September 28, 2021

Liane Randolph, Chair

California Air Resources Board

Sacramento, CA 95812

**Re: 2022 Scoping Plan Update Recommendations**

Dear Ms. Randolph,

On behalf of the Midpeninsula Regional Open Space District (Midpen), we commend the California Air Resources Board (CARB) for its ongoing leadership to address climate change. We thank you for the opportunity to provide input into the development of the 2022 Scoping Plan Update. This update can provide a more comprehensive strategy to achieve the state’s ambitious greenhouse gas (GHG) reduction goals.

Comprised of over 65,000 acres of acquired and protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California. Our braided mission is to acquire and preserve in perpetuity open space and agricultural land of regional significance, to protect and restore the natural environment, to preserve rural character and encourage viable agricultural use of land resources, and to provide opportunities for ecologically sensitive public enjoyment and education.

The District’s climate change goals have expanded in recent years. In 2018 the District produced a Climate Action Plan and a Climate Change Policy to set targets and identify actions for reducing administrative emissions. In 2021, the District completed a regional climate change adaptation planning project in conjunction with partners in the Santa Cruz Mountain Stewardship Network. Reducing emissions, preparing ecosystems for certain unavoidable impacts of climate change, and bolstering carbon storage, sequestration and resilience are all important aspects of the District’s climate actions.

As CARB develops new greenhouse gas reduction strategies and targets, Midpen recommends consideration of the following:

**Use landscape scales as a model –** California should be inclusive with the types of projects are eligible for potential funding since stewardship efforts that promote carbon sequestration can span complex landscapes. There is not a one-size-fits-all approach. For example, at Midpen, we perform land restoration and management work on our holdings. However, we also confer and coordinate with a network of land managers at the local and regional level too. We work together to understand the projected impacts of climate change in our region, identify how we can improve resilience, enhance opportunities for natural carbon storage and help ecosystems adapt at a local and regional scale. California should promote coordination at the local and regional level to ensure that these efforts support and complement each other.

**Explore other models of monitoring –** Pursuing Greenhouse Gas Reduction Fund dollars often requires a commitment to monitoring, data collection, and reporting for carbon sequestration projects. Unfortunately, such reporting is challenging in a fire-prone and dynamic landscape, as managing for fire resilience often conflicts with the funding requirement of demonstrating short-term enhancements to carbon sequestration. Fire risk mitigation treatments, such as selective thinning, creating shaded fuel breaks, and brush clearing remove carbon from the landscape in the short-term, but these treatments enhance the stability and resilience of carbon on the landscape in the long-term.

If natural and working lands are to be considered as part of the climate solution, a robust program that allows for both small and large-scale projects need to be developed. However, we cannot do that if compliance-grade monitoring is too onerous and site-specific. Midpen recommends another model of implementation for landscape-level sequestration projects that prioritizes the long-term stability of carbon in natural and working lands.

**Update conservation value criteria –** When determining a land’s “high conservation value,” the state should consider the following criteria:

* Recommend conservation grazing and other forms of sustainable agriculture that contribute to carbon sequestration.
* Preserve regional wildlife linkages and promote wildlife corridor value for local and threatened species.
* Encourage urban infill to promote Vehicle Mile Traveled (VMT)-reduction, prevent sprawl, and reduce development in the Wildland Urban Interface and open space.
* Assess how land conservation will encourage VMT-reduction and avoid impacts to open space lands and their resources.
* Promote urban growth boundaries and transfer of development rights.
* Evaluate the co-benefits of healthy, resilient landscapes, including long-term carbon storage, improvements to air and water quality, and reduced fire risks.
* Ensure equitable access to open space and the physical and mental health benefits it confers, and whether land serves nearby vulnerable or under-resourced communities.

**Offset conservation grazing emissions –** Conservation grazing is one of many land management tools Midpen uses to achieve conservation goals, including protecting biodiversity and enhancing habitat. Like any tool, it has tradeoffs. Grazing can reduce fire hazards by controlling potential fuel and can reduce competition from nonnative plants. The state should consider offsets to reduce grazing emissions. To that end, Midpen recommends state-supported research on this topic.

**Promote green transportation –** Midpen’spreserves are free and open to the public daily and provide an extensive trail network for low-impact recreation. The state should promote transit to trails, the use of clean vehicles and green infrastructure that reduces GHG emissions, support for development and operations for shuttle programs that can offer free services to communities for equitable access to open space.

**Continued support for transfer of development rights (TDR) and urban growth boundaries** - The 2017 Scoping Plan included the language under Ongoing and Proposed Measures – Vibrant Communities and Landscapes / VMT Reduction Goals:

*Promoting stronger boundaries to suburban growth through enhanced support for sprawl containment mechanisms such as urban growth boundaries and transfer of development rights programs*

Programs like this help to minimize the potential for human encroachment into essential open space, habitats, wildlife corridors, and high-fire risk areas.

Thank you for the opportunity to comment on the development of the 2022 Scoping Plan Update and look forward to engaging further as the work progresses.

Sincerely,



Kirk Lennington

Acting Assistant General Manager