

December 16, 2016

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

RE: 2030 Target Scoping Plan Discussion Draft

Dear Chair Nichols and Staff:

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

ARCCA is a network of existing regional collaboratives from across California. Our members 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 offer a few comments and recommendations for consideration to improve the 2030 Target Scoping Plan.

1. We appreciate that the Draft works to integrate existing and ongoing State efforts to establish a comprehensive approach. We are very enthusiastic about the Draft's recognition of the importance of local and regional decision-making, action, and support of our progress to date and our efforts in the future. We further support the Draft's inclusiveness across sectors and its clear acknowledgement of co-benefits for pollutants, sustainability, public health, and environmental justice. However, we offer these suggestions to enhance the approach to coordination and realization of shared goals:
 - a. We suggest the plan more directly call out the need to provide comprehensive decision-support for regional and local actors to make strong

plans in alignment with state goals. As local governments in particular struggle with ever-increasing burdens, and as climate impacts are likely to increasingly siphon precious funding and staff capacity, it becomes more imperative to seek every opportunity to reduce “transaction costs” for local and regional actors to fully participate in climate responses. We recommend the State provide clear metrics and accounting of additional State actions to facilitate simpler quantification of the local action required to reach 2030 and 2050 goals, and to increase the availability of climate action tools (e.g. ClearPath and others) so they support new targets and approaches easily and effectively.

- b. We also encourage ARB, where possible, to streamline funding through GGFR and other sources in order to support comprehensive activities and innovation in project activities that advance these goals. Streamlining funding guidelines and reporting requirements can encourage integration across departments and sectors at the local level to develop more comprehensive plans and projects, and can help lift the administrative burden of managing multiple eligibility criteria and reporting requirements that have common goals.
2. We strongly agree that “California is already feeling the effects of climate change, and projections show that these will continue and worsen over the coming centuries.” Despite this well-considered recognition, the plan as described continues to segregate consideration of climate impacts from GHG reduction goals, targets, and strategies. We would suggest that many of the anticipated effects are very likely to directly impact realization of state GHG reduction goals. For example, exacerbated drought reduces availability of hydropower, negatively impacting energy sector targets; sea level rise may adversely affect low-emission developments under consideration, which would impact VMT targets; wildfires reduce carbon sequestration benefits, which would negatively impact natural and working lands targets. As such, we feel this plan could more squarely address the potential impacts of climate change on GHG reduction initiatives and consider these impacts as a factor in the selection of and accounting for GHG reduction opportunities. We are not suggesting that the scoping plan take up adaptation as a whole, but only that projected climate impacts are more directly considered as a factor in these various GHG reduction plans. Additionally, we are encouraged by the inclusion of the social cost of carbon and recommend addressing the consideration of climate impacts more sufficiently in light of AB 197.

3. We support the Draft's recognition of the integral connection between urban and rural California and believe that the state's climate strategy must aim to deliver economic and health benefits for all California communities. We appreciate the Plan's integrated approach to natural and working lands strategies, as actions to build watershed health and divert forest and agricultural biomass for renewable energy generation will not only increase carbon sequestration but also support climate resilience, water supply, ecosystem health, community vitality, and other co-benefits. We encourage ARB to discuss and address the following considerations for rural communities:
 - a. While we appreciate the focus on aiding disadvantaged populations, the current indicators used for CalEnviroScreen focus primarily on urban areas through an emphasis on pollutants and other criteria that are not measured or do not occur in rural communities. Thus rural communities in need of support are not eligible to receive funding and resources from programs that rely on CalEnviroScreen to determine disadvantaged communities. We welcome the opportunity to have more focused discussions with the State on how the definition of disadvantaged and low-income communities can more accurately reflect the communities that demonstrate the greatest need for support in California.
 - b. We recognize the importance of promoting resilient economic growth and the need for a structural shift in both the local and global economy. Although the Draft discusses clean energy and advanced technology, we encourage ARB to also consider economic growth and sustainability for local economies, primarily in rural areas, that rely on natural resources by highlighting the relationship between natural lands and tourism, and by identifying the need to create pathways to sustainable jobs in rural communities. Sustainable jobs created by adaptive industries and programs can help to meet the State's climate and energy goals. For example, resilient forestry jobs can support improved water retention and reduce wildfire risk.
 - c. We support the discussion regarding the role of Air Districts and Metropolitan Planning Organizations (MPO) in achieving success, especially in regard to VMT reduction strategies. However, it is important to recognize that many rural areas in California do not fall into the jurisdiction of an MPO; consequently, rural areas outside of an MPO have less access to planning or funding options to help realize several of the actions suggested by this

discussion draft. Additionally, we recommend discussing the role of rural areas in meeting VMT reduction goals with specific consideration of how rural areas may carry a disproportionate burden due to their limited access to transit options. We look forward to seeing clearer processes and approaches toward VMT reduction goals.

4. AB 197 (Garcia) tasks CARB to prioritize the mitigation of greenhouse gas emissions in communities where substantial co-benefits can be obtained, especially in California's most disadvantaged communities. Two existing programs excel in the area of both reducing GHG and aiding low-income populations. The Single-family Affordable Solar Homes Program (SASH) and Low-Income Weatherization Program (LIWP) provide solar photovoltaic panels to low-income homeowners and are among the more successful mitigation programs in California. However, SASH and LIWP miss a large number of qualifying households because their roofs are substandard and need to be replaced prior to any solar installation. By expanding the program to permit the building of cool roofs, a significant barrier could be overcome, and would allow for the enrollment of many thousands of additional homes. The cool roofs would also provide added benefits of reducing the size of the photovoltaic installation, would reduce ratepayers' utility bills and, just as importantly, help occupants deal with extreme heat due to climate change.
5. We would like to see the Scoping Plan do more to address the greenhouse gas emissions of existing buildings, in addition to its efforts for new developments. While new financing opportunities are widespread in California, many renters, homeowners and businesses still face considerable barriers in undertaking energy efficiency retrofits. We support the suggestion of using energy efficiency retrofits and solar installation as a mitigation measure for new developments that cannot reduce their own GHG emissions on site, and would like to suggest the use of the California Air Pollution Control Officers Association's Home Energy Efficiency Protocol and Greenhouse Gas Reduction Exchange (GHG Rx) to facilitate this process.
6. On page 36, in the box for Natural & Working Lands, we suggest including the potential to reduce wildfires and significant emissions of smoke and other air pollutants.
7. We encourage, where feasible, modeling and quantifying the health, social, and economic benefits of lower-VMT development, infill, bicycling and pedestrian infrastructure, transit, urban trees, and other active transportation measures.

8. We welcome the inclusion of local and regional performance targets for mitigation of the Urban Heat Island (UHI) effect which already has a significant impact on the health of both urban and suburban dwellers, and we look forward to technical support and other assistance from the state. We are particularly interested in research or tools that can calculate the UHI effect for cities, identify priority areas for mitigation, and estimate the regional impact of cool roofs, increased tree canopy, and cool pavements.

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments in greater detail and to help draft language for inclusion in the final Scoping Plan.

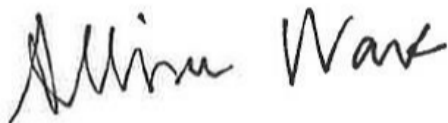
Sincerely,



Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative



Amy Hutzler
Bay Area Regional Collaborative



Allison Wood
ARCCA Vice-Chair
San Diego Regional Climate Collaborative



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Kate Meis
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