

From: Maricela Martinez [<mailto:mmartinez@baaqmd.gov>]
Sent: Monday, April 10, 2017 4:38 PM
To: Corey, Richard@ARB
Cc: Jack Broadbent; Jean Roggenkamp; Henry Hilken; Abby Young
Subject: BAAQMD Comments on the 2017 Climate Change Scoping Plan Update
Importance: High

Dear Mr. Corey,

Attached please find the Bay Area Air Quality Management District's comments on the 2017 Climate Change Scoping Plan Update.

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Connect with the
Bay Area Air District:



April 10, 2017

Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812
Via email: Richard.Corey@arb.ca.gov

RE: Comments on the 2017 Climate Change Scoping Plan Update

Dear Mr. Corey:

Thank you for the opportunity to comment on the California Air Resources Board's (ARB) 2017 Climate Change Scoping Plan Update (Scoping Plan Update). The Scoping Plan Update presents a comprehensive and ambitious strategy to continue California's leadership in addressing this critical environmental and public health challenge. The Bay Area Air Quality Management District (Air District) staff commends ARB on a well-balanced strategy to mitigate greenhouse gases (GHGs). We are closely following the development of the Scoping Plan Update as its policies will guide vital efforts statewide and will bolster the Air District's ability to successfully enforce and implement air quality rules and programs throughout Bay Area communities.

The Air District recently released its Draft 2017 Clean Air Plan, "Spare the Air, Cool the Climate" (2017 Plan), a comprehensive, multi-pollutant clean air plan. The central tenets of the 2017 Plan are to address the Bay Area's two most critical air quality challenges: 1) protecting the climate and avoiding the worst impacts of climate change, and 2) eliminating disparities that prevent equal access to healthy air in the Bay Area. These challenges are formidable and require the strongest possible planning at the state and local levels. In this spirit, we make the following recommendations that we believe will strengthen the Scoping Plan Update and help achieve California's and the Bay Area's climate protection goals.

Emphasize the Role of Local Air Districts in Reducing Greenhouse Gas Emissions

The Scoping Plan Update acknowledges in several places the important role that local air districts play in addressing GHG emissions. As stated in your recent letter of April 5th, CARB recognizes that the Air Districts have the authority to regulate GHG emissions. The Air District recommends that the Scoping Plan explicitly acknowledge the Air District's authority to regulate GHGs from sources under their jurisdiction.

Further, the Air District recommends that language throughout the Scoping Plan be strengthened to call out a definite and significant role for local air districts in developing rules limiting GHG emissions at stationary sources. Local air districts have decades of experience regulating, permitting and inspecting stationary

sources, and have critical expertise in identifying opportunities for emission reductions. Local rules can complement, reinforce and backstop State regulations and programs. The Air District looks forward to a continued partnership with ARB in rule-making and other efforts to reduce GHG emissions.

Refinery Rulemaking

As you know, the Air District is in the process of developing proposed rules that will further reduce criteria, toxic and GHG emissions from the Bay Area's five refineries. The Air District believes that the Scoping Plan should recognize these efforts as an example of how to achieve emission reductions from some of California's largest stationary sources. The Air District recommends that ARB and the California Air Pollution Control Officer's Association (CAPCOA) work together through an industrial source action committee to develop and implement comprehensive regulatory solutions.

Modify Local Plan-level Greenhouse Gas Reduction Goals

The recommended community-wide goals for local climate action plans of six metric tons CO₂e by 2030 and two metric tons CO₂e by 2050 were calculated by dividing the entire projected statewide 2030 GHG inventory by the projected 2030 statewide population. Although this method is a good overall target for the State, it does not adequately capture the diversity of local planning efforts and could minimize the urgency for local governments to include aggressive reduction strategies in their local climate action plans. Many major sources of GHG emissions that are included in the statewide GHG inventory are typically not included in local climate action plans (e.g., large stationary sources, marine vessels and aircraft, vehicles passing through but not stopping in a jurisdiction). As a result, a local jurisdiction could demonstrate that its climate action plan meets these per capita targets, but in reality would be excluding a significant portion of emissions sources from its calculation.

Air District staff recommends that the Scoping Plan Update include some "guiding principles" for local governments to consider for achieving GHG reduction targets when developing their climate action plans. Such principles, when taken in total, could provide more comprehensive guidance on how local jurisdictions should address GHG reductions in their local plans. We recommend that such principles include: 1) robust, aggressive quantitative targets, 2) emphasizing mandatory measures over voluntary measures, and 3) including measures that support the Governor's "5 Pillars" and other key state climate action goals.

This "guiding principles" approach may also be helpful to local governments for CEQA purposes. By emphasizing robust and mandatory measures to support the State's goals and policies, this approach would be similar in concept to a local jurisdiction implementing "all feasible" measures for discretionary projects. A local jurisdiction could thus prepare a CEQA analysis based on a list of all feasible

performance measures they choose to implement to demonstrate they are meeting the statewide climate goals.

Address Near-term Challenges to 100 Percent Electric Vehicle Sales

The Air District is pleased to see the Scoping Plan Update advocate for 100 percent sales of electric vehicles. However, we recommend the Plan address more fully the potential barriers to achieving such a goal. For example, pursuing a 100 percent sales goal for electric vehicles will require a significant increase in public charging infrastructure, incentives for deployment, support for the development of enhanced-range battery technology, persuading automobile manufacturers to bring more zero electric vehicles to market, and public education campaigns to increase consumer demand.

In addition to the above challenges, it is imperative that efforts to electrify all new passenger vehicles are synchronized with the shifting of power generation to renewable energy sources. The Air District encourages ARB as well as the California Energy Commission to take further actions to incentivize investments in solar, wind and other renewable energy sources to add capacity for increased demand and to meet its 50 percent Renewable Portfolio Standard goal by 2030.

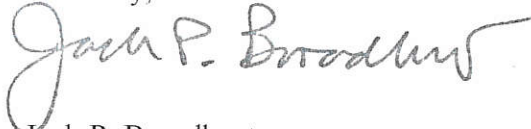
Include Public Health in Economic Analysis

Improving public health throughout the Bay Area is the cornerstone of the Air District's mission. In California, increasing temperatures due to climate change have resulted in more severe droughts, floods, extreme heat and longer wildfire seasons that exacerbate the State's existing public health challenges. Many of the GHG mitigation measures in the Scoping Plan Update will have the added benefit of reducing air pollutants (e.g., ozone precursors and PM_{2.5}) that are harmful to human health. The economic analysis included in the Scoping Plan Update does not include an assessment of the impacts of the Plan on public health. While there is a discussion of the social cost of carbon that is avoided due to the Plan's GHG mitigation measures, this discussion does not capture the public health co-benefits of the Plan. An economic analysis that does not include health care costs and benefits results in an incomplete picture of the true costs and benefits of implementing the Scoping Plan Update.

In conclusion, the Air District commends ARB for creating an excellent framework to achieve the State's long-term greenhouse gas reduction goals. We greatly appreciate the acknowledgment that regional and local governments will be necessary partners in this effort and are influenced by policies set forth by ARB. California has been a pioneer in leading greenhouse gas reduction efforts, and lacking national leadership, will continue to be looked upon as a foremost leader in meeting this unprecedented challenge. We look forward to working in partnership with ARB as we implement the Air District's 2017 Clean Air Plan, which is intended to complement and help achieve the Scoping Plan's goals as well.

Air District staff is available to assist ARB in addressing these comments. For more information or if you have any questions, please contact Henry Hilken, Director of Planning and Climate Protection, at (415) 749-4642 or via email at hhilken@baaqmd.gov.

Sincerely,

A handwritten signature in black ink that reads "Jack P. Broadbent". The signature is written in a cursive style with a large initial "J".

Jack P. Broadbent
Executive Officer/APCO

cc: Board of Directors, BAAQMD