



March 6, 2013

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[www.FHBP.org](http://www.FHBP.org)

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

RE: Comments on the ARB Draft Investment Plan

Dear Sirs:

Friends of Harbors, Beaches and Parks (FHBP) would like to thank you for the opportunity to provide substantive comments on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). FHBP is a regional non-profit based in Orange County. We oversee a coalition of 80 conservation and community groups that support our Green Vision Project. The Project's mission is to find and create funding for parks, open space and water quality. Our comments are as follows:

The Draft Investment Plan seems to be lacking natural resources and conservation strategies. Conservation is one strategy that can help meet the mandate of AB 32, support the policies of the Sustainable Communities Strategies (SCS) developed under SB 375, and is an authorized expenditure recognized in AB 1532. Therefore, simply put, FHBP supports the inclusion of conservation strategies, specifically land acquisition and restoration, in the Draft Investment Plan. Land conservation, through a willing-seller program, can be implemented immediately using existing conservation programs. It does not require development of a new technology and it has immediate short and long-term benefits.

We believe that inclusion of natural resources and conservation in the Draft Investment Plan has numerous benefits. For example, including conservation in the Plan will gain:

- Support for the Investment Plan by numerous federal, state, regional and local conservation organizations that have been closely following the Cap & Trade Auction sales and now the Draft Investment Plan.
- Better alignment with AB 1532's mandates where conservation components are specifically called out as a strategy for emissions reductions.
- Support from Metropolitan Planning Organizations that with appropriate funding can implement conservation strategies adopted in regional SCS.

By protecting natural resource lands the "threat" of land conversion to more urban uses is removed. Development is then directed at more urban areas providing infill development (a key feature of SB 375) and development is no longer targeted along the Wildland-Urban Interface. In addition, habitat lands offer carbon avoidance benefits that would NOT have happened if the land was converted to more urban uses. It seems there is a natural opportunity to use land conservation to avoid increasing the amount of carbon emissions from land development and transportation activities (aka carbon avoidance). At the outset, preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The undisturbed land is already doing the work for us, but if the land is

developed what has been gained “naturally” will be not only lost due to the vegetation clearance, but also there will be additional GHG emissions and vehicle miles travelled resulting as the development is built.

FHBP used an Environmental Impact Report to understand what the carbon avoidance benefits would be for one proposed development project known as Coyote Hills in Fullerton. The project proposed by Chevron includes the conversion of 510 acres of natural land into 760 houses and a small commercial center. This project, if built, is estimated to generate the following:

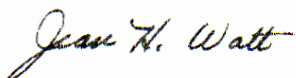
- 8,367 tons of CO<sub>2</sub>e (e=equivalent) for an annualized total (includes all GHG emitting activities);
- 33,340 tons of CO<sub>2</sub>e from construction emissions,
- 3,987 tons of CO<sub>2</sub>e from vehicular emissions, and
- 11,686,804 VMT annually. (See *West Coyote Hills Recirculated Draft Environmental Impact Report GHG Emissions Study Completed by ENVIRON, October 9, 2009*).

There are numerous opportunities to leverage existing conservation dollars and programs to implement a regional conservation plan. For example, in 2006 Orange County voters approved a ½ cent sales tax measure that funds transportation projects throughout the County over the next 30 years. Conservation and community groups, led by FHBP, negotiated with the Orange County Transportation Authority (OCTA) 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. By providing matching or complimentary funding to the OCTA efforts, conservation dollars will go farther. Existing programs that already provide conservation benefits should get first priority in the release of Cap and Trade Auction Revenues under the natural resources banner.

In addition, SCS documents that include conservation tools should be rewarded for their innovation and landscape-level approach. In 2011 the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority adopted a sub-regional Sustainable Communities Strategy (SCS) that outlined 15 land use, housing, and transportation strategies to reduce VMT. Through a strategic partnership with the conservation community, again led by FHBP, Orange County adopted a first-of-its-kind conservation policy to reduce carbon emissions through land acquisition and restoration. It is known in the SCS document as Strategy H. Since the Draft Investment Plan uses AB 1532 to meet state mandates of AB 32 and SB 375, it seems natural to encourage and fund the implementation of unique strategies such as Orange County’s Strategy H. Funds are currently needed to get this program off the ground and the Cap and Trade Auction Revenues seem to be a natural fit to fund this innovative program.

Thank you for your time and the opportunity to provide feedback to the Air Resources Board on the Draft Investment Plan.

Sincerely,



Jean Watt  
President



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