



November 13, 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**

Dear Chair 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 Cap-and-Trade Auction Proceeds Draft Second Investment Plan (Investment Plan). The District strives to protect agricultural and open space lands, and the natural resources of Sonoma County.

We support many of the strategies the Investment Plan 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. We are just completing a three-year initiative in collaboration with The Nature Conservancy and funded by the Gordon and Betty Moore Foundation, entitled *Climate Action Through Conservation*, which has developed a detailed carbon accounting framework and tools for documenting and analyzing the climate benefits for natural and working lands in Sonoma County. We believe this initiative offers solid foundational data to support investments in natural and working lands in California.

As you finalize the Investment Plan, we would like to discuss the following investment concepts:

**1. Expanding Investment Tools for Natural and Working Lands**

The Investment Plan 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. This includes protecting open space, which can provide a critical buffer between sprawling cities and natural lands. Open space, in addition to other types of natural and working lands, can provide important co-benefits beyond carbon sequestration, such as habitat and other ecosystem benefits.

Furthermore, the Investment Plan underscores the use of conservation easements as a primary tool to prevent conversion of natural and working lands to more carbon intensive uses. The

District supports this strategy, as it is a critical tool to our conservation objectives. However, **we suggest the inclusion of fee title land acquisition as an additional tool to be eligible for cap-and-trade funding**, as it can also help avoid GHG emissions associated with urban development.

## **2. Increasing Investment Opportunities for Rural Communities**

The Investment Plan 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.

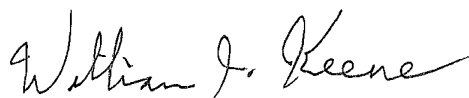
We would like to thank staff for their inclusion of rural communities in the Investment Plan, and **we are especially supportive of the Strategic Growth Council's consideration to target 10 percent of its 2015-16 funds for rural areas. We also believe that there should be dedicated funding for rural communities beyond just the SGC.** Rural communities, like disadvantaged communities, often lack the resources of urban areas and therefore have trouble competing for statewide programs. Despite these areas' low household income, they do not qualify as disadvantaged communities under the CalEnviroScreen tool and are therefore excluded from portions of cap-and-trade funding.

## **3. Using an Integrated, Landscape-Level Approach to Planning**

We support the comprehensive and holistic approach to resource protection and management outlined in the Investment Plan. We also support the use of 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. Many of the projects we implement can protect or restore multiple natural resources at the same time and an integrated approach recognizes these high-value projects.

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. We would like to thank agency staff for the inclusion of several of the investment concepts outlined above, as they are critical strategies to our work on the ground. We appreciate the opportunity to provide recommendations for your consideration for the Investment Plan.

Sincerely,

A handwritten signature in black ink that reads "William J. Keene". The signature is written in a cursive, flowing style.

William Keene  
General Manager