

From: Dan Silver
To: [ARB Clerk of the Board](#)
Cc: [Dan Silver](#)
Subject: Notice of Public Meeting To Present The Revised Draft Cap-and-Trade Auction Proceeds Third Investment Plan
Date: Saturday, November 10, 2018 9:40:28 AM

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Honorable Board Members:

Endangered Habitats League, a Southern California regional conservation group, is very concerned over selective treatment of California's geographically diverse ecosystems.

Appropriately, the Investment Plan discusses sequestering carbon on natural and working lands (p. 8-9) and thereby reducing GHGs. However, its list of conservation measures is wholly incomplete. The list of eligible habitats should be expanded (from wetlands, urban forests, etc.) to include woodlands, shrub and scrub lands, and desert lands. Soil carbon storage is well documented in these locations.

On page 22, the Investment Plan discusses AB 1532's priority (Natural Resources, Water Use and Supply, Land Conservation, Forestry and Sustainable Agriculture). It states that California's forests, wetlands, grasslands, and other natural lands also provide an opportunity to sequester carbon in the soil and in biomass through projects in reforestation and wetland and coastal restoration. Again, the list of eligible activities is wholly incomplete. In fact, conservation of many other habitat types increases soil carbon. Conservation of woodlands, grasslands, scrub and scrub lands, and desert lands should be added.

Appendix B is a table that lists the various programs for the next 3 years of investments. It only lists previously funded programs. This is entirely backward looking and should instead fill in the gaps that prior programs have left open.

Finally, please include a program for conservation of natural and working lands and specifically reference fee title acquisition as an included mechanism.

Thank you for the progress to date considering our views on improvements.

Sincerely,

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