management practices, which has resulted in less resilient ecosystems and communities and more destructive wildfires today."

These collective assumptions of wildfire history and management do not reflect the current scientific consensus that California's shrublands, and chaparral in particular, are at severe risk of type conversion to non-native grasslands. In addition to climate change, the most significant reason for this conversion is the *increased* frequency of fires from anthropogenic sources. Blanket strategies highlighted in the Draft 2022 Scoping Plan, such as prescribed burning or the need to "establish defensible space on all parcels", are thus inappropriately applied across these unique ecosystems.

Unfortunately, these strategies further perpetuate the misconception that "brush management" should be prioritized over home hardening and other wildfire resilience strategies. Blanket application of these actions will most likely *reduce* the carbon stock potential of California shrublands, which account for the greatest areal coverage of any habitat classification in the State. We are greatly appreciative of CARB's efforts to differentiate between these classifications in the modeling, but further revisions are necessary to accurately capture the carbon stock potential of these systems in light of the unique management requirements of each ecoregion.

<u>Urban Forests</u>

We appreciate the time and energy CARB and the Draft 2022 Scoping Plan focus on urban forestry. The Plan consistently highlights the carbon sequestration potential of urban forests; and provides constructive strategies for success that include "Increase public awareness of urban forests benefits" and "Provide technical assistance and resources to disadvantaged communities to implement community greening projects." The consistencies largely end there.

Urban forests are treated differently than every other NWL sector for reasons that remain unexplained. Why do all urban forest scenarios revolve around fiscal resources rather than conservation targets as detailed in wetlands, grasslands and all other NWL sectors? Why is it that, "for urban forests, the funds were modeled as being sourced from a combination of state government and private property owners in proportion to the current estimated private/public spending ratio?" For all other actions, funds were assumed to be sourced from the state government. Since so much of the urban forestry discussion does revolve around investment levels, why does the Draft Plan send mixed messages on this subject? On Page 98, "CARB estimates that the state currently spends approximately $4 billion dollars annually on planting, maintenance, sidewalk repair, tree removal, and other expenses related to urban forests…" The proposed scenario supports a 20% increase in urban forest investments and reflects this as one billion dollars and change in Table 3.1. Is this in addition to the $4 billion investment estimated by CARB? And what data informs that estimate?

With regard to sequestration estimates and consistency, CARB does assert "urban forests have a significant potential to sequester carbon," noting that "the Proposed Scenario estimates that approximately 600,000 MTCO2e in net sequestration may be possible from increases in urban forestry by 2030." While we are glad to see urban forests classified as a carbon sink rather than source, the estimates, which presumably factor in the proposed 20% increase in investments, fall dramatically short of the State's sequestration assertions highlighted in the 2018 Forest Carbon Plan. Within the Plan, CAL EPA, CAL FIRE and the California Natural Resources Agency cite published, peer-reviewed data that asserts "on an annual basis, the amount of carbon dioxide sequestered by urban forests was estimated to be almost 2 million metric tons of C per year." Further, "the amount of carbon dioxide emissions avoided was estimated to be 0.4 million metric tons of C per year, attributed to modeled reductions in building energy use." Therefore, the Draft Scoping Plan projects a 75% reduction in annual sequestration rates from urban forests receiving a 20% increase above BAU investments. And if urban forests are seen by CARB as the only sequestration gain in the NWL sector, why does it have one of the lowest levels of investments in this sector?

Finally, the Draft Plan Appendix does provide some detail into the modeling applied for these purposes, and also offers a mixed bag on urban forests.

We applaud CARB's recognition that society should prioritize water use during drought conditions for watering urban trees, and that if we don't water trees during a drought we will lose urban tree canopy. However, this technical tool has several problems because the model sought simplicity through lumping all urban forests in California into one equation and using a simple linear equation to model change. Consequently, the model is not particularly instructive as to how to grow the urban forest unless you believe the assumption of this model is that water use in response to drought is the only variable needed to understand and therefore influence urban forest change through time.

TreePeople's written comments to CARB throughout the last year have always reinforced the core theme that the materials developed by CARB will help guide California natural resources planning efforts and infrastructure investments needed to meet the ambitious greenhouse gas (GHG) reduction targets set forth in Executive Order B-30-15 and SB 32. Perhap the most important and influential guiding document will be the 2022 Scoping Plan. The final Extreme Heat Action Plan very clearly identifies the near-term goal to "Protect natural and working lands, ecosystems, and biodiversity from the impacts of extreme heat." That Plan places immense value on these critical resources, as does the final Pathways to 30X30 Plan, which opines that "Governor Newsom's clear call to expand environmental conservation helps lead an international movement to protect our planet." As currently crafted, the Draft 2022 Scoping Plan stands distinctly separate from these guiding documents, minimizing the value of natural and working lands in the sequestration discussion, and concluding " the Proposed Scenario slows the rate of emissions." Please do not let this critical discussion end here.

Thank you for the opportunity to provide written comments. We stand ready to be partners in meeting California's GHG reduction goals through ambitious nature-based solutions.

Sincerely,

Manny Gonez
Director of Policy Initiatives
TreePeople