

November 13, 2015

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

**RE: Comments on Draft Cap-and Trade Auction Proceeds Second Investment Plan**

Chair Nichols:

Placer County appreciates the opportunity to provide comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan. The County has an interest because we are in the process of developing the Placer County Conservation Plan which is a Habitat Conservation Plan and Natural Community Conservation Plan schedule to be completed by 2017. After reviewing the draft Second Investment Plan, we respectfully request your consideration of the following comments:

- Placer County supports the increase in funding for the Sustainable Agricultural Land Conservation (SALC) program, administered by the Strategic Growth Council. As stated on page 3 of the Plan, “[rural] communities... have a critical role to play, as they are often home to agricultural lands, rangelands, grasslands, and forested lands where GHG reductions and carbon sequestration activities intersect.” By funding projects that will conserve habitat and agricultural land, the SALC program will bring us substantially closer to California’s greenhouse gas reduction goals. Such investments are important for Placer County’s Placer Legacy Program that maintain agriculture as a viable part of the economy and protects the diversity of plant and animal communities, including endangered and other special-status species. Agricultural Land protected by the Placer Legacy Program already contributed to significantly reducing greenhouse gas emissions.
- Request the expansion of efforts to protect ‘natural lands’ to include funding for programs that conserve lands other than agricultural lands and forest lands. These programs include the Wildlife Conservation Board’s Rangeland, Grazing Land, and Grasslands Protection Program, and the Wildlife Conservation Board’s Oak Woodlands Conservation Program. The

Wildlife Conservation Board has a long history of working efficiently and effectively with local agencies and non-profit organizations to protect all types of natural lands. Protection of these lands will help sequester carbon and otherwise reduce greenhouse gas emissions.

- Request the establishment of a new program for other natural lands that are not covered by existing Wildlife Conservation Board programs and the SALC program, as there are risks of conversion for many different types of land. The new program should integrate large landscape-scale Natural Community Conservation Plans and Habitat Conservation Plans. These Plans are already in place and offer excellent opportunities which the Second Investment Plan should use. These programs include development of preserve management plans, plus in perpetuity monitoring and management and are highly leveraged. They will allow for management that protects already stored carbon and maximizes opportunities for additional carbon sequestration.
- Request the expansion of “greening the built environment to sequester carbon” (pg. ES-5) to include planting hedgerows and trees on agricultural lands in rural areas. Such multi-benefit projects would increase habitat benefits for endangered species, such as the Swainson’s hawk, while simultaneously sequestering carbon from the environment.

Thank you for taking our comments into consideration as you finalize the Cap-and-Trade Auction Proceeds Second Investment Plan. We look forward to the release of the final plan and the development of subsequent funding programs targeting California’s climate goals.

Sincerely,

A handwritten signature in black ink that reads "Loren E. Clark". The signature is fluid and cursive, with the first name "Loren" being the most prominent.

Loren Clark  
Assistant CDRA Director