

SANTA MONICA MOUNTAINS CONSERVANCY

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Mary D. Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols:

The Santa Monica Mountains Conservancy (Conservancy) is grateful for this opportunity to provide comments to the California Air Resources Board (CARB) with regard to the "Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19" (Second Investment Plan). The Conservancy recognizes that CARB and the Administration have continued to make natural resource protection a priority in developing new ways to mitigate and adapt to climate change.

The Conservancy has long been an enthusiastic partner in the state's efforts to achieve the greenhouse gas (GHG) emission reductions goals of AB 32 (Nunez and Pavley), SB 375 (Steinberg) and the State Implementation Plans. The Conservancy continues to work on issues important for adapting to and mitigating climate change: providing carbon sinks, stabilizing carbon in soils, restoring natural habitats, mitigating heat islands, building sustainable communities, increasing active transportation options, offering public education programs, engaging in climate-smart comprehensive planning, and engaging in environmental justice issues related to climate change and GHGs. The Conservancy believes that the current draft Second Investment Plan could be improved with a few important changes that would broaden the applicability and effectiveness of the Second Investment Plan's measures and ensure a more robust commitment to environmental justice concerns.

We appreciate your consideration of our comments on the first workshop, submitted on September 1, 2015 and referenced in Appendix C of the Cap-and-Trade Auction Proceeds Draft Second Investment Plan.

The Conservancy incorporates by reference its earlier comment letter and believes the Second Investment Plan can go further in order to meet the Conservancy's suggestions:

1. Designating State Conservancies as Implementing Agencies for investment funds;

2. Investing in natural land acquisitions (fee and easement) to curb peripheral development;
3. Investing in incentivizing urban infill with urban parks, including active transportation funding for paths along waterways and in parklands, and incentivizing green spaces, green infrastructure and other methods of reducing heat island effect;
4. Investing in water recycling and energy reduction projects at the regional level;
5. Investing in technical assistance or planning grants through Conservancies to allow smaller local entities and non-profits to be competitive.

In addition to these suggestions, the Conservancy would like to suggest modifications to the Strategic Agricultural Lands Conservation Program (SALCP).

SALCP AND THE CONSERVANCY:

Acquisition and protection of undeveloped land is a core function of the Conservancy that provides many benefits to local residents, including providing outdoor recreation, connecting people with nature, creating wildlife corridors, enhancing habitat and limiting even greater sprawl of development. Other state conservancies and similar entities acquire and protect undeveloped lands for similar reasons.

Even in greater Los Angeles, one of the State's most intensely developed and heavily urbanized areas, there still exist significant tracts of undeveloped and unprotected lands that continue to be targeted for GHG-intensive sprawl development. Protecting these lands in their natural state will be critical to achieving the goals of SB 375 and the Affordable Housing and Sustainable Communities (AHSC), increasing the sustainability of the region, reducing sprawl and reducing the vehicle miles travelled (VMTs) and associated GHG emissions that will come with development of these lands. Protecting these lands will encourage developers to build up instead of out as well as near public transit hubs, increasing urban land use efficiency and reducing per capita GHG. No current component of the AHSC Program funds protection of these undeveloped lands because they are not agriculture lands, and, therefore, not eligible for SALCP funding.

The AHSC should modify its approach to locking in urban limit lines and creating greenbelts by expanding eligible SALCP projects to include non-agricultural open spaces. SALCP is supposed to help lock in urban limit lines by conserving agricultural land on the periphery of cities. In greater Los Angeles, there is a negligible amount of agricultural lands, but there exist multiple unprotected open spaces that can help achieve this same and very important conservation goal. Furthermore, including non-agricultural open space is important to ensuring that the SALCP projects achieve maximum benefits by also providing opportunities

for direct action to limit urban sprawl, protecting disadvantaged communities from negative air quality impacts, limiting heat island effects, opening up lands for natural storm water capture and providing carbon sinks. While the Conservancy's comments focus on Los Angeles and Ventura counties, similar issues face other areas around the State.

The Conservancy has embarked on a strategic climate change plan to curb peripheral sprawl development and create greenbelts while encouraging infill, smart development in urban areas. The Conservancy commissioned Calthorpe Analytics to assess development and associated GHGs on a business-as-usual model and under the Conservancy's proposed conservation strategies on a 2040 timeline. The resulting data show that conserving the undeveloped lands the Conservancy has identified and concentrating development in urban centers will avoid .8 million metric tons of GHGs annually. A significant portion of these avoided GHG emissions are due to an annual reduction of 1.5 billion VMTs in 2040.

Hence, SALCP should be expanded to include open space, and the Conservancy and similar entities, given their strategic climate goals and local planning capacities, should be designated to help implement such programs.

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

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