



Carbon Cycle Institute



CALIFORNIA ASSOCIATION OF
RESOURCE
CONSERVATION DISTRICTS



August 16, 2022

The Honorable Governor Gavin Newsom
Governor of California
1021 O Street, Suite 9000
Sacramento, CA 95814

The Honorable Toni Atkins
President Pro Tempore
California State Senate
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Anthony Rendon
Speaker
California State Assembly
1021 O Street, Suite 8330
Sacramento, CA 95814

Re: Leveraging Natural and Working Lands Carbon Sequestration to Meet Climate Goals

Dear Governor Newsom, Pro Tem Atkins, and Speaker Rendon:

We, the cosponsors of AB 2649, thank the Administration for prioritizing Natural and Working Lands (NWL) sequestration as part of its 2022 legislative climate policy priorities. We write today to urge the Legislature to clarify and amend the legislative language recently provided by the Administration to distinguish NWL sequestration from engineered approaches, more clearly define it, and set in statute a minimum achievable target for 2030.

The science is clear. To secure a stable climate, we must not only significantly cut emissions, we must also begin removing past climate pollution from the atmosphere. The removal and accrual of past climate pollution from the atmosphere through the NWL sector is an essential strategy in this effort. NWL carbon sequestration is proven,

scalable, cost-effective, environmentally sound and just, and leverages practices informed by traditional ecological knowledge. NWL climate strategies can begin to be implemented immediately with multiple co-benefits for community health, our economy, and our environment—a unique and critical quality of this climate strategy.

The undersigned organizations believe the language circulated by the Administration on August 12, 2022 must be further clarified and amended to reflect critical distinctions and opportunities. The legislation should:

1. **Separate NWL sequestration goals from technological carbon removal goals.** Given the vastly different contexts, metrics, and ecological and equity outcomes of carbon removal strategies, it is imperative that NWL goals are separated from engineered carbon removal goals. The undersigned organizations oppose bills or language that conflate these. Setting a distinct target for NWL, separate from engineered carbon removal, will help to maximize the NWL sector's contribution to California's climate goals while also elevating the myriad ecosystem services and public co-benefits provided by these natural systems.

2. **Use the definition for “natural carbon sequestration” from AB 2649 (C. Garcia):**

We recommend using the definition for “natural carbon sequestration” as articulated in AB 2649 (C. Garcia): “Natural carbon sequestration’ means actions that are undertaken on natural and working lands to remove and provide long-term storage of atmospheric greenhouse gasses in vegetation and soils. This shall include preservation, conservation, restoration, and sustainable management of these lands, which may include compost application, cover crops, hedgerows, planned grazing, urban forestry, forest management and restoration, riparian restoration, restoration of tidal flows to wetlands, and other forms of wetland restoration, among other relevant actions.” This language is the product of robust policy negotiations in both the Assembly and Senate.

3. **Establish a minimum goal for additional CO₂e to be sequestered annually in the state’s NWL sector by 2030, independent of emissions reduction goals:**

- a. With the many benefits of NWL sequestration practices for resilience, food and water security, and the health of our communities, **we urge California’s leaders to adopt a goal of at least 30 MMT CO₂e/year sequestered by the NWL sector alone by 2030.** We are happy to provide the details of this analysis at your request.

In addition, we urge the Legislature and the Administration to take the following steps to ensure a robust and rapid scaling up of state NWL sequestration effort to meet its 2030 climate goals:

- Direct CNRA to establish an advisory committee that includes expert practitioners, EJ and/or tribal representatives, climate scientists, and soil and ecosystem ecologists to conduct additional analyses of NWL carbon sequestration strategies, and to develop priority pathways and actions;
- Bolster funding for established programs with demonstrated records of success in supporting carbon neutrality, the NWL Climate Smart Strategy, and the 30x30 goals. Robust investments in workforce development and training, and the provision of planning, technical and financial assistance, monitoring, and other services to practitioners and others are critical to scaling NWL programs and their climate impacts; and,
- Increase support for natural and working lands mitigation and adaptation planning at the city, county, and regional scale where projects are undertaken to achieve the State's NWL climate goals.

Confronting the climate crisis at the speed and scale demanded by the science and rapidly deteriorating climate reality requires bold action from California. By clarifying the role of NWL and establishing achievable minimum targets for 2030 in the Administration's climate package legislative language, California will set the stage for scaling up natural carbon sequestration from the atmosphere while enhancing water and food security, public health and equity outcomes, and resilience to greater weather extremes. We thank you for your climate leadership.

Thank you for your consideration.

Sincerely,

Ellie Cohen
The Climate Center

Torri Estrada
Carbon Cycle Institute

Don Butz
California Association of Resource Conservation Districts

Gilly Lyons
The Pew Charitable Trusts