



June 23, 2010

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: MPO Scenarios and SB 375 targets

Dear Chairman Nichols and Air Resources Board Members,

Thank you for the opportunity to provide input in response to the MPOs' GHG emission reductions scenario analyses and the SB 375 target setting process. We commend the Air Resources Board (ARB) and the MPOs for your extensive efforts and collaboration to date. As the MPOs continue their scenario analyses and ARB enters the final stages of the target setting process **the undersigned organizations urge ARB to 1) set the most ambitious targets feasible, especially for the 2035 timeframe and 2) consistent with RTAC recommendations, work with stakeholders to identify performance measures of the co-benefits of SB 375 implementation, especially preservation of natural resources and working landscapes and the carbon sequestration and climate regulation functions of these lands.**

Ambitious targets will not only reduce GHG emissions but will also ensure more efficient use of California's resources to keep our state healthy and prosperous and to protect our quality of life. ARB must set ambitious targets for 2035 so our communities and our economy reap the full benefit of SB 375 implementation.

Better integration of land use and transportation planning including designation of priority natural and agricultural areas for conservation can help regions meet their SB 375 targets by focusing growth, transit and infrastructure in areas that provide the greatest advantages to the community while preserving the broad suite of essential benefits provided by these lands including clean air and water, provision of food and jobs, removal of carbon and other greenhouse gases from the air, protection against severe weather events and habitat for fish and wildlife. Development of quantifiable metrics or proxies for these benefits that integrate with the MPOs' transportation models will help clarify and communicate the trade-offs of different planning scenarios, allowing us to select those that maximize on-the-ground quality of life benefits to our communities. Some of the metrics that might be considered include:

- Acres of high value carbon sequestration lands preserved
- Acres protected from conversion under permanent legal agreement (purchase for conservation/open space)

- Acres protected from conversion under short-term legal or voluntary agreement (Wetlands Reserve Program ten or 30 yr easement, Williamson Act)
- Acres adjacent to existing protected lands permanently conserved
- Acres avoided in the wildland urban interface
- Acres avoided in the 100-year flood plain
- Acres of prime farmland of statewide significance avoided

This information could be provided to MPOs either as raw GIS data to integrate into their models or a web-based tool could be developed to host full GIS layers of this information that could be added as an additional layer to MPO scenarios. There are also some existing and in-development examples of how to integrate land use and conservation plans, these include:

- Natural Community Conservation Plans and Habitat Conservation Plans -- <http://www.dfg.ca.gov/habcon/nccp/>
- Vision California -- <http://www.calthorpe.com/vision-california>
- Regional Greenprints – a region-wide mapping process in the model of a blueprint that identifies and allows communities to strategically preserve existing resource areas such as farm and rangeland, parkland, forests and other natural resource areas with high carbon storage or sequestration capacity, designated conservation areas, as well as those targeted for existing or future protection due to presence of sensitive resources, high value aquatic resources, vernal pools, sensitive habitat, wildlife movement corridors and floodplains.

Thank -you for your consideration and for your hard work and commitment. We look forward to continued engagement in the SB 375 implementation process.

Sincerely,

Elizabeth O'Donoghue
The Nature Conservancy

Rachel Dinno Taylor
Trust for Public Land

Dan Silver
Endangered Habitats League

Sean Wirth
Habitat 2020

Christina Lewis
California Native Plant Society, Sacramento Valley

Jude Lamare
Friends of the Swainson's hawk