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VIA ONLINE SUBMITTAL

April 6, 2016

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

RE: Comments on the Healthy Landscapes 2030 Natural and Working Lands Vision and Goals Discussion Paper

Dear Chair Nichols:

The Trust for Public Land (TPL) appreciates the opportunity to comment on the Discussion Paper for Public Comment related to California's Climate Change Vision and Goals for Natural and Working Lands to inform development of the 2030 Target Scoping Plan Update. Overall, we applaud the work that ARB is doing in coordination with other agencies, stakeholders, and the public, to develop measures to reduce GHG emissions and cultivate net carbon sequestration potential for California's natural and working lands. We are pleased with the direction the Discussion Paper takes and believe that Scoping Plan will make strides to protect critical working lands from conversion to more GHG-intensive uses and help to accomplish the dual and complementary goals of greater in-fill development (including green infrastructure) and working land conservation in California. Having said that, we think there are a few areas that can be strengthened or clarified, and we would like to offer the following comments.

Guiding Principles:

We suggest enumerating these principles for clarity and later ease of reference.

More specifically, as described on p. 9, urban areas contain approximately 95% of California's population, despite taking up less than 10% of the land area. While increasing the use of green infrastructure in urban areas is highlighted as a draft goal, there are no guiding principles directed at this overarching issue. We suggest adding a Guiding Principle for increased green infrastructure within California cities:

- *Support communities to implement far-reaching and replicable models of climate-smart green infrastructure techniques that reduce climate impacts by capturing and cleaning water, reducing energy usage by mitigating the urban heat island effect, promoting active transportation mode shifts, and storing carbon through natural infrastructure.*

Guiding Principle 5: This "Share science and implementation" bullet is unclear. Did you mean implementation *strategies*? We suggest splitting this bullet into two - one directed at science and one at policy as the second half of the current bullet seems more appropriate to policy/programs. As it relates to policy, do you mean to share and create policy? Suggest:

- *Share science and implementation strategies across disciplines and the state, and seek to disseminate science and coordinate solutions with local jurisdictions, landowners, and federal partners.*
- *Create avenues for sharing successful and replicable policies and implementation strategies related to local and regional land use planning, management, and protection; share engagement strategies for private, local, state and federal landowners. This necessitates....*

Guiding Principle 7: Can you clarify what state, regional and local models you will share?

Draft Goals (p.3):

1. **Land Protection and Land Use (p.4):** Under the implementation bullet describing "increase habitat acreage protected or restored by 5% above 2015 levels by 2020 for all habitat types identified in the State Wildlife Action Plan." We appreciate the consistency that this implementation goal endorses; particularly in the face of the haphazard way the SWAP identifies conservation targets. However, we suggest broadening this goal to be more inclusive of habitat types that were not specifically described in the SWAP.
2. **Enhance: Management and Restoration (p.5)**

Forests (p.6): *Provide explicit support for forest protection strategies*

While we support forest management planning and restoration activities throughout the state, this section neglects the vital role that forest *protection* continues to play. As described by the Forest Carbon Action Team in the 2016 California Forest Plan Concept paper, "forests that are protected from fragmentation and conversion... provide a diverse range of quality, interconnected habitat types for terrestrial and aquatic wildlife species, included listed and non-listed species."¹ Forest protection also provides the opportunity for extensive, well-managed urban forests to "sequester carbon; provide significant environmental, social and economic co-benefits to communities rich and poor; and yield wood products and biomass when trees must be removed."² We suggest that the goals and implementation sections provide some guidance around and support for forest protection strategies.

Oceans and Coast (p.7): *Broaden the discussion*

While we understand that green infrastructure is discussed in depth in a later section, it is limiting to focus solely on "blue carbon" projects under this heading. Green infrastructure in coastal areas reduces pollution and contaminants from sources including stormwater, non-point source discharges, and agricultural runoff; thereby increasing coastal resiliency in the face of climate change. We suggest enhancing this section to include a broader discussion of ocean and coastal goals.

Urban Forestry and Green Infrastructure (p.9): *Add mention of green roofs*

We applaud the prioritization of Urban Forestry and Green Infrastructure in this section. TPL's Climate-Smart Cities initiative is focused on supporting cities in mitigating and adapting to climate change through conservation and design. In addition to the climate mitigation and adaptation potential of permeable pavements, infiltration, and urban trees mentioned in this section, we'd suggest adding a mention of green roofs — an important way for communities to reduce energy use, sequester carbon, and reduce water treatment needs.

Thank you for your incredible leadership on climate change and specifically for your consideration of our comments on this Discussion Paper.

Sincerely,



Mary Creasman
California Director of Government Affairs

¹ Forest Carbon Action Team. *California Forest Carbon Plan California Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Changing Climate (DRAFT)*, March 9, 2016, p.1. Available at http://calfire.ca.gov/fcat/downloads/Forest_Carbon_Plan-ConceptPaper_Draft_PublicOutreach.pdf.

² Id. p. 2.