



Santa Clara Valley Open Space Authority
6980 Santa Teresa Blvd. Suite 100
San Jose, CA 95119

July 8, 2016

California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: 2030 Target Scoping Plan Update June 17 Concept Paper Comments

Dear Members of the Air Resources Board,

The Santa Clara Valley Open Space Authority (the Authority) is an independent special district that conserves the natural environment, supports agriculture, and connects people to nature in order to balance continuing urban growth. The Authority strategically prioritizes land near already-protected open spaces in order to create a connected network of agricultural lands, natural areas, streams, parks and preserves. Protection of these lands helps reduce sprawl, preserves the carbon sequestration processes on natural and working lands, and allows for climate adaptation by maintaining habitat connectivity.

The Authority applauds the well thought-through strategy elements of the Air Resources Board's 2030 Target Scoping Plan Update Concept Paper (dated June 17, 2016). We are particularly supportive of the strategy elements regarding sector integration – such as considering how transportation planning, urban planning, and environmental protection efforts complement each other - and intergovernmental collaboration. The Authority is proud to be working in close partnership with the County of Santa Clara and the affected municipalities to develop a policy framework for prioritized protection of the County's agricultural lands - thanks to a Sustainable Agricultural Land Conservation (SALC) grant from the Strategic Growth Council - in order to help focus new development closer to transit and maximize the GHG reduction benefits of our region's farm and ranchlands.

The Authority is also very supportive of the Concept Plan's proposals to increase the stringency *and* develop more ambitious targets under SB 375 - Sustainable Communities Strategies. We have worked closely with our conservation, county and municipal partners to receive approval for new Priority Conservation Areas (PCAs) throughout the Silicon Valley region that have been integrated into Plan Bay Area, which was created to meet the requirements of SB 375. The PCAs have been helpful in advancing the conversation with our partners regarding the importance of protecting our remaining natural and working lands. Our ability to work through complex planning issues regarding protection of urban edge lands and the associated GHG benefits would improve significantly with the strengthening of SB 375 requirements.



We also greatly support continued inclusion of natural and working lands as an important component of any GHG reduction strategy. To reinforce the importance of protecting *all* types of natural and working lands in the overall strategy, the Authority suggests that the “Natural and Working Lands – by 2030” element under each of the four proposed Concepts, include specific acreage targets for land preservation as well as for habitat protection and restoration, as have already been done for acreage targets of forested acres restored. While we understand the great importance to the State of forest health, the greatest growth at urban boundaries in our region - and we would suspect throughout California, as well - takes place on non-forested natural and working lands (farmland, ranchland, grasslands) and therefore presents the most significant potential for urban edge GHG impacts.

Thank you for your consideration of our comments and your continued dedication to thoughtful and comprehensive ways to employ our vital natural and working landscapes to addressing GHG reduction.

Sincerely,

A handwritten signature in blue ink that reads "Andrea Mackenzie". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Andrea Mackenzie
General Manager