



Sonoma County Transportation Authority
Regional Climate Protection Authority

December 16, 2015

Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Sonoma County Regional Climate Protection Authority Comments on December 2016 Discussion Draft of the 2030 Target Scoping Plan

Dear Chair Nichols,

The Sonoma County Regional Climate Protection Authority (RCPA) appreciates the opportunity to comment on the 2030 Target Scoping Plan Discussion Draft. The RCPA supports and is deeply committed to implementing the State's goals to address climate change in California by reducing greenhouse gas (GHG) emissions. The RCPA is a multi-jurisdictional agency that was created to coordinate climate protection efforts across the ten local jurisdictions in Sonoma County, housed under the same Board as the Sonoma County Transportation Authority. Both agencies collaborate to implement our local Climate Action Plan, Plan Bay Area, the AB 32 Scoping Plan, and other initiatives to advance vibrant local communities.

We commend the ARB for acknowledging the essential role of local governments in implementing climate smart policy and infrastructure investments: "While State-level investments, policies, and actions play an important role in shaping growth and development patterns, regional and local governments and agencies are uniquely positioned to influence the future of the built environment and its associated GHG emissions."

The language regarding local government (beginning on page 102) provides helpful clarifications regarding climate action plan targets and the consideration of GHG impacts under CEQA. ***We suggest the State consider compliance with these expectations as a criterion to determine eligibility for (or priority access to) funding administered by State agencies.***

We also support the nine tenets of California's Approach to Addressing Climate Change (page 23-33) but see several issues associated with these aspirations:

- 1. The framework for disadvantaged communities excludes disadvantaged households and opportunities for innovation in geographies without communities qualified by CalEnviroScreen.**

The State should absolutely target large stationary sources that generate disproportionate GHGs and impacts to disadvantaged communities as proposed in the discussion draft and follow the recommendations of the EJAC. However, it is essential that GHG measures and funding to implement them are directed not just to the geographic areas identified as disadvantaged but also to program and policy models that enable disadvantaged individuals and households to benefit from the transition to a low-carbon economy.

Low to moderate income households and renters are rarely able to access the benefits of building retrofits or clean vehicle technologies due to lack of capital, lack of credit, lack of time, or lack of control of their property. Many local and regional governments are working hard to remove these and other barriers to participation for these Californians through program innovation. For example, the RCPA has worked to bring the Pay As You Save (PAYS) tariff based on-bill repayment model to California for exactly this reason: to make economically beneficial investments in GHG reductions accessible to everyone.

We suggest that any discretionary GHG funds not allocated directly to DACs should target innovation and implementation models that serve individuals currently excluded from the clean energy economy.

2. Despite a desire to implement win-win solutions, State Agencies are limited in their ability to invest in programs and projects that achieve co-benefits.

Local governments interact with and are funded by many state agencies in their work to implement Climate Action Plans and support achievement of the State's Scoping Plan, including the California Public Utilities Commission, the California Energy Commission, the Air Resources Board, the Department of Water Resources, Caltrans, the Department of Natural Resources and Conservation, and others. These agencies typically approve funding based on their individual scope. To achieve the State's ambitious goals for both mitigation and resilience, State agencies should evaluate projects and programs based on their ability to achieve multiple co-benefits.

We suggest that the Scoping Plan be more explicit about integrating co-benefits into State Agency implementation.

3. Regional and local governments and agencies are leaders in addressing climate change, but local staff and funding resources are not commensurate with the scale of the opportunities or State expectations.

The Draft articulates numerous critical actions that local governments can take to achieve more resilient communities, including those foundational investments in land use necessary for climate resilience and long term success in reducing vehicle miles traveled (VMT). As the State strives to provide a supportive framework for these local actions, it is important to be realistic about the number of objectives that local Boards and Councils, and planning, building, public works, and utility staff are juggling.

State efforts must be coupled with increased support to local communities to ensure that decision makers have sufficient information, staff support, and policy clarity to define locally appropriate, cost-effective solutions.

We suggest that the Scoping Plan increase the emphasis on guidance, tools, and funding directed at local and regional government, who provide the "boots on the ground" for Scoping Plan implementation.

The Regional Climate Protection Authority thanks the Air Resources Board and staff for its work and the opportunity to comment on the Discussion Draft.

Sincerely,



Suzanne Smith, Executive Director
Sonoma County Transportation Authority/Regional Climate Protection Authority