Valley Clean Air Now Comments on the
Aliso Canyon Methane Leak Climate Impacts Mitigation Program

Thank you for the opportunity to comment on the Aliso Canyon Methane Leak Climate Impacts Mitigation Program (referred to below as Draft Plan).

Valley Clean Air Now (Valley CAN) strongly supports the overall direction and proposed framework for this proposed mitigation plan and its targeting of both direct reductions of methane and other Short-Lived Climate Pollutants (SLCP) as well as related co-benefits, as summarized on Page 8 of the Draft Plan:

> Specifically, the program should prioritize or otherwise encourage emission-reduction projects that:
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> - Involve substantial direct and indirect reductions in emissions of SLCPs, especially methane;
> - Enhance the sustainability of the State's energy infrastructure, by decreasing reliance on fossil fuels or otherwise;
> - Address the interests of disadvantaged California communities and communities directly impacted by the leak; or
> - Provide other significant and demonstrable environmental, economic, and public health co-benefits.
> - These additional factors reflect priorities, rather than essential elements. Not every project would have to fulfill each of these additional criteria to be eligible for inclusion within the Aliso Canyon mitigation program. That said, projects that satisfy one or more of these criteria would represent especially attractive candidates for inclusion within the program.

In addition, we support these statements:

> Serve valuable complementary roles by producing near-term emissions reductions, yielding co-benefits of their own, including in communities most directly affected by the Aliso Canyon leak, and ensuring the realization of other programmatic objectives.

As well as:

> Affected communities may represent optimal settings for pilot programs or other investments that will contribute toward a more sustainable energy infrastructure.

Valley Clean Air Now (Valley CAN) believes that the approach outlined in the Draft Plan creates the opportunity to build an organizing program in CalEnviroScreen 2.0-designated disadvantaged communities throughout the affected region to deliver community-level projects with quantifiable methane and SLCP reductions as well as associated criteria pollutant and public health co-benefits. Valley CAN feels that the Draft Plan creates ideal conditions for effective pilots in disadvantaged communities to reduce GHGs including SLCP as well as maximize criteria pollutant emissions and public health benefits.

Valley CAN requests that staff give serious consideration to including a program category to target high-emitting vehicles in disadvantaged communities. We believe that a program to reduce or eliminate emissions by repairing and retiring high-emitting, likely unregistered older vehicles in disadvantaged communities fits well within CARB's stated strategy in the Draft Plan of creating quantifiable reductions in STCP quickly, with the opportunity to create related co-benefits with criteria pollutant reductions and public health:

> Program should prioritize or otherwise encourage emission-reduction projects that:
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> - Generating significant environmental and economic co-benefits, including benefits to public health and reduced reliance on fossil fuels;
> - Conferring co-benefits upon disadvantaged communities and communities directly impacted by the leak, and incorporating avenues for engagement by these communities in the program development and implementation process;
> - Facilitating participation by other stakeholders, with the public being given the opportunity to provide meaningful input toward the program's ongoing process,
> - Allowing for ongoing monitoring and verification of program implementation and progress.
> - An inclusive program development process being followed by a well-supervised and transparent implementation phase

<u>Background</u>

Valley CAN is a 501c3 focused on quantifiable and unique emissions reductions in the San Joaquin Valley. We manage the GGRF-funded Enhanced Fleet Modernization Program Plus-Up on behalf of the San Joaquin Valley Air Pollution Control District and CARB.

Valley CAN serves 12,000 customers annually at 26 Tune In & Tune Up smog repair events throughout the San Joaquin Valley. 94% of Tune In & Tune Up customers live in disadvantaged communities as defined by CalEnviroScreen 2.0, with a vast majority residing in low-income households. 45% of vehicles at Tune In & Tune Up events are unregistered, many of which have driven 10,000 miles or more since their registration expired and 25,000 miles since passing their last smog check.

Tune In & Tune Up continues to be driven by the support and the input of community stakeholders. Our outreach and organizing is a continual collaboration with nearly 100 community-based organizations throughout the San Joaquin Valley. These organizations participate directly in operating the event, with dozens of members helping with directing traffic, translating, and preparing and serving lunch for customers. The program would not be successful without the deep input from diverse communities that we have incorporated into the program process.

Emissions Reduction Opportunities

Valley CAN has long believed, and has confirmed with our program results, that older vehicles in disadvantaged community census tracts are a disproportionate air quality impact within these overimpacted areas. Specifically, vehicles older than 1996 registered within a disadvantaged community ZIP code are a significant but under-reported emissions problem throughout the San Joaquin Valley and Southern California. These two regions are likely home to more of these vehicles than any other part of the U.S.

The opportunity for the Draft Plan is that a significant percentage of these vehicles are unregistered and thus are outside of the state's air quality models. Reducing emissions from these dirtiest vehicles is additional and unique.

The bulk of the emissions from gross polluting vehicles are the criteria pollutants NOx, HC, and CO. However, the State Implementation Plan shows higher-than-statewide-average emission levels for CH4, SOx, ROG, NO, and PM from pre-1996 vehicles.

In addition to the emissions modelled in the SIP, it is reasonable to assume that these older vehicles are among the most likely to have leaks and/or failure of the Freon system. According to the United Nations Environment Programme, Mobile Air Conditioning is the second largest source of hydrofluorocarbon (HFC) emissions at 24%, representing a full half of the total of Residential, Commercial & Industrial Air Conditioning & Refrigeration HFC emissions at 47%.

Given the high rate of unregistered vehicles within this category, it is difficult to estimate the true extent of the problem. However, rough estimates can be done with existing numbers:

- 2.8MM pre-1996 vehicles in California
    - 1.6MM in San Joaquin Valley and greater LA area
    - 20% of these older cars are likely high emitters
    - 20+% are likely unregistered
- Therefore, there are roughly 320,000 "problem" cars on the road in the San Joaquin Valley and greater LA area that are a priority to repair, retire or replace.

Solution

In keeping with a strategy that is very well presented in the Draft Plan:

> Projects in this sphere would sponsor or otherwise promote enhanced energy-efficiency measures and the targeted replacement of fossil fuels with renewable energy resources, especially in the transportation, commercial, and residential sectors. These projects could include incentive programs, sponsored infrastructure installations, equipment purchases, and other efforts to promote the adoption and utilization of less energy-intensive systems and devices, including those powered by renewable energy resources. Projects within this category could have several co-benefits, among them, reducing reliance on gas storage by reducing peak gas and electric demand in communities that have historically relied on the Aliso Canyon storage facility.
>
> These projects also could produce transformative benefits either by auditioning new technologies and processes, or by placing emission-reducing innovations on more secure footing. In addition, while mitigation projects in the agriculture and waste sectors may take time to start generating emission reductions, projects designed to enhance energy efficiency could yield returns more quickly, thereby ensuring continuing momentum for the mitigation program.

Valley CAN believes that the expansion of a community-based program to repair, retire or replace the highest emitting vehicles in the most severely disadvantaged areas with the worst air quality in the nation would be among the fastest and most cost-effective means of building a delivery network within disadvantaged communities while achieving quantifiable and additional STCP and criteria pollutant reductions.

Creating a consistent pipeline of these older high-emitting vehicles will require continuous community organizing in disadvantaged communities that are most likely to have these high-emitting older vehicles. These targeted residents could attend a series of events within their region where qualified low-income motorists are offered a complete set of smog solutions:

- Smog repairs
- Vehicle retirement
- Vehicle replacement (via EFMP and EFMP Plus-Up)
- Additional energy efficiency, health care, carbon reduction programs can be offered by disadvantaged community benefit providers

Community Co-Benefits

The initial organizing for the vehicle program could expand scope to deliver additional neighborhood- and household level programs including:

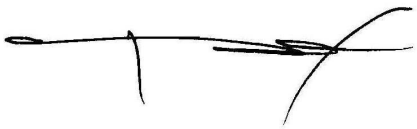
- Appliance retrofit and replacement
- Other residential and commercial energy-efficiency programs
- Vehicle replacement, including individual or fleets
- Gas network and appliance safety upgrades
- Sustainable transportation infrastructure
- Coordination with all other federal, state, local, and regional utility disadvantaged community and low-income assistance programs, in order to deliver the broadest potential benefits to qualified households.

Geographic Target

The greater LA area and the San Joaquin Valley have a disproportionate percentage of the older, likely high-emitting cars in the nation. SoCalGas has service territory in both of these air basins, which share the worst air quality in the U.S., so it could make sense to include at least the southern San Joaquin Valley as well as the greater L.A. area.

Thank you again for the opportunity to provide comments. Please don't hesitate to contact me if you need any additional information.

Sincerely,



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