



December 16, 2016

Rajinder Sahota  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Discussion Draft 2030 Target Scoping Plan Update**

Dear Ms. Sahota,

On behalf of the Santa Clara Valley Open Space Authority (OSA), I am pleased to submit the following comments to the Discussion Draft 2030 Target Scoping Plan Update (Discussion Draft). We appreciate the ongoing process being led by the Air Resources Board (ARB) to allow for public participation in the formation of the 2030 Target Scoping Plan, which will be a critical tool to achieve our climate goals. We also appreciate the increased attention that the Discussion Draft pays to the Natural and Working Lands (NWL) Sector as an important strategy towards meeting our 2030 goals.

The Discussion Draft outlines carbon benefits from the NWL Sector in three main categories – protecting lands to curb sprawl and reduce vehicle miles travelled (VMT), better land management to reduce emissions from forest fires and agricultural practices, and enhancing the ability for lands to sequester carbon. The Discussion Draft also describes a multitude of cross-sector benefits that can be realized by better protecting and managing our natural and working lands. In terms of GHG emission reductions, the NWL Sector best provides cross-sector benefits with the Transportation Sector since protecting natural and working lands influences land use decisions that can reduce VMT and associated GHG emissions.

The Discussion Draft provides many recommended measures in the NWL Sector for protecting natural and working lands that curb sprawl and incentivize infill development. We have identified the following three suggestions to strengthen the *Protect* section of the NWL Sector (Page 67) for your consideration in the next draft of the scoping plan:

**1. Stabilize acquisition and easement funding so investments are available to develop greenbelts and curb urban sprawl.**

Recent state funding for acquisition or easements to protect natural and working lands has come from two sources – bonds and agricultural conservation easements through SALCP. It has been ten years since the passage of Proposition 84, which was the last bond measure to provide

significant funds for acquisition and protection of natural and working lands. Most of this funding has been spent down and available funds are quite limited. Protection of agricultural lands received an infusion of cap and trade funds through the creation of SALCP and the easements the program supports. Recent auction results suggest a significant decrease in available cap and trade funds for SALCP, creating uncertainty in the ability for SALCP to fund easements in the next round and potentially further down the road. Including this comment suggests to the Legislature and other departments of the Administration that the state needs to develop a reliable and ongoing source of funding to protect California's natural and working lands for GHG-related benefits.

**2. Include the Strategic Growth Council (SGC) and Department of Transportation (Caltrans) in the fifth bullet that describes coordination of state funded land and easement acquisition.**

This bullet currently describes the need for coordination among departments within the Natural Resources Agency regarding activities to protect natural and working lands. There is no mention of natural resource departments coordinating with the SGC or Caltrans to leverage resources to meet common goals. Development projects and transportation projects often require mitigation, which could be used to protect critical lands that create greenbelts and reduce sprawl. One of the potential new measures for the Transportation Sector calls for "Promoting efficient development patterns that maximize protection of natural and working lands." (Fourth bullet on Page 57). This suggests that the Transportation Sector would promote these development patterns, but would do so without coordinating with natural resources departments. To effectively protect natural and working lands for the creation of greenbelts that reduces sprawl and spurs infill development, the agencies working on sustainable development and the agencies working natural and working lands must coordinate.

**3. Include AB 2087 in bullet 3.** Bullet 3 of the *Protect* section describes the need to provide support and technical assistance to local and regional governments to integrate natural and working lands priorities into plans and to draw from other planning efforts that promote land protection. However, there is no mention of legislation passed in 2016, AB 2087, that should drive smart investments in landscape level conservation and smart growth of infrastructure. The plans or investment strategies that would be developed from AB 2087 would identify and prioritize regional conservation through a science-based public process while also encouraging investments in conservation through advance mitigation. This new policy is recognized as one of the measures for the Transportation Sector to achieve the state's 2030 goals and should also be included as a key measure for success in the NWL Sector.

We thank the ARB for its consideration of these comments that we believe will strengthen the role of the Natural and Working Lands Sector in achieving our 2030 climate goals. We look forward to further opportunities to work with the ARB on the scoping plan.

Sincerely,



Andrea Mackenzie  
Santa Clara Valley  
Open Space