



March 24, 2016

Mr. Richard Corey  
Executive Officer  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Development of the Aliso Canyon Climate Impacts Mitigation Program

Dear Mr. Corey:

The Placer County Air Pollution Control District (District) is pleased to provide these comments and recommendations on the Air Resources Board's (ARB) Aliso Canyon Climate Mitigation Program Draft Plan (Draft Plan).

The leak at Southern California Gas' (SoCalGas) Aliso Canyon natural gas storage facility resulted in the release of over 94,500 tons of methane, resulting in significant local and regional health impacts. Also, as a powerful short lived climate pollutant (SLCP), the methane emissions resulting from the leak resulted in significant greenhouse gas (GHG) emissions that impact the entire state. The District is pleased to see that SoCalGas has pledged to fully mitigate the impacts of the leak event, and we strongly support Governor Brown's emergency proclamation of January 2016 that directs ARB to develop a plan to fully mitigate the impacts of the leak.

In reviewing the Draft Plan, ARB has indicated that it will take a portfolio approach to identifying appropriate mitigation strategies. We agree that such an approach which incorporates an "all of the above" strategy makes the most sense to address the sheer magnitude of mitigation reductions needed. Any mitigation activities and projects should receive funding in an equitable and transparent manner, and supported projects should meet several core principles, including a focus on SLCPs that are additional to existing state programs. Other relevant factors should include co-benefits to air quality and criteria pollutant emissions, water supply and quality, as well as other environmental and societal benefits. We recognize that appropriate consideration should be given to affected and economically disadvantaged communities in southern California, as identified through the California Environmental Protection Agency's CalEnviroScreen Version 2.0 (CalEnviroScreen). However, ARB must also recognize the statewide nature of GHG emissions and climate impacts, and that the Aliso Canyon leak will result in impacts beyond just southern California. As such, the District believes that the opportunity for mitigation should include projects in other regions of the state, especially those that will benefit the many economically disadvantaged rural communities throughout the state that are not identified in CalEnviroScreen.

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While we support the development and implementation of a statewide mitigation plan that includes SLCPs, the District is concerned that the focus of the potential mitigation measures identified in the Draft Plan only targets methane emission reduction projects, especially those relating to the agricultural and waste sectors. In only including such project types, ARB is losing a tremendous opportunity to invest in projects that can reduce other SLCPs and provide even greater GHG benefits relative to a methane only approach. For example, black carbon is a SLCP with a global warming potential that is more than 30 times that of methane.

Considering this, the District recommends and requests that any final mitigation plan proposed by ARB staff appropriately recognize the opportunities for non-methane SLCP projects in California's Sierra Nevada forests which are at risk for catastrophic wildfire. In particular, this includes projects that directly reduce black carbon emissions such as woodstove replacement programs, forest biomass projects which reduce open burning, forest resiliency projects that reduce the significant impacts of wildfires, and bioenergy and biogas production. All of these projects have the potential to significantly reduce black carbon and/or carbon dioxide emissions, and have the potential to do so in a much more cost effective manner than exclusively implementing methane reduction projects in the agriculture and waste sectors. These projects also provide significant co-benefits, including protection of our critical upper watersheds to enhance water quality and quantity, reducing criteria and air toxic emissions, protecting human health, providing real economic benefits to rural communities, and protecting wildlife habitat and community and electrical transmission infrastructure.

Finally, the District supports the South Coast Air Quality Management District's request that the mitigation impact analysis consider several factors, including: (1) quantifying the GHG emission impacts by valuing methane using its 20 year global warming potential, (2) the byproduct formation of ground level ozone from the methane release, and (3) the global warming potential of the byproduct ozone.

Thank you again for the opportunity to comment on the Draft Plan. We look forward to working with you on the development of a final mitigation plan. If you have any questions, or wish to discuss the District's comments further, please do not hesitate to contact me at (530) 745-2330.

Sincerely,



Christa Darlington

District Counsel, Placer County Air Pollution Control District

cc:

Erik White, Air Pollution Control Officer, Placer County Air Pollution Control District

Jill Whynot, Assistant Deputy Executive Officer, South Coast Air Quality Management District

Alan Abbs, Executive Director, California Air Pollution Control Officers Association