



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

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April 7, 2016

Mary D. Nichols, Chairperson
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Comments on the Forest Carbon Plan

Dear Chairperson Nichols:

The Mountains Recreation and Conservation Authority (MRCA) is grateful for this opportunity to provide comments to the California Air Resources Board and Forest Climate Action Team (FCAT) with regards to the Forest Carbon Plan Concept Paper (Plan).

The MRCA is a local government public entity established in 1985 pursuant to the Joint Powers Act. The MRCA is a local partnership between the Santa Monica Mountains Conservancy (Conservancy), which is a state agency established by the Legislature, and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District, both of which are local park agencies established by the vote of the people in those communities.

The MRCA is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. The MRCA manages and provides ranger services for almost 72,000 acres of public lands and parks that it owns and that are owned by the Conservancy or other agencies, and provides comprehensive education and interpretation programs for the public. The MRCA works in cooperation with the Conservancy and other local government partners to acquire parkland, participate in vital planning processes, and complete major park improvement projects.

The MRCA provides natural resources, scientific expertise, critical regional planning services, park construction services, park operations, fire prevention, ranger services, educational and leadership programs for thousands of youth each year, and is one of the lead agencies providing for the revitalization of the Los Angeles River.

Because of MRCA's dedication and long history of preservation and management of local open space, natural resources and parkland, the MRCA takes the threats climate change presents seriously and seeks proactively to implement climate change

mitigation and adaptation efforts. MRCA protects some of California's most at risk species and biodiversity from human encroachment, drought, pollution and climate change. The lands we own and manage for all Californians provide important local air quality, water quality and heat island mitigation for the local population, including many disadvantaged and environmental justice communities.

Looking towards climate change's future and existing threats and uncertainties, the MRCA has embarked on a research and planning program to investigate how parks, local planning, development and open space efforts can mitigate greenhouse gas emissions and implement cost-effective climate change adaptation measures. MRCA has worked closely on this program with the Santa Monica Mountains Conservancy.

Given MRCA's roles and perspectives, MRCA makes the following recommendations to CARB and FCAT. MRCA staff are also available to meet with your staff as desired to discuss these ideas further.

1. Regionally Based Entities as Implementors:

MRCA requests that CARB and FCAT specifically designate State Conservancies and other regionally based entities, such as MRCA, as Implementing Entities for investment funds. State Conservancies have the ability to implement climate change adaptation and mitigation projects quickly, equitably and efficiently. California's Conservancies and MRCA are particularly well suited to meet greenhouse gas emissions (GHG) reductions goals and targets because they already have the mechanisms and partnerships in place to implement regional programs that serve statewide priorities. Conservancies and MRCA will be able to leverage allowance revenues with existing funds, form strategic partnerships with local entities, and utilize existing administrative infrastructure to efficiently roll out projects that incentivize and foster GHG reduction goals and further the purposes of AB 32 and the Forest Carbon Action Plan.

Many of the current or proposed projects by MRCA, the Santa Monica Mountains Conservancy, and similar regionally focused entities are located in and serve disadvantaged communities (DACs) as identified by Cal/EPA. The Los Angeles area has the largest concentration of DACs in California. These areas of high need have long been a focus for the MRCA because every dollar invested achieves important statewide co-benefits like job creation, advanced skills and job training, and neighborhood revitalization. The MRCA is in a position to quickly implement this work should strategic investment funds from auction proceeds become available.

Both regionally based entities, like MRCA, and regional state agencies, like State Conservancies, have the local implementing knowledge and networks designed to respond quickly and adapt to local needs. These tested capabilities allow these entities to prioritize environmental concerns, identify environmental hazards, work with affected

communities, continually monitor and adapt solutions, provide transparency, and ensure regionalized participation in climate change solutions.

2. Invest in chaparral for climate adaptation and carbon sequestration:

In addition to forests, California's important chaparral ecosystems serve as important carbon sinks and, in many areas, are better adapted to endure the stresses of climate change.

Chaparral systems serve, like forests, as important carbon sinks and must be protected. [See, for example, Luo, H. 2007. Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide. *Global Change Biology* 13: 386-396.]

The water needs of chaparral ecosystems also indicate that they might be more resilient to negative changes in state water availability as droughts increase and climate change alters water cycle patterns. These ecosystems often sequester significant portions of their stored carbon underground, providing greater carbon sequestration resiliency in the wake of wildfires.

Thus, it is important for CARB and FCAT to ensure that chaparral systems are considered along with forests in California's carbon sequestration and climate adaptation equations. There must exist similar policy incentives for chaparral to ensure that these ecosystems are protected. CARB and FCAT should ensure that forest carbon initiatives do not have the perverse incentive of encouraging conversion and development of chaparral ecosystems by not prioritizing chaparral through regulatory and economic incentives at parity with forest ecosystems. Otherwise, attempts to improve forest health may have the negative impact of signaling to developers and planners that chaparral ecosystems are still ripe targets for conversion.

3. Habitat interconnectivity and wildlife corridors under a changed climate:

FCAT intends that the Plan (page 2)

- "Establish forest health and resiliency conditions needed to reach targets for carbon sequestration and net reductions in emissions of greenhouse gases (GHGs) and atmospheric black carbon;"...
- "Develop near-, medium- and long-term targets for carbon sequestration and emissions reductions by region and ownership, through 2050 and beyond, based on goals and ecosystem potential."

The Plan also recognizes that (page 6)

“Forest losses due to climate change not only threaten carbon storage and emissions from forests, but also threaten water resources, energy transmission, the survival of fish and wildlife, and human health. These losses also will negatively impact tourism, recreation opportunities, and the timber industry.”

Therefore, MRCA recommends that the Plan provide financial incentives, research support and funding, and technical assistance. Local operators need to implement the best forest health strategies for resilient ecosystems during and after climatic changes. Local entities will need to plant and manage forests, rural and urban, that will adapt to fire pattern changes; temperature changes; humidity changes; wildlife changes, including invasive species; and water availability changes, including precipitation changes. Local planners, like MRCA and its partners will better sequester carbon and plan for the future if they have the support to know which species will survive and thrive in their jurisdictions as climatic changes affects their regions.

Similarly, MRCA and other entities will need to manage forests in a way that ensures current wildlife corridors will be able to adapt as climate change shifts vegetation patterns. This is especially important for megafauna and keystone species that may not be able to survive in their current ranges if changes in vegetation patterns limit the availability of food sources in shifting corridors.

Thus, it is not enough that the forests today are “protected from fragmentation and conversion, and that [forests] provide a diverse range of quality, interconnected habitat types for terrestrial and aquatic wildlife species, including listed and non-listed species.” Rather, it is important to ensure that the forests of the future are similarly protected. To better ensure this happens, the state should provide incentives, research support and technical assistance so that current investments realize their goals.

4. Active Transportation and Urban Forest Health

Regionally focused entities, like MRCA and State Conservancies, are in the best position to exploit synergies between the urban forest and GHG reduction co-benefits. As the FCAT recognizes, urban forests serve as important carbon sinks. However, it is also important to prioritize urban forest programs that leverage urban forestry investment with other strategies to reduce carbon emissions.

MRCA and the Santa Monica Mountains Conservancy have worked together with their consultants to research quantifiable methods of leveraging urban park and urban forestry investments to reduce GHG emissions from the urban area. State funds and incentives should be made available so that local actors, like MRCA and the Santa Monica Mountains Conservancy, have the ability to prioritize urban forestry investments that provide important climate change adaptation and mitigation co-benefits. State funding can catalyze local actors to invest in these multi-benefit urban park and urban forestry strategies. Examples of these strategies include:

• **Active Transportation:**

The strategic co-location of urban parks and urban forestry investments to mitigate heat island effect and provide shade along potential and important active transportation routes can reduce VMTs and encourage dense urban living. This is especially important along bus and rail stations, dense urban infill areas, important walking corridors, and bike paths.

• **Greenbelts:**

Forestry programs can incentivize the acquisition, maintenance and preservation of urban greenbelts, containing the urban limit line. Forestry programs, thus, cannot only help combat climate change through directly sequestering carbon, but also by reducing VMTs. Strong urban limit lines encourage dense urban living and infill development. By creating incentives for forestry acquisitions to create strong greenbelts, especially when combined with the Sustainable Agricultural Land Conservation (SALC) program, forestry programs can make sustainable and significant GHG reductions in addition to direct sequestration, water quality and wildlife benefits.

• **Urban Amenities:**

Urban parks and inviting urban open spaces and corridors enhance the value and increase the desirability of dense urban living. Strategic urban forestry investments that support park growth, stabilize neighborhoods and create inviting urban open spaces, such as the future redevelopment plans for the Los Angeles River, can create additional GHG benefits outside the urban forest's carbon sequestration and urban runoff nutrient load reducing abilities. By making dense urban living attractive, entities like MRCA and State Conservancies, can help reduce urban sprawl, related VMTs, and related land conversion losses.

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", written over a horizontal line.

George Lange, Chair
Mountains Recreation and Conservation Authority