



June 24, 2022

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

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

On behalf of the undersigned environmental protection and conservation organizations, we are writing to provide input on the California Air Resources Board's (CARB) draft 2022 Climate Change Scoping Plan Update and offer recommendations specific to the role of coastal wetlands in the draft Plan's Natural and Working Lands (NWL) component. We appreciate that the draft Plan incorporates, for the first time ever, modeling and quantification of carbon sequestration and greenhouse gas emissions associated with NWL – including the Sacramento-San Joaquin Delta's wetlands. As CARB considers ways to further strengthen the draft Plan, we suggest that a broader focus on all coastal wetlands would help California harness the significant climate benefits provided by these habitats and maximize their contribution to the state's ambitious carbon neutrality goals.

Though their extent is limited in California due to past degradation and destruction and continued threats from development and related impacts, coastal habitats like salt marsh, scrub shrub, and eelgrass play an outsized role in combatting climate change. In addition to their capacity to attenuate severe storms and flooding while providing vital habitat for fish and wildlife, these habitats are also incredibly efficient at capturing carbon dioxide from the atmosphere and surrounding waters and storing it as "blue carbon" in their leaves, stems, roots, and soils.

Recognizing the important contribution coastal wetlands play in mitigating climate change, the United Nations' Intergovernmental Panel on Climate Change has established methodologies for including these ecosystems in greenhouse gas inventories, and countries around the world are now advancing proposals to protect and restore their coastal wetlands as part of their national climate commitments and goals under the Paris Agreement.

With this Scoping Plan Update, CARB has the opportunity to leverage the protection and restoration of California's blue carbon habitats as part of the state's climate mitigation strategy. We applaud the draft Plan's inclusion of a target to restore at least 60,000 acres of wetlands in the Sacramento-San Joaquin River Delta. This target would not only contribute to California's climate goals by reducing emissions currently occurring in these degraded landscapes, it will also protect communities from flooding, improve water quality, and support biodiversity in the Delta region.

This is a great start, but CARB should not stop with the Sacramento-San Joaquin Delta. We ask that you expand this target to include all coastal wetlands in the final Scoping Plan Update.

California is fortunate to have robust blue carbon data,¹ particularly for its salt marsh habitats, and a recent study concluded that just in San Francisco Bay alone, tidal wetlands sequestered around 44,200 metric tons of carbon dioxide equivalent in 2020,² the equivalent of taking 9,524 gasoline-powered passenger cars off the road in one year.³ CARB can help to ensure these climate benefits continue to accrue by establishing specific targets for conservation and restoration of coastal wetlands across the state. For example, the Ocean Protection Council's current strategic plan includes a goal to increase the acreage of coastal wetlands 50% by 2040; CARB can incorporate this ambitious target into the Scoping Plan, along with additional measures to strengthen protections of existing coastal wetlands – such as reconnecting tidal influence by removing dikes and other barriers, as well as conserving adjacent lands

¹ Holmquist, J., et al. September 2021. [CRCN Blue Carbon Inventory](#). The Coastal Carbon Network at the Smithsonian Environmental Research Center.

² Beers, L. and S. Crooks. 2022. [Coastal Wetland Greenhouse Gas Inventory for the San Francisco Bay Estuary](#). Report prepared with the funding of The Pew Charitable Trusts.

³ [EPA Greenhouse Gas Equivalencies Calculator](#).

that will allow coastal habitats to move inland as sea levels rise. For blue carbon habitats where additional mapping and carbon data may be needed (e.g., eelgrass), CARB should prioritize support for information gathering, monitoring, and research so that such data can be included in the next Scoping Plan Update. Finally, we recommend that CARB undertake a more comprehensive co-benefits analysis for all landscape types within the NWL sector, including wetlands.

California has lost an estimated 90% of its wetlands after more than a century of draining, damming, development, and other impacts – yet the coastal wetlands that remain continue to efficiently store the approximate equivalent of emissions from 10 million cars driven in one year. Now is the time to prioritize the protection, conservation, and restoration of these habitats to meet the challenge of climate change. As the draft Scoping Plan states, it’s vital that we ensure NWL, including wetlands, “play as robust a role as possible in incorporating and storing more carbon.”⁴ By including all coastal wetlands in the Scoping Plan Update, and using the best available science to account for their climate benefits, CARB can maximize that role for blue carbon habitats.

Thank you for your consideration, and for your work to reach California’s climate mitigation goals.

Sincerely,

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⁴ California Air Resources Board. [Draft 2022 Climate Change Scoping Plan](#). Executive Summary, page ii.

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