



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 Draft Second Investment Plan

Dear Chair. Nichols,

On behalf of Big Sur Land Trust (BSLT), we appreciate the opportunity to submit the following comments on the California Air Resources Board's Cap-and-Trade Auction Proceeds Draft Second Investment Plan (Investment Plan).

BSLT's mission is to inspire love of the land and conservation of our treasured landscapes with a focus on Monterey County. We strongly support several strategies the Investment Plan identifies as critical to realizing the state's long-term climate goals, which includes: investing in urban forestry and community greening projects; supporting investments that achieve mid- and long-term emission reductions; providing more opportunities for climate investments in rural communities; and developing a more comprehensive approach to resource protection and carbon sequestration.

1. Investing in Urban Forestry and Community Greening Projects

The Investment Plan recognizes that forests located in urban areas will yield multiple benefits in addition to emissions reductions, including air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention. Moreover, the Investment Plan highlights the multi-beneficial role that wetlands restoration plays in carbon sequestration, defense against sea-level rise and storm surge with the added advantage of providing resiliency to disadvantaged communities. BSLT is very supportive of both of these concepts, as we implement wetland restoration projects.

In our region, BSLT is working with the City of Salinas and numerous community partners to complete an urban greening plan and to restore hundreds of acres within the central coast's most populated city. **We urge agency staff to further consider wetland restoration within urban and wildlands/urban interface areas as a high priority throughout California, not only the Delta.** This will also substantially advance both short- and long-term GHG reduction goals.

2. Expanding Investment Tools for Natural and Working Lands Conservation

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. BSLT 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.

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. 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. In Monterey County, the County planning department recently initiated a process to map wildlife corridors throughout the County in an effort to promote well-informed planning decisions on both a regional and site scale. This process will need state-level support to be successful. By funding integrated, landscape-level planning, cap-and-trade auction proceeds can support local and regional governments ability to practice collaborative transportation, energy and land-use planning efforts with a solid network of private and public partnerships that ultimately result in transformational and enduring climate change solutions.

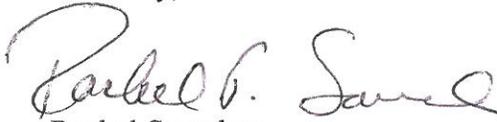
4. Increasing Investment Opportunities for Rural Communities

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.

Thank you for the opportunity to provide these comments. Overall, BSLT 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 are a critical component to the overall reduction of GHGs in the state. 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.

Sincerely,

A handwritten signature in black ink that reads "Rachel Saunders". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Rachel Saunders
Director of Conservation
The Big Sur Land Trust