



July 28th, 2017

**Re: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets**

Dear Chair Nichols, Air Resources Board members and staff:

Thank you for your ongoing leadership and commitment to address climate change. Due to your persistence, California continues to be an example for other states—and countries—on how to successfully tackle one of the most important issues of our lifetime.

We, the undersigned organizations, are writing to encourage the board and staff to pursue the most ambitious targets possible, ones that will maximize our GHG emission reductions by incorporating land use changes from the natural and working lands sector.

Land use changes that incorporate green infrastructure and resource conservation into planning and design are critical to achieving our climate goals. For example, a study from American Farmland Trust found that reducing California’s farmland conversion rate by half would prevent 55 million metric tons of GHG emissions over the next decade. This is “equivalent to avoiding emissions from more than 129 billion vehicle miles traveled.”<sup>1</sup> Additional benefits could accrue from conserving rangeland, which has been found to produce per-acre GHG emissions up to 217 times lower than those from urban areas.<sup>2</sup>

Similarly, a 2015 study from UC Davis<sup>3</sup> estimates 103 MMT of carbon is stored in the urban forests of California, with 7.2 million metric tons of carbon dioxide sequestered annually and 1.3 million metric tons of avoided GHG emissions each year. Hence, the value and importance of land use changes when discussing how we will achieve our climate goals cannot be overstated.

In our previous comments on the Scoping Plan Update, we urged ARB to include a clear and quantifiable climate goal for the natural and working lands sector. Based on an initial analysis by

<sup>1</sup> Shaffer, S., and Thompson, E. (2015). A New Comparison of Greenhouse Gas Emissions from California Agricultural and Urban Land Uses.

<sup>2</sup> Jackson, L., Haden, Van R., Hollander, A.D., Lee, H., Lubell, M., Mehta, V.K., O’Geen, T., Niles, M., Perlman, J., Purkey, D., Salas, W., Sumner, D., Tomuta, M., Dempsey, M., and Wheeler, S.M. (2012). Adaptation Strategies for Agricultural Sustainability in Yolo County, California. California Energy Commission. Publication number: CEC-500-2012-032. Retrieved from <http://www.energy.ca.gov/2012publications/CEC-500-2012-032/CEC-500-2012-032.pdf>.

<sup>3</sup> Bjorkman, J., Thorne, J.H., Hollander, A., Roth, N.E., Boynton, R.M., de Goede, J., Xiao, Q., Beardsley, K., McPherson, G. & Quinn, J. (2015). Biomass, carbon sequestration and avoided emission: assessing the role of urban trees in California. University of California, Davis: Information Center for the Environment.

The Nature Conservancy, combined with peer-reviewed data, there is evidence that the natural and working land sector could achieve at least 10 million metric tons of reductions in carbon dioxide equivalent (MMTCO<sub>2e</sub>). While we continue to support the inclusion of a clear and quantifiable climate goal for the natural and working lands sector in Scoping Plan, we believe embedding GHG reductions from regional land conservation strategies in the targets provide an excellent opportunity to maximize our GHG reductions. Land use and transportation planning helps to avoid emissions by directing development away from natural and working lands. We believe if every region does more than it is currently doing, they could exceed their current targets and achieve much more ambitious targets. A recent report from The Nature Conservancy<sup>4</sup> outlined a number of best practices focused on land conservation, and we believe every region could find something there that it has not yet adopted.

For these reasons, we urge the board and staff to pursue the most ambitious targets as possible by incorporating land use-based GHG reductions from the natural and working lands sector. With SB 32, we cannot continue business as usual.

Ambitious targets will also help us achieve SB 375's goal of encouraging compact growth, as clear conservation goals can help those agencies prioritize protecting natural lands and investing those funds into existing communities.

Sincerely,

Sopac McCarthy Mulholland, President and CEO  
Sequoia Riverlands Trust

Claire Schlotterbeck, Executive Director  
Hills For Everyone

Virginia Jameson, Interim California Director  
American Farmland Trust

Michael Wellborn, President  
Friends of Harbors, Beaches, and Parks

Elizabeth O'Donoghue, Director of Infrastructure and Land Use  
The Nature Conservancy

Matt Vander Sluis, Interim Chief Operating Officer  
Greenbelt Alliance

---

<sup>4</sup> Livingston, A. (2016). Sustainable Communities Strategies and Conservation: Results from the First Round and Recommendations for Future Rounds. Retrieved from <http://www.southernsierrapartnership.org/scs-policy-report.html>.

Dan Silver, Executive Director  
Endangered Habitat League

Matthew Baker, Land Use and Conservation Policy Director  
Environmental Council of Sacramento (ECOS)

Howard Penn, Executive Director  
Planning and Conservation League

Mike Williams, Acting Assistant General Manager  
Midpeninsula Regional Open Space District

Jeanne Merrill, Policy Director  
California Climate and Agriculture Network (CalCAN)

Chuck Mills, Director of Public Policy and Grants  
California ReLeaf

Cc: Secretary Brian Kelly, California State Transportation Agency  
Deputy Director Kate White, California State Transportation Agency  
Director Malcolm Dougherty, California Department of Transportation  
Deputy Director Ellen Greenberg, California Department of Transportation  
Executive Director Randall Winston, Strategic Growth Council  
Director Ken Alex, Governor's Office of Planning and Research  
Executive Director Susan Bransen, California Transportation Commission  
Deputy Director Eric Thronson, California Transportation Commission