MEMORANDUM

TO: California Air Resources Board

FROM: Nancy L.C. Steele, D.Env., Executive Director

SUBJECT: 2013 Scoping Plan Update Comments

DATE: August 12, 2013

**Comments on the ARB 2013 Scoping Plan Update**

We appreciate this opportunity to provide comments to the California Air Resources Board as it develops the 2013 Scoping Plan Update. We offer suggestions for Section 16, *Sustainable Forests* and Section 17, *Water*.

First, we suggest changes to Section 16 of the scoping plan to address recent science documenting that shrubland ecosystems are important carbon sinks[[1]](#footnote-1). The ability of shrublands to absorb carbon is proving so significant that we recommend changing the title of Section 16 to “Forests and Shrublands.” Valuing forests over shrubland ecosystems can lead to misguided efforts to attempt afforestation at great expense, with a likelihood of failure to establish, and with significant negative impacts to biodiversity.

Additionally, because of increased wildfire under climate change, the ability for shrublands to play a significant role sinking carbon is at great risk due to type conversion to exotic annual grasses and other invasive plants. In Southern California, development patterns have significantly impacted shrubland ecosystems and this has increased wildfire ignitions. Where possible, municipalities should be encouraged to protect forests and shrublands to protect the provision of valuable ecosystem services.

For Section 17, *Water* we have several recommendations for efficiency projects that also emphasize water capture, storage and reuse. Consider adding the following to the Recommended Actions in the Scoping Plan:

* Find opportunities to expand energy audit programs to include indoor and outdoor water audits whereby recommendations are made to address both direct energy use and energy use as a result of excessive water use.
* Conduct energy audits of water conservation practices (water recycling, stormwater capture and infiltration) to determine true energy savings and costs.
* Expand programs like the Los Angeles Department of Public Works rain garden program[[2]](#footnote-2) by providing incentives for rainwater harvesting.
* Pool conservation funding resources of small water purveyors to fund water use efficiency coordinators to direct education and programs and incentive programs.
* Promulgate multibenefit energy and water efficiency improvements including shade tree planting in addition to opportunities direct rainwater to landscape trees, rain gardens and other pervious areas. The Council for Watershed Health-led neighborhood retrofit demonstration project at Elmer Avenue in Sun Valley[[3]](#footnote-3) has proven to be a useful tool to teach energy and water efficiency best practices for the region.
* Conduct regional stormwater capture feasibility studies to determine optimal infiltration locations.

Thank you for providing the Council with the opportunity to contribute to the 2013 Scoping Plan Update. We hope that you will find our comments useful. Please contact me with any further questions.

1. <http://mercury.ornl.gov/metadata/ornldaac/daac_citations/2007/luo_etal.pdf> [↑](#footnote-ref-1)
2. <http://www.lastormwater.org/wp-content/files_mf/homeowner_howto_guide.pdf> [↑](#footnote-ref-2)
3. <http://watershedhealth.org/programsandprojects/was.aspx> [↑](#footnote-ref-3)