



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 Sonoma County Agricultural Preservation and Open Space District (District), we are 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). The District strives to protect agricultural and open space lands, and the natural resources of Sonoma County.

We support many of the strategies the Concept Paper identifies as critical to realizing the state's long-term climate goals; however, the focus of our comments will be to ensure that natural and working lands continue to be an important part of the state's climate change solutions. When developing the Second Investment Plan, we 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.

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 has the added co-benefits of protecting local food supplies, preserving wildlife habitat, protecting our water supply, and much more.

Therefore, we would like to acknowledge the importance of 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 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 state agencies that could get funding on the ground for the protection of working and open space lands. Agencies that could be important partners in this effort include the Wildlife Conservation Board and the Coastal Conservancy. These agencies already have robust programs in place 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.

The District 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. We respectfully urge you to increase investments in rural communities and acknowledge their importance in the investment plan.

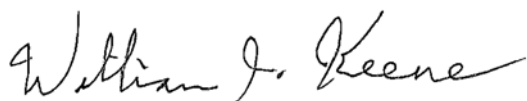
Using an Integrated, Landscape-Level Approach to Planning

We support the comprehensive and holistic approach to resource protection and management outlined in the Concept Plan. 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, the District 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.

Sincerely,

A handwritten signature in black ink that reads "William J. Keene". The signature is fluid and cursive, with the first name "William" and last name "Keene" clearly legible.

William Keene
General Manager