

SANTA MONICA MOUNTAINS CONSERVANCY

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December 11, 2015

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

Revised Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols:

The Santa Monica Mountains Conservancy (Conservancy) is grateful for the opportunity to provide comments to the California Air Resources Board with regard to the Revised Draft Cap-and-Trade Auction Proceeds Second Investment Plan (Revised Draft).

The Revised Draft contains several strategies in the section on Natural Resources and Waste Diversion that the Conservancy supports. In particular, the "Gaps and Needs Assessment" recognizes the need to "Protect existing natural and working lands threatened by conversion to more carbon-intensive land uses." The Conservancy submitted comments on the original Draft Cap-and-Trade Auction Proceeds Second Investment Plan supporting this strategy. This strategy protecting natural lands needs to also apply to the Sustainable Communities and Transportation Infrastructure concept investments as well.

Pages 33-34 of the Revised Draft discusses the "Gaps and Needs Assessment" for the Transportation and Sustainable Communities section. This assessment recognizes the need to "improve mobility options to all residents to drive less and reduce household costs while reducing GHG emissions" and includes the strategy for the "protection of agricultural lands that are at risk of conversion to more carbon-intensive uses." Furthermore, Figure 12, showing draft investment concepts for Sustainable Communities and Transportation Infrastructure, calls for "infill development and agricultural land conservation." Restricting land protection strategies to strictly agricultural lands limits the potential for greater infill development and reduced driving. Conservation of open space needs to be a factor in the Sustainable Communities strategy.

As described in Conservancy's October 15 letter, undeveloped and unprotected lands still exist in greater Los Angeles, but they continue to be targeted for GHG-intensive sprawl. These lands are not agricultural, and do not fit within the strategies discussed above for Sustainable Communities. Accordingly, we request the following changes to the revised draft:

1. On page 34, add natural lands into the third paragraph so it reads: "....car share, and carpool programs; incentives that reduce vehicle travel; and protection of agricultural **and natural** lands that are at risk of conversion to more carbon-intensive uses."
2. On page 35, add natural lands to the first bullet in the Sustainable Communities and Transportation Infrastructure box so it reads: "...bicycle utilization, infill development and agricultural **and natural** land conservation..."

These changes will send a clear message that protection of open space and other natural lands have a role in limiting sprawl development, reducing vehicle miles travelled, and creating more sustainable communities through more infill development. Without this inclusion, California will miss out on a key strategy to achieve these goals.

Thank you again for the opportunity to comment.

Sincerely,

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