



Laguna Greenbelt, Inc.

a non-profit corporation

March 8, 2013

California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Comments on the ARB Draft Investment Plan

To The Air Resources Board:

Thank you for the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). Laguna Greenbelt, Inc., is a long time non-profit community organization based in Laguna Beach. Since 1968 we have successfully advocated for conservation and public use of open space lands and natural resources in Orange County. The Laguna Greenbelt is currently 22,000 acres of parks and preserves. We are writing to comment on the Draft Investment Plan as it relates to natural resources and conservation.

**We support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions.** The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture. Yet, not a single conservation strategy is outlined in the Investment Plan to further this mandate.

Attached is a graphic showing estimated investment since 1908 for preservation of open space in Orange County. Please note that investments were made at all levels: personal; private business; public utility; City, County, State, and Federal governments. This huge investment does not include ongoing management or restoration, critical to maintaining the health of the natural resources. In several areas of what has become a regional system of parks and preserves, connectivity between open space areas is lacking; although *this is the single best way to ensure the continued health of the natural resources and their GHG- absorbing functions*. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

Sincerely,

Elisabeth M. Brown, Ph.D., President  
Laguna Greenbelt, Inc.

Attachment: OS investment

# Federal, State, Local and Stakeholder Investment in Open Space & the Irvine Wildlife Corridor

**Limestone Canyon - Cleveland National Forest Open Space**  
(+/-120,000 acres)

**South Coast Wilderness - Laguna Greenbelt Open Space**  
(22,000 acres)

**Federal Resource (1908)**  
A major contributor to the foothill open space system is the Cleveland National Forest.

**Federal Resource (1996)**  
US Fish & Wildlife Service is a key signatory agency for the Natural Communities Conservation Plan and the Habitat Conservation Plan.

**Local Resource (1996)**  
Metropolitan Water District & Irvine Ranch Water District each contributed \$1 million to the NCCP/HCP endowment.

**Local Resource (1996)**  
Southern California Edison contributed \$400,000 and Chandis-Sherman \$500,000 to the NCCP/HCP endowment.

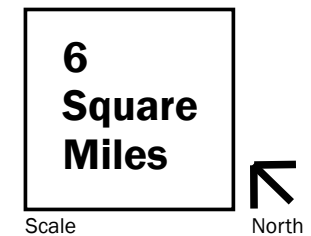
**Federal Resource (1996)**  
The County of Orange transferred \$1 million in federal funding for the NCCP to NROC for the endowment.

**Stakeholder Resource (2000-2008)**  
The Rancho Mission Viejo Company agrees to set aside over 17,000 acres of open space for preservation (Southern Reserve HCP) in exchange for the ability to develop other parts of their property.

## Regional Investment in Open Space

Throughout Orange and Riverside Counties a concerted effort to preserve open space and wilderness areas by federal, state, local and stakeholder interests has resulted in the creation of a number of very large open space systems. To date hundreds of millions of dollars and additional non-monetary resources have been spent collectively to preserve these areas.

Large open space systems such as these need wildlife movement and ecological connectivity to survive. Without viable wildlife and habitat connections, the systems will lose their functionality over time.



**State Resource (2000)**  
State of California contributes \$6 million to the \$40 million acquisition of 649-acres in Coal Canyon.

**Stakeholder Resource (2010)**  
Orange County Parks accepts a 20,000-acre donation of open space from the Irvine Company. Overall, 50,000 acres of open space are preserved on the former ranch.

**Federal, State, Local & Stakeholder Resource (1996)**  
The 38,000-acre NCCP/HCP reserve system established in 1996 was endowed with \$11 million in federal, state and local funding. Federal, state and local governments as well as private landowners and major area utility companies are represented on the Nature Reserve's Board.

**Federal Resource (2006)**  
Interior Department has designated the Irvine Ranch as a National Natural Landmark.

**Stakeholder Resource (2005)**  
Since its inception, the Irvine Ranch Conservancy has spent a \$30 million to restore and maintain open space lands.

**Federal, State, Local & Stakeholder Resource (2006)**  
Nature Reserve of Orange County develops a Resource Management Plan for El Toro with state funding, and works with US Fish & Wildlife Service to manage natural resources.

**Local Resource (2005)**  
The Orange County Great Park will ultimately provide county residents with over 1,300-acres of open space. The eastern most portion of the park will be set aside as a wildlife corridor.

**Stakeholder Resource (2005)**  
Lennar purchases the area known as Heritage Fields for \$695 million and provides \$200 million for construction of the park and wildlife corridor.

**Local Resource (2002)**  
Voters approve Measure W, a ballot initiative that creates Orange County Great Park 58 to 42 percent. A major component of the initiative is the wildlife corridor.

**Stakeholder Resource (1984-1986)**  
US Fish and Wildlife Service requires The Irvine Company to set aside land in their Irvine Spectrum development area for habitat & wildlife along the proposed route of the Irvine Wildlife Corridor.

**Stakeholder Resource (2001)**  
Irvine Company donates 169-acres of open space in Laguna Canyon at an assessed value of \$100 million.

**Local Resource (1991-2011)**  
Laguna Beach residents vote to tax themselves \$20 million (actual cost with interest: \$40 million) to purchase Laguna Canyon from the Irvine Company.

**State Resource (2006)**  
Reconstruction and realignment of Laguna Canyon Road includes, 7 undercrossings specifically designed to protect wildlife.

**Stakeholder Resource (1994)**  
Irvine Company dedicates 4,000-acres of open space to the County of Orange as part of their Newport Coast development.

**State Resource (1978)**  
State of California pays \$32 million dollars to purchase 2,400-acres of open space for the creation of Crystal Cove State Park.

