September 17, 2021

Liane Randolph, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

***Submitted via online form:*** <https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=4thinvestmentplan-ws&comm_period=1>

**Comments from Agricultural Land Trusts on the**

**Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan**

**Fiscal Years 2022-23 through 2024-25**

Dear Chair Randolph,

We appreciate the opportunity to address the State’s Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan for Fiscal Years 2022-23 through 2024-2025 or “Plan”. As allied agricultural land trusts, we recognize the intrinsic link between the state’s goals to address climate challenges, and the opportunity for working farms and ranches to sequester carbon and to ensure California protects its most important working lands that provide for economic prosperity and a healthy and abundant food supply.

California faces climate challenges that impact natural and working lands, affordable housing, drought, water availability, and more. Further compounding accelerating solutions is the complex planning process and highly localized nature of this work with landowners, local communities and government stakeholders. As land trusts, we are uniquely positioned to offer our perspectives and how to best prioritize funding for the Plan.

Our comments will focus on the how the Plan takes into consideration, **Affordable Housing and Sustainable Communities, smart growth, conservation easements on the Sustainable Agricultural Land Conservation program, coordination between state agencies and stakeholders, and long-term funding for these priorities** on natural and working lands.

The Plan references in its **appendices** several administrative efforts that are still underway, or in draft form yet to be released for public comment. These include the California Department of Food and Agriculture’s *Farmer and Rancher Led Solutions*, and the California Natural Resources Agency’s *Natural and Working Lands Climate Smart Strategy* and *2021 Climate Adaptation Strategy*. We have been working with the agencies on these comment processes and look forward to reviewing these documents through the public comment period. At this time, we are unable to comment on the inclusion of these documents in the proposed Plan.

**Sustainable Communities, Smart Growth, and the Sustainable Agricultural Land Conservation Program**

In California, we lose approximately 50,000 acres of agricultural land annually, necessitating aggressive investments and strategies. As agricultural land trusts, we recognize the critical link between smart community growth strategies, including infill development, coupled with planning for agriculture, which includes agricultural land conservation easements. The Affordable Housing and Sustainable Communities program serves as a critical lynch pin in developing strategies to build resilient communities. ***As part of this program, we are supportive of ongoing annual investments, or continuous appropriations for the highly popular Sustainable Agricultural Lands Conservation program, a program that offers conservation easements to avoid conversion of agricultural lands and innovative planning resources for local communities and stakeholders.*** To date (through Round Six), this program has funded 101 acquisition projects, amounting to 117,000 acres to be conserved, with 24 planning grants spanning across 18 counties.

American Farmland Trust’s research entitled *Greener Fields* highlights that urban expansion, especially low-density development, results in the irreplaceable loss of far more farmland than necessary. Average emissions from urban areas are 58–70 times higher (per acre) than those from crop production in California. Related to this, low-density development produces more greenhouse gases (GHG) per capita than efficient high-density development. Additionally, a recent study by U.C. Berkeley found that, on only 306,000 acres of conserved rangeland in California, the return on invest was nearly $3.50 for each dollar invested. The value of the ecosystem services provided to all Californians by these same protected ranches is $1.44 Billion *annually*.

**Agency and Stakeholder Coordination**

There are many state priorities around climate, making it even more important for state agencies to double down on coordination efforts around Climate Investments envisioned in this Plan and future supplemental funding sources, to ensure the state’s objectives are met. ***We strongly urge the state continue to build upon multi-agency coordination and stakeholder engagement as many of the supported programs are complex and multifaceted.*** This coordination aid in the completion of projects that are more representative of stakeholders voices, and will support stronger and more durable community and climate outcomes. Connected with this, is coordination between stakeholders, technical assistance providers, and community groups, and the critical role these entities serve in meeting these climate priorities. ***Building capacity within these communities and with these providers is essential to the state’s success.***

**Long-Term Funding**

We recognize that the state has a direct interest in incentivizing the protection of agricultural lands in California, and ***we support ongoing Climate Investments outlined in this Plan specifically for the Sustainable Agricultural Lands Conservation (SALC) program*** as a complement to the Affordable Housing and Sustainable Communities work. SALC program investments are amplified when leveraged as a critical component for developing federal match monies to secure United States Department of Agriculture ACEP-ALE or Agriculture Conservation Easement Program, Ag Land Easements funding. There are hundreds of thousands of acres of critical agricultural lands ready to be permanently conserved by willing landowners. The funding historically appropriated, while successful in protecting these lands, falls drastically short of the levels needed to meet the demand.

***We support state investment in sustainable climate smart agricultural practices, including manure management for livestock producers, and energy efficiency for agricultural irrigation.*** We ask that you do not overlook the critical need for ***ongoing planning resources for communities*** to develop more climate resilient communities that recognize and protect natural and working lands, and do not sacrifice these critical, irreplaceable resources for shortsighted growth.

**In Conclusion**

Thank you for the opportunity to comment on this Plan. Should you have any questions about these comments, please contact Katie Patterson, California Policy Manager, American Farmland Trust at [kpatterson@farmland.org](mailto:kpatterson@farmland.org).

**Sincerely,**

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Katie Patterson

California Policy Manager

American Farmland Trust



Charlotte Mitchell

Executive Director

California Farmland Trust

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Michael Delbar

Chief Executive Officer

California Rangeland Trust