



November 13, 2015

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

RE: Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19

Dear Chair Nichols and Board Members:

California Trout appreciates the opportunity to provide input on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19 (Second Investment Plan). A statewide organization, we are working to solve complex resource issues while balancing the needs of wild fish and people. California Climate Investments are critical to solving those complex resources issues.

California Trout has the following recommendations for the Second Investment Plan:

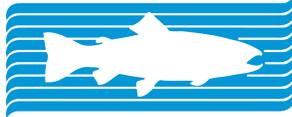
### **I. Make Investments in Green Infrastructure**

California Trout is very pleased with the increased emphasis on projects that reduce greenhouse gas emissions and sequester carbon on natural and working lands, including cost-share programs to promote restoration of forested lands, meadows, wetlands, and other natural systems. CalTrout strongly recommends continued and increasing investment in the health and resilience of our green infrastructure - reconnecting stream coarse to floodplain; restoring salt marshes and seagrass beds; managing invasive species and fire risk, and reconciling the demands of working lands with natural processes. Investment in green infrastructure provides multiple other returns including benefits to listed species, water quality benefits, flood protection benefits, water supply benefits, local economic benefits, and more. Toward this end, California Trout is focused on wetland restoration in mountain meadows and Central Valley floodplains, in estuaries from San Diego to Humboldt County, and on working lands.

### **II. Easements Aren't The Only Option for Natural Resources Solutions**

Conservation easements are an important tool for providing natural resources solutions to climate change, but they are not the only tool available for greenhouse gas emissions

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reductions. A large portion of the Cascade and Sierra Nevadas, which hold extraordinary potential for terrestrial, aquatic, and forest sequestration, are in public hands, and therefore not conducive to easements projects. We suggest the Second Investment Plan put greater weight in activities such as ecosystem restoration and land management practices that increase carbon sequestration on those public lands. Such projects will be necessary to meet California's greenhouse gas reduction targets as stated in CA Assembly Bill AB 32.

### **III. Use a Targeted Definition of Disadvantaged Communities for Reduction Strategies in the Natural and Working Land Sector**

California Trout recognizes the necessity of investing in disadvantaged communities throughout the state. However, we suggest the Second Investment Plan incorporate definitions of disadvantaged communities that are appropriate to both emission reduction and carbon sequestration strategies. Specifically, the population density criteria of disadvantaged communities under CalEnviro Screen 2.0 does not adequately address the economically disadvantaged areas of rural California where most sequestration potential exists. Many investments in the natural and working lands sector would be excluded from DAC qualification under CalEnviro Screen 2.0, due to the inherent rural location of those types of projects. In these cases, we suggest the California Air Resources Board consider using the Department of Water Resources sliding-scale model for Disadvantaged Communities (DAC) and Economically Distressed Areas (EDA).

California Trout is committed to on-the-ground solutions to California's complex resources issues. Thank you for the opportunity to provide input into the development of one of California's greatest tools for combatting climate changes.

Sincerely,

Curtis Knight  
Executive Director  
California Trout