

## **Comment 1 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Wendy

Last Name: Ring

Email Address: wring123@gmail.com

Affiliation: Climate 911

Subject: scenarios need better definitions

Comment:

There are too many undefined terms in the NWL Scenarios for citizens to understand. This is the first set of scoping scenarios which is so opaque. I'm no expert but am fairly well informed and I don't know which measures/practices are included in the terms below. They may have been agreed upon behind the scenes by major stakeholders, but they are not clear to members of the public, like myself, who want to participate.

Please post more specific descriptions of the measures/practices listed below and reset the comment period to start when the definitions are posted.

"sustainable harvesting"

"heterogeneous harvesting" (different from "no clearcuts"?)

"increased (type of) harvesting" net increase in harvest or change in harvest method with no increase in net harvest?

"ag practices with the co-benefit of increased drought resilience"

"nutrient cycling with a focus on woody biomass soil incorporation (almond trees or also slash?) and composting for both carbon and agronomic benefits"

"climate smart practices focused on drought resilience"

"climate smart practices focused on biodiversity"

"protect WUI" vs "maximum defensible space" vs "defensible scientifically recommended defensible space"

More comments to follow once I understand what is in the scenarios.

Also, I live in Humboldt County, which, in addition to forests, has 600,500 acres of pasture and range land with great potential for carbon sequestration. Simply categorizing our region as forest will miss out on the opportunity to sequester carbon and increase drought resilience on those working lands.

Thank you.

Wendy Ring MD, MPH

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-04 10:48:05

No Duplicates.

**Comment 2 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: William

Last Name: Stewart

Email Address: billstewart@berkeley.edu

Affiliation: University of California Berkeley

Subject: scenarios need to include benefits of wood products and risk of forest carbon saturation  
Comment:

In line with current IPCC technical guidance, the full life cycle storage and emissions of wood products needs to be included, as well as the risks of carbon saturation and carbon loss to wildfires need to be included in all scenarios. Only counting increases carbon stocks in forests will provide an incorrect view under IPCC accounting principles.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-nwl-2021-scen-ws-Wz9XNABiAAxSZgc3.pdf>

Original File Name: dec 2021 William Stewart UCB comments on NWL scoping plan.pdf

Date and Time Comment Was Submitted: 2021-12-06 10:57:38

No Duplicates.

**Comment 3 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Muriel

Last Name: Strand

Email Address: ecoengr@comcast.net

Affiliation:

Subject: comments on NWL Dec 2 workshop

Comment:

i'm submitting these as early as possible so staff will have plenty of time to digest them, as there is potentially a lot of info to review in the links and references.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-nwl-2021-scen-ws-AG4BcFQ5WVUBdFIx.pdf>

Original File Name: NWL scoping comments dec 2 .pdf

Date and Time Comment Was Submitted: 2021-12-17 09:51:24

No Duplicates.

**Comment 4 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: david

Last Name: bezanson

Email Address: bezanpsy3506@hotmail.com

Affiliation:

Subject: Natural and Working Lands Scenarios

Comment:

See pdf file attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-nwl-2021-scen-ws-VDoAZ1wpAyUEcFc2.pdf>

Original File Name: NaturalCARBDec2021.pdf

Date and Time Comment Was Submitted: 2021-12-23 14:01:36

No Duplicates.

## **Comment 5 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Endangered Habitats League (EHL), as southern California conservation group, appreciates the opportunity to comment on the Working and Natural Lands Scoping Plans Draft Alternative Scenarios.

The scenarios err - and err grievously - in lumping forest and shrublands together in a single category. Conifers forest (for example, towering redwoods) and shrublands (for example, sparse patches of coastal sage scrub hugging the ground) do not look alike, act alike, or have even vaguely similar fire regimes and fire behavior. We call on CARB to immediately withdraw these faulty scenarios.

CARB should first consult with scientific experts on the major differences between these two classes of vegetation, and separate them according into two different categories. The category of shrublands should reflect their unique ecology, carbon sequestration in soil and root systems, propensity to type-convert to flammable weeds after vegetation removal or too-frequent fire, and specific fire modeling characteristics.

In particular, CARB should engage independent experts on appropriate fire management in shrublands. Outside of defensible space for structures, roadside treatments, and strategic fuel breaks for the purposes of staging and access, science-based management does not include broad-scale treatments like vegetation removal and prescribed burning. This differs completely from forest systems, where prescribed fire can rectify fire-deficient conditions. However, due to existing habitat degradation and the baseline high frequency of anthropogenic wildfire in shrublands, such treatments are counterproductive, and will result in type-conversion to weeds, loss of carbon storage and biodiversity, and increase in flammability and fire hazard.

After the above scientific process is conducted, please reformulate a new and scientifically sound set of alternative scenarios. In concept, a combination of the objectives of Scenarios 1 and 2 (conservation and restoration, carbon sequestration, and climate resilience) will best serve the State. But as it now stands, the conflation of forests and shrublands is a blatant and egregious mistake that renders the scenarios as a whole scientifically indefensible.

EHL would be happy to work with CARB and to recommend qualified fire ecologists for consultation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-nwl-2021-scen-  
ws-BWAGaAFsB3kHdgNs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-nwl-2021-scen-ws-BWAGaAFsB3kHdgNs.pdf)

Original File Name: EHL-Working and Natural Lands Alternative Scenarios.pdf

Date and Time Comment Was Submitted: 2021-12-28 08:56:07

No Duplicates.

**Comment 6 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Evi

Last Name: Meyer

Email Address: evimeyer@cox.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 09:14:13

No Duplicates.



**Comment 7 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Sandra

Last Name: DeSimone

Email Address: sdesimone@dslextre.me.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 09:18:10

No Duplicates.

**Comment 8 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: gerald

Last Name: meral

Email Address: jerrymeral@gmail.com

Affiliation: Natural Heritage Institute

Subject: working and natural lands alternative scenarios

Comment:

Please do not merge conifer forests and shrublands into a single category. There is no basis in science for this merger, and it will lead to bad management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these incorrect scenarios. CARB should provide a separate category for shrublands, and consult with recognized experts on appropriate management strategies. In the new scenarios a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 09:29:25

No Duplicates.

**Comment 9 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: D.

Last Name: Fachko

Email Address: DFachko@yahoo.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

As a Californian resident, I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 09:36:53

No Duplicates.

**Comment 10 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Jess

Last Name: Morton

Email Address: jmorton@igc.org

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Management practices, especially where fire safety and control are concerned, must treat differing habitat types in different and appropriate ways. The present lumping of coniferous forests and scrub lands will result in practices inimical to one, if not both. Natural fire regimes in these two habitats are not the same, nor will be their needs post fire. Lumping could result in the conversion of scrub lands into ruderal grasslands prone to constant threats of fire, to say nothing of the loss of their biodiversity that includes many species endemic to it. Please revisit this unwise strategy. Go with recommended management practices drawn from sound scientific research and then recirculate the proposed scenarios.c

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 09:50:02

No Duplicates.

**Comment 11 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Lori

Last Name: Jirak

Email Address: lorih@mcn.org

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I am writing to express strong objections to the merger of conifer forests and shrublands into a single category. I have lived in and near California conifer forests, and now live in a chaparral area. This proposed categorization is not based on sound science and will lead to erroneous management practices over large parts of our state for carbon sequestration, climate resilience, and wildfire management.

CARB must withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized independent experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 10:17:06

No Duplicates.

**Comment 12 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Lela

Last Name: Updegrave

Email Address: lelaroy@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 10:24:39

No Duplicates.

**Comment 13 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Patricia

Last Name: Martz

Email Address: p.martz@cox.net

Affiliation: California Cultural Resources Preservati

Subject: Working and Natural Lands Alternative Senarios

Comment:

I stronglyobject to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed senarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculate , a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 10:37:24

No Duplicates.

**Comment 14 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Peter

Last Name: A Andersen

Email Address: westone47@gmail.com

Affiliation: Dr. (Mr.)

Subject: Shrublands are different

Comment:

I am commenting your recent management plan for wildlands  
I have concerns about the planed th merger of conifer forests and shrublands into a single category. This is questionable scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. Then you should circulate a new EIR for shrubland management. Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 10:59:38

No Duplicates.



**Comment 15 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Sandra

Last Name: Glover

Email Address: Sandygloverart23@icloud.com

Affiliation:

Subject: Protect our wildlands

Comment:

I'm opposed to any plans to reduce or destroy California's chaparral. It is already stressed due to climate change and increased frequency of fires which is resulting in a permanent alteration of plant communities. The weeds that replace chaparral following frequent fires are more flammable than native plants. Instead, require power companies to bury their transmission lines and home owners to harden their houses. Provide funds to help those who can't afford to do the necessary work.  
Thank you.  
Sandra Glover

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 11:01:20

No Duplicates.

**Comment 16 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Reed

Email Address: nancy@elfinforest.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I appreciate your work to help with climate change. However, you must do better! Putting together all "forests" that reside in California is scientifically not correct and is a fatal flaw. Please go back and separate out the many various types of forestlands (ie conifer forests, coastal sage scrub, chaparral, oak woodlands, etc) and generate specific scientifically based plans for each type. Thank you so much!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 11:11:58

No Duplicates.

**Comment 17 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Mark

Last Name: Jenne

Email Address: markjenne@aol.com

Affiliation:

Subject: Smart burning only, please

Comment:

Please DO NOT treat all types of habitat the same for the purposes of fire suppression. Coastal sage scrub and chaparral must be handled differently from forests and cannot be regularly burned without destroying the ecosystem and native plant community.

Thanks for considering the science on this and not rushing to burn everything wild.

Regards, Mark Jenne

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 12:00:24

No Duplicates.

**Comment 18 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Don

Last Name: Wood

Email Address: dwood8@cox.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the combination of conifer forests and coastal shrublands into a single category.

This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed combined scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies.

After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 12:28:20

No Duplicates.

**Comment 19 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Michael

Last Name: Popoff

Email Address: [madrussian90640@yahoo.com](mailto:madrussian90640@yahoo.com)

Affiliation: Lujavi Printing

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Dear CARB employees,

It is counter to science, biology and ecology to treat conifer forests, shrublands and chaparral as a single category for ANY purpose, even fire management. To do so WILL lead to terrible and counterproductive management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should consult with nationally recognized outside experts who's livelihood does not depend on CARB's decisions in this area.

I believe that you should recirculate scientific sound scenarios with an appropriate focus on conservation, restoration, carbon sequestration, and climate resilience. Thank you for applying the scientific veracity of my comments to your scenarios.

Yours truly, Michael W. Popoff

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 12:20:03

No Duplicates.

**Comment 20 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Ken

Last Name: Goldsmith

Email Address: kenconserv@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 12:43:45

No Duplicates.

**Comment 21 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Barnard

Email Address: ksbarnd@earthlink.net

Affiliation: 10100000889177

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments. If this policy is enacted it would allow fire agencies to construct very destructive "fire breaks" in preserved wildlands that will not result in any enhanced fire safety, but rather create large swaths of land that will require vast resources to properly manage and keep free of highly combustible weeds and invasives and contribute to creek turbidity.

Kevin Barnard

Escondido Creek Conservancy

Board Member

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 12:46:24

No Duplicates.

**Comment 22 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Songster

Email Address: songster@cox.net

Affiliation: CNPS

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 13:37:00

No Duplicates.



**Comment 23 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Mary Lou

Last Name: Rosczyk

Email Address: mlrszcz@icloud.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I certainly agree that California's farmlands, ranch lands and natural landscapes need to be managed for wildfire, climate change and carbon sequestration. However, it is totally erroneous to lump forests, coastal sage scrub, and chaparral into a single category. Coastal sage scrub and chaparral can be managed similarly. Forest lands are in a different category altogether; they are in need of prescribed burning and will benefit from such treatment. To treat sage scrub and chaparral in this manner, however, will turn these areas into flammable weed grasslands, which will prevent the return of our native chaparral and sage scrub. Please consult with recognized outside experts like Richard H. Halsey on the appropriate management of these lands. Thank you for considering my comments.

Respectfully,

Mary Lou Rosczyk

24435 Village Walk Place, #304

Murrieta, CA 92562

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 13:17:25

No Duplicates.

**Comment 24 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Charlotte

Last Name: Frieze

Email Address: cmfrieze@aol.com

Affiliation: Malibu Open Space Alliance

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 14:52:37

No Duplicates.

**Comment 25 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Sandy

Last Name: Zelasko

Email Address: slzphoto@sbcglobal.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 16:05:44

No Duplicates.

**Comment 26 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Violet

Last Name: Ouyang

Email Address: ouyangv@aol.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 16:23:35

No Duplicates.

**Comment 27 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Cary

Last Name: Lowe, Ph.D.

Email Address: carylowe@cl.sdcoxmail.com

Affiliation:

Subject: 2022 Scoping Plan Update -- Natural & Working Lands Scenarios

Comment:

As someone who has studied and written about climate change issues extensively, I have great concern about your proposal to treat conifer forests and shrub lands identically with regard to carbon sequestration potential. Not only does this appear to be inaccurate from a scientific perspective, but it will result in erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. I urge CARB to withdraw these flawed scenarios, provide a separate category for shrub lands, and consult with recognized outside experts on appropriate management strategies. Once scientifically sound scenarios have been developed and recirculated, CARB will be able to effectively address the program goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 16:40:48

No Duplicates.

**Comment 28 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Lida

Last Name: Hill

Email Address: lhilllink@gmail.com

Affiliation:

Subject: Vegetation removal in coastal areas or any of california.

Comment:

I believe Cal fire along with PG&E has devastated so much of california. Preventing fires is impossible. My example is my cabin on airport Road in markleyville california. For many many years but BLM in Carson City has been managing the small track of land they hold in the state of california. Krutz lake and Summit lake are part of the beauty of this area and we're harshly managed especially in the past 5 years or 10 years. Then last year it all burned regardless of the many years of government money wasted on management. I have seen extensive cutting and riparian areas devastating the amphibian populations. We have to stop. And stop now we are just supporting these municipalities that do not base their decisions on science. And in addition, base their decisions on budget. I am very opposed to any action taken for fire prevention in the future it's a waste of resources and a waste of time and a waste of State money Federal money and local money.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 16:46:23

No Duplicates.

**Comment 29 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Beth

Last Name: Amann

Email Address: beleam@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-28 21:29:29

No Duplicates.

**Comment 30 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Christopher

Last Name: Reed

Email Address: chris.reed@ucr.edu

Affiliation:

Subject: Different vegetation demands different management

Comment:

I am strongly opposed to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 08:23:24

No Duplicates.



**Comment 31 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Karin

Last Name: Zirk

Email Address: me@karinzirk.com

Affiliation: Friends of Rose Creek

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I am strongly opposed the the consolidation of conifer forests and shrublands into a single category.

From a scientific perspective this is incorrect and will create bad management practices across California's diverse shrubland communities.

As with much else in this plan, it tilts towards Northern California and the Sierras while ignoring the realities of Southern California's diverse eco-systems.

Shrublands require different management strategies for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 08:23:52

No Duplicates.

**Comment 32 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Peter

Last Name: Bloom

Email Address: petebloom@bloombiological.com

Affiliation:

Subject: Working and Natural Lands Scenarios

Comment:

To whom this may concern:

I am a scientist living, researching and publishing on the ecology of southern California natural and urban landscapes for 50+ years. Please read below for my opinion, including that the use of bull dozers on wildfires in natural areas should always be the last resort, both from the perspective of protecting our fire fighters and protection of natural resources.

The California Air Resource Board (CARB) has drafted "scenarios" to manage California's farm, ranch, and natural landscapes for carbon sequestration, wildfire, and climate change. But it has grievously botched the process by lumping together in a single category vastly different conifer forests and coastal sage scrub and chaparral. Our shrublands differ completely from forests. If not corrected, the scenarios will support CalFire's plan for massive vegetation removal and prescribed burning, which will cause the rich native habitat to convert to flammable weeds without public safety benefit.

Thank you for your kind consideration of my experienced position on this subject. Peter H. Bloom PhD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 08:55:26

No Duplicates.

**Comment 33 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Frank

Last Name: Landis

Email Address: franklandis03@yahoo.com

Affiliation: CNPSSD

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Dear Members of the Board,

As a PhD trained botanist, I strongly object to the merger of conifer forests and shrublands into a single category. There is no functional utility in uniting these groups, because they store biomass in different ways (above versus below ground) and they are subject to vastly different fire regimes, to vastly different climate limits, and so forth. This absurd simplification is not just useless, it is actively harmful.

Most importantly, much of the state's vegetation has already been mapped in detail using a hierarchical classification by CDFW and CNPS, so lumping them actually undoes work that has already been done. Worse, it already ignores the crosswalk done by CDFW and CNPS between vegetation types and fire ecology, information that is freely available online.

It also leads CARB into problematic conflict with existing species management scenarios under the state and federal Endangered Species Acts. And it probably conflicts with 30x30. And it probably conflicts with fire models being independently developed by insurance industry experts, although others in the State of California are working to reconcile the insurance and CalFire models.

This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide separate categories (plural) for shrublands, and consult with recognized outside experts on appropriate management strategies that recognize that climate change and the extinction crisis are two facets of the same problem. Scenarios must simultaneously deal with climate resilience, fire resilience, conservation, and restoration simultaneously. This is completely doable, especially with current science and technology. As noted above, some of this work has already been done, and ignoring it helps no one.

Thank you for taking my comments.

Sincerely,

Frank Landis, PhD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 10:14:31

No Duplicates.

**Comment 34 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: George

Last Name: Weiss

Email Address: gweisslaguna@gmail.com

Affiliation: Laguna Beach Beautification Council

Subject: Conifer forests and shrub lands should not be in the same category

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 10:33:08

No Duplicates.

**Comment 35 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: George

Last Name: Weiss

Email Address: gweisslaguna@gmail.com

Affiliation: Laguna Beach Beautification Council

Subject: Conifer forests and shrub lands should not be in the same category

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 10:33:08

No Duplicates.

**Comment 36 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Patt

Last Name: Healy

Email Address: healy patt@aol.com

Affiliation: Malibu Coalition for Slow Growth

Subject: Working and Natural Lands Alternative Scenarios

Comment:

The Malibu Coalition for Slow Growth urges the CARB to consider and adopt a new way of thinking acting about air quality and not just look at the natural environment as wildfire fuel which has to be destroyed because of its carbon footprint. A broader prospective is needed.

Although vastly different in its management, It is our forests and coastal sage scrub and chaparral habitat which provide us with oxygen and much needed clean air. They remove carbon dioxide from the environment, For example, coastal sage scrub and chaparral which is the habitat of the Santa Monica Mountains have been recognized as the 'Lungs of Los Angeles'.

Our conifer forests and coastal sage scrub and chaparral require different management methods since this habitat differs from forests. If not recognized by the CARB, CalFire's plan for massive vegetation removal and prescribed burning, will cause the rich native scrub habitat to convert to flammable weeds which will also burn without offering any public safety benefit.

Conifer forests and coastal sage scrub/ chaparral have to be looked at differently, they are not the same. If not considered separately, it will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should look at the current science, provide a separate category for these shrublands and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering our thoughts on this important subject.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 11:08:51

No Duplicates.



**Comment 37 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Lambe

Email Address: ejlambe@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

As someone who has been active in conservation issues for many years and a lifelong Southern Californian,

I strongly object to the merger of conifer forests and shrublands into a single category.

That makes no sense and is absolutely wrong scientifically and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Elizabeth Lambe  
4100 E. 6th St.  
Long Beach CA 90814

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 11:16:40

No Duplicates.

**Comment 38 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: robert

Last Name: lovich

Email Address: rlovich@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. I am a wildlife manager, and can't believe the stupidity and thoughtlessness that went into lumping these ecosystems. The California Floristic Province is one of the most biodiverse on earth, and exceedingly complex. To lump any of the respective habitats together is a flawed approach. That is a fact. They function and operate differently under any of the scenarios envisioned.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Dr. Lovich

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 11:33:01

No Duplicates.

## **Comment 39 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Penny

Last Name: Elia

Email Address: greenp1@cox.net

Affiliation: Concerned environmentalist

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

I must add that I find it very disturbing that there's such a rush by so many agencies to ignore environmental protection and the experts that have been working on how to protect and preserve all of our "unique" habitats, wild lands and open space for decades. Please, and I know I am repeating myself, consult with outside experts that have given their lives to protecting and preserving our finite natural resources. They can offer you valuable solutions and a better way to manage. We cannot afford to lose any more habitat and see more and more conversion to nothing more than weeds.

I strongly recommend working with Richard Halsey at California Chaparral Institute <https://californiachaparral.org/> Please consider thoughts from their Mission Statement:

To promote an understanding of and appreciation for the chaparral and the Mediterranean-type climate in which it thrives in order to:

- Foster connections with Nature and the creative spirit it can inspire
- Explore innovative ideas to create a new Nature-centered, engaging education model
- Preserve and protect native shrubland ecosystems, especially the chaparral
- Reconcile our modern existence with Nature to enhance our lives and protect our planet

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 12:16:05

No Duplicates.

**Comment 40 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Robin

Last Name: Ikeda

Email Address: robin.ikeda@gmail.com

Affiliation:

Subject: California Air Resource Board Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 13:00:15

No Duplicates.

**Comment 41 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Robert

Last Name: Hall

Email Address: bilgepump100@sbcglobal.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside-experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 17:29:55

No Duplicates.

**Comment 42 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Arbuckle

Email Address: crockerbuckle@mindspring.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 17:47:33

No Duplicates.

**Comment 43 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Rosy

Last Name: Schlussel

Email Address: rosymoon1@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Solutions

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is scientifically incorrect, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wild fire management.

Our shrublands differ completely from forests. If not corrected, the scenarios presented will support CalFire's plan for massive vegetation removal and prescribed burning, which will cause the rich native habitat to convert to flammable weeds without public safety benefit.

CARB should withdraw these fatally flawed scenarios, provide a SEPARATE category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation, restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments,

Sincerely,  
Rosy Schlussel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 17:47:41

No Duplicates.



**Comment 44 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Alice

Last Name: Polesky

Email Address: askalice@pacbell.net

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Please do not combine conifer forests and shrub lands into one category. This is absolutely wrong scientifically, and will lead to disaster in the form erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrub lands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 19:45:43

No Duplicates.

**Comment 45 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Schlemmer

Email Address: jkodiak@earthlink.net

Affiliation: San Francisco Naturalist Society

Subject: Please fix this flaw in the plan.

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 20:08:52

No Duplicates.

**Comment 46 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Laura

Last Name: Cohen

Email Address: lacohen@comline.com

Affiliation:

Subject: Classification of Plant Communities for Management

Comment:

Since California is a hot spot of biodiversity, we must always consider the variety of plant communities that make our state so diverse. Each of our plant communities requires a different kind of management for its preservation and the overall protection of California's rich biota.

In the interest of preserving California natural communities, I request that you consider each community separately for its distinctive characteristics and requirements for preservation. I understand that you intend to place conifer forests and shrublands into a single category. These two communities require completely different management practices. It is important to bring in experts who understand California's natural communities, so management practices will be aligned with preservation needs...and requirements for carbon sequestration, climate resilience, and wildfire management.

CARB needs to provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. We need to protect the natural beauty and diversity of our state. Thank you for your time and considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-29 23:52:49

No Duplicates.

**Comment 47 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Turner Wallace

Email Address: eltwallace@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I object to CARB's plan to merge conifer forests together with shrublands (chaparral and coastal sage scrub) in the baseline strategy to manage our natural lands for wildfire, carbon sequestration, and climate change.

The combined habitat (forest and shrublands) scenarios are flawed and may lead to destructive management practices.

Please withdraw the flawed scenarios and provide a separate category for shrublands. I also ask CARB to consult with recognized outside experts on appropriate management strategies for shrublands separate from conifer forests.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-30 09:33:35

No Duplicates.

**Comment 48 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Christina

Last Name: Tuccillo

Email Address: christina.tuccillo@gmail.com

Affiliation:

Subject: regarding landscape management plan

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-30 13:24:12

No Duplicates.

**Comment 49 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Charlotte

Last Name: Pirch

Email Address: dpirch@socal.rr.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrub lands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrub lands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-30 13:44:11

No Duplicates.

**Comment 50 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Lawrence

Last Name: LaPre

Email Address: lflapre@aol.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

The alternative scenarios are flawed because they combine forested lands and shrublands. A scientifically sound management plan for the various alternatives, especially regarding prescribed burns, cannot be formulated with these vegetation types treated together. The combining of ecologically different plant communities will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. The model mix of strategies, while sounding beneficial, cannot be successful unless shrublands are managed in their specific ecological context. CARB should withdraw these scenarios and provide a separate category for shrublands. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-30 17:19:26

No Duplicates.

**Comment 51 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: William

Last Name: E Tippets

Email Address: billtippets@gmail.com

Affiliation: Retired

Subject: Natural and Working Lands Scenarios Technical Workshop Alternatives  
Comment:

I have read and commented (for the Southwest Wetlands Interpretive Association/SWIA) on the Natural and Working Lands Strategy (file attached). One of the comments SWIA made was that "forests" is a very inclusive term/category and that not all forests can or should be addressed as a single "entity."

The scenarios go one step further in the WRONG direction by lumping forests and shrublands into a single category. I strongly object to the merger of forests and shrublands into a single category. As we made clear in our letter, and consistent with scientific studies that demonstrate the vast differences within "forest" types and more so between forests and shrublands, the current proposed lumping is not defensible. It will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

Regarding the alternatives, it is apparent that current practices (Business As Usual/BAU) has been a disaster for California's natural habitats, as well as for urban and agricultural areas. None of the alternatives as summarized in the technical workshop fully addresses the needs of the NWL categories. A synthesized version of Alternatives 1-3 would more closely meet basic needs. For example, statements such as "maximum wildfire defensible space" in Alternative 3 are both vague and unjustified - more appropriate is "Establish defensible scientifically recommended defensible space" in Alternative 2.

CARB should replace these flawed scenarios with a set of new ones that better reflect and represent scientific principles and verified approaches. That new set should treat shrublands as a separate category from forests (which also needs to recognize significant differences within forest types). After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-nwl-2021-scen-ws-AmFROQNwWWtQCVA+.pdf>



Original File Name: CNRA Natural and Working Landscapes\_SWIA draft letter\_15Nov2021.pdf

Date and Time Comment Was Submitted: 2021-12-30 17:49:59

No Duplicates.

**Comment 52 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Alicia

Last Name: A Springer

Email Address: aaspringer644@gmail.com

Affiliation:

Subject: Working and Natural Lands Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Alicia Springer  
Chico CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-01 06:58:20

No Duplicates.

**Comment 53 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Norman

Last Name: Powell

Email Address: njpowell@cox.net

Affiliation: Laguna Canyon conservancy

Subject: Working and Natural Lands Alternative Scenarios

Comment:

It does not make sense to merge conifer forests and shrublands into one category. CARB should provide a separate category for shrublands, and develop appropriate management strategies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-01 12:02:10

No Duplicates.

**Comment 54 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Starlyn

Last Name: Howard

Email Address: pelistar@onebox.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-02 11:28:00

No Duplicates.

**Comment 55 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Paul

Last Name: Merritt

Email Address: merrittmaster@yahoo.com

Affiliation: LCC

Subject: AGREE PROTECT COASTAL/ and Farmland zones PAUL

Comment:

SUPPORT stronger classifications.

best for 2022

paul Merritt LAGUNA BEACH

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-03 07:43:24

No Duplicates.

**Comment 56 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Eric

Last Name: Mintzer

Email Address: duhdoctah@aol.com

Affiliation:

Subject: Working and Natural lands alternative scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-03 09:20:11

No Duplicates.

**Comment 57 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Thuy

Last Name: Hua

Email Address: [thua@planning.lacounty.gov](mailto:thua@planning.lacounty.gov)

Affiliation: LA County Dept of Regional Planning

Subject: CARB Natural and Working Lands Scoping Plan Draft Alternative Scenarios  
Comment:

Please see the attached PDF for Los Angeles County Department of Regional Planning's comments on the CARB Natural and Working Lands Scoping Plan Draft Alternative Scenarios.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-nwl-2021-scen-ws-BmVSNQBzAjMKUwBs.pdf>

Original File Name: CARB\_LA County DRP.pdf

Date and Time Comment Was Submitted: 2022-01-03 13:25:36

No Duplicates.

**Comment 58 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Cheryl

Last Name: Czyz

Email Address: czyzc@yahoo.com

Affiliation: Laguna Canyon Conservancy

Subject: Working and Natural Lands Alternative Scenarios

Comment:

This merger is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios and provide a separate category for shrublands.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-03 18:19:05

No Duplicates.



**Comment 59 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: lesley

Last Name: stansfield

Email Address: lesleys460@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management.

CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-04 06:57:44

No Duplicates.

**Comment 60 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Marc

Last Name: Landgraf

Email Address: mlandgraf@openspaceauthority.org

Affiliation: Santa Clara Valley Open Space Authority

Subject: Comments to NWL scenarios of 2022 Scoping Plan Update

Comment:

Please see attached letter from the Santa Clara Valley Open Space Authority.

Marc

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-nwl-2021-scen-ws-USIGYwZxUGwFcFc2.pdf>

Original File Name: SCVOSA CARB Scoping Plan letter 1 4 22.pdf

Date and Time Comment Was Submitted: 2022-01-04 07:11:52

No Duplicates.

**Comment 61 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Lesley

Last Name: Bindloss

Email Address: lesleybindloss@gmail.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

See attached file:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-nwl-2021-scen-ws-BWZWMQFyVWQGLgZ2.pdf>

Original File Name: CARB.pdf

Date and Time Comment Was Submitted: 2022-01-04 07:26:28

No Duplicates.

**Comment 62 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Tessa

Last Name: Charnofsky

Email Address: workforchange@sbcglobal.net

Affiliation:

Subject: Forests vs shrublands

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category.

Our Southern California chaparral should not be victim to prescribed burns, as the result will be more invasive grasses and significantly damaged ecosystems. In fact, the Southern portions of the state have had too many fires and what we need instead is restoration of oak woodlands and sage scrub--not more fire.

CARB should withdraw its fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-04 08:11:32

No Duplicates.

**Comment 63 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Joanne

Last Name: Baggaley

Email Address: weej@me.com

Affiliation:

Subject: Working and Natural Lands Alternative Scenarios

Comment:

I strongly object to the merger of conifer forests and shrublands into a single category. This is absolutely wrong scientifically, and will lead to erroneous management practices over large parts of the state for carbon sequestration, climate resilience, and wildfire management. CARB should withdraw these fatally flawed scenarios, provide a separate category for shrublands, and consult with recognized outside experts on appropriate management strategies. After scientifically, sound scenarios are recirculated, a focus on conservation and restoration, carbon sequestration, and climate resilience will be appropriate. Our native wildlife needs our native coastal sage scrub. Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-04 09:21:11

No Duplicates.

**Comment 64 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: John  
Last Name: Hopkins  
Email Address: john4IEH@gmail.com  
Affiliation: CA Habitat Conservation Planning Coaliti

Subject: Comment on 12-2-21 NWL worrkshop  
Comment:

January 4, 2022

Chair Liane M. Randolph  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: CHCPC Comment on the December 2, 2021 ARB Scoping Plan Natural and Working Lands Workshop

Dear Chair Randolph:

On behalf of the California Habitat Conservation Planning Coalition (CHCPC), thank you for your continued effort to engage stakeholders and the public across the state to advance climate action with nature-based solutions. Habitat Conservation Plans (HCP) and Natural Community Conservation Plans (NCCP) were created with the state's support and participation for the conservation and protection of land, species, and habitat, which allow for growing regions across the state to thrive sustainably. These Plans are ready, willing, and have the long-term infrastructure to acquire, restore, and uplift land that can deliver on the state's goal to achieve carbon neutrality and build climate resilience while promoting biodiversity and access to open space. Through land acquisition, fully implemented Plans will permanently manage and protect well over 2 million acres of carbon sequestering habitat.

CHCPC applauds the State's commitment to developing a comprehensive strategy to inventory and implement nature-based solutions to the impacts of climate change. However, we remain concerned regarding the dangerous oversimplification of landscape types and proposed treatments that remain in the Scoping Plan discussions.

The following comments highlight opportunities for the California Air Resources Board to focus its approach to a climate-resilient future.

Thank you for your time and consideration. Please do not hesitate to contact me, should you require additional information. CHCPC looks forward to the continued partnership.

Sincerely,

John Hopkins  
Director  
(530) 601-1489  
John4IEH@gmail.com

Below: CHCPC Comments

CHCPC Comments on CARB's December 2nd Workshop for the 2022 Scoping Plan Update Natural and Working Lands Component

#### A] Modeling section

There is a single modeling category for forests, shrublands and grasslands. [We assume that forests includes woodlands and riparian areas as well as conifer forests.] Slides 10 and 11 detail a single modeling approach. Inputs include the treatments "Clearcut, Harvest, Thinning, Mastication, Mechanical, Bio/Chem/Herb, Prescribed Fire". This may be convenient for modelers. However, the ecology, management needs, fire issues and more for these landscapes are very different to forests and to each other. Woodlands, shrublands, grasslands and riparian areas must all be individual categories, separate from forests and from each other.

We note the California Natural Resources Agency's (CNRA)'s 2019 Natural and Working Lands Implementation Plan excluded chaparral and shrubland management and restoration from modeling "due to an insufficient understanding of their effects on carbon dynamics." Does CARB believe that CNRA's determination has changed since 2019? CARB must be deliberate in its modeling approach if the treatments ultimately included in the Scoping Plan are to be successful.

#### B] The scenarios section

The five scenario alternatives separate out grasslands from forests. But they continue to lump chaparral / shrubland, and woodlands [also we assume riparian areas] with forests.

Management of shrublands, including chaparral and coastal scrub, woodlands and riparian areas must each be addressed separately. They must be based on the ecology, fire issues, and overall management needs that ensure the conservation of the different vegetation types and their health and resilience.

Note that the State has a three-component vision for Natural and Working Lands. The final scenario should follow this vision:

A] Protect land from conversion to more intensified uses by increasing conservation incentives and pursuing local planning processes that maximize development where it already exists;  
B] Enhance the resilience of and potential for carbon storage and sequestration on lands through management and restoration, including expansion and management of green space in urban areas, and reduction of GHG and black carbon emissions from wildfire and management activities; and

C] Innovate biomass utilization such that harvested wood and excess agricultural and forest biomass can be used to advance statewide objectives for renewable energy and fuels, wood product manufacturing, agricultural markets, and soil health, increasing the resilience of rural communities and economies and avoiding GHG emissions relative to traditional utilization pathways through these activities.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-nwl-2021-scen-  
ws-AGZRPgZpV2UHbVIN.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-nwl-2021-scen-ws-AGZRPgZpV2UHbVIN.pdf)

Original File Name: Final CHCPC comments on 12-2-21 NWL workshop.pdf

Date and Time Comment Was Submitted: 2022-01-04 22:49:14

No Duplicates.



**Comment 65 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Anne

Last Name: Fege

Email Address: afege@sdrufc.com

Affiliation: San Diego Regional Urban Forests Council

Subject: Working and Natural Lands Alternative Scenarios

Comment:

Chaparral shrublands need to be recognized, analyzed, and managed as a distinct category (not combined with forests). Shrublands have substantially different ecosystem structure and natural fire regimes, historically greater wildfire frequency due to human ignitions, strategies for wildland-urban risk reduction and for habitat restoration, lack of harvest and commercial markets, and different carbon sequestration and climate resilience. Shrublands account for a large percent of natural lands in California, both in southern California (where I reside and work) and in foothills adjacent to most forested areas. If shrublands are combined with forests, the vegetation strategies will result in loss of shrubland acreage, ecosystem values, and public benefits.

Anne Fege, retired Forest Supervisor, Cleveland National Forest; Adjunct Professor, Department of Biology, San Diego State University; Ph.D., College of Forestry, University of Minnesota; Master of Forest Science, Yale University.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-05 09:41:07

No Duplicates.

**Comment 66 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Cedric

Last Name: Twilight

Email Address: ctwight@spi-ind.com

Affiliation: Sierra Pacific Industries

Subject: comment

Comment:

Attached find Sierra Pacific Industries comments on the NWL Scenarios modeling.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-nwl-2021-scen-ws-AnECdFU9UFwHYghn.pdf>

Original File Name: SPI\_Comment\_Letter\_Scenario modeling\_1-2022.pdf

Date and Time Comment Was Submitted: 2022-01-05 10:40:56

No Duplicates.

**Comment 67 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Rebekah

Last Name: Weber

Email Address: rweber@ccof.org

Affiliation: CCOF

Subject: CCOF Comment on NWL Alternative Scenarios

Comment:

See comment attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-nwl-2021-scen-ws-VjUAZQBuU2ZSCwdk.pdf>

Original File Name: CCOF Comment on NWL Alternative Scenarios.pdf

Date and Time Comment Was Submitted: 2022-01-05 10:52:25

No Duplicates.

**Comment 68 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Nick

Last Name: Cammarota

Email Address: ncammarota@cbia.org

Affiliation:

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-nwl-2021-scen-ws-BWsAcQRpAg5RNFM8.pdf>

Original File Name: NWL Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-01-05 12:33:11

No Duplicates.

**Comment 69 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Asha

Last Name: Sharma

Email Address: asha@panna.org

Affiliation: Pesticide Action Network North America

Subject: PAN and CPR Sign On Letter

Comment:

Dear CARB staff:

Please see the attached sign-on comment letter organized by Pesticide Action Network and Californians for Pesticide Reform in response to the Natural and Working Lands Scenarios Technical Workshop.

We are happy to discuss the recommendations with staff for further detail.

Thank you for your consideration,  
Asha Sharma  
Organizing Co-Director  
Pesticide Action Network

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-nwl-2021-scen-ws-BXVcO1E+U14DZgZ2.pdf>

Original File Name: PAN CPR Natural and Working Lands Scenarios Technical Workshop Sign On Letter.pdf

Date and Time Comment Was Submitted: 2022-01-05 12:50:27

No Duplicates.

**Comment 70 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Jeanne

Last Name: Merrill

Email Address: jmerrill@calclimateag.org

Affiliation: CA Climate and Agriculture Network

Subject: Comments on Agriculture, Land Use and Grasslands Scenarios

Comment:

Please find our comments attached.

Jeanne Merrill

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-nwl-2021-scen-ws-UzBWMQNnWWkAZ1U7.pdf>

Original File Name: CalCAN - NWL Scenarios Comments - FINAL - 1-5-21.pdf

Date and Time Comment Was Submitted: 2022-01-05 13:49:30

No Duplicates.

**Comment 71 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Spangler

Email Address: thomas@cleanbayrenewables.com

Affiliation:

Subject: AgLand Renewables Comments on 2022 Scoping Plan  
Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-nwl-2021-scen-ws-UzJQMVwxV2UFbQFl.pdf>

Original File Name: AgLand Scoping Plan Letter (Final).pdf

Date and Time Comment Was Submitted: 2022-01-05 14:04:27

No Duplicates.

**Comment 72 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Kevin

Last Name: McCrackin

Email Address: kmccrackin@chpk.com

Affiliation:

Subject: CUC & Kiewit Letter re NWL Workshop 01.05.22

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-nwl-2021-scen-ws-BWZTIFAyAAwGa1M6.pdf>

Original File Name: CUC Kiewit Letter to CARB.01.05.22.pdf

Date and Time Comment Was Submitted: 2022-01-05 14:29:30

No Duplicates.



**Comment 73 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Gilly

Last Name: Lyons

Email Address: glyons@pewtrusts.org

Affiliation: The Pew Charitable Trusts

Subject: Comments on Natural Working Lands Alternative Scenarios

Comment:

Please find attached a comment letter from The Pew Charitable Trusts regarding CARB's 2022 Scoping Plan Update - Natural and Working Lands Alternative Scenarios. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-nwl-2021-scen-ws-VCRcP1AmAg5VMAFu.pdf>

Original File Name: Pew Comments on CARB NWL Scenarios 1.5.22.pdf

Date and Time Comment Was Submitted: 2022-01-05 14:56:16

No Duplicates.

**Comment 74 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Comments on NWL Scenarios for SPU modeling

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-nwl-2021-scen-ws-UCAFZVwpWVUEbgZy.pdf>

Original File Name: PFT Ltr on ARB SPU NWL Modeling Jan 5.pdf

Date and Time Comment Was Submitted: 2022-01-05 15:29:37

No Duplicates.

**Comment 75 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@treepeople.org

Affiliation: TreePeople

Subject: TreePeople written comments on proposed NWL Scoping Plan Scenarios  
Comment:

Thank your for the opportunity to provide comments on this critical issue.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-nwl-2021-scen-ws-BnJXI1M3WG4FcwNm.pdf>

Original File Name: TreePeople 2022 Scoping Plan Workshop NWL Scenarios Comments FINAL.docx (2).pdf

Date and Time Comment Was Submitted: 2022-01-05 15:35:25

No Duplicates.

**Comment 76 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Alex

Last Name: Carter

Email Address: ajohncarter@gmail.com

Affiliation: Shasta, Trinity and Siskiyou

Subject: Carter NWL Comment

Comment:

There is no time like the present to act and implement much needed forest management treatments to restore ecosystems and save communities.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-nwl-2021-scen-ws-Uz1cLQRpVlpSJwNg.pdf>

Original File Name: NWL Scenarios Comments\_Carter.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:02:41

No Duplicates.

**Comment 77 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Sydney

Last Name: Chamberlin

Email Address: s.j.chamberlin@tnc.org

Affiliation: The Nature Conservancy

Subject: Comments on NWL Scenarios Technical Workshop

Comment:

Please see attached letter with comments from The Nature Conservancy on CARB's recent NWL Scenarios Technical Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-nwl-2021-scen-ws-WjkCZQFyWGkAWVI8.pdf>

Original File Name: CARB\_NWL\_SPU\_Wksp\_1\_5\_2022.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:16:38

No Duplicates.

**Comment 78 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Taylor

Last Name: Roschen

Email Address: troschen@cfbf.com

Affiliation: California Farm Bureau

Subject: Scoping Plan Update Agriculture Comment Letter  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-nwl-2021-scen-ws-BnUFYFQ6UHMZVA+.pdf>

Original File Name: Scoping Plan Comment Letter FINAL.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:25:41

No Duplicates.

**Comment 79 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Arohi

Last Name: Sharma

Email Address: asharma@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: 01.05.2022. NRDC Public Comments - Draft NWL Modeling Scenarios for 2022 Scoping Plan

Comment:

Thank you for the opportunity to provide public comments on CARB's Draft NWL Modeling Scenarios for the 2022 Scoping Plan Update. Please see attached for public comments from the Natural Resources Defense Council (NRDC).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-nwl-2021-scen-ws-BzcBN1lyAGNSYQUr.pdf>

Original File Name: 01.05.2022. NRDC Public Comments - Draft NWL Modeling Scenarios for 2022 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:28:24

No Duplicates.

**Comment 80 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: NWL Scenarios

Comment:

The Center for Biological Diversity appreciates this opportunity to provide input regarding the analysis of Natural and Working Lands scenarios in the development of the 2022 Scoping Plan Update.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-nwl-2021-scen-ws-BTdcaFEPB2QHMAIW.pdf>

Original File Name: 22 01 05 CBD comments Scoping Plan NWL Scenarios.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:41:29

No Duplicates.



**Comment 81 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Gail

Last Name: Wechsler

Email Address: gail.wechsler@gmail.com

Affiliation:

Subject: Natural and Working Lands Alternative Scenarios

Comment:

CARB is making a very serious mistake by lumping forests and shrublands into a single category in its NWL scoping plan draft alternative future scenarios. California's shrublands are fundamentally dissimilar to coniferous forests, especially as regards fire regimes, and they require management practices specific to their types.

Only if the NWL scoping plan is based on sound science will CARB achieve its goals of reducing greenhouse gases and maintaining resilient carbon sinks. CARB must revise its scenarios for "forests and shrublands" and instead treat shrublands in their own category. Failure to do so will set our state on a course to destruction of shrubland habitats and loss of biodiversity, and will set us back further from our climate goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-01-05 15:46:18

No Duplicates.

**Comment 82 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Andrea

Last Name: Williams

Email Address: [awilliams@cnps.org](mailto:awilliams@cnps.org)

Affiliation: California Native Plant Society

Subject: CNPS CARB NWL Scenarios Technical Workshop

Comment:

While we appreciate the opportunity to comment, we request a more transparent presentations of assumptions underpinning the alternatives presented.  
Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-nwl-2021-scen-ws-AWICagR1ACABWFAz.docx>

Original File Name: CNPS CARB NWL Scenario Comments 20220105.docx

Date and Time Comment Was Submitted: 2022-01-05 16:38:11

No Duplicates.

**Comment 83 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Janet

Last Name: Cox

Email Address: janet@350siliconvalley.org

Affiliation: 350 Silicon Valley

Subject: Comments on Natural/Working Lands scenarios

Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-nwl-2021-scen-ws-AGNROFI+UmxVNgNt.pdf>

Original File Name: Comments-CARB\_NWL\_Scenarios.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:49:34

No Duplicates.

**Comment 84 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Dani

Last Name: Diele

Email Address: dani@agcouncil.org

Affiliation: Agricultural Council of California

Subject: 2022 Scoping Plan Natural and Working Lands Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-nwl-2021-scen-ws-UiFTNl0zV3QGaQdp.pdf>

Original File Name: ScopingPlan\_N&WLComments\_Jan5\_2022.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:51:26

No Duplicates.

**Comment 85 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Shayda

Last Name: Azamian

Email Address: [sazamian@leadershipcounsel.org](mailto:sazamian@leadershipcounsel.org)

Affiliation:

Subject: Environmental Justice Strategies for NWL Draft Scenarios

Comment:

Please see attached! Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-nwl-2021-scen-ws-AW9dLFQ5BwsGc1Az.pdf>

Original File Name: NWL Scenarios Comment Letter 1.5.22.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:57:21

No Duplicates.

**Comment 86 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 87 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Michael

Last Name: Walz

Email Address: michael.walz@poet.com

Affiliation: POET, LLC

Subject: POET Comments to 2022 Scoping Plan NWL Workshop on 12/02/2021  
Comment:

Please find attached POET's comments to the Scoping Plan Workshop held on 12/02/2021.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-nwl-2021-scen-ws-UWFXYPJ9VjVVZggm.pdf>

Original File Name: 01.05.2022 POET Scoping Plan Natural Working Lands 12.02.2021.pdf

Date and Time Comment Was Submitted: 2022-01-05 16:57:19

No Duplicates.

**Comment 88 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Peter

Last Name: Reinhardt

Email Address: peter@charmindustrial.com

Affiliation: Charm Industrail

Subject: Charm's Comments to Scoping Plan NWL Workshop on 12/02/2021

Comment:

Please find attached Charm's comments to CARB's workshop on the Scoping Plan - Natural Working Lands held on 12/02/2021.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-nwl-2021-scen-ws-UmICNQEuVjVRYgkn.pdf>

Original File Name: 01.05.2021 Charm Comments Scoping Plan Update Workshop  
12.02.2021.pdf

Date and Time Comment Was Submitted: 2022-01-05 17:01:39

No Duplicates.



**Comment 89 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Amy

Last Name: Bodek

Email Address: ABodek@planning.lacounty.gov

Affiliation:

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-nwl-2021-scen-ws-UTIGYVEiU2IAKFU0.pdf>

Original File Name: CARB.ajb.pdf

Date and Time Comment Was Submitted: 2022-01-06 13:06:49

No Duplicates.

**Comment 90 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Aubrey

Last Name: Bettencourt

Email Address: aubrey@almondalliance.org

Affiliation:

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-nwl-2021-scen-ws-Vj8AaFwtVXMHdQIs.pdf>

Original File Name: input.pdf

Date and Time Comment Was Submitted: 2022-01-06 13:31:26

No Duplicates.

**Comment 91 for Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) - 1st Workshop.**

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation: Sierra Club CA Agriculture Committee

Subject: Models/Scenarios NWL to Maximize C Sequestration on Ag Lands Comment:  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-nwl-2021-scen-ws-VyRRPlw4ACFXIwFg.pdf>

Original File Name: Sierra Club CA AgCom on NWL Models and Scenarios rev .pdf

Date and Time Comment Was Submitted: 2022-01-11 08:02:06

No Duplicates.

**There are no comments posted to Public Workshop: 2022 Scoping Plan Update – Natural and Working Lands Scenarios Technical Workshop (nwl-2021-scen-ws) that were presented during the Workshop at this time.**