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**INTERIM
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Connect with the
Bay Area Air District:



December 12, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comment Letter on Final 2022 Scoping Plan Update

Dear Chair Randolph:

I am writing to provide comments from the Bay Area Air Quality Management District (Air District) on the Final 2022 Scoping Plan Update (Final Plan). We commend you and your staff for developing a statewide Scoping Plan that sets a new, bold standard for leadership on climate protection while also addressing important local health risks.

In this Final Plan, the California Air Resources Board (CARB) has addressed important issues and concerns raised by the Air District and the broader community, including stronger targets for emission reductions, a continued commitment to achieving community health protections and environmental justice, a focus on key action areas, and clear guidance to local governments for achieving the state's long-term targets.

Stronger Targets

In order to ensure the state is on track to achieve carbon neutrality by 2045, the Final Plan includes important new targets, including an accelerated 2030 emissions reduction target (48% compared to 40% below 1990 levels in the original plan), and a direct greenhouse gas (GHG) emissions reduction target of at least 85% below 1990 levels by 2045. These targets are important because they ensure that the carbon neutrality target will largely be achieved through direct GHG emission reductions. In addition, they help illuminate the role of Cap-and-Trade in meeting the 2030 target, especially when partnered with the caveat that "as the actual reductions from non-Cap-and-Trade Program measures increase, California will be less reliant on the Cap-and-Trade Program to "fill the gap" to meet an accelerated 2030 reduction target."

Community Protection/Environmental Justice

The Air District acknowledges CARB's commitment to ongoing engagement with the Environmental Justice Advisory Committee. Such engagement is essential to ensuring that environmental justice and racial equity are prioritized and that the health and economic benefits of the Final Plan are maximized for all residents, especially those in overburdened communities. The analysis of projected household economic impacts resulting from plan implementation by income level and race/ethnicity underscore the importance of this work. As a local agency with strong connections to EJ organizations and leaders, we look forward to working with CARB staff as they engage with EJ organizations on implementation of the Final Plan.

The Final Plan includes a Carbon Capture, Removal, Utilization, and Storage (CCUS) Program to evaluate and regulate CCUS and carbon dioxide removal projects in a manner that addresses equity concerns. The program includes a multi-stakeholder process to inform carbon capture and storage (CCS) rule-making, that includes community residents and tribes “to further understand and address community concerns related to CCS.” It will be important for local air districts to work with CARB to ensure that facilities considering adopting CCS first minimize their GHG and local air pollutant emissions, to protect public health and local air quality.

Key Action Areas

The Air District supports the Final Plan’s emphasis on action in several key areas - energy and building decarbonization and reduction in vehicle miles traveled (VMT). The Final Plan calls for no new fossil gas-powered plants to meet increased demand for electricity. The increased electricity demand will be met in part through aggressive interim targets for renewable and zero-carbon resources for electricity. The Final Plan also includes targets for 3 million all-electric and electric-ready homes by 2030 and 7 million by 2035, with strong analysis of associated household economic impacts by income level and race/ethnicity.

The Air District also supports the Final Plan’s comprehensive approach to reducing emissions from the transportation sector, particularly the more aggressive targets to reduce VMT per capita. Rigorous VMT reduction combines with an increase in stringency of the Low Carbon Fuel Standard, acceleration of refinery transition to non-fossil feedstocks, and prioritization of electric vehicle (EV) infrastructure to demonstrate a life-cycle approach to reducing transportation sector emissions.

Local Action

Many of these priority action areas are reinforced by the strategies outlined in Appendix D Local Actions. This appendix includes an expanded list of strongly recommended actions for jurisdictions to include in local plans, including three “priority key actions” that are performance-based and align well with the guidance the Air District provides to local governments. Appendix D also includes a robust discussion on the key issues and challenges local governments face when setting appropriate local targets for achieving GHG reductions that support the state’s long-term targets. While it does not call out specific quantitative targets for local governments to use in local plans, it does identify the most important challenges to target-setting and provides very helpful guidance.

As attention now pivots towards implementation of the Final Plan, the Air District looks forward to working with CARB to accelerate deployment of direct emissions reduction strategies that reduce harmful air pollution, particularly in overburdened communities, and lessen the reliance on CCS and CDR to achieve the state’s carbon reduction goals. Similarly, we agree with the Final Plan’s assertion that the state “must avoid making choices that will lead to stranded assets and incorporate new technologies that emerge over time.” The Final Plan also references potential use of the Community Vulnerability Metric (CVM) to guide funding and resource decisions in implementation to help increase communities’ resilience to climate impacts. It is an impressive analytical tool to help quantify community-level impacts of climate change on human welfare. The Air District welcomes the opportunity to participate in discussions and further development of the CVM as the state considers whether and how the tool may be used to inform resource and funding decisions.

The Air District appreciates the hard work of CARB staff to address so many of the comments received from the Air District and other stakeholders. This work has resulted in a ground-breaking statewide roadmap to carbon neutrality. We welcome the opportunity to collaborate with CARB and other agencies on implementing the Final Plan to realize a safer, more just, and healthier future for all Californians.

For any questions regarding our comments, please contact Jamesine Rogers Gibson, Senior Advanced Projects Advisor, at jrogersgibson@baaqmd.gov or Sally Newman, Senior Air Quality Specialist, at snewman@baaqmd.gov.

Sincerely,

A handwritten signature in blue ink that reads "Sharon L. Landers". The signature is fluid and cursive, with the first name "Sharon" and last name "Landers" clearly legible.

Sharon L. Landers
Interim Executive Officer/APCO

Cc: Yana Garcia, Secretary, California Environmental Protection Agency
Lauren Sanchez, Senior Climate Advisor, Office of Governor Newsom
Steven Cliff, Executive Officer, California Air Resources Board
John J. Bauters, Chair, Board of Directors, Bay Area Air Quality Management District
Davina Hurt, Vice-Chair, Board of Directors, Bay Area Air Quality Management District
Teresa Barrett, Secretary, Board of Directors, Bay Area Air Quality Management District
Therese McMillan, Executive Director, Association of Bay Area Governments and Metropolitan Transportation Commission