



June 14, 2018

California Natural Resources Agency
California Air Resources Board
California Department of Food and Agriculture
Sacramento, CA 95814

RE: California 2030 Natural and Working Lands Climate Change Implementation Plan Concept Paper

To Whom It May Concern:

We represent regional and statewide organizations committed to reducing greenhouse gas emissions (GHGs) through equitable land use strategies, including land conservation. We appreciate the state's effort to focus on Natural and Working Lands (NWLs) and the essential role they play in climate mitigation and adaptation.

We offer the following suggestions for the Natural and Working Lands Concept Paper.

Identify the maximum land acreage that can be urbanized while meeting climate goals.

Over the past ten years, we've worked hard with regional agencies to advance healthy, sustainable, and equitable communities. For us, better regional planning can reduce greenhouse gas emissions, improve Californians' health, expand economic opportunities, and - most important - conserve natural and working lands. One of the barriers we've faced in our advocacy is understanding the maximum land that can be urbanized if we are to achieve our climate goals. There isn't a clear sense of how much we can urbanize before we reach the point of no return. As advocates, our goal is to conserve natural and working lands. Understanding how much land can be urbanized can be incredibly helpful to both advocates as we work hard to preserve open space; it can also be helpful to regional agencies as they track how much land is being urbanized. The Appendix: Proposed Management Activities for the Implementation Plan of the Concept Plan describes the State's proposed activities for meeting the goals of the Implementation Plan. One of the activities is "Land Protection," explained as reducing the rate of urbanization. We recommend including a quantitative measure for local and regional governments that would not only be the rate of urbanization but the total amount of land that can be urbanized. Without this number, we believe it will be difficult to restrict land conversion and ensure the potential for land conservation.

Integrate policies from the 2017 Scoping Plan

Appendix C from the 2017 Scoping Plan includes the forward-looking document, “Vibrant Communities and Landscapes: A Vision for California in 2050.” This vision was developed by eight state agencies, including the California Air Resources Board and the California Natural Resources Agency. Vibrant Communities outlines the path to create a sustainable, healthy, equitable future in California. As noted in the document, this path emphasize collaboration and “forms a common foundation for actions related to land use across State agencies and programs.” To elevate this cohesive approach to development and conservation in California, the Implementation Plan should integrate actions from Appendix C into the Implementation Plan. Key actions that should be integrated include: performance metrics for environmental, health, and equity outcomes associated with stronger land use policies, and quantifiable and achievable land conservation targets that will protect and limit the conservation of the State’s most productive farmland, rangeland, forests, as well as natural and working lands most critical to preserving California’s biodiversity, The Concept Paper describes that the Implementation Plan will “provide context on how action will be prioritized in the near and long-term, considering non-carbon factors such as... social, economic suitability...health outcomes...” For the Implementation Plan, we recommend the inclusion of the actions listed in the Vibrant Communities document.

Thank you for your consideration. We look forward to continuing to work with you on the Implementation Plan. Please let me know if you have any questions or concerns: Ella Wise, ella@climateplanca.org, 510-740-9320.

Regards,

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