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Mary D. Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Comments on AB 32 Scoping Plan Update

Dear Chair Nichols:

The Santa Monica Mountains Conservancy (Conservancy) is grateful for this opportunity to provide comments to the California Air Resources Board (CARB) with regard to the 2030 Target Scoping Plan, held October 1, 2015 in Sacramento, CA. The Conservancy urges CARB and the Administration to make natural resource protection a priority in developing new ways to prevent and adapt to climate change by:

1. Designating State Conservancies as Implementing Agencies for investment funds;

2. Investing in natural land acquisitions (fee and easement) to curb peripheral development;

3. Investing in incentivizing urban infill with urban parks, including active transportation funding for paths along waterways and in parklands, and incentivizing green spaces, green infrastructure and other methods of reducing heat island effect;

4. Investing in water recycling and energy reduction projects at the regional level;

5. Investing in technical assistance or planning grants through Conservancies to allow smaller local entities and non-profits to be competitive.

STATE CONSERVANCIES ARE OPTIMAL IMPLEMENTING ENTITIES

The Conservancy requests that CARB specifically designate State Conservancies as Implementing Entities for investment funds. State Conservancies have the ability to implement climate change adaptation and mitigation projects quickly, equitably and

efficiently. California's Conservancies are particularly well suited to meet greenhouse gas emissions (GHG) reductions goals and targets because they already have the mechanisms and partnerships in place to implement regional programs that serve statewide priorities. Conservancies will be able to leverage allowance revenues with existing funds, form strategic partnerships with local entities, and utilize existing administrative infrastructure to efficiently roll out projects that incentivize and foster GHG reduction goals and further the purposes of AB 32.

Many of the Conservancy's current or proposed projects are located in and serve *disadvantaged communities* ("DACs") as identified by Cal/EPA. The Los Angeles area has the largest area of DAC communities in California. These areas of high need have long been a focus for the Conservancy because every dollar invested achieves important statewide co-benefits like job creation, advanced skills and job training, and neighborhood revitalization. The Conservancy is in a position to quickly implement this work should strategic investment from auction proceeds become available.

As regionally based state agencies, State Conservancies have the local implementing knowledge and networks designed to respond and adapt to local needs. These tested capabilities allow Conservancies to prioritize environmental concerns, identify environmental hazards, work with affected communities, continually monitor and adapt solutions, provide transparency, and ensure regionalized participation in climate change solutions.

THE CONSERVANCY OFFERS THE FOLLOWING RECOMMENDATIONS TO ENSURE STRONG AND CLEAR CLIMATE ACTIONS ARE REFLECTED ON THE STATE'S 2030 GHG EMISSION REDUCTION TARGET IN THE AB 32 SCOPING PLAN UPDATE (2014):

NATURAL AND WORKING LANDS SECTION:
CARBON SINKS, FORESTS AND OPEN SPACE MANAGEMENT

The Conservancy helped to preserve over 72,000 acres of parkland in both wilderness and urban settings, and has improved more than 114 public recreational facilities throughout Southern California. The Conservancy's network of open space provides multiple climate-related benefits. The Conservancy lands serve as a vital carbon sink, provide critical ecosystem services, soften local heat island effects, mitigate dangerous levels of air pollution, support tourism and recreation, and provide critical species habitats in an area where climate change is already altering species natural ranges. The cap-and-trade program has the potential to support some of these important programs and functions that make our communities more livable and sustainable. As climate

change increases the risk of droughts, intense flooding, reduced snowpack, invasive species and fires, there should be increased funding for California's open and natural space conservation and management needs.

In addition, cap-and-trade should not risk favoring conservation of forests over chaparral and grasslands. Climate change adaptation and mitigation programs need to foster holistic mitigation and adaptation throughout California in order to prevent disproportionally negative local impacts. Thus, open space and carbon sink management programs should ensure that programs not only target forests in Southern California as well as Northern California, but also target chaparral, which acts as vital carbon sinks and stores large amounts of carbon in soils, where it is less vulnerable to release through fires. Chaparral programs provide important climate change adaptation benefits like storm water capture, water filtration, erosion prevention, heat island mitigation, and biodiversity protection.

TRANSPORTATION AND LAND USE SECTION:
URBAN GREEN AND GREEN TRANSPORTATION INFRASTRUCTURE

The proposed portion of funding dedicated to active transportation should be expanded. Active transportation programs only form a small portion of the current climate change adaptation resources available to entities interested in working to reduce greenhouse gas emissions. The Conservancy has experience with active transportation improvements, such as walking and biking paths. These programs are vital to making greenspace accessible and, in terms of climate change, important for creating the urban network of pedestrian and bike friendly paths that connect the public to public transit. Hence, active transportation programs should be eligible for funding under all transit programs to ensure public transportation is easily accessible. These amenities are vital for making the urban area attractive as a residential area, discouraging urban sprawl.

The planting of native, water-efficient and high sequestration value vegetation needs to be encouraged in urban areas, where climate change's effects will have strong direct impacts on significant numbers of people from disadvantaged communities. Hence, the urban greening programs should be expanded.

Urban greenspace could serve as an incentive for urban infill and was underemphasized in the workshop. Urban greenspace should be considered a high priority and receive significant planning resources to design replicable projects and funding to help construct initial example projects. Urban greenspace is an important land use and transportation consideration, not only because of the heat island and direct carbon uptake benefits, but

also because carefully planned urban greenspace serves as the important foundational infrastructure for making urban areas attractive for active transportation, for public transportation use, for building sustainable communities and for discouraging environmentally destructive sprawl.

NATURAL AND WORKING LANDS SECTION, AND TRANSPORTATION AND LAND USE SECTION:

THE SPRAWL / INFILL DYNAMIC AND CHALLENGES

The Conservancy's Climate Change Program fills in vital gaps in the State's current proposals for natural resources investments related to greenhouse gas mitigation and reduction. The Program will produce verifiable and quantifiable greenhouse gas and air pollution reductions through strategic acquisitions to limit sprawl and avoid conversion of open space that development currently threatens. At the same time, the Program addresses urban infill to provide an alternative for urbanites considering the move outward to the suburbs. Investment in urban parks and greenways strategically collocate with other public amenities to promote infill development where it is most needed.

Suburban development and associated land use changes lead to dramatic increases in GHG emissions. Conversion of open space to developed resources brings with it all the impacts associated with construction, infrastructure expansion, loss of habitat area, water use and quality impacts, among many other consequences. Sprawling development patterns bring substantial air pollution because of the increased automobile dependence associated with suburban communities. Loss of natural space results in loss of the innate sequestration benefits of open space; studies also show that manufactured green space in the form of lawns and landscaping sequesters less carbon than unmaintained open areas.

The Conservancy has invested in researching the greenhouse gas impacts of various conservation and development scenarios. Our studies found that, by implementing the Conservation Strategies of the Conservancy to curb peripheral development, encouraging infill development instead of suburban development in the greater Los Angeles area, the Conservancy's Conservation Strategies would reduce GHG emissions per unit of new housing 40% annually while reducing local infrastructure costs 37%. It is important to consider the impacts of transportation, buildings, water, and energy as well and land consumption itself when evaluating protection and restoration of open space. In addition, with appropriate urban conversation program funding, Conservancies can develop attractive urban parks and active transportation routes to make living in urban areas healthy and convenient, facilitating the growth of urban transit-oriented

developments attractive to families of all income levels that would otherwise seek suburban sprawl housing.

ELECTRICITY:

WATER – ENERGY

Water-related energy consumes roughly 19% of the State's electricity. Water and energy conservation have been central to the Conservancy's approach to preserving the Mediterranean biome in one of the largest metropolitan areas in the nation. The Conservancy has the capability to implement immediate water recycling and energy reduction projects in disadvantaged communities that will have immediate and extensive GHG reduction impacts, and foster local job growth. In a recent Conservancy-commissioned study of 268 potential sites for water recycling and energy efficiency on school and vacant land, it was determined that the Conservancy's approach would generate approximately 555 million gallons of stored local water per year, and save approximately 5.2 million kilowatts of energy per year.

With strategic investments from the auction funds, the Conservancy can develop a Regional Water Efficiency and Watershed Investment program that reduces the energy used in the supply, conveyance, and treatment of water. These projects will also provide climate and water improvements to critical watershed lands that reduce or sequester GHG emissions and increase regional water supplies.

TECHNICAL ASSISTANCE

The problems disadvantage communities face are prime concerns as California implements its statewide climate change adaptation and mitigation program and allocates GGRF funding. Conservancies, with their institutional, environmental, regional and local knowledge, could serve as important planning facilitators and partners with local disadvantaged communities and nonprofits. Providing technical assistance and planning grants to Conservancies can help ensure that that small non-profit and local entities can design, construct and implement competitive proposals for GGRF funding. With such grants, Conservancies can help ensure that funding targets the most important community-identified needs in disadvantaged communities.

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

JOSEPH T. EDMISTON, FAICP, Hon. ASLA
Executive Director