



## MOUNTAINS RECREATION & CONSERVATION AUTHORITY

Los Angeles River Center & Gardens

570 West Avenue Twenty-Six, Suite 100

Los Angeles, California 90065

Phone (323) 221-9944 Fax (323) 221-9934

August 31, 2015

Ms. Shelby Livingston  
Chief, Climate Change Program Planning and Management Branch  
California Air Resources Board  
Sacramento, CA 95814

### **Comments on Cap-and-Trade Auction Proceeds Second Investment Plan**

Dear Ms. Livingston,

The Mountains Recreation and Conservation Authority is grateful for this opportunity to comment on the Second Investment Plan.

The Mountains Recreation and Conservation Authority (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 (Conservancy), which is a state agency established by the Legislature, 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 MRCA is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. The MRCA manages and provides ranger services for almost 72,000 acres of public lands and parks that it owns and that are owned by the Conservancy or other agencies and provides comprehensive education and interpretation programs for the public. The MRCA works in cooperation with the Conservancy and other local government partners to acquire parkland, participate in vital planning processes, and complete major park improvement projects.

The MRCA provides natural resources and scientific expertise, critical regional planning services, park construction services, park operations, fire prevention, ranger services, educational and leadership programs for thousands of youth each year, and is one of the lead agencies providing for the revitalization of the Los Angeles River.

Because of MRCA's dedication and long history of preservation and management of local open space, natural resources and parkland, the MRCA takes the threats climate change presents seriously and seeks proactively to implement climate change mitigation and adaptation efforts. MRCA protects some of California's most at risk species and biodiversity

August 31, 2015

Page 2

from human encroachment, drought, pollution and climate change. The lands we own and manage for all Californians provide important local air quality, water quality and heat island mitigation for the local population, including many disadvantaged and environmental justice communities. Looking towards climate change's future and existing threats and uncertainties, the MRCA has a few important suggestions for maximizing the benefits from the cap-and-trade program. The MRCA urges the California Air Resources Board (CARB) and the Administration to make natural resource protection a priority in its Second Investment Plan (Plan). Additionally, the MRCA urges the development of new ways to prevent and adapt to climate change by:

1. Designating State Conservancies as Implementing Agencies for investment funds;
2. Investing in natural land acquisitions (fee and easement) to curb peripheral development;
3. Investing in incentivizing urban Infill with urban parks, including active transportation funding along waterways and in parklands, and incentivizing green spaces, green infrastructure and other methods of reducing heat island effect;
4. Investing in water recycling and energy reduction projects at the regional level;
5. Investing in technical assistance or planning grants through Conservancies to allow smaller local entities and non-profits to be competitive.

The MRCA has a long and productive history of working with State Conservancies, most frequently with the Santa Monica Mountains Conservancy. Based on our experiences, we believe that Conservancies would be ideal Implementing Entities for investment funds. California's Conservancies are particularly well suited to meet greenhouse gas emissions reductions goals and targets because they already have the mechanisms and partnerships in place to implement regional programs that serve statewide priorities. Conservancies will be able to leverage allowance revenues with existing funds, form strategic partnerships with local entities, and utilize existing administrative infrastructure to roll out efficiently projects that incentivize and foster greenhouse gas emission reduction goals and further the purposes of AB 32.

We regular discuss climate change challenges with the Conservancy and fully endorse the Conservancy's recommendations for the Plan and incorporate their comments by reference (attached).

August 31, 2015

Page 3

While climate change presents many problems, the MRCA believes that it, working with State Conservancies, can make a significant, efficient and lasting contribution to California's climate change adaptation and mitigation portfolio. The MRCA has the opportunity to engage climate change problems effectively while navigating local challenges, providing co-benefits and working with disadvantaged communities. We hope that, if our comments are implemented in the final Plan, the MRCA, working in large part with the State Conservancies, can lead California in climate change action.

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

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", with a horizontal line drawn through it.

George Lange, Chair  
Mountains Recreation and Conservation Authority