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September 15th, 2021

Rajinder Sahota, Deputy Executive Officer, Climate Change & Research

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**Re: Trust for Public Land Comments – Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan**

Dear Rajinder,

The Trust for Public Land very much appreciates the opportunity to comment on your “Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan.” As the impacts from climate change continue to escalate, threatening human life, water supply, food supply and critical habitat, we must be strategic in advancing investments that protect human health while also reducing our overall emissions.

Given our over 40-year history conserving land for people, creating parks and open space in low-income park-poor communities, we will focus our comments on *Natural and Working Lands* and the *Guiding Principles*.

**AB 398 – Urban Greening**

Since 2012, the California Legislature conducted countless hearings to allow for maximum public participation to create the Greenhouse Gas Reduction Fund Statutory Framework. In advance of extending the Cap-and-Trade Program through 2030, AB 398 (E. Garcia, 2017) was introduced to augment the foundational priorities set by AB 1532 (Pérez, 2012) with seven complementary funding priorities that provide additional direction for future investments.

‘Healthy Forests and Urban Greening’ is one of (7) priorities identified in AB 398, yet funding for both of those programs pales in comparison to the historical allocations made to emission reduction programs, most notably the Urban Greening Program.

**To date, auction proceeds have provided the ARB with over $9 billion which has been distributed through the budget process over the last several years. Out of that total of $9 billion, only $155 million in total has ever been allocated to the Urban Greening Program. That is 1.72% of $9 billion.**

With regard to the Urban Greening Program, it is clear the cap and trade program has failed to mirror the intentions of AB 398 and recognize the urgent danger of extreme heat to vulnerable populations, and that is echoed in the statistical analysis of the distribution of auction proceeds to date.

Although hurricanes and tornados get more attention, heat kills more people than any other weather-related event. The National Oceanic and Atmospheric Administration released [U.S. temperature data](https://www.ncdc.noaa.gov/sotc/national/202010) last November for revealing that October of 2020 was the hottest October on record in California, with records going back to [1895](https://www.ncdc.noaa.gov/temp-and-precip/us-maps/1/202010#us-maps-select). That came on the heels of both the hottest [September](https://www.ncdc.noaa.gov/cag/statewide/time-series/4/tavg/1/9/1895-2020?base_prd=true&begbaseyear=1901&endbaseyear=2000) and the hottest [August](https://www.ncdc.noaa.gov/cag/statewide/time-series/4/tavg/1/8/1895-2020?base_prd=true&begbaseyear=1901&endbaseyear=2000) in recorded history. These temperature records hit at the peak of wildfire season in a year when more than [9,000](https://www.fire.ca.gov/incidents/2020/) wildfires scorched a record-breaking [4.2 million](https://www.fire.ca.gov/incidents/2020/) acres. So far in 2021, we have lost 2 million acres to wildfires.

The Urban Greening Program reduces heat and mitigate both day and night urban heat islands. **The program is incredibly successful - to date the Urban Greening Program has awarded $148.2 million in grants from $825.5 million in grant requests. That is an over-subscription rate of over 550%!**

According to the Natural Resources Agency that administers the program, in addition to heat mitigation, projects are designed to:

* Convert the existing built environment into green spaces that provide park or recreational benefits to critically underserved and/or disadvantaged communities.
* Sequester and store carbon by planting trees
* Reduce building energy use by strategically planting trees to shade buildings
* Reduce commute vehicle miles traveled by constructing bicycle paths, bicycle lanes or pedestrian facilities that provide safe routes for travel between residences, workplaces, commercial centers, and schools.

Past investments plans have not reflected the will of the stakeholders involved and has not reflected extreme heat as a serious consideration of the ARB. We strongly believe protecting our most vulnerable communities from extreme heat has to be a top imperative in the Fourth Investment Plan.

**Recommendation:**

* Dedicate a minimum of 5% of auction proceeds to the Urban Greening Program. Science has informed us of the immediate deadly impacts from extreme heat. The ARB must take this issue seriously to protect our vulnerable communities. There are hundreds of millions in projects that are ‘shovel ready’ and could be implemented in months.

**Urban Greening 2.0 – Focus on Green Schoolyards**

* Greened public schoolyards offer the most cost-effective and innovative opportunity to make huge strides to address urban heat and stormwater collection, improve recreational opportunities, and environmental education of our children, all while expanding green space in line with GHG reductions and climate adaptation.

Most public school campuses in California are in a state of disrepair, covered in concrete and blacktop, with little to no green spaces or tree canopy. With temperatures soaring throughout the state, many schoolyards are empty during recess, because the playground equipment gets too hot and surface temperatures routinely exceed 150-degrees Fahrenheit. These same schoolyards with impermeable surfaces fail to absorb valuable stormwater in the winter.

Because public schoolyards are owned by the state or local districts, acquisition costs are eliminated, taking the most prohibited obstacle to park and open space out of the equation. For an average investment between $1-2 million, climate smart schoolyards can be built that feature permeable surfaces, tree canopy and other shading, green open space and educational gardens. We think this is important enough to require schools to transform their campuses statewide by 2030, and to fund this initiative.

**Natural and Working Lands**

The state will soon release its first-ever ‘Natural and Working Lands Climate Smart Strategy’ along with the ‘Pathways to 30X30’ reports. Both will be released before the 2022-23, 2023-24 budget years of the Fourth Investment Plan. The Trust for Public Land believes we must aggressively invest in the natural and working lands sector if we are to meet our climate goals. This sector has been grossly ignored by past investment plans, with the Urban Greening Program, Urban Forestry Program and Wetlands Restoration Program historically getting miniscule investments, or nothing at all.

And although the Forest Health Program has seen a recent commitment of $1 billion over 5-years to address the restoration and enhancements our forests have needed for decades, historically that program was also largely ignored by past investments plans. We must make bold changes to the status quo and increase funding to forest conservation and wetland restoration. Land acquisition, restoration and sequestration must be top priorities in the Fourth Investment Plan.

**Recommendations:**

* Dedicate 10% of Auction Proceeds to Forest Health and Conservation: Since January of 2020, nearly 7 million acres of forest have burned in California, and our forest are overgrown and diseased. We are not only losing the incredible benefits of carbon sequestration, watershed protection and habitat benefits with each acre burned. Not only that, but the fires are emitting millions of tons of GHG’s each year. We must commit to substantial and stable funding to protect and restore our forests.
* Dedicate 2% of Auction Proceeds to Wetlands Restoration: Acre for acre, wetlands sink more carbon than our forests. We have opportunities to expand and protect our existing coastal wetlands across the state to maximize their service as a carbon sink, but also to protect us from sea-level rise. Wetlands and vernal pools are also sensitive and diverse habitat.
* Dedicate 2% of Auction Proceeds to the Urban and Community Forest Program; like the Urban Greening program, the Urban Forestry Program not only sequesters carbon, but improves air and water quality. Trees also provide shade which is the most important variable to addressing the human burden of heat.

**Guiding Principles -** The Trust for Public Land strongly supports many of the Guiding Principles that are creating the framework for the Draft Cap-and –Trade Auction Proceeds Fourth Investment Plan and would like to highlight what we believe need to be central to all investments:

• Advance equity and environmental justice;  
• Improve public health;  
• Support a climate-resilient and prosperous economic future;  
• Foster interagency coordination.

Finally, we would like to note your Table 5 on page-63 of the Investment Plan. There you rank 30 investment types to support the guiding principles using 21 individual metrics. Natural and Working Lands provide the most diverse set of benefits based on the metrics you used in the table. In fact, Urban Greening and Urban Forestry checked 14 of the 21 metrics demonstrating the most ‘bang for the buck’ of any climate investment types.

Sincerely,

Rico Mastrodonato

Senior Government Relations Manager