

SANTA MONICA MOUNTAINS CONSERVANCY

LOS ANGELES RIVER CENTER & GARDENS
570 WEST AVENUE TWENTY-SIX, SUITE 100
LOS ANGELES, CALIFORNIA 90065
PHONE (323) 221-8900
FAX (323) 221-9001
WWW.SMMC.CA.GOV



July 31, 2013

Ms. Edie Chang
Deputy Executive Officer
State Air Resources Board
Sacramento, California 95814

Preservation of Natural Resources in Scoping Plan Update

Dear Ms. Chang:

The staff of the Santa Monica Mountains Conservancy respectfully urges the State Air Resources Board to make natural resource protection a priority in its Scoping Plan Update. Natural resource protection will be a critical component of the state's ability to meet its short-and long-term GHG reduction goals under A.B. 32, and we welcome the opportunity to help craft solutions and implement programs to achieve these goals.

A Strategic Investment in Natural Resources Will Further Goals of AB 32

In addition to preserving key recreational resources and wildlife habitat, **conservation of open space** is critical to California's future GHG reductions goals. Strategic conservation of areas surrounding urban cores will reduce sprawl, vehicle miles travelled, and avoid additional GHG emissions associated with new development. At the same time, open space conservation will encourage density and mixed use development in urban areas. To help California's cities achieve these results, the Scoping Plan update should emphasize programs to promote strategic buy-back and conservation easement efforts. Timing on this is crucial; near-term action in the form of land use planning, direct funding, and other incentives and programs for conservation will achieve significant long-term benefits for California.

In addition, **natural resource protection in urban areas** will contribute to significant GHG reductions and other co-benefits. Urban greening programs are a cost-effective way to reduce electricity costs by reducing the heat island effect and sequestering carbon. Strategic development of parks and greenways along waterways and bike paths encourages non-motorized transit and promotes investment in park-poor

neighborhoods. Further, the Conservancy utilizes water recycling and filtration techniques at many of our parks that contribute to water and energy savings in the Los Angeles region.

California's State Conservancies Are Well-Positioned for Implementation

We recommend that the Board specifically designate State Conservancies as Implementing Entities for programs and funding under the Scoping Plan. California's Conservancies are particularly well-suited to meet near term greenhouse gas emissions reductions goals because they already have the mechanisms and partnerships in place to implement regional programs that serve statewide priorities. Conservancies will be able to leverage revenues with existing funds, form strategic partnerships with local entities, and utilize existing administrative infrastructure to efficiently roll out projects that incentivize and foster GHG reduction goals and further the purposes of A.B. 32.

In particular, the Santa Monica Mountains Conservancy has extensive jurisdiction in the southern California region, including not only the Santa Monica Mountains themselves, but also the Rim of the Valley Corridor and Upper Los Angeles River and Tributaries. In addition to significant urban greening and strategic buy-back/avoided development programs, the Conservancy is positioned to make significant contributions to water and energy savings in the Los Angeles region through various water use efficiency programs. As a state agency we are able to oversee and monitor the land development activities of local governments with diverse constituencies across six mountain ranges.

Natural Resources Investment Will Yield Substantial Co-Benefits

In addition to GHG reduction benefits, investment in Conservancies will also address environmental justice and inequality concerns as required by S.B. 535, foster job creation through projects in local communities, and provide opportunities for public agencies, nonprofits, and other community institutions to participate in and benefit from such efforts.

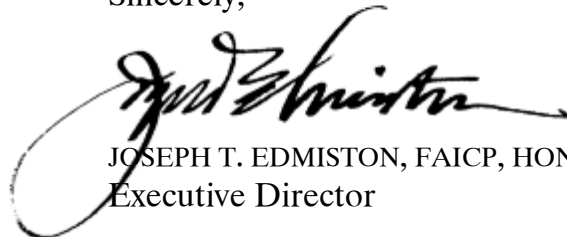
- Many of the Santa Monica Mountains Conservancy's current or proposed projects are located in and serve **disadvantaged communities** ("DACs") as identified by the California Environmental Protection Agency. The Los Angeles area has the largest concentration of disadvantaged communities in California. The Mountains Conservancy supports S.B. 535's recommendation to use 25% of Greenhouse Gas Reduction Fund to benefit disadvantaged communities and address statewide goals to create clean air and water for all Californians. These

areas of high need have long been a focus for the Conservancy because every dollar invested achieves important statewide co-benefits like job creation, advanced skills and job training, and increased property values.

- Urban park and water use reduction projects must be done in the local communities where the benefits are received. Because they cannot be outsourced, this type of projects fosters **job creation** in communities that need it most.
- The Mountains Conservancy has an **established network of partnerships** with various local public agencies, nonprofits, and community institutions. We are in an excellent position to immediately tap into its connections to form synergistic partnerships and leverage and disburse funds to local groups.
- The Mountains Conservancy is poised to **efficiently implement projects in the near term**. We have a proven record of coordinating efforts between state, local, federal and non-profit entities. The agency has programs, policies, and practices in place for awarding and monitoring funding, as well as an existing Advisory Board with the ability to determine how to apply the Board's investment principles and evaluate proposals. Further, the Conservancy has procedures in place for reporting to State agencies such as Department of Finance, and is qualified to assist in developing project criteria.

For these reasons, the Santa Monica Mountains Conservancy is uniquely qualified to help the state achieve its GHG reductions targets and further the aims of A.B. 32 and S.B. 535. Using our expertise and network of partnerships, we look forward to helping the State Air Resources Board achieve measurable, significant GHG reductions impacts in southern California. We appreciate the efforts the Board has taken so far to address climate change, and encourage the agency to continue to make natural resource protection a priority as it looks forward to 2020 and beyond.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Edmiston", written in a cursive style.

JOSEPH T. EDMISTON, FAICP, HON. ASLA
Executive Director

Ms. Edie Chang
July 31, 2013

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cc: Conservancy Members
Advisory Committee Members
Interested Parties