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August 3, 2021

California Air Resources Board

Attn: Matt Botill, Assistant Division Chief

Adam Moreno, Lead Natural and Working Lands Climate Scientist

Submission via ARB portal, under **nwl-2021-tech-ws**

Re: Comments to 2022 Scoping Plan Update - Natural and Working Lands Technical Workshop

Dear Mr. Botill, Mr. Moreno:

On behalf of the Santa Clara Valley Open Space Authority (Open Space Authority), I am writing first, to express our agency's sincere gratitude for hosting a very informative workshop on August 20th, 2021 regarding the role Natural and Working Lands (NWL) play in the upcoming 2022 CARB Scoping Plan update, and second, to provide our comments to this aspect of the Scoping Plan.

The Open Space Authority is a public, independent special district created by the California State Legislature in 1993 to conserve the natural environment, support agriculture, and connect people to nature by protecting open spaces, natural areas, and working farms and ranches for future generations.

While our agency is involved in many NWL-related initiatives that address *the reduction of GHG emissions through avoidance of future emissions* (such as urban edge land conservation to reduce future Vehicle Miles Traveled or VMT), our understanding is that the Air Resources Board, in its August 20th workshop, specifically requested information relating to *carbon sequestration and emissions on the NWL themselves*. With this in mind, we offer the following information that we hope is useful.

The City of San Jose, in 2018, adopted [Climate Smart San Jose](#) (CSSJ) – a fairly comprehensive Climate Action Plan – and has more recently been working on adding a Natural and Working Lands element, with partner engagement and support from the Open Space Authority. The technical report regarding the NWL element has not yet been published. However, on May 18, 2021, a [presentation was provided by staff](#) to the San Jose City Council updating the Council on the Climate Smart program overall, and included mention of ongoing work towards completion of the NWL element that seeks to quantify carbon sequestration potential of those lands, as well as link this potential to other climate-related community benefits.

Based on our ongoing work with City staff on the NWL element of CSSJ, we make the following suggestions to the Air Resources Board:

- Request sharing of data from the City of San Jose's consultants who are helping develop the NWL element of CSSJ, **Cascadia Partners LLC**, regarding their carbon sequestration model, specifically around NWL.
- Integrate modeling of carbon stocks on NWL with other carbon-related benefits such as
 - o Relate local carbon stock and sequestration potential modelling to GHG offset/neutrality planning in local jurisdictions
 - o Linking to GHG emission avoidance measures and opportunities, including mitigation activities, as they tie to NWL management and enhancement actions
 - o Linking to related initiatives statewide, such as the NWL Climate Smart Strategy and 30x30, especially where these initiatives involve projects that include restoration and re-wilding

- Include the Open Space Authority and other key regional partners as the Air Resources Board performs specific “bottoms up” outreach in the San Francisco Bay Area on potential NWL strategies, targets, and projects.
- Quantify the difference between well-managed forests’ carbon stocks and potential emission from wildfires in those forests vs poorly managed forests, and how managing for resilience helps prevent transitions to less carbon dense natural communities.
- Encourage development of local and regional plans for carbon stock protection and enhancement, with integration of / connection to other climate adaptation and mitigation related planning like climate action plans and greenhouse gas reduction strategies.
 - o Encourage elevation of NWL in those local and regional climate plans – they still tend to be neglected far too often.
 - o Provide new tools and resources that help characterize or quantify the co-benefits that are provided by NWL
 - o When providing technical assistance and funding, provide a common platform to make it easier for local entities to pull resources together from multiple state sources.
 - o Provide more partial funding up front, to overcome a serious barrier to many communities in undertaking planning efforts.

The Authority is grateful for the work of the Air Resources Board to increasingly incorporate Natural and Working Lands in its Scoping Plan updates, and its extensive outreach to stakeholders such as the Open Space Authority. We appreciate this opportunity to comment, and look forward to continuing our partnership to build a more resilient future for our communities around the State.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Andrea Mackenzie". The signature is fluid and cursive, with a long, sweeping tail on the "z".

Andrea Mackenzie
General Manager

CC: Santa Clara Valley Open Space Authority Board of Directors