



August 31, 2015

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

RE: Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols,

On behalf of the Santa Clara Valley Open Space Authority (SCVOSA), we are pleased to submit the following comments to the California Air Resources Board's (CARB) draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Concept Paper). SCVOSA is an open space special district in Santa Clara County whose mission is to conserve natural resources, support agriculture, and connect people to nature.

We strongly support several strategies the Concept Paper identifies as critical to realizing the state's long-term climate goals, including supporting investments that achieve mid and long-term emissions reductions, providing more opportunities for climate investments in rural communities, developing a more comprehensive approach to resource protection and carbon sequestration, and increasing investment in urban forestry. In developing the final version of the Second Investment Plan, we respectfully request you consider the following:

1. Increased Investment in Sustainable Agriculture and Farmland Conservation

The Concept Paper recognizes that the state should prioritize investments in carbon storage *in all land types* by protecting existing lands threatened by conversion and strategically managing lands to increase their carbon storage capacity and reduce GHG emissions.

We agree that investing in the protection and improvement of all types of land, including farmland, grasslands, and rangelands, is critical to avoiding GHG emissions associated with urban development. Protecting these lands have the added co-benefits of protecting local food supplies and preserving wildlife habitat. We ask that you give more consideration to investing in open space. These lands are also threatened by conversion and protecting them provides many of the same benefits as agricultural land protection.

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Furthermore, **we support increased funding for the Strategic Growth Council's Sustainable Agricultural Lands Conservation (SALC) Program.** This program focuses on preventing increases in GHG emissions in agricultural lands by limiting opportunities for expansive, vehicle-dependent forms of development in favor of more focused, compact, and transit-oriented development.

Here in Silicon Valley, for instance, we are excited Plan Bay Area, which brings together the cities and counties around the Bay under the auspices of SB 375 to develop sustainable communities. SCVOSA is working with its partners to help implement Plan Bay Area by permanently protecting a greenbelt of working landscapes around urbanized areas that focuses housing near transit corridors and limits sprawl and therefore vehicle miles traveled. We see the SALC Program as critical to supporting this important strategy and therefore the long-term achievement of the state's climate goals as it begins to look beyond 2020.

2. Increased Investment Opportunities for Rural Communities

The Concept Paper notes that rural communities also have a critical role to play in achieving the state's climate goals, as they are home to agricultural lands, rangelands, grasslands, and forested lands.

SCVOSA agrees that rural communities should have a greater focus in the next investment plan. Rural communities, like disadvantaged communities, often lack the financial and technical resources of urban areas and therefore have trouble assembling competitive grant proposals for statewide programs. Furthermore, many rural communities do not qualify as disadvantaged communities under the CalEnviroScreen tool and are therefore excluded from portions of cap-and-trade funding despite the fact that many rural areas, like the community of San Martin and agricultural areas outside the City of Morgan Hill in southern Santa Clara County which have lower household incomes. Accordingly, **we respectfully urge you to increase funding for rural communities.**

3. Using an Integrated, Landscape-Level Approach to Planning

We support the comprehensive and holistic approach to resource protection and management outlined in the Concept Paper. The Concept Paper points out that natural systems do not have specific boundaries and future investments need a landscape-level approach to maximize carbon sequestration benefits.

The County of Santa Clara was recently awarded an SALC planning grant to prioritize those agricultural lands that provide the greatest GHG benefits. SCVOSA and other partners will work closely with the County in this vital collaborative planning process so that local and regional funds can be leveraged with state funding to protect the working lands identified in the study.

We support increased funding for landscape-level planning, especially where it brings together a broad range of partners. Only with thoughtful planning can a long-

term vision be created and implemented that will result in effective agricultural land protection around urban areas that maximizes efficiencies of scale and minimizes sprawl.

4. Increased Investment in Urban Forestry and Community Greening Projects

The Concept Paper recognizes that forests located in urban areas will yield multiple benefits in addition to emissions reductions, including air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention. **We agree with the Concept Paper's assessment of urban forestry's many benefits, and strongly support increased investment, as these benefits are under-realized.** With over 95% of Californians living in an urban area, and recent studies concluding that 60% of the nation's top ten cities suffering from the deadliest air pollution are located in California, our residents rely on urban greening projects to deliver GHG emission reductions while also providing key health, safety, economic, and environmental co-benefits.

Overall, SCVOSA strongly supports the direction of the natural and working lands component for the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. California's natural and working lands continue to be a critical component to reducing GHG emissions in the state, and we hope to see them further integrated with state efforts to achieve those ends. We appreciate the opportunity to provide recommendations for your consideration for the Second Investment Plan.

Sincerely,



Andrea Mackenzie
General Manager