# California Native Plant Society

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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:

We appreciate the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). The California Native Plant Society (CNPS) works to protect California's native plant heritage and preserve it for future generations. CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

We support better aligning the Draft Investment Plan with AB 1532's mandates relating to natural resources and conservation strategies as a mechanism to reduce emissions. The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of greenhouse gas emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the greenhouse gas Reduction Fund shall appropriate funds towards one of several items, including the reduction of greenhouse gas emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture.

Unfortunately, not a single conservation strategy is outlined in the Draft Investment Plan to further this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions. Doing otherwise is shortsighted. There are numerous benefits and co-benefits associated with using land conservation as a means to reduce greenhouse gas emissions.

To pick one obvious example, California is home to some of the biggest trees in the world: redwoods, sequoias to name just a few. Why not invest in them? Why not invest in the over 7000 California native plant species that are adapted to every different habitat that the diverse state of California offers? It is so much cheaper than performing the research to find agricultural substitutes for this diversity. 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.

Plants naturally absorb carbon dioxide ($CO_2$) from the atmosphere and through photosynthesis it is stored as carbon. Plants release oxygen into the atmosphere as a by-product of this process. The carbon is stored (or sequestered) in the plants' tissues and up to 20% of the plants' total carbon intake ends up bound in the soil through root exudates. Our natural lands are capture and store carbon dioxide that would have otherwise been released into the atmosphere. When these lands are converted to more intensive uses, including agriculture, development, and even frequent fires, this carbon is rapidly lost back to the air, through soil disturbance, oxidation, and burning. Research has already been done in California supports this claims. East Bay Regional Parks District, for example, estimated the average amount of $CO_2$ sequestered annually by the District's 98,600 acres of protected natural lands to be 91,157 metric tons, the equivalent of removing 16,317 passenger cars from the roadways annually. (http://www.ebparks.org/Assets/files/ebrpd_carbon_seq_study_2008.pdf, retrieved 1/16/2013). On a bigger scale, 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% (http://www.sciencedaily.com/releases/2011/04/110414131851.htm, Retrieved 1/16 2013).

Wildlands offer carbon avoidance benefits that would not have happened if the land was converted to more urban uses. Carbon avoidance offers manifold benefits. Preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The greenhouse gas impacts from construction are also avoided. Automotive emissions that would have come from vehicle miles traveled from residential and commercial uses are also avoided. This also ignores the other benefits that wildlands provide, such as trapping air pollutants, reducing noise, recharging groundwater, providing homes for sensitive species, and last but not least, providing cheap areas for recreation, education, and research.

Given that conservation managers are routinely underfunded and therefore extraordinarily efficient at leveraging funds to many purposes, any investment of cap and trade revenues in conservation issues will go much further than it would in the commercial sector. CNPS, for example, has partnered with agencies for years to provide low cost, high quality research and conservation activities throughout the state both with paid and volunteer staff, and we are just one of the many entities that work in the conservation sector.

We urge you to amend the Draft Investment Plan to incorporate conservation. It is productive, cost effective, and produces many benefits. Thank you for consideration of our comments.

Sincerely,

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Conservation Chair
California Native Plant Society, San Diego Chapter

cc: Cliff Rechtschaffen