

# HILLS FOR EVERYONE

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*Southern California comes  
together at the Puente - Chino Hills*



Los Angeles County  
Orange County  
Riverside County  
San Bernardino County

March 6, 2013

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

Dear Members of 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). Hills For Everyone was established to protect the wildlands at the juncture of Los Angeles, San Bernardino, Orange and Riverside Counties. Our efforts resulted in the establishment of Chino Hills State Park and we continue to educate about the need for the preservation and connectivity of the Puente Chino Hills Wildlife Corridor.

First and foremost, we support better alignment with AB 1532's mandates pertaining to natural resources and conservation strategies. This is a powerful mechanism to reduce emissions. Your Draft Investment Plan refers to natural resources and conservation but does not utilize or identify appropriate tools to 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 one of several items, including 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 that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

As you know, there are numerous benefits and co-benefits associated with using land conservation as a means to reduce greenhouse gas emissions.

- By protecting natural resource lands the "threat" of land conversion to more urban uses is removed. Urban uses tend to generate not reduce GHG emissions.

- Natural lands sequester carbon. The National Science Foundation and U.S. Department of Energy commissioned a study that showed forests and other terrestrial ecosystems can sequester 40% of the nation's carbon emissions—up from the previous estimate of 30% (See *Science News Daily (SND)*). "Carbon Sequestration Estimate in US Increasing, Barring A Drought." Retrieved 16 Jan 2013 from the SND website:  
<http://www.sciencedaily.com/releases/2011/04/110414131851.htm>.
- Habitat lands offer carbon avoidance benefits that would NOT have happened if the land was converted to more urban uses. At the outset, preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The GHG impacts from construction are also avoided. Then, over the long term, the automotive emissions that would have come from vehicle miles traveled (VMT) from residential and commercial uses are avoided.

Again we urge you to revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

Thank you for your time and the opportunity to provide feedback to the Air Resources Board on the Draft Investment Plan.

Sincerely,



Claire Schlotterbeck  
Executive Director  
Hills For Everyone

cc: Cliff Rechtschaffen