November 13, 2015

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

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

Chair Nichols:

On behalf of the Yolo Habitat Conservancy, thank you for the opportunity to comment on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan. The Yolo Habitat Conservancy is a joint powers agency composed of the cities of Winters, West Sacramento, Davis, and Woodland, as well as the County of Yolo, and will complete a Habitat Conservation Plan and Natural Community Conservation Plan (“Yolo HCP/NCCP”) by 2017. The Yolo HCP/NCCP will focus primarily on the acquisition of conservation easements on agricultural land to maintain existing habitat values, including easements that prevent orchard and vineyard conversion. After reviewing the draft Second Investment Plan, the Conservancy respectfully requests your consideration of the following comments:

• First, the Yolo Habitat Conservancy strongly supports the increase in funding for the Sustainable Agricultural Land Conservation (SALC) program, administered by the Strategic Growth Council. As stated on page 3 of the Plan, “[rural] communities… have a critical role to play, as they are often home to agricultural lands, rangelands, grasslands, and forested lands where GHG reductions and carbon sequestration activities intersect.” By funding projects that will conserve habitat and agricultural land, the SALC program will bring us substantially closer to California’s greenhouse gas reduction goals. Such investments are especially important in areas like Yolo County, which have directed growth to cities and therefore have already contributed to significantly reducing greenhouse gas emissions.

• Second, the Yolo Habitat Conservancy requests an expansion of efforts to protect ‘natural lands’ to include funding for programs that conserve lands other than agricultural lands and forest lands. These programs include the Wildlife Conservation Board’s Rangeland, Grazing...
Land, and Grasslands Protection Program, and the Wildlife Conservation Board’s Oak Woodlands Conservation Program. The Wildlife Conservation Board has a long history of working efficiently and effectively with local agencies and non-profit organizations to protect all types of natural lands. Protection of these lands will help sequester carbon and otherwise reduce greenhouse gas emissions.

- Third, the Yolo Habitat Conservancy suggests the establishment of a new program for other natural lands that are not covered by existing Wildlife Conservation Board programs and the SALC program, as there are risks of conversion for many different types of land.

- Fourth, the Yolo Habitat Conservancy encourages the expansion of “greening the built environment to sequester carbon” (pg. ES-5) to include planting hedgerows and trees on agricultural lands in rural areas. Such multi-benefit projects would increase habitat benefits for endangered species, such as the Swainson’s hawk, while simultaneously sequestering carbon from the environment.

Thank you for taking our comments into consideration as you finalize the Cap-and-Trade Auction Proceeds Second Investment Plan. We look forward to the release of the final plan and the development of subsequent funding programs targeting California’s climate goals. If you have any questions regarding these comments, please Petrea Marchand, Executive Director of the Yolo Habitat Conservancy, at 916-505-7191 or petrea@yolohabitatconservancy.org.

Sincerely,

Jim Provenza
Chair
Yolo Habitat Conservancy