

April 10, 2017

SENT VIA E-MAIL

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: The 2017 Climate Change Scoping Plan Update

To Whom It May Concern:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the California Air Resources Board (CARB) for the opportunity to review the 2017 Climate Change Scoping Plan Update (Plan). We appreciate the Plan's thoughtful accommodation of discussion draft comments, including many of SMAQMD's, and we have follow-up comments. First, however, we would like to thank CARB for drafting an ambitious, comprehensive vision to help California maintain its leadership in climate action and reach its climate change goals.

Proposed Scenario

SMAQMD supports the Proposed Scenario, including the extension of the Cap-and-Trade Program beyond 2020 and additional control measures identified in the Plan. We believe that these actions will enable California to meet needed greenhouse gas (GHG) emissions reductions in a manner that provides maximum flexibility, clear targets, a range of co-benefits for California communities, and incentives for carbon storage projects throughout the United States. We also support the known commitments to transportation and transit that will help the Sacramento region meet its air quality and public health goals, including the Mobile Source Strategy and Advanced Clean Cars. Our agency will continue to regulate local emissions from permitted sources under Cap-and-Trade, ensuring that our mission to achieve state and federal clean air goals in Sacramento is aligned with the broader goal of attaining California's 2030 and 2050 climate goals.

Metrics

SMAQMD conceptually supports the recommended local plan-level GHG emissions goals of no more than six metric tons carbon dioxide equivalent (CO₂e) per capita by 2030

and no more than two metric tons CO₂e per capita by 2050 (p. 134). We further support the project-level recommendation that, absent conformity with an adequate geographically specific GHG reduction plan, all new land use development should implement all feasible measures to reduce GHG emissions (p. 136). We recommend that all feasible measures, in this context, are defined as measures sufficient to ensure no net increase in GHG emissions.

SMAQMD's letter on the December 2016 scoping plan discussion draft recommended mechanisms to provide flexibility for local jurisdictions in meeting targets. Local jurisdictions in California are very diverse, and in an optimal position to engage their communities to develop GHG reduction strategies most appropriate to their unique circumstances. A more regional approach to investments and programs could help achieve this flexibility, for example structuring delivery through metropolitan planning organizations (MPOs), and including a regional investment floor to ensure even geographic distribution.

Land Use

SMAQMD commends the reminder that contributions from policies and programs such as renewable energy and energy efficiency are helping to achieve the near-term 2020 target, but longer-term targets cannot be achieved without land use decisions that allow more efficient use and management of land and infrastructure (p. 134). Energy and fuel efficiency improvements are currently the most easily quantifiable methods to reduce GHG emissions, which could result in bias against using land use measures to reduce GHG emissions. We recommend that CARB provide further information quantifying the importance of land use in achieving long-term targets, and incorporate land use efficiency considerations into methodologies used to determine GHG reductions from land use. These efficiencies include "secondary" emissions from the transportation sector (cited p. 104), the energy and water efficiency of compact development, and reduced conversion of natural and working lands. Including these efficiencies could also help MPOs in meeting their Sustainable Communities Strategy targets.

Climate Adaptation

While the 2030 Scoping Plan rightly focuses on climate mitigation and planning for the State's 2030 and 2050 emissions targets, we recommend greater recognition of the climate adaptation benefits of the Plan's programs and strategies. We believe this recognition could effectively message the benefits of proposed strategies to inland and rural communities, who may not recognize the urgency of installing electric vehicles but do acknowledge the immediate threats to the health of their forests, watersheds, and agricultural lands. Further, emphasizing resilience and solutions to challenges that will affect Californians' everyday lives – extreme weather, drought, flooding, wildfires, air pollution, sea-level rise, clean water, and agricultural phenology – would support the

case for the Plan and related programs with local jurisdictions, decision makers, and the general public. These are tangible benefits that Californians can recognize and appreciate, while the benefits of programs and policies on methane emissions or hydrofluorocarbons are more abstract. **As heavy damage from recent winter storms and the severe five-year drought illustrate, the real human and financial costs of climate change are imminent.**

In particular, we recommend that the State prioritize adaptation considerations in programs for the Natural and Working Lands Action Plan, the Forest Carbon Plan, and the Healthy Soils Initiative. The carbon storage capacity of natural and working lands is directly related to their long-term resilience, which in turn supports the resilience of the entire state.

We recommend that the State make adaptation benefits a key consideration in funding and implementing carbon storage projects, for example by including it as an evaluation criterion for project applications and prioritization. Prioritizing projects that provide adaptation benefits, in addition to carbon storage, can help engage local communities in carbon storage activities. Examples of adaptation benefits could include storm protection (e.g. coastal wetlands or riverine floodwater storage), economic vitality (e.g. forest restoration projects), or increased water storage (e.g. meadow and rangeland compost applications). Prioritizing these projects would also open critical streams of funding for large-scale, landscape-level adaptation activities that deliver multiple benefits, in the current absence of adaptation funding.

Here are some specific sections where we recommend a deeper discussion of climate adaptation and its benefits:

- Transportation sector: Under potential additional actions, we believe that the last item, "Take into account the current and future impacts of climate change when planning, designing, building, operating, maintaining, and investing in State infrastructure," is requisite for California jurisdictions (p. 108). Failure to do so would result in higher lifecycle costs for the State, both financially and through GHG and criteria pollutant emissions, resulting from production and transport of pavement materials, construction and repair work, and greater travel inefficiencies due to detours and delays. Foreseeably, communities that must expend more money on road repairs would also have less to use on other climate mitigation and adaptation activities. Thus, we believe the state should elevate this from a "potential" action to a definite.
- Urban heat island (UHI) reduction: Mitigating the UHI effect is a clear win-win strategy for climate adaptation and mitigation. Climate adaptation collaboratives around the state, including in Los Angeles and the Greater Sacramento region,

have identified extreme heat as a key public health issue to address in the next few decades. We would welcome greater State technical assistance and funding to help determine UHI hotspots, set UHI reduction targets, and set supportive State policies and regulations.

- Climate Action through Local Planning (p. 133): We suggest including greater climate resilience as a co-benefit of local government action to reduce GHG emissions within their jurisdictions.

We also support California's continued engagement with the Governors' Climate and Forests Task Force. The Amazon and other tropical rainforests play a critical role in exchanging moisture and cooling the air, affecting rainfall patterns around the world; however, they are threatened by drought and deforestation. Deforestation would likely affect global climate systems and indirectly reduce precipitation in California and elsewhere¹. It is critical to recognize that California's climate adaptation efforts are tied to the interconnected global climate and weather systems, and not limited to state boundaries. California could play a catalyst role in avoiding tropical deforestation through its Cap-and-Trade system, by providing a stable funding stream necessary for the success of nascent REDD+ projects.

Conclusion

SMAQMD maintains that reducing GHG emissions in California presents a unique opportunity to achieve clean air, promote public health, and improve the resiliency of our communities. We thank you for your attention to our concerns. If you have questions about these comments, please contact Shelley Jiang at sjiang@airquality.org, or Molly Wright at mwright@airquality.org.

Sincerely,



Larry F. Greene
Executive Director
Sacramento Metropolitan Air Quality Management District

Cc: Paul Philley, Program Coordinator, SMAQMD

¹ <https://www.carbonbrief.org/deforestation-in-the-tropics-affects-climate-around-the-world-study-finds>