

May 26, 2016

Chairman Mary D. Nichols and Executive Officer Richard Corey
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Short-Lived Climate Pollutant Reduction Strategy

Dear Chairman Nichols and Executive Officer Corey:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Proposed Short-Lived Climate Pollutant Reduction Strategy.

ARCCA is a network of existing regional collaboratives from across California. ARCCA's members represent leading regional collaboratives that are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region's most innovative and successful strategies; and determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships.

We would like to sincerely thank the Air Resources Board for developing a comprehensive strategy to reduce short-lived climate pollutants (SLCP) to help mitigate and adapt to climate change. We appreciate that the strategy recognizes the importance of pursuing actions and measures that curb emissions of SLCPs and maximize co-benefits, such as improved air and water quality, public health benefits, wildfire risk reduction, soil resilience, water conservation, job creation, and economic growth. We also appreciate that the Air Resources Board underscores the importance of integrating the strategy with ongoing local, regional and statewide planning efforts, and encourages coordination and collaboration among agencies at all levels of government, and across sectors, systems, and jurisdictions. To realize success, we offer a few broad recommendations that we believe will help strengthen the strategy.

1. **Put greater emphasis on forest resiliency and wildfire risk reduction** given that wildfires account for two-thirds of the state's black carbon emissions in a typical year, and prolonged drought and rising temperatures can exacerbate the frequency, severity and damages of wildfires across the state. In addition to decreasing the likelihood of emitting great amounts of black carbon, improved forest management

creates an array of benefits from protecting the homes and livelihoods of Californians in rural forested lands to preventing negative health and economic implications from the effects of wildfire smoke in urban areas. Incentivized sustainable biomass energy production, forest thinning, and fuel treatment should be included as more prominent and impactful measures in the Proposed Strategy.

2. **Improve monitoring of oil and gas methane emissions** in light of the Aliso Canyon well failure and subsequent methane release. We appreciate that the Proposed Strategy recognizes the importance of adopting and implementing GHG emission standards for oil and gas facilities regulation and improving monitoring to detect and minimize emissions. We recommend that the Air Resources Board coordinate more intentionally with the Public Utilities Commission and California's Investor Owned Utilities to encourage less reliance on natural gas during peak hours and to improve monitoring at all storage fields. Given that about 90 percent of California's natural gas is imported, we recommend that the State work closely with exporting states to ensure safe transport and storage with minimal leakage.
3. **Develop solutions to help prevent an increase in agricultural burning** in light of the closures of bioenergy facilities. The Proposed Strategy does not include any additional measures to prevent a potential increase in agricultural burning. If new community-scale bioenergy facilities are located near high-hazard forests, as suggested by Governor Brown's emergency proclamation E35 553, it would be costly for agricultural waste to be transported to facilities from the Central Valley. The transport would also result in additional vehicle emissions. Therefore, creating incentives or developing a streamlined system for transport that reduces vehicle miles traveled would help improve this strategy and avoid unintended consequences.
4. **Develop a coordinated statewide outreach strategy** to encourage thoughtful behavior change to reduce SLCPs. In many ways, the Proposed Strategy focuses on creating markets and developing standards to drive change, which requires substantial funding and capacity building to implement and enforce. We believe it is important to not overlook the impact of education and outreach for residents and businesses, particularly to eliminate the disposal of organics in landfills and to encourage woodstove conversion. A coordinated behavior change campaign can also lead to a substantial shift in consumption and demand, and can help reduce the emission of SLCPs from energy sources, appliances, and the dairy and livestock industry. We encourage the Air Resources Board to implement a coordinated outreach strategy through increased public-private partnerships and in collaboration with community-based organizations as a cost-effective strategy to encourage sustainable behavior change.

We hope these comments are helpful to your efforts, and welcome the opportunity to provide additional clarification or support development of specific language as desired.

Sincerely,



Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative



Allison Wood
ARCCA Vice-Chair
San Diego Regional Climate Collaborative