

SOUTHERN SIERRA PARTNERSHIP



August 14, 2015

Mr. Matthew Botill
Manager, Climate Investments Branch, Policy Section
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: *Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts for Public Discussion and Draft Funding Guidelines for Agencies that Administer California Climate Investments*

Dear Mr. Botill,

I am writing on behalf of the Southern Sierra Partnership (SSP), a coalition of business and conservation organizations working to protect land, livelihoods and communities, to comment on the *Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts for Public Discussion* (“Draft Concept Paper”) and *Draft Funding Guidelines for Agencies that Administer California Climate Investments* (“Draft Funding Guidelines”). SSP’s member organizations—Audubon California, Sequoia Riverlands Trust, the Sierra Business Council, Tejon Ranch Conservancy, and The Nature Conservancy—serve a 7 million acre region stretching from the Southern San Joaquin Valley to the peaks of the Sierra and Tehachapi Ranges. As discussed in our *Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains*, conservation of natural and working lands is essential to our region’s long term viability in a changing climate.¹

Given the recent finding that per-acre emissions from farmland in California are an average of 58 times lower than those from the state’s urban areas,² and additional research showing that natural landscapes such as oak woodlands can sequester millions of tons of carbon,³ we are pleased to

¹ Southern Sierra Partnership. 2010. *Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains*. Retrieved from <http://www.southernsierrapartnership.org/ssp-framework.html>.

² Shaffer, S. and Thompson, E. 2015. A New Comparison of Greenhouse Gas Emissions from California Agricultural and Urban Land Uses. Retrieved from <https://4aa2dc132bb150caf1aa-7bb737f4349b47aa42dce777a72d5264.ssl.cf5.rackcdn.com/AFTCrop-UrbanGreenhouseGasReport-February2015.Edited-May2015.pdf>.

³ Gaman, T. 2008. Oaks 2040: Carbon Resources in California Oak Woodlands. Report for the California Oak Foundation. Retrieved from http://www.forestdata.com/oaks2040_carbon.pdf.

see that conservation-based strategies play a role in both the *Draft Concept Paper* and *Draft Funding Guidelines*. As the *Draft Concept Paper* rightly notes, Greenhouse Gas Reduction Fund (GGRF) investments in conservation can support a comprehensive, landscape-level approach to carbon sequestration and greenhouse gas (GHG) reductions, while increasing climate resilience and providing “ecosystem services on which we all depend, including water capture[,] supply and filtration, . . . groundwater recharge, improved air quality and . . . food, fiber and wildlife habitat.”⁴ The *Draft Funding Guidelines* incorporate these insights as well, specifically providing for programs that fund conservation easements, wetland restoration projects, urban forestry and forest health improvement.⁵

While we strongly support this overall approach, we would respectfully suggest three changes to maximize the effectiveness of GGRF investments:

1) EXPAND OPPORTUNITIES FOR RURAL AREAS TO CONTRIBUTE TO MEETING CALIFORNIA’S CLIMATE GOALS

As the *Draft Concept Paper* notes, “[p]roviding more opportunities for small businesses and rural communities to help advance the State’s climate mitigation efforts could bring economic and health benefits,” but realizing these benefits may require creating additional programs.⁶ The programs suggested in the *Draft Concept Paper* are an excellent start, but we would also recommend the creation of dedicated pools within other GGRF programs to support projects from rural communities, as well as technical assistance for rural applicants who lack access to data modeling or other expertise needed to develop successful applications.

2) PROVIDE CLEARER GUIDANCE ON DOCUMENTING AND QUANTIFYING CO-BENEFITS

As the *Draft Concept Paper* emphasizes, the co-benefits of conserving, restoring and stewarding natural and working lands “should be sought at every opportunity and pursued through innovative integration of natural resources into other GGRF investment priorities.”⁷ Administering agencies would be better equipped to realize this goal—and to select projects that maximize co-benefits in general—if they had access to a standardized method of accounting for co-benefits. For this reason, we recommend that the final version of the *Funding Guidelines* include explicit guidance applicable to all GGRF programs on 1) documenting and quantifying co-benefits, and 2) how administering agencies should consider co-benefits in relation to GHG reduction benefits.

⁴ *Draft Concept Paper*, 22.

⁵ *Draft Funding Guidelines*, 3.A-27 to 3.A-34.

⁶ *Draft Concept Paper*, 7.

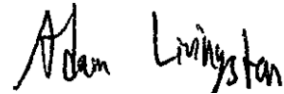
⁷ *Draft Concept Paper*, 23.

3) PRIORITIZE CONSERVATION PROGRAMS THAT MUST BE STARTED NOW TO MAXIMIZE
LONG TERM BENEFITS

As the *Draft Concept Paper* points out, conservation programs can make significant contributions to carbon sequestration and GHG reductions, but these contributions “often occur on a decadal scale, making immediate action critical to reaching long term goals.”⁸ We recommend that the *Funding Guidelines* incorporate this insight by directing agencies to prioritize conservation projects that must be started in the near future to realize benefits on timescales relevant to California’s 2050 climate goals.⁹

We appreciate your work on the *Draft Concept Paper* and *Draft Funding Guidelines*, and are grateful for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Adam Livingston". The signature is written in a cursive, slightly slanted style.

Adam Livingston

Coordinator, Southern Sierra Partnership

⁸ *Draft Concept Paper*, 19.

⁹ See California Executive Order S-3-05 (setting a goal of reducing GHG emissions to 80% below 1990 levels by 2050).