



Midpeninsula Regional Open Space District

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August 10, 2015

Mary D. Nichols, Chairman
Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan and
Draft Funding Guidelines for Agencies Administering California Climate Investments
(Greenhouse Gas Reduction Funds).

Dear Chairman Nichols and Executive Officer Corey,

The Midpeninsula Regional Open Space District (Midpen) commends the Air Resources Board's efforts to develop Funding Guidelines for agencies that administer California Climate Investments. We appreciate the opportunity to comment on the Draft of the Cap- and-Trade Auction Proceeds Funding Guidelines.

Midpen's purpose is to purchase, permanently protect, and restore lands forming a regional open space greenbelt, preserve unspoiled wilderness, wildlife habitat, watershed, viewshed, and fragile ecosystems, and provide opportunities for low-intensity recreation and environmental education. The District has permanently preserved nearly 63,000 acres of mountainous, foothill, and bayland open space, creating 26 open space preserves.

Contained within Midpen's network of protected open space is nearly 12,000 acres of forest landscape. Though some funds are allocated towards forest management and preservation, increased funding is clearly needed to adequately fund California's forest management needs. One catastrophic forest fire, the likes of which we are all too frequent, can release a quantity of carbon equivalent to the emissions of all of the vehicles on California's roadways for an entire year. Managing this risk is going to require a variety of innovative management solutions combined with recognized best management practices. Funding these forest management solutions should be a priority for the Cap-and-Trade Auction Proceeds.

Reaching the state's greenhouse gas reduction goals will require numerous innovations. One of these should be supporting carbon-smart green infrastructure to fully realize 'Urban Forestry and Greening' and 'Integrated Investments in Disadvantaged Communities' as referenced in the Concept Paper. Green infrastructure investments provide parks, trees and other natural

infrastructure that not only sequester carbon, but also cool heat islands in urban environments, and incentivize active and alternative transportation.

Agricultural conservation easements are an essential tool to store carbon, help cities combat sprawl and maintain working lands close to where people live. With careful management, rangelands and cropland sequester carbon in soils – through the growth of vegetation and accumulation of organic matter. Appropriate incentives can help landowners achieve these results. We encourage the Air Resources Board to direct a meaningful portion of the Cap-and-Trade Auction Proceeds to the agricultural land conservation and management incentives described above.

MidPen appreciates the Air Resources Board's collaborative planning efforts to the benefit of all stakeholders. We hope that ARB will consider refining their criteria to better incorporate our suggestions so that together we can build a stronger and more resilient California landscape.

Sincerely,

A handwritten signature in black ink, reading "Stephen E. Abbors". The signature is fluid and cursive, with the first name "Stephen" being more prominent and the last name "Abhors" following in a similar style.

Stephen E. Abbors
General Manager