

Chair Mary Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

December 15, 2016

Re: 2030 Target Scoping Plan Update, Discussion Draft

Dear Chair Mary Nichols and Members of the Board,

Thank you for the opportunity to review the 2030 Target Scoping Plan Update Discussion Draft (“Discussion Draft”). The Trust for Public Land would like to provide brief comments on the Discussion Draft, specifically related to Environmental Justice and the key sectors of Transportation and Natural and Working Lands. The Trust for Public Land has worked for over 40 years to create a healthy and climate-smart California with access to nature for all.

Environmental Justice

We commend the ARB on their conscientious investment in the Environmental Justice Advisory Committee (EJAC) and integration of environmental justice considerations and EJAC recommendations throughout the Discussion Draft. The nine workshops EJAC conducted show ARB’s growing commitment to ensure that Californians from every corner of the state have an opportunity to voice their concerns and priorities for how best to reduce GHGs while improving their quality of life. We strongly encourage ARB to partner with community-based organizations that have strong and trusting relationship with residents to increase participation; to the extent possible, ARB should also provide childcare and other supportive services that can enable parents to attend.

Transportation Sustainability

The transportation section is robust and we support the focus on technology, fuel switching and VMT reduction. VMT reduction in particular is essential to meeting SB32 goals - this is emphasized in section 1 (p.51) under “promote all feasible policies to reduce VMT, including land use changes and community design that reduce VMT” as well the stated goal of striving for a nine-fold increase in the proportion of trips taken by bicycle in 2030 (p.52).

With California communities experiencing an increased frequency and severity of heat waves, we believe that an important element for VMT reduction is to integrate green infrastructure that reduces land surface temperatures while also storing carbon and increasing resiliency of local water supplies through stormwater management. As we encourage more Californians to meet their mobility needs through walking, biking and transit, we encourage ARB and other state implementing agencies to support improvements in our urban and rural built environment that advance public health and enhance climate resilience. Green infrastructure and VMT-reduction strategies through active transportation are complimentary and should be closely linked.

We are supportive of the comprehensive list of known commitments and potential new measures to reduce GHG provided on p.54. We suggest the addition of “encourage use of streets *and alleys* for multiple modes of transportation...” (second-last bullet, p.54) as alleys can be extensive in dense, urban areas and provide an untapped opportunity to expand active transportation networks.

We look forward to reviewing “Potential State-Level Discussion Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel” in early 2017. We suggest editing the fourth bullet on p. 57 to read “Promoting efficient development patterns that maximize protection of natural and working lands *and reduce sprawl*”.

Natural and Working Lands

We appreciate the extensive consideration of NWL and integration within other sections in the document. On p.63, under b) Enhance carbon sequestration and resilience through management and restoration, in addition to urban tree canopy, we suggest consideration of the GHG benefits from a full suite of green infrastructure deployment including reduced VMTs from construction of new active transportation networks.

Under *Enhance* on p. 68 - thank you for the excellent description of green infrastructure and its benefits. We hold firm in our belief that all new development should be multiple-benefit and include green infrastructure wherever possible.

Importance of the Greenhouse Gas Reduction Fund

Regardless of the mechanisms selected to meet the state’s GHG reduction targets, it is critical that any funds generated by the state as a result of GHG reductions be reinvested in local communities. The GGRF has become a critical funding source for building affordable housing, NWL protection and restoration, urban forestry and urban greening - while contributing to additional GHG reductions and providing essential benefits to DACs. Finally, ARB should support technical assistance and capacity building opportunities in DACs across the state to enable broader participation in GGRF programs.

Sincerely,

A handwritten signature in black ink, reading "Mary Creasman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mary Creasman
California Director of Government Affairs