July 6, 2016

Mary D Nichols, Chair

California Air Resources Board

Sacramento, CA

Dear Honorable Mary Nichols,

Thank you for the opportunity to review the 2030 Target Scoping Plan Concept Paper, which outlines a strategy for how to achieve GHG reductions of 40% below 1990 levels by 2030. We applaud the holistic approach your staff has taken in developing the Concept Paper and respectfully submit the following feedback to strengthen it. With a 40+ year history of preserving thousands of acres of forests and landscapes for the enjoyment of current and future Californians as well as building parks and greening our urban environment, The Trust for Public Land remains committed to partnering to achieve your ambitious and necessary efforts to cut GHG emissions.

We are particularly pleased to see recognition of the low emissions from the agriculture and natural lands sector coupled with the encouragement of policies to support these sectors in order to reduce emissions and sequester carbon, while also providing ecosystem benefits such as improved water quality, increased water yield, soil health, reduced erosion and habitat connectivity. We are glad that these policies and co-benefits will be considered as part of the integrated strategy outlined in the concept paper.

We are particularly glad to see the following identified goals below:

1. Harnessing natural functions through urban greening to achieve multiple benefits such as cooling the urban environment, increasing carbon storage in urban landscapes, making it safer and easier for people to walk or bike to/from transit and short-distance destinations so they can avoid driving.

2. By 2030: Natural and Working Lands:

a. Each year, 500,000 acres of nonfederal forest lands included in restoration plans oriented towards forest health and carbon storage

b. More infill and revitalization of urban core areas

c. Land preservation policies;

d. Increase habitat acreage protected or restored.

Having expressed our support for the goals and strategies described above, we make the following recommendations:

1. A more concerted effort to conserve forest land – as the recent wildfires in Kern County and Duarte/Azusa us, extreme heat exacerbated by climate change threatens our already fragile forests and natural lands. We encourage you to use available tools such as conservation easements and acquisition to permanently protect these lands from conversion to development. We also need to increase investment s to better manage forest to achieve fuel reduction and thinning of younger trees which would allow for greater carbon storage through larger, older trees.

2. Raise the importance of advancing health outcomes in SB 375 and other regional GHG target platforms: as your environmental justice section points out, we cannot divorce the effort to reduce GHGs from a reality of disproportionate concentration of emissions in communities inhabited by low income communities of color. Encouraging more local planning and investment in solutions such as safe active transportation, urban greening and conservation, and infill and affordable housing development will make more Californian communities for resilient to climate change impacts.

We look forward to working with your staff to provide input into the planning, methodologies or guidelines used to shape the final scoping plan. Please don’t hesitate to let us know how we can be helpful.

Best regards,

Rico Mastronado

Senior Government Relations Manager

The Trust for Public Land