



# Puente Hills Habitat Preservation Authority

Endowment Provided by the Puente Hills Landfill

March 6, 2013

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

## **RE: Comments on the ARB Draft Investment Plan**

Dear Air Resources Board:

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). We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

The Puente Hills Habitat Preservation Authority (Habitat Authority) is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

**We support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions.** The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards one of several items, including the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management,



forestry, and sustainable agriculture. However, no conservation strategy is outlined in the Investment Plan that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

**Habitat lands offer carbon sequestration benefits that equate to removing passenger cars from roadways.** Carbon, found in all living organisms, primarily exists terrestrially as plant biomass and soil organic matter (SOM). Plants naturally absorb carbon dioxide (CO<sub>2</sub>) from the atmosphere and through photosynthesis it is stored as carbon. Plants release oxygen into the atmosphere as a by-product of this process. The carbon is stored (or sequestered) in the plants' branches, tree trunks and roots. Carbon is either transferred to animals when they eat plants or added to the soil when plants drop their leaves and/or die; decomposing plant and animal matter stores carbon as SOM. This process is known as terrestrial carbon sequestration and soils contain approximately three times more carbon than is stored in living plants and animals; emphasizing the importance of soils in the carbon cycle and carbon sequestration. SOM is ultimately derived from vegetation and habitat management practices can be easily modified to increase carbon sequestration (see *Native Plants for Optimizing Carbon Sequestration in Reclaimed Lands* by Unkefer et al.) at the following website:

[http://www.netl.doe.gov/publications/proceedings/01/carbon\\_seq/p51.pdf](http://www.netl.doe.gov/publications/proceedings/01/carbon_seq/p51.pdf)

Research has already been done in California that furthers this assertion. East Bay Regional Parks District, for example, determined the average amount of CO<sub>2</sub> sequestered annually by the District's 98,600 acres of protected natural lands is estimated to be 91,157 metric tons (Mt). This also equates to removing 16,317 passenger cars from the roadways annually. (See *East Bay Regional Park District (EBRPD). EBRPD Carbon Sequestration Evaluation. Retrieved 16 Jan 2013 from the EBRPD website:*

[http://www.ebparks.org/Assets/files/ebprd\\_carbon\\_seq\\_study\\_2008.pdf](http://www.ebparks.org/Assets/files/ebprd_carbon_seq_study_2008.pdf)).

**Habitat lands offer carbon avoidance benefits that would NOT have happened if the land was converted to more urban uses.** Our natural lands are "carbon sinks" storing GHG emissions that would have otherwise been released into the atmosphere with conversion to more intensive uses (such as residential, commercial and industrial development). 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). Avoidance benefits are multifactorial in origin. 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 GHG impacts from construction are also avoided. Then, over the long term, the automotive emissions that would have come from vehicle miles traveled (VMT) from residential and commercial uses are avoided. To this end, environmental documents are

analyzing project impacts pursuant to the California Environmental Quality Act. Consultants are more frequently analyzing all of the development related sources of GHG emissions (construction, household, infrastructure, etc.) and VMTs. Utilizing these reports can be the starting point for understanding what carbon avoidance values could be for a proposed development. This analysis was in fact utilized to understand what the carbon emissions would be for a project in Fullerton, CA. The project proposed the conversion of 510 acres of natural land into 760 houses and a small commercial center. This project, if built, is estimated to have generated 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*).

By protecting natural habitat lands the “threat” of land conversion to more urban uses is removed and directed at more urban in-fill areas. The role of habitat lands in carbon sequestration and the reduction of GHG emissions is important and not to be overlooked; especially since it is an effective way to sequester carbon without negative environmental consequences.

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

Sincerely,



Andrea Gullo

Executive Director

cc: Cliff Rechtschaffen, Governor's Office