



November 9, 2015

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Draft Second Investment Plan for Cap and Trade Auction Proceeds

Gentlepersons:

Endangered Habitats League (EHL) appreciates the opportunity to provide comments on this plan for California's future. For your reference, EHL is a Southern California regional conservation group dedicated to ecosystem protection and sustainable land use. We have been stakeholders in many local government-led habitat and land use planning endeavors. Our comments pertain to *Natural and Working Lands*.

We support Natural and Working Lands as part of the Second Investment Plan. However, we propose an important expansion of the program to habitat lands not targeted in the First Investment Plan, or in the Draft Second Investment Plan, that can also make important contributions to carbon sequestration. In doing so, investments would be distributed far more equitably around the State.

Specifically, we proposed a Carbon Sequestration on Habitat Lands (CSHL) program. It would fulfill several objectives of the Second Investment Plan, including:

- Net carbon sequestration benefits on natural lands
- Use of rangelands
- Improved management practices
- Protection of lands threatened with conversion
- Major co-benefits

The CSHL would target habitat lands threatened by conversion to GHG-intensive development. In this way, it is similar to and builds upon the existing Sustainable Agricultural Lands Conservation (SALC) program for agricultural lands. But it would go beyond those benefits to *also* require net carbon sequestration. Carbon sequestration in the soil is a particular virtue of non-forest habitat lands, and is at the leading edge of our scientific understanding of how to fight global warming.

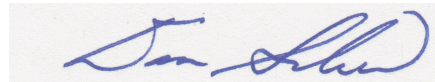
Long term management is key, and priority would be given to lands that are managed and monitored to maintain and enhance sequestration. Priority would also be given to lands with co-benefits, such as contributing to regional preserve systems that, via connectivity and elevational gradients, enhance ecological resilience and allow species to

adapt to climate change over time. Proximity to urban population centers for recreation, helping direct growth toward transit infrastructure, and preserving water quality and groundwater are also co-benefits for prioritization.

We believe that Carbon Sequestration on Habitat Lands is a logical next step for the Second Investment Plan. Indeed, if linked with the existing State of California Natural Communities Conservation Planning (NCCP) program, it would be a truly *integrative* program, with substantial leverage and efficiency due to local and federal cost sharing.

A summary of Carbon Sequestration on Habitat Lands follows. We would be happy to work with you on further development of these ideas.

Yours truly,

A rectangular box containing a handwritten signature in blue ink. The signature is cursive and appears to read "Dan Silver".

Dan Silver
Executive Director

Enclosure

Carbon Sequestration on Habitat Lands Program

Carbon Sequestration on Habitat Lands (CSHL) Program

Draft Second Investment Plan goals include:

- Conservation and improved management strategies for achieving net climate benefits and long-term carbon sequestration on natural and working lands.
- Support net GHG emission reductions and carbon sequestration on agricultural and rangelands, including healthy soils practices.
- Improve management and restoration activities on public and private natural and lands to improve carbon sequestration.
- Support conservation easements on natural and working lands that are at risk of conversion to more carbon intensive uses.
- [E]mphasize co-benefits such as disadvantaged community support, public health, water quality and supply, urban and rural greening, climate resilience, and habitat protection.

To help achieve these goals, we propose a new program that complements and extends the benefits of the existing natural and working lands programs (forests, wetlands, agricultural lands) to new land types and regions of the State. The target of this program would be California's habitat lands, via the *Carbon Sequestration on Habitat Lands (CSHL)* program.

The primary criterion for investment would be the same as of the Sustainable Agricultural Land Conservation (SALC) program, that is, avoidance of conversion to VMT-intensive development. Eligible lands would be habitat lands otherwise subject to conversion or habitat lands that would no longer be subject to conversion as the result of implementing a local agency habitat protection program. In order to maximize co-benefits, priority would be given to landscape-level programs that, by maintaining connectivity, diversity, and environmental gradients, enhance the resilience of biological systems to climate change. Examples of eligible programs are State of California Natural Community Conservation Plans and large scale Habitat Conservation Plans.

The secondary criterion for investment would be that the habitat protected serves as a net carbon sink over time or is amenable to management practices or restoration that achieve this objective. Such sequestration can occur either above ground or as soil carbon.

Conservation under the program may be achieved through easements or fee title-based deed restrictions that permanently preclude development or other uses that interfere with carbon sequestration. Priority will be given to projects that incorporate long-term management and monitoring to maintain and enhance sequestration.

Co-benefits to be considered besides biological resilience to climate change include proximity to population centers that may recreate on conserved lands, watershed and water supply protection, groundwater recharge protection, fire hazard reduction, and shifting development toward existing infrastructure and services with a more compact and transit-adaptive urban form.