



Ms. Mary Nichols
Chair, California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

August 18, 2008

RE: Higher priority for land use in the AB 32 Scoping Plan

Dear Ms. Nichols:

Thank you for your excellent work on the draft AB32 Scoping Plan. The plan is an exciting and bold step in meeting the challenge of climate change.

For the past 50 years, Greenbelt Alliance has been the Bay Area's advocate for open spaces and vibrant places, supporting smart land-use planning at the city and county level. We appreciate the opportunity to offer our comments on the draft Scoping Plan.

Set a higher target for emissions reductions from land use

Greenbelt Alliance urges CARB to prioritize land-use planning and policies in the AB 32 Scoping Plan. Because the transportation sector is the largest single source of greenhouse gas emissions in California, and because local land-use decisions play such a key part in fuel consumption patterns, land use must play a larger role in the Scoping Plan's strategies for greenhouse gas reductions.

Recent research shows that better regional planning can reduce emissions by significantly more than the 2 million metric tons (MMT) designated in the Scoping Plan. A team at Stanford, led by Jim Sweeney, conducted an analysis of smart growth scenarios in all four major California regions and found that these plans could reduce emissions by 7 MMT if properly implemented. The Sacramento Area Council of Governments projects that they will achieve 750,000 metric tons of reductions through smarter land use measures by 2020, and they account for only 6% of the state's population. We urge CARB to set a land-use related reduction target of at least 10 MMT.

MAIN OFFICE • 631 Howard Street, Suite 510, San Francisco, CA 94105 • (415) 543-6771 • Fax (415) 543-6781
SOUTH BAY OFFICE • 1922 The Alameda, Suite 213, San Jose, CA 95126 • (408) 983-0856 • Fax (408) 983-1001
EAST BAY OFFICE • 1601 North Main Street, Suite 105, Walnut Creek, CA 94596 • (925) 932-7776 • Fax (925) 932-1970
SONOMA OFFICE • 555 5th Street, Suite 300B, Santa Rosa, CA 95401 • (707) 575-3661 • Fax (707) 575-4275
MARIN OFFICE • 30 North San Pedro Road, Suite 285, San Rafael, CA 94903 • (415) 491-4993 • Fax (415) 491-4734
SOLANO-NAPA OFFICE • 1652 West Texas Street, Suite 163, Fairfield, CA 94533 • (707) 427-2308 • Fax (707) 427-2315

INFO@GREENBELT.ORG • WWW.GREENBELT.ORG

Establish a strong, flexible regional framework

The regional planning framework described in both the Scoping Plan and SB 375 provides a good foundation for land-use related greenhouse gas reductions. We also support the incentive package, including directing state infrastructure funding to areas doing climate-friendly planning and providing improved treatment under CEQA for climate-friendly projects.

However, more is needed to ensure the necessary land-use changes take shape on the ground. The state must set the bar high for greenhouse gas reductions from land use, require regions to plan to achieve targets, and then provide a suite of tools and revenue sources to local and regional agencies to implement the plan and reach the targets, allowing regions and localities the flexibility to choose which tools are right for them.

These tools could include an Indirect Source Rule, Pay-As-You-Drive Insurance, fees linked to automobile emissions (such as congestion pricing and gasoline fees), aggressive investments in public transportation, and resources and technical assistance.

The framework must also include milestones for measuring progress, rewards for good behavior, and consequences for failure to act. We recommend that CARB adopt a schedule for the creation and implementation of regional plans, and set milestones every 2-4 years that regions must achieve. Initially, regions and localities should be given flexibility to choose which tools work best for them. Regions that fail to achieve milestones should be required to recalibrate their plans and adopt different or stronger tools.

Adopt Indirect Source Rules

The Scoping Plan should direct all California air districts to adopt an Indirect Source Rule (ISR) for greenhouse gas emissions. CARB should develop guidelines for the ISR using the best elements of the landmark San Joaquin Valley rule for criteria pollutants. The guidelines should require the use of advanced modeling to estimate emissions, and mitigation of those emissions through a combination of onsite and offsite mitigation, including fees to be paid to the air districts to identify and fund offsite mitigations in the project vicinity.

Establish policies to retain the climate benefits of natural lands

The draft Scoping Plan correctly recognizes that forests have an important role in sequestering carbon, and the conversion of these lands results in a loss of that sequestration value. Like forests, other natural and working landscapes also provide important climate benefits, not only by sequestering carbon, but also by limiting sprawl, providing a local source of food and fiber, and capturing and delivering drinking water.

The scoping plan should recognize the conversion of land uses from open space to urbanized land as a significant source of carbon emissions. Converting involves both an

immediate “pulse” of carbon released from reservoirs, and the loss of continued sequestration activity as the living biomass, such as trees, grows.

We therefore recommend inclusion of the following elements in the Scoping Plan:

- Create a statewide program to inventory and assess the carbon sequestration rates of natural and working landscapes across the state. Develop protocols for measuring sequestration rates and assist local and regional agencies in implementing the protocols.
- Create a statewide program and/or guidelines to mitigate for the loss of sequestration resulting from conversion. There are a number of possible mechanisms for implementing this strategy, including, CEQA, ISR and regional planning.
- Funds generated through a mitigation program as described above, or through other revenue generation mechanisms in the Scoping Plan, should be used for:
 - Acquiring open space lands (through either fee-title or conservation easements) to permanently prevent their conversion.
 - Maintaining and stewarding natural areas to ensure lands maintain their ecological integrity and their ongoing carbon storage potential.
 - Restoring the health of ecosystems to improve future carbon sequestration potential.

Open space is a crucial component of the compact, walkable urban areas that are needed to reduce VMT. Funding for open space, like other state infrastructure funding, should be directed to areas that are meeting their regional land-use and transportation greenhouse gas reduction targets. Urban parks funding should be provided to underserved areas first.

Thank you again for your hard work developing this plan and for the opportunity to comment. Greenbelt Alliance looks forward to continuing to work with you on implementing this landmark legislation.

Sincerely,



Jeremy Madsen, Executive Director