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Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

May 26, 2016

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

Dear *Richard* Mr. Corey:

Thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Short-Lived Climate Pollutant Strategy (Strategy). Bay Area Air Quality Management District (Air District) staff has followed the development of the Strategy, including numerous communications with ARB staff, over the past two years. We commend the leadership ARB has taken in developing this comprehensive Strategy, particularly as it reflects and supports important priorities and approaches of the Air District. As the Strategy makes abundantly clear, addressing emissions of short-lived climate pollutants (SLCPs) in the near-term is critical to our efforts to avoid catastrophic climate change. We support the Strategy and look forward to working with ARB in implementing this important document.

There has been a tremendous amount of progress in the Bay Area and throughout California in reducing levels of black carbon, an important SLCP, largely due to the concerted efforts of ARB and the Air District. Our work in collaboration with ARB to reduce emissions of particulate matter and black carbon from diesel engines through early adoption and enforcement of ARB regulations, as well as grants and incentives, has had a beneficial impact not only on reducing emissions of SLCPs, but on improving the air quality of communities most impacted by particulate and air toxics emissions. In addition to black carbon, the Air District has also worked with ARB to enforce ARB's regulations under AB 32 to limit methane from landfills and hydrofluorocarbon (HFC) emissions from refrigeration systems and semiconductor manufacturing.

Currently, the Air District is developing its 2016 Bay Area Clean Air Plan and Regional Climate Protection Strategy (2016 Plan). The 2016 Plan focuses on two goals – to protect public health and the global climate. In addition to reducing local and regional pollutants and air toxics, the 2016 Plan will reflect the Air District's efforts to facilitate positioning the Bay Area on a course for meeting the Air District's long-term goal of reducing greenhouse gas (GHG) emissions 80% below 1990 levels by 2050. The 2016 Plan reflects the same economic sector-based framework upon which ARB's first Scoping Plan Update (2014) was structured. To ensure a high level of consistency with the Scoping Plan Update, Air District staff has worked in close communication with ARB staff throughout our planning process. ARB staff and staff from many other state agencies have participated in meetings, working groups, and as subject matter experts that have assisted in the

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development of the 2016 Plan. One key objective of the 2016 Plan is to aggressively reduce emissions of short-lived climate pollutants.

Throughout the Strategy, ARB affirms the importance of working with local air districts to implement the Strategy. We are pleased to see this approach, and agree that many of the objectives of the Strategy will best be achieved through partnerships and collaboration. Current collaborations between the Air District and ARB and other state agencies are critical to the successful implementation of both ARB's Strategy and the Air District's 2016 Plan. For example, the Air District is currently working with ARB in the development of the Oil & Natural Gas Production, Processing and Storage regulation, and with both ARB and the California Public Utilities Commission (CPUC) to develop rule-making to reduce methane emissions from leaks in the natural gas transmission, distribution and storage systems.

In addition, many efforts outlined in the Strategy to reduce emissions of SLCPs will best be accomplished through collaborations with air districts, and with regional and local governments, including:

- restricting and diverting organic materials from landfills;
- encouraging ranchers and farmers to use compost amendments on rangelands and other open spaces to increase carbon sequestration and provide a beneficial use for animal and agricultural waste;
- providing usable biogas from wastewater treatment facilities for transportation uses and natural gas substitution;
- transforming animal waste from dairies into usable biogas; and
- continuing to restrict wood burning in existing homes and new developments.

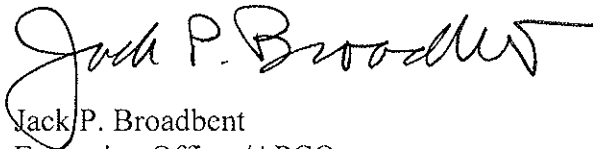
We also commend ARB for highlighting the need to advance the state of knowledge of SLCP sources and emissions. Studies indicate that current inventory methodologies tend to underestimate methane emissions from many sources. The Air District has been working through scientific collaborations and direct monitoring to improve the understanding of GHG emissions, particularly methane, in the Bay Area. This effort includes a fixed-site, four-station network to monitor ambient concentrations of CO<sub>2</sub> and methane, as well as a fully-equipped mobile GHG measurement research van. The data provided by this effort will be used to validate and improve the Air District's emissions inventory and understanding of methane sources, and to help evaluate the effectiveness of Air District measures to reduce methane emissions.

The Strategy uses a global warming potential (GWP) for methane of 28 over a 100-year timespan, referencing the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4), published in 2007. The IPCC released its Fifth Assessment Report (AR5) in 2013, including updated scientific research and conclusions about GWP values. While currently not as widely used, the IPCC recommends using the AR5 GWP values, as they reflect the best information on global warming potentials. The Air District is using the GWP values from AR5, which include a GWP for methane (including all feedback effects) of 34. We recommend that ARB also use GWPs from AR5 in the Strategy.

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The Strategy states, "State policy is most effective with the support, engagement, and complementary actions of regional and local efforts." Indeed, some of the greatest achievements in improving California's air quality have come through collaborations between ARB, air districts, and local governments. We believe it is through continuing this collaboration that we will achieve similar successes in the fight against climate change. My staff and I look forward to working with ARB to implement the Short-Lived Climate Pollutant Strategy, as one piece of a larger partnership in achieving California's and the Bay Area's long-term climate protection goals.

Sincerely,



Jack P. Broadbent  
Executive Officer/APCO

Cc: John Gioia, Air District and Air Resources Board Member