

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

June 23, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments Regarding The 2022 Scoping Plan Update

Dear Chair Randolph and Members of the California Air Resources Board:

The San Diego Audubon Society is an environmental non-profit that has focused on protecting the birds, habitats and natural legacy of the highly biodiverse San Diego region for over 70 years. We achieve this by carrying out grassroots advocacy campaigns, creating collaborative relationships with local, state and federal agencies, and educating and empowering our community members to become involved and informed about environmental and climate threats and potential solutions.

Over the last several decades, we have become actively involved in the fight to protect and restore coastal wetlands, due in large part to the rare and declining species that they are home to, their historic losses throughout the state, their anticipated losses due to climate change and sea level rise, and their impressive ability to sequester carbon. This work has led us to create the ReWild Mission Bay campaign, a visionary project that seeks to restore the Kendall-Frost Marsh, the last remaining contiguous wetland in Mission Bay. Over 99% of the Bay's historic wetlands have been lost to development.

We are happy to see that the growing body of research regarding the importance of coastal wetlands in sequestering carbon and mitigating the impacts of climate change is being recognized in scoping plans such as this one. The restoration of 60,000 acres of wetlands in the Sacramento-San Joaquin River Delta will be an important step in meeting the state's carbon sequestration goals. It has additional benefits for ecological functioning, including improving hydrological functioning of the delta, safeguarding groundwater reserves, and restoring riparian habitat in an area that is extremely important for migratory birds and waterfowl. It should be noted that areas where large numbers of waterfowl gather such as the delta have experienced significant mortality events in recent years, with diseases passing more quickly between individual animals as they gather in increased densities due to the decreasing availability of resources. Additional wetland acreage will reduce this crowding pressure, protecting the ducks and other waterfowl that are important to birders, hunters, and the overall ecosystem functioning.

That being said, it is not enough to focus only on the Delta. Throughout the state, coastal wetlands continue to face pressures from development and sea level rise. A recent study found that nearly all of the coastal wetlands along the West Coast could be lost by 2100 if sea levels rises as anticipated and no

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

actions are taken to allow for upland migration. The loss of these habitats would severely undercut the state's commitments to sequester carbon and meet our climate goals. We therefore ask that this Scoping Plan be expanded to include conservation and restoration targets for all of California's coastal wetlands, from the Tijuana River Estuary to Humboldt Bay. Doing so would create a powerful tool for advocating for wetlands restoration and expansion (and the carbon sequestration value inherent in that expansion) throughout the state. The California's Ocean Protection Council has set a goal to increase the acreage of coastal wetlands by 50% by 2040. CARB should incorporate this goal into this Scoping Plan Update.

We also ask that the Plan include commitments to carry out additional mapping and carbon sequestration research on eelgrass. This highly productive submerged aquatic vegetation is essential nursery habitat for the fish that humans, birds and other marine mammals need to survive, and multiple studies have found that it has the potential to both sequester carbon and reduce the impacts of ocean acidification. It is also particularly sensitive to the impacts of sea level rise due to its narrow habitat range – as they require shallow waters for photosynthesis, eelgrass beds will be forced to move up toward the coast, where they will likely be blocked by man-made barriers. The CARB should prioritize gathering the information needed to better quantify the carbon sequestration value of eelgrass, creating additional momentum to protect this habitat before it is lost to sea level rise along our coast.

Thank you to the CARB staff that have helped to create this innovative Scoping Plan update. Creating an efficient, two-pronged strategy that reduces our GHG emissions while also sequestering carbon through natural and working land management is the best path towards a stable climate and resilient future. It also has the potential to create many co-occurring benefits for the wildlife that rely on CA's landscape, and the citizens that value these wild places. We ask that the focus on blue carbon be expanded to include all of CA's coastal wetlands, and submerged habitat as such as eelgrass.

Thank you so much for your hard work in negotiating the many stakeholder concerns in this process, and please keep us updated about additional milestones in this process.

Sincerely,

Megan Flaherty
Conservation Manager
San Diego Audubon Society
flaherty@sandiegoaudubon.org