



March 13, 2023

Wade Crowfoot
Secretary for Natural Resources
California Natural Resources Agency

Dr. Jennifer Norris
Deputy Secretary for Biodiversity and Habitat
California Natural Resources Agency

Amanda Hansen
Deputy Secretary for Climate Change
California Natural Resources Agency

Jenn Phillips
Assistant Secretary for Climate Change
California Natural Resources Agency

RE: Expert Advisory Committee: Lack of California Desert Representation

Dear Secretary Crowfoot, Deputy Secretary Norris, Deputy Secretary Hansen, and Assistant Secretary Phillips,

Thank you for your contributions in designing the AB 1757 Natural Working Lands Expert Advisory Committee (EAC) and all the hard work that went into ensuring a smooth first EAC meeting on February 10, 2023.

It is disappointing for us to see that some key stakeholders were not represented by any experts on the EAC. The lack of representation of a tribal voice and that of desert landscapes created a large void that significantly weakens the outcome for reaching the stated goals for AB 1757.

We are aware that CNRA has extended the deadline for application and opportunity to join the EAC for tribal interests and applaud that decision. Given the crucial role that California's desert lands play in carbon sequestration, and the availability of scientific expertise in modeling carbon sequestration in the desert, we strongly urge you to extend the opportunity to include representatives from the desert region as well.

We understand that the window for applying for these roles has passed; however, given the importance of these two missing voices, we believe it is feasible to extend the opportunity to submit our applications as is taking place with tribal members, and are prepared to expedite and support that process for the desert region.

For context, please note that on Oct 4, 2022, via an NGO coalition [letter](#) (attached), we submitted a list of nominees for CNRA's consideration that included four desert experts -one of which is also a representative of tribal concerns. However, our four nominees

were never reached out to or followed up with. We should emphasize that overlooking our nominees is not the issue: we are simply interested in ensuring that the state's EAC has the benefit of tribal voices and desert ecologists.

Without desert representation and expertise sitting on the EAC, the work that AB 1757 seeks to accomplish will be flawed and incomplete. Desert lands comprise over 25% of the state of California. Omission of representation of an ecosystem that occupies over a quarter of the Golden State is too large a deficit to stand.

Desert expertise is essential on the EAC because the desert's carbon sequestration processes diverge from ecosystems currently represented. There is minimal overlap between carbon sequestration processes in a forest or grassland ecosystem and that which takes place in the desert. Carbon sequestration in the desert takes place primarily underground. Carbon emissions are captured aboveground, then transferred through the root system and stored deep underground in the caliche soil layer for thousands of years if left undisturbed.

It was recently discovered that "sand transfer," or shifting movement of sand on balance functions as a carbon sink, even absent vegetation. Researchers in China have reported that desert and arid lands may account for what has been termed the "missing carbon sink" in the global carbon accounting system. Researchers have assessed that desert and arid lands could account for up to one-third of carbon sequestration on terrestrial lands. For these reasons, it is of the utmost importance that California's deserts play an integral role in AB 1757's goals and that desert expertise is present on the Expert Advisory Committee.

California's desert ecosystem is not a peripheral player in our Natural and Working Lands effort. It is a mainstay. Scientific data estimates that California's desert region sequesters about 10% of our state's carbon emissions. At a specific unit scale, the desert sequesters less carbon relative to a forested ecosystem - but the vast expanse of desert acres across our state offsets the desert's unit deficiency and makes the desert region a critical resource for carbon sequestration.

Expert representation is also critical because Natural and Working Lands has a "people" element attached to it. The California deserts span approximately 8 counties, home to a demographic that accounts for approximately half the population of the state of California, many of which are considered disadvantaged. Omission of the California desert lands as functional NWL's diminishes recognition of these important communities and the benefits they derive from their close proximity to natural working lands.

Thank you for your time and consideration on this matter. We look forward to seeing representation for two overlooked yet critical contributors to AB 1757 – tribes and desert lands – joining the outstanding EAC panel you have assembled. We have drafted a current list of experts in modeling desert carbon sequestration and biodiversity for your consideration.

Sincerely,

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Policy Advocate
Sierra Club California

Matthew Simmons
Staff Attorney
Environmental Protection Information
Center

Laura Hunter
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