

## **Comment on the Cap-and-Trade Auction Proceeds Third Investment Plan**

Comment by the California Habitat Conservation Planning Coalition. The Coalition includes local government entities preparing and implementing Natural Communities and Habitat Conservation Plans, as well as NGOs and businesses involved the plans

Thank you for the opportunity to comment

On pages 3 and 4, you the plan states that stakeholders identified aspects of the Investments plan that could be improved and that the plan addresses gaps identified by stakeholders  
On pages 8 and 9 the Plan brings in the Natural and Working Lands Climate Change Implementation Plan, which is still in preparation and still without a draft plan for public review. This Investment Plan's language includes "California's approach to sequester carbon and reduce GHG's on natural and working lands will encompass conservation .." [then lists specific items from urban forests to wetlands].

### **Request;**

**The latter list needs to be expanded to include woodlands, shrub and scrub lands, and desert lands.**

On page 22, the this Investment Plan discusses AB 1532's Priority 3 'Natural Resources, Water Use and Supply, Land Conservation, Forestry and Sustainable Agriculture'  
The paragraph includes the sentence "California's forests, wetlands, grasslands, and other natural lands also provide an opportunity to sequester carbon in the soil and in biomass through projects in reforestation and wetland and coastal restoration."

### **Request;**

**The language in this sentence reads that only projects in "reforestation and wetland and coastal restoration."**

**This is woefully lacking. In perpetuity conservation of many other habitat types provide essential ways to conserve and increase the all-important soil carbon. These include woodlands, grasslands, scrub and scrub lands and other desert lands . [Restoration projects can also help in all these categories].**

Appendix B is a table that lists the various programs for the next 3 years of investments  
It only lists previously funded programs. This is entirely backward looking and is not filling in all the gaps mentioned on pages 3 and 4.

### **Request;**

**Please include a very important conservation of natural and working lands program, which must apply to all natural lands and allow for fee title acquisition.**

Sincerely

John Hopkins, Director, California Habitat Conservation Planning Coalition.

[ieh@cal.net](mailto:ieh@cal.net)

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