



September 1, 2015

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([http://www.arb.ca.gov/lispub/comm2/besubform.php?listname=investplan2015-ws&comm\\_period=1](http://www.arb.ca.gov/lispub/comm2/besubform.php?listname=investplan2015-ws&comm_period=1))

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 Big Sur Land Trust (BSLT), we appreciate the opportunity to submit the following comments on the California Air Resources Board's (CARB) draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Concept Paper).

BSLT's mission is to inspire love of the land and conservation of our treasured landscapes with a focus on Monterey County. We strongly support several strategies the Concept Paper identifies as critical to realizing the state's long-term climate goals. These include: increasing investment in urban forestry and community greening projects; supporting investments that achieve mid- and long-term emissions reductions; providing more opportunities for climate investments in rural communities; and developing a more comprehensive approach to resource protection and carbon sequestration. As you finalize the Second Investment Plan, we respectfully request that you consider the following:

**1. 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. Moreover, the Concept Paper highlights the multi-beneficial role that wetlands restoration plays in carbon sequestration, defense against sea level rise and storm surge with the added advantage of providing resiliency to disadvantaged communities. In our region, BSLT is working with the City of Salinas and numerous community partners to complete an urban greening plan and to restore hundreds of acres within the central coast's most populated city. We urge CARB to consider wetland restoration within urban and wildlands/urban interface areas as a high priority throughout California, not only the Delta. This will also substantially advance both short and long-term GHG reduction goals.

We agree with the Concept Paper's assessment of urban forestry's many benefits, and strongly support increased investment, as these benefits are under-realized. With over 95% of Californians living in an urban area, and recent studies concluding that 60% of the nation's top ten cities suffering from the deadliest air pollution are located in California, our residents rely on urban greening projects to deliver GHG emission reductions while also providing key health, safety, economic, and environmental co-benefits.

## **2. 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 practices, as they have the potential to yield significant GHG emissions reductions and sequester carbon.

Furthermore, 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. This is one of the few programs at the state level that offers consistent funding for conservation easements on agricultural lands. In Monterey County, conversion of agricultural land, particularly rangelands, continues to pose a threat to important habitat and wildlife corridor protection as well as economic stability for our ranchers. We see the SALC Program as critical to supporting the long-term achievement of the state's climate goals within our region and beyond.

## **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. In Monterey County, the County planning department recently initiated a process to map wildlife corridors throughout the County in an effort to promote well-informed planning decisions on both a regional and site scale. This process will need state level support to be successful. By funding integrated, landscape-level planning, Cap-and-Trade auction proceeds can support a foundation from which local and

regional governments can strengthen the practice of collaborative transportation, energy and land use planning efforts with a solid network of private and public partnerships that ultimately result in transformational and enduring climate change solutions.

#### **4. 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. BSLT 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. Accordingly, we respectfully urge you to increase funding for rural communities.

Overall, BSLT 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 goals. Because the State Wildlife Conservation Board and Coastal Conservancy have solid track records of supporting well managed natural lands and working lands projects, we also urge you to allocate funds to these agencies to implement projects in the future.

Thank you for the opportunity to provide these recommendations for your consideration for the Second Investment Plan.

Sincerely,



Rachel Saunders  
Director of Conservation  
The Big Sur Land Trust