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California Air Resources Board

Attn: Matt Botill, Assistant Division Chief

Adam Moreno, Lead Natural and Working Lands Climate Scientist

Submittal via ARB portal

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 December 2, 2021 regarding the modeling of Natural and Working Lands (NWL) scenarios and outcomes as part of the upcoming 2022 CARB Scoping Plan update, and second, to provide our comments to regarding NWL modeling scenarios.

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.

Natural and Working Lands are critical to meeting the State's carbon neutrality goals, as Deputy Secretary for Climate Change at the Resources Agency, Amanda Hansen, pointed out at the beginning of the workshop. We applaud the Air Resources Board for integrating NWL into the 2022 Scoping Plan update via careful modeling of the ways we can minimize greenhouse gas emissions being sourced on these lands as well as how we can maximize emissions sinks.

We believe understanding and quantifying the co-benefits of protected and well-managed NWL are important as well. These co-benefits can include water conservation, groundwater recharge, downstream flood-risk reduction, preservation of biodiversity, among many others.

It is understandable, as we heard during the workshop, that only a limited number of scenarios can be modeled, given resource capacity constraints. We generally believe the variety of high level visions represented by the five scenarios presented during the workshop cover a suitable range of cost/benefit climate action opportunities to consider. That said, what we feel **it is critically important in modeling these scenarios, that the results from the modeling show the quantitative emission source/sink outcomes from each individual climate action within each NWL type, and that each be individually published.** Only if we know the emission source and sink numbers for each action that could be taken, can the State, as well as local practitioners, make "mix-and-match" type decisions about the optimal combination of actions to maximize reduction of atmospheric carbon. We realize not all actions can be mixed and matched independently, as there are often interdependencies, but many of them can. For instance, as practitioners that hope to use modeling results for the Agriculture land type, the Open Space Authority would want to know the quantified carbon benefit from *maximizing climate smart ag practices and nutrient cycling* AND, independently, the quantified carbon benefit from *reducing land conversion away from ag* (i.e. not just one comprehensive outcome number for all of Scenario 1) so we can perform our own cost/benefit analysis with a goal of maximizing local carbon benefit, hopefully with a combination of climate smart practices and land conservation.

Other comments on the modeling of the five scenarios presented:

Agriculture NWL type:

- Modeling of ag land conversion should include not only conversion related to SGMA, but also conversion due to urban sprawl. CDFA estimates that about 40,000 acres of farmland are lost per year in California due to expansion of urban areas. This is a very high rate of conversion that has many detrimental impacts on the State and local communities.
 - The Agriculture NWL type under Scenario 2 paints a misleading picture in its suggestion to *“model low level of conversion of ag based on existing conversion rates and SGMA”*.
- The Sustainable Agricultural Land Conservation (SALC) program at the Department of Conservation provides grant funding to conserve farmland for climate benefits: primarily greenhouse gas reduction due to reduction of Vehicle Miles Traveled (VMT) at the urban edge. We would hope that the Quantification Methodology (QM) used for assessing the relative carbon benefits of projects proposed for SALC funding could be used in or at least inform the modeling for the Scoping Plan Update.
- Many of the scenarios include varying intensities of climate action - from low to moderate to high intensity. We suggest that for each type of action, a “100% implementation” alternative be modeled somewhere in the five scenarios, even if 100% implementation is not necessarily considered achievable due to financial or political constraints. Knowledge of the potential impact from a full implementation target could, however, be very motivational for local or regional actions in that direction, potentially much more motivating than a modest target.
 - Assisting with efforts towards stopping sprawl is an excellent example where knowledge of the emissions savings from a 100% implementation alternative could be highly motivating.

Settlements NWL type

- Modeling of urban tree cover should consider not only the carbon sink potential of the trees themselves, but also the reduction in carbon emissions resulting from mitigation of urban heat island effect (reducing demand for air conditioning, etc.)

In addition to the above comments related to the modeling, we also provide the following suggestions on the 2022 Scoping Plan Update, which we anticipate would be closely coordinated with the Natural Resources Agency and the Department of Food and Agriculture at the State (and their respective climate frameworks such as 30x30, the NWL Climate Smart Strategy, and Climate Smart Agriculture) as strategies for implementation of the Scoping Plan to reduce greenhouse gases are considered:

- 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.
 - Encourage elevation of NWL in those local and regional climate plans – they still tend to be neglected far too often.
 - Provide new tools and resources that help characterize or quantify the co-benefits that are provided by NWL
 - 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.
 - Provide more partial funding up front, to overcome a serious barrier to many communities in undertaking planning efforts.

We also offer the following examples of significant climate action in the southern Bay Area in which we have played a role, in case these serve as helpful examples for what can be implemented at a local level to reduce greenhouse gases and provide myriad climate co-benefits.

The City of San Jose, in 2018, adopted [Climate Smart San Jose](#) (CSSJ) – a fairly comprehensive Climate Action Plan – which now includes a Natural and Working Lands element [link], developed in partnership with the Open Space Authority. We have attached to this letter a brochure we recently published that highlights key points from the Natural and Working Lands element of CSSJ, as well as its connection to other local, regional, and State climate policy actions, which we hope would be helpful in. As part of CSSJ, the City of San Jose also declared a net zero emissions target for 2030, part of which will need to come from NWL-based actions.

San Jose also recently adopted General Plan amendments that change the land use designation in North Coyote Valley, at the southern edge of San Jose, from campus industrial to open space and agriculture. This bold action effectively halted sprawl at its southernmost urban edge, avoiding VMT that would have been incurred by travel to and from industrial developments. It also enables planning for advancing NWL management practices on these now-protected lands that can enhance many climate benefits for the community, including improved carbon source and sink capabilities.

In concert with the City of San Jose, the County of Santa Clara recently approved General Plan and zoning amendments that protect farmland in Mid and South Coyote Valley through development restrictions, and by offering a variety of financial incentives for conservation, also resulting in avoided VMT and increased opportunities for climate smart agricultural practices.

The Open Space 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 underline.

Andrea Mackenzie
General Manager

CC: Santa Clara Valley Open Space Authority Board of Directors