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March 16, 2017

Mary D Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2017 Climate Change Scoping Plan Update

Dear Chair Nichols:

Thank you for the opportunity to review the 2017 Climate Change Scoping Plan Update: *The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Proposed Plan)* which establishes the action framework to reduce the state's greenhouse gases by 40% by 2030 compared to 1990 levels. Overall, we are heartened to see that the Proposed Plan focuses "renewed attention on California's natural and working lands and the contribution they make to meet the State's long-term goals for carbon sequestration, GHG reduction, and climate change adaptation" (p.108). Conservation of urban green space, natural resources, and working lands must be prioritized in the state's effort to meet its ambitious climate goals.

For over 40 years, The Trust for Public Land (TPL) has conserved land for people to enjoy as parks, gardens, and other natural places; and built parks and other nature-based infrastructure in our urban environment, ensuring equitable and livable communities for generations to come. As California quickly pivots from fossil fuels towards a more sustainable future, TPL works to make communities are more resilient, ensuring that inequities are addressed and quality-of-life is improved for disadvantaged communities in the new California economy. Our comments are focused on clarifying the role that urban and rural conservation and improved land management play in climate mitigation and adaptation while ensuring that critical environmental and health benefits flow to communities most impacted by climate change.

Conservation Objective: We are pleased to see *Protect* listed as one of three primary objectives in the Natural and Working Lands section (p. 110). Avoiding the conversion of California's natural and working lands both protects the carbon sequestration potential of these lands and supports infill development and its benefits. And these benefits are cross-cutting, with the potential to reduce VMTs as well. On p. 107, we suggest that a *Potential Additional Action* be changed to read as follows:

"Promoting stronger boundaries to suburban growth through enhanced support for sprawl containment mechanisms, including urban growth boundaries, and-transfer of development rights programs, and protection of natural and working lands."

Appendix C: Vibrant Communities and Landscapes and Potential VMT Measures describes the development of "quantitative and achievable goals to protect and limit the conversion of the State's most productive farmland, rangeland, and forests, as well as the natural and working lands." We suggest that the Proposed Plan reiterate this goal on p. 114 (Protection of Land and Land Use).

Additional Emphasis on "Urban Greening" or "Green Infrastructure":

We are pleased to see strong support for green infrastructure on p.116. Green infrastructure can connect communities to daily destinations such as jobs, schools, medical facilities or grocery stores; to trails and transit lines; reduce the urban heat island effect; absorb rainfall, reduce flooding, and recharge drinking water supplies; and protect communities from rising seas and coastal storms. Green infrastructure can also provide close-to-home play and recreational opportunities, improving community health and quality-of-life. We believe that Green infrastructure (or "Urban Greening") should be given its own section within this scoping plan, rather than fall under 4. Efforts to Support Sector Objectives, *Enhance*. This suggestion is bolstered by the "[c]onsistent message" provided through stakeholder feedback of the "need for infrastructure and other community improvements that enhance quality of life, increase access to safe and viable transportation options, and improve physical activity and related health outcomes." (p.8)

Include Anti-Displacement and Technical Assistance Goals in the Proposed Plan:

While policies and efforts to prevent displacement of existing residents are outlined throughout the EJAC Recommendations for the Proposed Plan (Appendix A), the Proposed Plan itself does not mention displacement. We suggest that a change be made on p. 20 of the Proposed Plan to read "Effective climate action requires that the inequities that create and intensify community vulnerabilities be addressed, *while ensuring that projects do not result in the displacement of local residents, businesses, and people of color.*" Strategies to ensure that long-time residents can stay in place as neighborhoods improve is a critical step to ensure that socially vulnerable populations don't get priced out after urban greening and other climate investments take place. Research shows that low income residents are more likely to use mass transit and/or active transportation to meet their daily commutes than their middle or upper income neighbors so it is imperative that we develop and implement strategies to help low income residents remain in place so as to not undermine GHG-reduction efforts.¹

While the EJAC Recommendations also include some language supporting technical assistance for disadvantaged communities, we believe the Proposed Plan should specifically encourage capacity building of local community organizations and government entities in order for them to participate meaningfully in state climate investment programs. Technical assistance should include resource, leadership, and partnership development in disadvantaged communities, leveraging existing programs and partnerships to accomplish climate resiliency goals at the local level.

In his January 2015 inaugural address, Governor Brown identified "[m]anaging farm and rangelands, forests, and wetlands so they can store carbon as one of five key climate change strategies and this policy objective was codified through the passage of SB 1386

¹ See Gray-O'Connor, Jen (2015, June 1) Transit-oriented Development. *Critical Sustainabilities*. Retrieved from <https://critical-sustainabilities.ucsc.edu/transit-oriented-development/>.

in 2016. However, the **Natural and Working Lands Including Agricultural Lands** section on p. 108 of the Proposed Plan focuses primarily on the agricultural sector and we encourage increased references to all working lands- farms, ranches and forests.

- P. 116: We believe that "Partner with landowners, local and federal agencies, and private conservation organizations to conserve critical lands" could be moved to its own bullet.
- We encourage a change under *Enhance* on p. 116 to: "engage local communities and private and public landowners to implement best practices for carbon sequestration to achieve net GHG benefits by undertaking actions that reduce on-farm, *ranch, and working forest* GHG emissions, improve soil and biomass carbon sequestration...."
- We also suggest a change on p. 118 to "Efforts to reduce GHGs ~~in the agricultural sector~~ *on working lands*," and add appropriate efforts related to working ranches and forests, including community forests within this section.

Thank you again for the opportunity to comment on the Proposed Plan. Please don't hesitate to let us know how we can be helpful.

Sincerely,

A handwritten signature in cursive script that reads "Mary Creasman". The signature is written in black ink and has a long, sweeping horizontal line extending to the right.

Mary Creasman

California Director of Government Affairs
The Trust for Public Land