



## California Native Plant Society

ORANGE COUNTY CHAPTER

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occnps.org

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The mission of the California Native Plant Society is to conserve California native plants and their natural habitats, and to increase understanding, appreciation, and horticultural use of native plants.

OCCNPS focuses that mission on the native plants and remaining areas of natural vegetation in Orange County and adjacent Southern California.

California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: ARB Draft Investment Plan

Dear Sirs:

Thank you for the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan).

The Orange County Chapter of the California Native Plant Society has an ongoing concern to conserve and enhance our area's native vegetation, not only for its own sake but also as a carbon sink. We believe that natural land and its native vegetation have far more long-term value as part of the natural cycle of carbon sequestration and oxygen production than any short-term value that development may generate.

We are surprised to learn that the Draft Investment Plan does not include any substantive strategies for allocating AB 1532 funds toward land and natural resources conservation as a method to reduce greenhouse gas emissions--to take advantage of Nature's sustainable ability to continuously absorb CO<sub>2</sub> and store (sequester) it indefinitely at no cost beyond the initial cost of the land.

Two existing programs in Orange County work to preserve natural land as open space, both for its own sake and as a carbon sink. We are among the dozens of Orange County conservation and community groups that have supported the programs' establishment and functioning.

1. The Orange County Transportation Authority's Environmental Mitigation Program. In 2006 Orange County voters approved a ½ cent sales tax measure to fund transportation projects throughout the County over a 30-year period. Conservation and community groups negotiated for 5% of the freeway program to fund comprehensive mitigation focusing on acquisition, restoration and management of important habitat lands. To date nearly 950 acres have been conserved and 11 restoration projects launched as mitigation for 13 freeway projects. Cap and Trade Auction Revenues could provide matching or complementary funding for this program, helping the mitigation dollars to go farther.

2. The Southern California Association of Governments' adoption of the Sustainable Communities Strategy (SCS) as part of its Regional Transportation Plan. The SCS is an innovative sub-regional landscape-level conservation tool that outlines 15 strategies to reduce vehicle miles traveled, hence CO<sub>2</sub> emissions. "Strategy H," one of the 15 strategies, is a first-of-its-kind conservation policy to reduce carbon emissions through land acquisition and restoration. Funds are needed to get this program off the ground and Cap and Trade Auction Revenues seem to be a natural fit.

We request that Cap and Trade Auction Revenues be directed first toward existing programs that already provide conservation benefits. Cap and Trade revenues applied to regional conservation plans would provide a much needed boost to conservation efforts while concurrently meeting emission reduction targets.

Thank you again for the opportunity to comment, and for your time.

Respectfully,

Celia Kutcher  
Conservation Chair

cc: Cliff Rechtschaffen, Office of the Governor