



September 1, 2015

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Mary D. Nichols, Chair  
California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812

RE: Cap and Trade Investment Plan

Dear Chair Nichols and Board Members:

Friends of Harbors, Beaches, and Parks (FHBP) is a regional non-profit organization that works to protect the natural lands, waterways, and beaches of Orange County. We are pleased to provide comments on the most recent Cap and Trade Investment Plan for the Greenhouse Gas Reduction Fund (GGRF) (July 2015). Our comments are as follows:

**Transportation and Sustainable Communities Section**

As the Plan points out (page 9) Metropolitan Planning Organizations (MPO) are developing and implementing Sustainable Communities Strategies (SCS). We would like to see MPOs rewarded through additional funding for meeting California Air Resources Board (CARB) reduction targets. For example the Southern California Association of Governments (SCAG) had an 8% and then 13% target for the six-county Southern California region (2020 and 2035 respectively). We believe if SCAG can make significant headway toward its 8% target, there should be a prioritization or bonus system to fund additional reduction strategies in that region. But for the SCS, it is likely MPOs would not have the mechanism available for developing and implementing their reduction strategies in the first place.

*We request MPOs receive bonus/prioritization funding for their projects if they've substantially met their CARB reduction targets.*

Additionally, on page 12 there are thousands of acres of natural lands that remain in an unprotected status all over California. To limit conservation activities strictly to agricultural lands does not account for the scores of natural lands at the Wildland-Urban Interface (WUI) that are being converted to housing and roads under the often deceitful banner of "infill development." Not only are these WUI projects jeopardizing people and property due to their location in fire prone areas, but they are also completely out of alignment with the SCS because they are being built far away from transit, community amenities, businesses, services, etc.

In short, several MPOs have a natural lands strategy included in their SCS, a strategy which is currently unfunded and still excluded based on this Investment Plan language. The need for new roadways at the WUI is eliminated if the lands are protected through the SCS process. Housing and roadways increase greenhouse gas emissions; natural land protection reduces emissions through sequestration. Natural lands acquisition should be added to the fundable opportunities within Sustainable Communities investments.

*We request CARB include protection of natural lands as a fundable item for SCS implementation.*

**Natural Resources and Waste Diversion Section**

We are pleased to see the conservation of natural lands in the Investment Plan. However, the types of natural lands included in the Plan seems to exclude most of what Central and Southern California has to offer. Specifically, natural lands in Southern California largely consist of the upland communities of chaparral, coastal sage scrub, oak savannah, grasslands, and desert scrub. The science is there to justify Southern California's habitats as carbon sinks—in addition to forest lands and working lands.

*We request CARB either expand its scope of "lands" or better define the types of lands included.*

Having worked on conservation in Southern California for nearly 15 years, we know that the suite of conservation mechanisms available to protect land is not limited to the purchase of easements. Through this limited mechanism, natural lands elsewhere may be ignored completely or opportunities may be lost as the easement tool may not be appropriate and is more geared toward agricultural (working) lands.

*We request CARB expand its suite of protection mechanisms to include land acquisition in fee.*

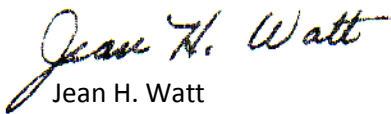
We are pleased to see the Investment Plan discuss landscape level conservation as a means to achieve the state's climate goals. Landscape level conservation through Regional Advanced Mitigation Programs (RAMP) is the newest tool for habitat protection. Our organization was at the forefront of creating a RAMP within a transportation sales tax, known as the Environmental Mitigation Program of Renewed Measure M (offered by the Orange County Transportation Authority). RAMPs like those in Orange County and San Diego County offer the highest level of innovation and review for acquisition, restoration, management of important natural lands. We believe RAMPs should be called out specifically in the Investment Plan.

To this end, we offer two potential recipients of funding for the natural land conservation section. The first is the inclusion of agencies with RAMPs, like the one described above, as potential recipients of funds. The RAMP agencies already have a scientifically based, transparent, and inclusive process established. These agencies also potentially have matching dollars to advance CARB's climate goals. The second potential recipient of funds is the inclusion of Natural Community Conservation Plans and Habitat Conservation Plans (NCCPs/HCPs) agencies as appropriate entities to be eligible for GGRF dollars. These wide ranging plans offer an existing and thoughtful mechanism that would greatly benefit from Investment Plan dollars.

*We request RAMP agencies and NCCP/HCP agencies both be included on the list of eligible recipients for Natural Resource funds via the Investment Plan.*

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Jean H. Watt". The signature is fluid and cursive, with the first name "Jean" and last name "Watt" clearly legible.

Jean H. Watt  
President