



101 Montgomery St.  
Suite 900  
San Francisco, CA  
94104  
t: 415.495.4014  
f: 415.495.4103

[tpl.org](http://tpl.org)

September 28, 2016

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

**Re: Vibrant Communities and Landscapes: A Vision for California in 2050**

Dear Honorable Nichols,

Thank you for the opportunity to review the Vibrant Communities and Landscapes: A Vision for California in 2050 ("Land Use Vision") which outlines land use strategies that will help the state meet its commitment to reduce its greenhouse gas (GHG) emissions 40 and 80 percent below 1990 levels by 2030 and 2050 respectively. Overall, we are pleased to see the overarching strategy to integrate conservation and sustainable development throughout the state and respectfully submit the following feedback. For over 40 years, The Trust for Public Land 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. The Trust for Public Land can serve as a valuable partner in the effort to achieve your ambitious and necessary efforts to cut GHG emissions while simultaneously realizing critical benefits to public health and natural resources; as well as economic, equity, and resiliency outcomes.

**Actions:**

We are particularly pleased to see language which prioritizes the "conservation and protection of natural and working lands" (p.2). 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.

**Establish land conservation targets(p.3):** Suggest the inclusion of "protect and limit the conversion of the State's most productive farmland, rangeland, *wetlands*, and forests..." as wetlands are essential to maintenance of the state's water supply and biodiversity, and particularly important to mitigate climate change. Further, what is the timeline associated with the development of the "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 most critical to preserving California's biodiversity and the ability for Californians to adapt to climate impacts"? Will these quantitative goals be located in the final 2030 Scoping Plan? Will there be opportunity for public input on these measures? The Trust for Public Land can contribute to this continued discussion.

**Develop policies and processes for infrastructure siting that are consistent with the State's conservation, development, and population health goals (p.3):** We would like to see the addition of language that promotes the use of infrastructure that delivers multiple benefits for communities. We suggest the addition of a sentence at the end of this paragraph such as "Wherever possible, new development will be designed to maximize public health, environmental, and economic benefits within communities."

**Explore and develop financing, regulatory, and other tools to support more efficient and more equitable development (p.3):** We support the state's inclusion of implementing anti-displacement strategies in this action. We suggest the addition of "*developing and implementing strategies to ensure that long-time residents can stay in place as neighborhoods improve*" to include development of new anti-displacement strategies and further the state's leadership in this area. Implementation of this strategy is a critical step to ensure that socially vulnerable populations – the elderly, low income, communities of color, immigrant, and other long-term residents – don't get priced out after urban greening investments take place; often, these residents end up relocating to areas that have inadequate mass transit, urban greening, and social service networks thus exacerbating their vulnerability to climate change.

**Explore and develop financing, regulatory, and other tools to promote land protection and carbon-oriented land management practices (p.3):** This action, as written, encourages two related outcomes – land protection and carbon-oriented land management practices – yet the descriptive language only addresses the latter (incentives to "private landowners to promote both permanent and temporary conservation and management for carbon sequestration."). Land protection can provide a myriad of environmental benefits in addition to natural carbon sequestration and this section should be explicit in support for the development of tools to promote land conservation to *protect and limit the conversion of natural and working lands, sequester carbon, protect biodiversity, and promote an infill-oriented development pattern*. Finally, we suggest that incentives to promote permanent and temporary conservation be made available to open space and land management agencies in addition to private landowners.

**Suggest additional action:** "Explore and develop financing, regulatory, and other tools to promote urban greening to reduce GHG emissions, increase carbon storage, and create more livable communities." As described on p. 3, "focusing on infill and compact development patterns . . . encourages investment in existing and underserved communities." We hope that the Land Use Vision can more explicitly support the acquisition and development of parks and green infrastructure projects in the communities that suffer from poor air quality, high unemployment, and lack of recreational opportunities. Urban greening also leads to other, related benefits such as cooling the urban environment, mitigating flooding, increasing carbon storage, and reducing VMTs by making it safer and easier for people to walk or bike to/from transit and short-distance destinations. Access to parks and green space, and abundant recreational options" are touted as some of the health benefits of the Land Use Vision's "actions" (see p.4). However, we feel that in order to achieve these benefits, strategies for increasing urban

parks, green space, and recreational opportunities should be elucidated more clearly in the actions on p.2-3.

Thank you for the continued opportunity to provide input into the planning, methodologies and guidelines used to shape the 2030 Scoping Plan Update and GGRF programs. Please don't hesitate to let us know how we can be helpful.

Sincerely,

A handwritten signature in black ink, reading "Mary Creasman" in a cursive script. The signature is fluid and extends to the right with a long, thin horizontal stroke.

Mary Creasman

California Director of Government Affairs  
The Trust for Public Land