September 1, 2015

Mary D. Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: Cap-and-Trade Auction Proceeds Second Investment Plan**

Dear Ms. Nichols:

On behalf of the Marin Agricultural Land Trust (MALT) we are pleased to submit the following comments to the California Air Resources Board’s draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Concept Paper). MALT is a land trust who’s mission is to protect Marin’s agricultural land for agricultural use.

MALT supports many of the strategies the Concept Paper identifies as critical to realizing the state’s long-term climate goals such as providing more opportunities for climate investments in rural communities and developing a more comprehensive approach to resource protection and carbon sequestration, including the benefits or protecting and managing working lands. When developing the Second Investment Plan, we request you consider the following:

**1. Increased Investment in Sustainable Agriculture and Farmland Conservation**

The Concept Paper recognizes that the state should prioritize investments in carbon storage ***in all land types*** by protecting existing lands threatened by conversion and strategically managing lands to increase their carbon storage capacity and reduce GHG emissions.

We agree that investing in the protection and improvement of all types of land, including farmland, grasslands, and rangelands, is critical to avoiding GHG emissions associated with urban development. Protecting these lands have the added co-benefits of protecting local food supplies and preserving wildlife habitat. We ask that you give more consideration to investing in on-farm climate beneficial practices, as they have the potential to yield significant GHG emissions reductions, sequester carbon, increase productivity and help make our agricultural lands more resilient to climate change.

Further, we support increased funding for the Strategic Growth Council’s Sustainable Agricultural Lands Conservation (SALC) Program. This program focuses on preventing increases in GHG emissions in agricultural lands by limiting opportunities for expansive, vehicle-dependent forms of development in favor of more focused, compact, and transit-oriented development. We see the SALC Program as critical to supporting the long-term achievement of the state’s climate goals as it begins to look beyond 2020.

In addition to the SALC Program, there are other state agencies that should get funding for the protection of working and open space lands. Agencies that should be important partners in this effort include the Wildlife Conservation Board and the State Coastal Conservancy. These highly effective agencies already have robust programs in place for working lands and open space protection and therefore could move forward immediately to fund projects. We strongly recommend that these agencies be used to help implement Cap-and-Trade investments in the natural resources sector.

**2. Increased Investment Opportunities for Rural Communities**

The Concept Paper notes that rural communities also have a critical role to play in achieving the state’s climate goals, as they are home to agricultural lands, rangelands, grasslands, and forested lands.

MALT agrees that rural communities should have a greater focus in the next investment plan. Rural communities, like disadvantaged communities, often lack the financial and technical resources of urban areas and therefore have trouble assembling competitive grant proposals for statewide programs. Furthermore, many rural communities do not qualify as disadvantaged communities under the CalEnviroScreen tool and are therefore excluded from portions of cap-and-trade funding despite the fact that many rural areas have lower household incomes. Accordingly, we respectfully urge you to increase funding for rural communities.

**3. Using an Integrated, Landscape-Level Approach to Planning**

We support the comprehensive and holistic approach to resource protection and management outlined in the Concept Plan. The Concept Plan points out that natural systems do not have specific boundaries and future investments need a landscape-level approach to maximize carbon sequestration benefits.

We support increased funding for landscape-level planning, especially where it brings together a broad range of partners. Only with thoughtful planning can a long-term vision be created and implemented that will result in effective agricultural land protection around urban areas that maximizes efficiencies of scale and minimizes sprawl.

Overall, MALT supports the direction of the natural and working lands component for the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. California’s natural and working lands continue to be a critical component to reducing GHG emissions in the state, and we hope to see them further integrated with state efforts to achieve those ends. We appreciate the opportunity to provide recommendations for your consideration for the Second Investment Plan.

Sincerely,

Jamison Watts

Executive Director