

April 10, 2017

Ms. Rajinder Sahota  
Assistant Division Chief, Air Strategies Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Reference: Comments from the City of San Diego Regarding the California Air Resources Board's  
(CARB) 2017 Scoping Plan Update

Dear Ms. Sahota:

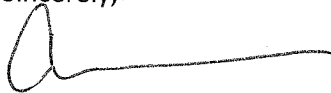
The City of San Diego is pleased to submit comments on CARB's 2017 Scoping Plan Update. San Diego's ambitious Climate Action Plan (CAP) demonstrates a committed leadership role in achieving greenhouse gas (GHG) emissions reductions while fostering economic development and social equity. The CAP was designed to accomplish the ongoing climate change mitigation efforts set forth in AB32, and the City of San Diego has aggressively pursued these goals.

San Diego has worked diligently to foster economic growth, and encourages clean tech job activity through various strategies. The City also places a priority on social equity, including how it relates to climate action. Recently, an area within the City of San Diego was federally designated as a Promise Zone, which will assist in addressing key areas within its most disadvantaged neighborhoods.

San Diego is the second most populous city in California. With our proactive strategy of mitigating the impacts resulting from climate change, San Diego has the ability to greatly assist CARB in meeting the emission reduction goals of the Scoping Plan. However, we found that the City has historically been under represented in planning and funding opportunities at the State-administered level. We would like to fix that, establishing a strong partnership with CARB that achieves the goals of the Scoping Plan.

The City of San Diego is a leader in addressing climate change in our region and nationally, and anticipates working more closely with CARB in ensuring a sustainable future for both San Diegans and all Californians. The City of San Diego appreciates CARB's consideration of our comments and we look forward to your responses. If you have any questions, please contact Cody Hooven at (619) 236-6563 or [chooven@sandiego.gov](mailto:chooven@sandiego.gov).

Sincerely,



Cody Hooven  
Chief Sustainability Officer

Attachment

### **Environmental Justice Advisory Committee**

The Environmental Justice Advisory Committee (EJAC) plays a significant role in providing input to CARB in regards to the development of the Scoping Plan as well as any other pertinent matter in implementing AB 32, to ensure that fair and equitable climate action is occurring. EJAC is a thirteen member committee selected by CARB to represent communities in the State with the most significant exposure to air pollution. San Diego currently has no representation on EJAC, locally or regionally.

Per the SB 535 list of census tracts facing multiple pollution burdens there are seventeen tracts that fall within the City of San Diego. Of those seventeen, three scored a 96%-100% on CalEnviroScreen 2.0, which is the highest score possible. Out of all of the census tracts in the State that scored a 96%-100% on the CalEnviroScreen 2.0 model, census tracts in San Diego are the only ones to not have representation on EJAC.

The City of San Diego requests the CARB include one or more representatives from the San Diego region to participate on EJAC.

### **Natural and Working Lands Including Agricultural Lands**

In regards to carbon sequestration CARB states that “California will continue to pursue develop and new infrastructure construction patterns that avoid greenfield development. Success here will depend on working through local and regional land use planning and permitting, as well as developing incentives for participation by local government and individual landowners.” Staff at the City of San Diego request to work directly with CARB to integrate natural and working lands conservation priorities into local-level plans (e.g. habitat conservation plans).

### **Local and Regional Government Engagement**

Climate change policies and perspectives vary greatly between local and regional entities. The City of San Diego encourages CARB to work directly with local governments in regards to regulatory developments that will be implemented at a local level. As stated in the 2017 Scoping Plan Update: “Regional and local governments and agencies are leaders in addressing climate change and are uniquely positioned to reduce emissions from certain sources, especially by reducing the demand for electricity, transportation fuels, and natural gas. The State is striving to provide a supportive framework to advance these and other local efforts.” we strongly encourage CARB to work directly with the City of San Diego to develop a “supportive framework” that assists in meeting the goals of the CAP and beyond.