



June 22<sup>nd</sup> 2022

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

RE: Comment on CARB's 2022 draft scoping plan update

Chair Randolph,

We applaud CARB for having a much more extensive approach to Natural and Working Lands [NWLs] than in the previous update. This includes having shrubland / chaparral, grasslands, wetlands, and sparsely vegetated lands as separate categories to forests and having a very extensive and complex modeling appendix for NWLs.

The California Habitat Conservation Planning Coalition focuses on the oak woodland component of forests, on shrublands / chaparral, grasslands and wetlands because these categories are the main components of our conservation plan preserve systems. Our Natural Community Conservation Plans [NCCPs] and Habitat Conservation Plans [HCPs] are located around the state, especially next to the urban edges of major metropolitan areas. When all of our plans are fully implemented, they will permanently protect over two million acres, with in perpetuity management and monitoring. While primarily focused on the conservation of biodiversity and ecosystem functioning, they also address carbon storage and sequestration. For example, they protect natural and working lands from carbon-emitting land conversion and seek to minimize vegetation loss to wildfires. Our plans are well positioned to manage significant landscapes in critical areas of the state for carbon storage if funding is available to help facilitate that management.

We note that the primary approach of this Scoping Plan Update's NWL component is to focus on the impacts of management strategies on carbon emission and carbon sequestration, addressing carbon pools for which there is sufficient data and ongoing carbon measurements, and dealing with ongoing land management methods.

We just have a few comments on the preferred scenario.

- A. It states that current wildfire and other issues will make NWLs a net emitter of 8 million metric tons of carbon dioxide equivalent per year from 2025-2045 [Page 72]. But on page 71 it states that "the results of the modeling demonstrate that regular NWL management over the next two decades can **increase** carbon stocks from the Reference Scenario trajectory, reduce GHG emissions from lands, and improve ecosystem and public health." Also, table 3-5 on page 112 states there will be average GHG emission **reductions** for forests / shrublands / grasslands. Items 2 and 3 contradict item 1 above. We need clarification and consistency.
- B. It states that there will be 2 to 2.5 million acres of treatment annually [forests, shrublands / chaparral and grassland combined]. Page 64 states treatments will be "through regionally

specific management strategies that include prescribed fire, thinning, harvesting and other management actions”. Other information in the NWL modeling appendix states that shrubland / chaparral management will be through “bioChemHer, mastication, other mechanical, prescribed burns” and grassland management will be through “bioChemHer and prescribed burning.” [BioChemHer is a catch all phrase encompassing chemical treatment to inhibit biological growth of target organisms, NWL Modeling Appendix, Page 54.]

#### Grassland treatments.

Where available and appropriate, the dominant treatment should be annual well managed grazing, such as rotational grazing. This will remove all but a short stubble of annual grasses. It will encourage reappearance of native perennial grasses and forbs [annual flowering plants]. In much of southern California, the absence of livestock prevents grazing. Mechanical removal should be used adjacent to human communities and along roadways. Prescribed burning is an option where appropriate. Chemical treatments should only be used in very localized areas and as a last result.

#### Shrubland / Chaparral treatments

Currently, there is extensive ecological damage to these lands by mechanical removal, including bulldozing. Most of this should stop. Construction of firebreaks adjacent to human communities is often appropriate.

- C. The actions for the proposed scenario include “no land conversions of forests, shrublands/chaparral or grasslands” [Pages 63-64]. This would include conversion of the natural lands to various types of human development and conversion between types. Examples of the latter are conversion of grasslands to vineyards or orchards, and conversion of chaparral and coastal sage scrub to non-native grasslands and weeds through too-frequent, severe wildfires.

While “no conversion” is ideal, it is unrealistic. Instead, there should be very robust goals for major reductions in urban / suburban / rural sprawl and in carbon emitting conversions of natural lands to various croplands.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "John Hopkins". The signature is written in a cursive style and is positioned above a horizontal line that extends to the right.

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