

SANTA MONICA MOUNTAINS CONSERVANCY

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April 5, 2016

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

Comments on the Natural and Working Lands Sector Plan Update

Dear Chair Nichols:

The Santa Monica Mountains Conservancy (Conservancy), which is a state agency established by the Legislature, is grateful for this opportunity to provide comments to the California Air Resources Board (ARB), the California Natural Resources Agency (CNRA), the California Department of Food & Agriculture (CDFA), the Strategic Growth Council, and the Office of Planning & Research (collectively, Agencies) with regards to the discussion paper and workshop on Development of the 2030 Target Scoping Plan Update on California's Climate Change Vision and Goals for Natural and Working Lands (Plan Update).

The Conservancy urges the Agencies and the Administration to make natural resource protection a priority in developing new ways to prevent and adapt to climate change by leveraging the opportunities available in California's rich natural and working lands.

The Conservancy has worked on comments with the Mountains Recreation and Conservation Authority (MRCA). The MRCA is a local government public entity established in 1985 pursuant to the Joint Powers Act. The MRCA is a local partnership

between the Santa Monica Mountains Conservancy, and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District, both of which are local park agencies established by the vote of the people in those communities. The Conservancy incorporates the comments submitted by MRCA by reference.

The Conservancy would like to highlight:

(1). The importance of regionally based entities, including the Conservancy, as implementors of natural and working lands cap-and-trade program and projects:

These regional entities often are in the best position to ensure environmental justice concerns are addressed, disadvantaged community (DAC) needs are identified, co-benefits are maximized and local funds are leveraged with state funding.

(2). The importance of protecting chaparral ecosystems:

The Natural and Working Lands component of the Plan Update identifies several mechanisms to leverage forests for safeguarding California's carbon future. It is important to provide similar incentives for chaparral ecosystems. Chaparral systems serve, like forests, as important carbon sinks and must be protected. The water needs of chaparral ecosystems also indicate that they might be more resilient to negative changes in state water availability as droughts increase and climate change alters water cycle patterns. These ecosystems often sequester significant portions of their stored carbon underground, providing greater carbon sequestration resiliency when wildfires strike.

(3.) Greenbelts:

Natural and working lands cap-and-trade programs can incentivize the acquisition, maintenance and preservation of urban greenbelts, containing the urban limit line. A robust open space greenbelt program will help meet the goals identified in the Update Plan on page 4 regarding "Land Protection and Land Use". These greenbelts should be formed out of a variety of natural and working lands, including parks and open space. The Sustainable Agricultural Land Conservation (SALC) program is an important greenbelt program for agricultural lands. A similar program should exist for parklands and open space. This will also ensure that there is some sort of policy parity between the SALC program and open space protection. Otherwise, the efforts to preserve agricultural areas as part of an effort to promote greenbelts will have the perverse incentive of making natural and working lands the prime targets for conversion into urban sprawl because these lands will lack the same protection incentives as agricultural lands.

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

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