



CALIFORNIA
CHAPARRAL
INSTITUTE

...the voice of the chaparral

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

March 8, 2013

RE: Comments on the ARB Draft Investment Plan

Dear Air Resources Board:

Since conservation is a fundable tool in AB 1532 (Greenhouse Gas Reduction Fund), we are surprised the Board didn't include conservation or natural resources in its Investment Plan. We urge the Board to reconsider this omission and include both these critical components to any greenhouse reduction program.

We see conservation as an easily implementable tool (no new technologies need to be invented, installed, developed). Conservation provides immediate short and long term benefits. It can do so by removing undeveloped private lands from the development market and provides carbon sequestration benefits as well as carbon avoidance benefits if the land had been converted to more urban uses. Since the most extensive ecosystem in California is the chaparral, the Board should pay special attention to incorporating the conservation of this ecosystem into its Plan.

We are aware that that the benefits of conservation of native shrublands, such as chaparral and California sage scrub, are not easy to quantify since there are currently no protocols for these habitat types. However, this should not preclude the Board from including shrublands into its planning process. For example, old-growth chaparral provides significant levels of carbon sequestration and its preservation can play a vital role in the State's greenhouse reduction goals. We are providing a link to the following paper by Luo (2007) that will assist the board in doing so:

http://www.californiachaparral.org/images/Luo_et_al_Chaparral_as_carbon_sink_2007.pdf

Sincerely,

Richard W. Halsey
Director