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Puente-Chino Hills Task Force  
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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). The Puente-Chino Hills Task Force of the Sierra Club is based in Brea but our members come from the four counties that border the Puente-Chino Hills: Los Angeles, Orange, Riverside, and San Bernardino counties. We offer hikes, sponsor educational events and provide input on projects that threaten the biological and recreational integrity of this important region. We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

**We support better alignment with AB 1532's mandates to reduce emissions through natural resources and land conservation strategies.** The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate habitat conservation and restoration tools that reduce greenhouse gas emissions (GHG). 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. Yet, not a single conservation strategy is outlined in the Investment Plan that furthers this mandate. The Draft Investment Plan should be revised to include land conservation tools as a strategy for emissions reductions.

**There are numerous benefits and co-benefits associated with using land conservation as a means to reduce greenhouse gas emissions.**

- By protecting natural resource lands the "threat" of land conversion to more urban uses is removed. Development is directed at more urban areas and not at the Wildland-Urban Interface. In many cases there are existing conservation plans and programs that are supported at the local, regional, statewide and national levels by agencies, landowners

and non-profit organizations that provide a suitable framework to achieve habitat conservation.

- Natural lands provide significant abilities to sequester carbon. In fact, the National Science Foundation and U.S. Department of Energy commissioned a study that showed forests and other terrestrial ecosystems can sequester 40% of the nation's carbon emissions—up from the previous estimate of 30% (*See Science News Daily (SND)*). “Carbon Sequestration Estimate in US Increasing, Barring A Drought.” Retrieved 16 Jan 2013 from the SND website: <http://www.sciencedaily.com/releases/2011/04/110414131851.htm>).
- While existing protected lands offer benefits in terms of emissions reductions, through appropriate restoration and enhancement efforts these benefits can be multiplied. The United States Fish and Wildlife Service through a Climate Change Strategy studied the effects of extensive restoration on a Southeastern wildlife refuge. By planting more than 22 million trees, more than 33 million tons of carbon will be captured over the next 90+ years (*See United States Fish and Wildlife Service*. “Service Releases Climate Change Strategy for Public Review and Comment.” Retrieved 16 Jan 2013 from the USFWS website: <http://www.fws.gov/southeast/news/2009/r09-050.html>).

**Existing funding sources could be leveraged to increase conservation dollars and reduce greenhouse gas emissions.** There are numerous types of conservation funding from local government general funds, development fees, grant funds allocated from the federal Endangered Species Act, funding from California's General Obligation (GO) bond measures and many other sources. To continue to implement a regional conservation plan, ongoing funding sources are needed to meet conservation objectives and to complete the conservation vision. Any cap and trade revenues available for regional conservation plans would be a much needed boost to the conservation effort while concurrently meeting emission reduction targets.

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

Sincerely,

*Eric Johnson*

Eric Johnson, Chair  
Puente-Chino Hills Task Force of the Sierra Club