

December 16, 2016

SENT VIA E-MAIL

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: Discussion Draft 2030 Target Scoping Plan Update

To Whom It May Concern:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the California Air Resources Board (CARB) for the opportunity to review the Discussion Draft 2030 Target Scoping Plan Update (Draft Plan). We particularly appreciate the Draft Plan's discussion of the importance of air districts and metropolitan planning organizations in reducing regional greenhouse gas (GHG) emissions and meeting State climate action goals, and the importance of climate action plans to this end.

Co-Benefits

SMAQMD supports the Draft Plan's clear acknowledgement of GHG emission reduction's co-benefits for pollutants, sustainability, public health and environmental justice. We encourage, as feasible, quantifying the health, social, and economic benefits of pedestrian and bicycle supportive development. We recommend including a goal to identify and eliminate structural barriers to infill development, in the list of measures beginning on page 66.

Additionally, we support the Draft Plan's discussion of the interconnection of urban and rural California, and efforts to deliver co-benefits for all California communities. Further, we support the Draft Plan's discussion of investment in our natural and working lands, as strategies to restore watersheds and divert biomass for renewable energy generation will support climate resilience, water supply, ecosystem health, and community vitality – in addition to increasing carbon sequestration.

Performance Targets

SMAQMD conceptually supports the recommended local plan level GHG emissions reduction goals identified on Draft Plan page 103 – including emissions of no more than six metric tons carbon dioxide equivalent (CO₂e) per capita by 2030 and no more than two metric tons CO₂e per capita by 2050. Local jurisdictions in California are very diverse, however, and in an optimal position to engage their communities to develop

GHG targets most appropriate to their unique circumstances. As such, we recommend mechanisms to provide flexibility for local jurisdictions in meeting targets, as necessary. We support providing general principles for GHG target development for this purpose.

Additionally, we support the inclusion of targets to mitigate the Urban Heat Island (UHI) effect. We anticipate technical support and other assistance for localities from the State, particularly any research or tools that can calculate the UHI effect for cities, identify priority areas for mitigation, and estimate the regional impact of cool roofs, increased tree canopy, and cool pavements.

Existing Development

We recommend greater measures to reduce GHG emissions from existing buildings than currently exist in the Draft Plan. Energy efficiency incentives funding programs such as Property Assessed Clean Energy (PACE) are widespread in California; however there are still considerable barriers for property owners to undertake efficiency retrofits. We support using energy efficiency retrofits and solar installation as possible mitigation measures for new developments, especially rental properties. Further, we recommend using the California Air Pollution Control Officers Association's (CAPCOA's) [Greenhouse Gas Credit Exchange](#) and associated protocols to facilitate this process, and to ensure that GHG emissions are verifiable.

Conclusion

Reducing GHG emissions in California presents a unique opportunity to achieve clean air, promote public health, and improve the resiliency of our communities. SMAQMD looks forward to the upcoming 2030 Target Scoping Plan Update; and we thank you for your attention to our concerns. If you have questions about these comments, please contact Molly Wright, AICP at mwright@airquality.org or (916) 874-4207.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. F. Greene".

Larry F. Greene
Executive Director
Sacramento Metropolitan Air Quality Management District

Cc: Paul Philley, Program Coordinator, SMAQMD