

**SANTA MONICA MOUNTAINS CONSERVANCY**

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April 5, 2016

Mary D. Nichols, Chairperson  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Comments on the Forest Carbon Plan**

Dear Chairperson Nichols:

The Santa Monica Mountains Conservancy (Conservancy), which is a state agency established by the Legislature, is grateful for this opportunity to provide comments to the California Air Resources Board and Forest Climate Action Team (FCAT) with regards to the Forest Carbon Plan Concept Paper (Plan).

The Conservancy urges the Agencies and the Administration to make natural resource protection a priority in developing new ways to prevent and adapt to climate change by leveraging the opportunities available in California's rich forests, including urban forests.

The Conservancy has worked on comments with the Mountains Recreation and Conservation Authority (MRCA). The MRCA is a local government public entity established in 1985 pursuant to the Joint Powers Act. The MRCA is a local partnership between the Santa Monica Mountains Conservancy, and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District, both of which are local park agencies established by the vote of the people in those communities. The Conservancy incorporates the comments submitted by MRCA by reference.

The Conservancy would like to highlight:

**1. The importance of regionally based entities, including the Conservancy, as implementors of forestry cap-and-trade program and projects:**

These regional entities often are in the best position to ensure environmental justice concerns are addressed, disadvantaged community (DAC) needs are identified, co-benefits are maximized, and local funds are leveraged with state funding.

**2. The importance of protecting chaparral ecosystems:**

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The Plan identifies several mechanisms to leverage forests for safeguarding California's carbon future. It is important to provide similar incentives for chaparral ecosystems. Chaparral systems serve, like forests, as important carbon sinks and must be protected. The water needs of chaparral ecosystems also indicate that they might be more resilient to negative changes in state water availability as droughts increase and climate change alters water cycle patterns. These ecosystems often sequester significant portions of their stored carbon underground, providing greater carbon sequestration resiliency when wildfires strike.

### **3. Greenbelts:**

Cap-and-trade programs, including those focused on forestry and green spaces, can incentivize the acquisition, maintenance and preservation of urban greenbelts, containing the urban limit line. A robust and thoughtful urban and rural forestry program can help create a strong greenbelt program. These greenbelts should be formed out of a variety of natural and working lands, including parks and open space, combined with rural and urban forestry protections. The Sustainable Agricultural Land Conservation (SALC) program is an important greenbelt program for agricultural lands. A similar program should exist for forests and chaparral around urban areas. This will also ensure that there is some sort of policy parity between the SALC program and forest protection. Otherwise, the efforts to preserve agricultural areas as part of an effort to promote greenbelts will have the perverse incentive of making forests and chaparral the prime targets for conversion into urban sprawl because these lands will lack the same protection incentives as agricultural lands.

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Edmiston", written in a cursive style. The signature is positioned above the printed name and title.

Joseph T. Edmiston, FAICP, Hon. ASLA  
Executive Director