



BIG SUR
LAND TRUST

December 14, 2015

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

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

Dear Chair Nichols,

The Big Sur Land Trust (BSLT) 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 BSLT 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." BSLT submitted comments on the original Draft Cap-and-Trade Auction Proceeds Second Investment Plan supporting this strategy. The strategy to protect natural and working lands can also achieve GHG reduction benefits in the Transportation section, as protection of natural lands can assist in the creation of greenbelts and lock in urban limit lines that reduces sprawl and vehicle miles travelled (VMTs).

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 "protection of agricultural lands that are at risk of conversion to more carbon-intensive uses." Further, Figure 12 showing draft investment concepts for Sustainable Communities and Transportation Infrastructure calls for "infill development and agricultural land conservation." Restricting land protection strategies strictly to agricultural lands limits the potential greenbelt developments that will drive greater infill development and reduced driving. Conservation of open space also needs to be a tool in the Sustainable Communities strategy.

There are undeveloped and unprotected lands in Monterey County beyond agricultural lands that continue to be targeted for GHG-intensive sprawl. As these lands are not agricultural, they do not fit within the strategies discussed above for Sustainable Communities. Accordingly, we respectfully request the following changes be made 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...”

Incorporation of these changes will send a clear message that protection of open space and other natural lands have an important role in limiting sprawl development, reducing vehicle miles traveled, 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,



Rachel T. Saunders
Director of Conservation
Big Sur Land Trust