September 1, 2015

Mary D. Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: Comments on the Cap-and-Trade Auction Proceeds Second Investment Plan – Concept Paper**

Dear Ms. Nichols,

On behalf of the California Association of Resource Conservation Districts (CARCD), I am pleased to submit the following comments on the California Air Resources Board’s draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Concept Paper). CARCD supports many of the strategies the Concept Paper identifies as critical to realizing the state’s long-term climate goals.

CARCD represents 96 Resource Conservation Districts (RCDs) statewide. RCDs are special districts that provide a wide range of conservation services at the local level. To date many RCDs have been involved in the Cap and Trade programs administered by CALFIRE, the Strategic Growth Council, and the Department of Fish and Wildlife. RCDs work with public and private land owners, which makes them strategically positioned to implement all types of conservation projects throughout the state.

When developing the Second Investment Plan, we respectfully request you consider the following:

**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.

CARCD agrees 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. RCDs work directly with landowners to manage every habitat and resource type in California. Protecting these lands has the added co-benefits of protecting local food supplies, preserving wildlife habitat, protecting our water supply, and much more.

To that end, we would like to acknowledge the importance of the Strategic Growth Council’s Sustainable Agricultural Lands Conservation (SALC) Program. This program focuses on sustaining agricultural lands as places for GHG reduction by helping local government make better land use decisions regarding new development. This program also includes the ability for the state to fund planning and on-farm practices that sequester carbon, going forward we would like to see significant investments in these areas of the program. We believe the SALC Program is critical to supporting the long-term achievements of the state’s climate goals and we would like to see increased funding for this program in the future.

In addition to the SALC Program, there are other agencies in the state that could get funding on the ground for the protection of working and open space lands. Agencies that are important partners in this effort include the Resource Conservation Districts and state conservancies. The RCDs are trusted local government agencies that implement natural resource conservation programs on the ground. These special districts cover almost every part of California and work with public and private partners from all resource sectors including agriculture, rangelands, forestry, fisheries and all forms of wildlands. RCDs have an important role to play in GHG reduction by providing technical expertise to landowners and serving as professional managers for demonstration, planning and implementation projects. State conservancies also 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 help implement Cap-and-Trade investments in the natural resources sector.

**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.

RCDs are important local agencies that work directly with rural communities across California and CARCD agrees that rural communities should have a greater focus in the next investment plan. Rural communities, like disadvantaged communities, often lack the resources of urban areas and therefore have trouble competing 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 low household incomes. We respectfully urge you to increase investments in rural communities and acknowledge their importance in the investment plan.

**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. We also support increased funding for landscape-level planning, especially where it brings together a broad range of partners. RCDs have a successful history of working on a regional scale to conduct resource and land use planning. CARCD agrees that professional planning is critical for effective agricultural land protection around urban areas that maximizes efficiencies of scale and minimizes sprawl.

**Increased Investment in Urban Forestry and Community Greening Projects**

The Concept Paper recognizes that forests located in urban areas will yield multiple benefits in addition to emissions reductions, including air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention.  CARCD agrees with the Concept Paper’s assessment of urban forestry’s many benefits, and we strongly support increased investment in urban forestry and other urban greening projects. California residents rely on urban greening projects to deliver GHG emission reductions while also providing key health, safety, economic, and environmental co-benefits.

Thank you for the opportunity to provide these comments. Overall, CARCD 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 are a critical component to the overall reduction of GHGs in the state. We are excited to see them further integrated with state efforts to achieve those ends.

Sincerely,

Karen Buhr

Executive Director