

July 8, 2016

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
Sacramento, CA

**RE: Scoping Plan 2030 – draft Concept Paper**

Dear Chair Nichols:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Draft 2030 Scoping Plan Concept Paper.

ARCCA is a network of existing regional collaboratives from across California. Our 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.

As reflected in our membership, which includes collaborations from both urban (San Diego, Los Angeles, Bay Area, Sacramento) and rural (Sierra) parts of the state, we are very interested in and appreciate the draft concept paper's focus on "caring for the whole" and the call for exploring local/regional target-setting to help achieve statewide goals. Communities are bound together at an intra-regional scale by shared geography and an inter-regional scale by mutual reliance on certain resources; so this concept paper's focus on common goals and assessment of impacts across regions and sectors is critical. We are all in this together – a \$2 trillion annual economy and the needs of nearly 40 million residents rely on the success of California's climate preparations and response.

We respect that the 2030 target concept paper is grounded in the "same science that informs the recent agreement reached in Paris by the 2015 Conference of Parties to the United Nations Framework Convention on Climate Change, aimed at keeping the global temperature rise below 2 degrees C." We note that there was also much discussion and

agreed intent to drive efforts to limit the temperature increase even further to 1.5 degrees Celsius above pre-industrial levels, a more conservative precaution against the worst impacts of a changing climate. This is an important perspective to consider as the state plans for the coming 15 years, as a faster pace of GHG reductions will likely be required.

We also support the draft concept paper’s call for coordinating among multiple state efforts to achieve greater cumulative impact. This can be achieved by incorporating appropriate portions of existing efforts/plans into the 2030 Scoping Plan, effectively knitting the different efforts together through the pieces of each that are transferable. Collaborative planning and efforts that cross sectoral boundaries deserve additional emphasis. For example, the transportation examples on pages 6 and 7 focus on multiple existing programs to improve mobility, but attention must be paid to how the transportation sector can also serve other objectives, such as incorporating cool pavements to reduce energy use and urban heat island, and the placement of distributed energy systems in transportation right of ways to help increase local renewable energy supply and also relieve development pressure on natural and working lands.

Similarly, we appreciate the emphasis on taking action that achieves multiple benefits. While reducing greenhouse gas (GHG) emissions may be the primary goal under AB 32, we can use climate mitigation activities to simultaneously improve public health and well-being, provide for economic growth, and improve environmental quality – all of which increases our overall resiliency as a state. To that end we encourage ARB not only to identify proactive programs and new opportunities for achieving goals, but also to identify and minimize barriers within sectors and programs that might discourage or disqualify broad participation. We should seize this opportunity to engage new constituencies and build support across more regions and sectors of the state so that we are all working together to minimize impacts and provide benefits to all Californians.

We also encourage the state to create a communication plan associated with the revised Scoping Plan and the GGRF spending that supports it, to better connect the benefits of the state’s climate policy (including Cap and Trade) with on the ground community benefit. The Federal American Recovery and Reinvestment Act (ARRA) required prominent signage indicating the source of funding for all projects, which were executed by multiple agencies and private parties. We encourage ARB to develop a similar approach for GGRF funding in California, to improve citizen awareness of the program and its impacts on local communities.

The 2030 Target Scoping Plan also provides an opportunity to highlight policies that will help California build a future that is both low carbon and climate resilient, and meet the

requirements of EO B-30-15. We suggest that ARB highlight the ways in which it is already considering climate impacts and preparedness in its pathway and policy development and identify additional areas for evaluation through the development of the Scoping Plan.

In addition to the overarching values expressed above, we offer the following more specific comments for your consideration:

### **Land Use/Transportation/Public Health**

We expect the Draft Scoping Plan to address the root issue of air quality and public health impacts from wildfire smoke – as an “upstream” measure to reduce emissions – including ways to measure the benefits and co-benefits that can be gained from investments in forest management, restoration and forest bio-products, both as a means of reducing wildfire risk and replacing practices that cause more harm to public health, such as open pile burning of slash or use of fossil fuels for energy and other products. [p. 10, *Improving Public Health*]

Each of the concepts discussed in the paper supports some expansion of the Sustainable Communities Strategies created as a result of SB375, whether they be “increased stringency,” “more ambitious targets” or “ambitious stringency.” We support the use of this existing policy and planning framework to continue to deliver GHG savings from the built environment, including buildings and transportation infrastructure. In fact, in regions where a COG or MPO is active, these organizations should be utilized as a partner to the state and the lead in convening regional stakeholders and identifying regional priorities for GHG reduction. Further, providing direct funding to MPOs/COGs to carryout regional/local GHG reduction projects through their local grant and funding programs is also recommended and has proven successful with CalTrans funding. However, the SCS concepts have been difficult to implement in suburban communities and have not been widely applied in rural communities, and many lack the support of a COG within which to execute these plans. We would also recommend consideration of the potential for “Rural Sustainable Communities Strategies” and, similarly, adjustments for suburban communities which could link to urban plans and be a focal point for incorporation of opportunities related to rural, natural and working lands.

We are encouraged that the draft plan recognizes public health and climate, and that as part of the Draft Scoping Plan, you will present a public health assessment that will discuss key statewide climate mitigation measures and their potential impacts on public health, especially co-benefits, such as reductions in criteria and toxic air contaminants. However, statewide mitigation measures need to consider implementation by cities and counties. The details and nuances in how this is done are critical in providing successful and meaningful

mitigation and resiliency while having a positive influence on the public's health. Local and regional government need to be included in this discussion, and provided with the necessary resources (funding) to do the actual work. Further data is also needed. Any grants or associated funding outcomes tied to Plan Implementation need to include funding to collect pre- and post-project data.

Land use and transportation all significantly impact public health. Individually, staff in the Planning sectors of land use and transportation is aware of this, but rarely are they engaging with their counterpart local Public Health Officer or Public Health Department. This was confirmed in a statewide survey and report, "Health in Planning Within California's Local Health Departments," dated September 29, 2015 and compiled as part of the California Wellness Plan Implementation. Public Health must be meaningfully engaged with land use and transportation planning, design, engineering and execution for health benefits (physical and mental), and environmental mitigation to be achieved. This must occur at the local, regional and state levels, and such a directive needs to be addressed in the Scoping Plan. This engagement and dialogue is very necessary in order to address impacts in a meaningful way, provide authentic resiliency, reduce GHG emissions, reach residents and communities of highest need, and to make the essential changes to the environment that are needed to support health.

The draft plan identifies the need for more infill and revitalization of urban core areas, land preservation policies and increasing habitat acreage protected or restored. Local governments need more incentives and infrastructure funding to advance infill development. Greenfield development is still cheaper and easier to develop, and there are not enough disincentives in place to discourage sprawl development. Many local jurisdictions are letting the market drive development, which literally means increased versus decreased VMT. With the loss of redevelopment funding, cities and counties need additional funding to advance infrastructure projects for higher density projects, and to reduce other costs to improve and advance reuse, particularly where transit and mixed uses are present or planned for. The draft scoping plan needs to address the importance and greater inclusion of urban forests, tree canopy, parks and greening. While emphasizing infill development and increased densities, livability in this type of development is declining. Livability directly impacts health (mental and physical) and a balance must exist. Urban greening also has many GHG reducing benefits and needs to be prioritized as a necessary component of infill development. Many of the action items in the Safeguarding California Implementation Action Plan-Public Health Section and others should be incorporated into the Scoping Plan for complimentary implementation. Similarly, outcomes

from the Regional Transportation Plan Guidelines update (currently underway) should also be included in this Scoping Plan.

Further, more emphasis needs to be placed on local/regional jurisdictions adopting complete street policies and retrofitting existing corridors with safer bicycle and pedestrian facilities. Mandatory complete street policies for urban/suburban areas will help achieve multiple goals with many co-benefits. The auto industry is addressing safety for its drivers and passengers (i.e. Volvo promises deathproof cars by 2020), pedestrians and bicyclists need equal attention and protection. CalTrans is developing the first-ever California State Bicycle and Pedestrian Plan, which will be a visionary and comprehensive policy plan to support active modes of transportation and to increase safe bicycling and walking in California. This document should be supported by the Scoping Plan and integrated with other compatible state efforts so similar goals are achieved, we provide consistency throughout all the documents, we coordinate efforts for desired outcomes, and we utilize funding to achieve mutual goals and ensure successful implementation.

We are glad to see the attention given to the transportation sector. We would recommend more near-term GHG reduction benefits by also including renewable diesel. Regional and local governments are able to access renewable diesel today with immediate benefits achieved without expensive engine or infrastructure modification, or purchasing new trucks. With greater access to and utilization of renewable diesel, pricing will be reduced and usage increased – resulting in immediate and significant GHG emission reductions.

### **Natural and Working Lands**

We heartily agree that California needs a natural and working lands carbon inventory and agreed-upon method of accounting for GHG emissions, emission reductions, and carbon storage. We urge ARB to: a.) prioritize and work quickly to find a reasonable methodology that can be improved over time as we collect more data, and b.) ensure that GHG/carbon accounting in this sector is not held to a higher standard than accounting for other sectors, such as High Speed Rail or urban forestry/urban greening. We can adopt a methodology now that will allow us to estimate and compare emission and carbon storage outcomes, and then build monitoring into those projects for use in groundtruthing results and adjusting the accounting protocols. This way we can start achieving GHG, public health, economic and other important benefits while using actual projects to help improve the accounting methodology. [pp. 5-6, *Progress*]

After hearing an informational presentation by Strategic Growth Council staff about the carbon mapping project with UC Berkeley's Lawrence Livermore Labs, ARCCA is

encouraged that the rural forest sector may be approaching an evaluation system similar to that used by CalFIRE in its urban forestry program. That program uses data extrapolated from six reference cities to determine estimated carbon storage and biomass content for new urban forestry projects. CalFIRE operates eight Demonstration State Forests representing the most common forest types in the state. If data from these two sources can be brought together, perhaps that can lead us to a near-term workable evaluation system for rural forest projects, as well. Other sectors use proxies for evaluating benefits, such as avoided conversion for Sustainable Agricultural Land Conservation (even though there's no way of ensuring those lands would have been converted to more carbon-intensive uses) or estimated VMT reductions from compact development or active transportation projects (even though there is no guarantee that people living in more compact communities would actually drive fewer miles). Rural forest projects ought to be allowed similar flexibility in how they prove their emission reductions and carbon storage benefits over time. [pp. 12-13, *Relying on Sound Science and Research*]

In addition, the science around carbon sequestration in tidal saltwater wetlands is clear: these habitats sequester large amounts of carbon, while also providing adaptive capacity to shoreline communities. Investments should be made up and down the coast of California in large-scale restoration of tidal wetlands. The sooner these projects are implemented, the sooner the restored habitats can evolve into mature, vegetated marshes that are more resilient to sea level rise while also sequestering carbon. Estimates of carbon sequestered by restored tidal wetlands can easily be made now, and monitoring of implemented projects can improve and fine tune the accounting methodology.”

### **Environmental Justice/Disadvantaged Communities**

We understand the rationale and obvious need to focus resources on the state's most disadvantaged communities, and we encourage ARB to look beyond just those disadvantaged communities identified by CalEnviroScreen (CES) to ensure that GHG reductions and co-benefits are felt by disadvantaged people throughout the state. One approach could be to maintain CES for urban areas and complement that with a companion mechanism, similar to what the Strategic Growth Council has done in its Affordable Housing Sustainable Communities Rural Innovation Project Areas (RIPA) program, that provides a certain amount of funding to underserved portions of the state not captured by the CES Disadvantaged Communities definition. Directing funds to such a program would serve as a “floor” to ensure a minimum amount of investment in other underserved areas. Another idea could be to define disadvantaged communities within a region rather than on a statewide level. This would result in a more equitable distribution of funds and resulting

GHG reductions and co-benefits to disadvantaged people across the entire state, as well as better support for the forest products, raw materials and water sources relied upon by ALL Californians. [pp. 11-12, *Environmental Justice*]

### **Intergovernmental Collaboration**

We appreciate the recognition of local actions and the role that local and regional governments play in advancing climate solutions through land use, climate action planning, and other activities. Regional and local targets can be an important tool in achieving the State’s carbon goals. In addition, we recommend that the Draft Scoping Plan fully explore the potential associated with emerging building standards (such as the International Living Future Institute’s Building and Community Challenges) which address energy, water, waste and much more. Such ambitious standards move development projects from the realm of “less bad” to truly regenerative, “net positive” additions to the community that are socially, economically and environmentally just. These projects may require adjustments to local zoning and permit/building or other fees and thus would benefit from guidance from the state to support broader adoption.

Also, as the Draft Scoping Plan further explores this relationship between statewide and local actions, we encourage the state to provide clear guidance and as much certainty as possible regarding the state’s post-2020 actions. Most local jurisdictions are planning beyond 2030 and need more certainty from the state in its approach to emission reductions out to 2050 so that planning efforts can account for both statewide and local actions necessary to reach reduction targets.

### **Co-Benefits and Adaptation**

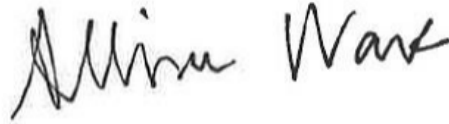
The draft concept paper brings up an important concept about the need to plan for and implement projects in the near-term that can set the stage for achieving 2030 and 2050 goals in the longer-term. There will be a natural progression over time of moving away from the “low hanging fruit” and more into the smaller sectors as we achieve the maximum gains possible in the larger industrial sectors. This progression will likely align with the fact that in later years, climate impacts will be felt more intensely. As a result, we strongly recommend that this 2030 Scoping Plan include near-term strategies for launching projects now that we know will need a longer time to achieve measurable benefits – such as those related to the natural and working lands and land use decisions – as well as including strategies for supporting adaptation activities that will help ameliorate the increasing climate impacts expected in the post-2020 timeframe. Adaptation needs to start becoming more of a primary focus in the post-2020 era. [p. 13, *Setting the Path to 2050*]

Thank you for your consideration of our comments.

Sincerely,



Larry Greene  
ARCCA Chair  
*Capital Region Climate Readiness Collaborative*



Allison Wood  
ARCCA Vice-Chair  
*San Diego Regional Climate Collaborative*