



November 1, 2013

Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Inclusion of Working Lands in the Climate Change Scoping Plan Update Discussion Draft

Dear Ms. Nichols,

The undersigned organizations are writing to comment on the inclusion of working lands in the Climate Change Scoping Plan Update Discussion Draft (Scoping Plan Draft), and to encourage the California Air Resources Board (CARB) to prioritize funding for programs that will help protect these lands.

Our organizations are diverse in mission and membership, but we all support the protection of California's working lands- the agricultural, rangeland and open space lands that are a critical to the environmental and economic health of our state. We appreciate that the Scoping Plan Draft recognizes the important role that working lands will play in helping California meet its 2050 emission reduction goals and that the Scoping Plan Draft acknowledges the critical importance of providing funding to protect working lands from conversion pressures.

Earlier this year, our organizations formed the Working Lands Coalition (WLC) and developed a proposal to fund a comprehensive agricultural land and open space protection program with cap and trade auction revenue. The WLC proposal builds upon California's existing effective programs and techniques for protecting working lands, and would help the state effectively address the GHG emission reduction goals of AB 32 and the land use and transportation planning objectives of SB 375. Specifically, the proposal requests that the state provide funding for three interrelated programs in order to reduce conversion of agricultural and open space lands, and help reinforce the urban limits established pursuant to SB 375:

- Restoration of Williamson Act subvention program.
- Create additional subvention incentives for counties and planning money for cities and counties for the adoption of strong agricultural and open space protection programs that support the regional Sustainable Communities Strategies and further the goals of SB 375.

- Funding for existing conservation easement and farmland mapping programs- including the California Farmland Conservancy Program, and the Rangeland, Grazing Land and Grassland Protection Program and the Farmland Mapping and Monitoring Program-which can directly guide the path of development toward more compact growth scenarios.

In the final Climate Change Scoping Plan Update, we encourage CARB to prioritize funding for the protection of working lands, and specifically for the programs included in the WLC proposal. Investments in our state's working lands can provide important GHG emission reduction benefits, and as stated on page 101 of the Scoping Plan Draft, "action within the next 10 years is critical so long-term benefits can be fully realized in the 2050 time frame."

We would also like to comment on the importance of fully funding the Open Space Subvention program for all Williamson Act enrolled property. On page 94, the Scoping Plan Draft promotes "funding for the Williamson Act subvention programs to be used for at-risk agricultural and rangelands (sic) on the urban/suburban edge." All agricultural land, be it farmland on the central coast or rangeland in Sierra foothills is at-risk in California. Limiting Williamson Act protection to the urban/suburban edge would have a number of extremely negative and significant environmental impacts. Such a policy would only serve to stimulate leapfrog residential developments, including rural ranchette subdivisions, exacerbating vehicle miles traveled, increasing the number of single occupancy vehicle commuters, as well as increasing the loss of critical habitat. We respectfully request that CARB support the full funding of the Open Space Subvention program for all Williamson Act enrolled property and provide funding for a strong conservation easement program through the California Farmland Conservancy Program and the Rangeland, Grazing Land and Grassland Protection Program to address the particular problem of development pressure at the urban/suburban edge.

Thank you for highlighting the role working lands will play in helping California meet its 2050 climate goals, and for recognizing the urgent need to make investments to protect these lands. We look forward to working with CARB throughout the AB 32 Scoping Plan Update process.

Sincerely,

Nita Vail
Executive Director
California Rangeland Trust

Bill Keene
General Manager
**Sonoma County Agricultural
Preservation and Open Space
District**

Karen Christensen
Executive Director
**Resource Conservation
District of Santa Cruz County**

Jamison Watts
Executive Director
**Marin Agricultural Land
Trust**

Walter Moore
President
Peninsula Open Space Trust

Terry Corwin
Executive Director
**Land Trust of Santa Cruz
County**

William H. Leahy
Executive Director
Big Sur Land Trust

Meghan Hertel
Associate Director of Public
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Audubon California

Robert Parkhurst
Agriculture Greenhouse Gas
Markets Director
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