

## Leon Freeman

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**From:** Jessica McFarland [jessica@landveritas.com]  
**Sent:** Tuesday, March 11, 2014 10:15 AM  
**To:** DRP Community Climate Action Plan  
**Subject:** CCAP Draft comments  
**Attachments:** 20140305\_LA Cty CCAP Draft Comments\_2 (1).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chung,

Attached please find correspondence from Tracey Brownfield regarding the current draft of the Los Angeles County Community Climate Action Plan.

Thank you,  
Jessica

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March 10, 2014

County of Los Angeles  
Department of Regional Planning  
Attn: Connie Chung  
320 West Temple Street  
Los Angeles CA 90012

Dear Ms. Chung:

I am writing in response to the County's request for public comment on the January 2014 draft of the Community Climate Action Plan 2020. Land Veritas is a California-based land investment and development firm specializing in conservation/mitigation bank establishment and management. We are in the final approval stages of the first full service mitigation/conservation bank in unincorporated Los Angeles County, comprised of 4,300 acres including the Petersen Ranch and additional property in Elizabeth Lake. As an environmental services firm, we are deeply invested in sustainable planning in Los Angeles County and believe that the practice of mitigation banking can be leveraged to meet many of the goals of the CCAP. We are writing to suggest ways that this practice could be introduced into the language of the draft document, as a means to guide future policy both directly and indirectly related to mitigation bank establishment and operation.

- 1) Mitigation/conservation banking focuses on **preservation, restoration, and enhancement of substantial tracts of land**, which offers greater ecological benefits than fragmented planting and conservation efforts. It is our suggestion that the CCAP should distinguish between the benefits of small- and large-scale preservation efforts, which are well documented, as well as between development avoidance and active restoration of ecological resources and habitats.
- 2) Mitigation banking is the primary mechanism for ensuring systematic compliance with the Clean Water Act Section 404 principle of **"no net loss" of wetland resources** through land development. Wetland protection, in turn, has a critical role to play in addressing climate change, and we believe it should be identified as a strategy in the CCAP.
- 3) While heavily regulated by federal, state and local agencies, mitigation and conservation banks are **privately funded and operated**. They therefore provide an efficient means of ecological protection without the expenditure of public funds.
- 4) Mitigation and conservation banks can assist in the **fast-tracking of green and alternative energy development** in California. Banks (particularly at the scale of the Petersen Ranch) offer a means to simplify permitting for new renewable energy development by offering ease of access to a substantial volume of mitigation credits. Supporting bank development can help ensure that the CCAP's green energy targets can be met.



- 5) The entitlement process for mitigation and conservation banks provides a critical linkage between state and local development policy and ***national, state and local environmental protection efforts***. The oversight of the regulatory agencies mentioned above ensures a connection between local permitting and nationally recognized best practices for ecological preservation.

We would be happy to further discuss how mitigation and conservation banking might be represented in the next draft of the CCAP. Thank you for your consideration.

Sincerely,

H. Tracey Brownfield  
President