

April 10, 2017

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

RE: The 2017 Climate Change Scoping Plan Update

Dear Chair Nichols and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Proposed 2017 Climate Change Scoping Plan Update (Proposed Plan).

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 Proposed Plan to better achieve State goals and to take a comprehensive approach to responding to climate change.

1. We appreciate ARB's intent to provide a comprehensive policy framework to integrate the multitude of related state laws and programs to provide streamlined guidance. We offer a few comments to support ARB's effort and to make this approach more effective.
 - a. While the Proposed Plan captures a few important state orders and laws, such as EO B-30-15, SB 32, SB 350, SB 1383 and several others, recent laws have not been adequately discussed nor integrated. We recommend the inclusion and integration of AB 1482, SB 246, SB 379, SB 1000, AB 2139, and AB 2800 to strengthen the critical link between climate change mitigation and adaptation. We have developed legislative update factsheets for [2015](#) and [2016](#) that highlight these important laws.
 - b. We recommend incorporating findings and recommendations from State guidance documents, plans, and tools that have already been developed to leverage the best available science and research to appropriately respond to climate change impacts. Key documents and tools that are not discussed in the Proposed Plan include [Safeguarding California: Implementation Action Plans](#), [2013 CDPH Extreme Heat Adaptation Plan](#), [Cal-Adapt Extreme Heat Projections](#), and many other relevant State reports. While guidance



from the EO B-30-16 Technical Advisory Group is not yet finalized, we recommend connecting with the group to proactively incorporate relevant guidance in the Plan.

- c. We recommend coordinating with key state agencies to retool the process and timeline before the next Scoping Plan update. The 2017 update was developed out of sync with component plans, including the Forest Carbon Plan and the Short-Lived Climate Pollutants Strategy, which would have provided critical data and recommendations to ensure informed target-setting and greater understanding of where investments are needed.
 - d. While we agree that it is critical to integrate policies and programs at the state level, much of the burden to meet state targets falls on local and regional agencies. As reductions become more difficult to achieve over time, strategies that establish regional targets linked to local goals that already have substantial community buy-in can be more effective. Economic growth and job creation receive strong support from Californians throughout the state – urban and rural, red and blue, coastal and inland. To support local and regional agencies, we recommend ARB conduct deeper economic analyses to identify and promote actions that demonstrate a strong connection between emissions reduction, resiliency to the impacts of climate change and economic growth, particularly for job growth and from a regional perspective.
 - e. Finally, to better ensure complimentary local emission reduction programs do not run into additionality concerns, we recommend the development of a clear methodology on how to determine when state programs end and local programs begin.
2. We recommend greater consideration of adaptation and natural resources to achieve 2030 reduction targets in order to leverage limited available resources to support both mitigation and adaptation efforts, and to take into account the critical role that natural resources play in achieving GHG reductions.
- a. As two sides of the same coin, mitigation and adaptation need to be bridged and discussed more robustly throughout the Scoping Plan. Several examples of the “future proofing” of buildings and communities are available for extreme heat and other climate change impacts. We encourage ARB to leverage these resources and examples to create a closer link between mitigation and adaptation efforts.
 - i. High performance buildings are more resilient and protective, compared to those meeting only current code requirements. Various types of residential buildings in New York City stayed at survivable temperatures much longer during power outages during heat waves or cold spells, [based on modeling work](#).

- ii. The UK's Climate Information Program has provided probabilistic weather projections for future years. As of 2014, this tool has been used for [numerous risk assessments](#) and over £3 billion worth of [building projects](#) around the UK. Although some building designers and software firms in the U.S. are beginning to use future climate projections to assess building designs for climate change vulnerability, a more robust tool for designers, builders, and communities is needed.

- b. There are numerous and credible peer-reviewed journals and analyses (e.g. from the [Carbon Cycle Institute](#)) that demonstrate quantifiable GHG reductions via carbon sequestration from urban and rural forests, as well as from wetlands, agriculture, and other green infrastructure. While the Proposed Plan suggests using data currently in the early stages of development, there are readily available scientific findings and recommendations from natural resource stakeholders that can be included immediately. Additionally, advancing regional understanding of the benefits and how to finance and incentivize green infrastructure (in terms of permitting, building, maintaining green infrastructure projects), via workshops and white papers would be particularly impactful.

- c. Scientists and government officials have declared that there are 102 million dead trees in California's forest, greatly increasing the risk of wildfire – the single largest contributor of black carbon, a dangerous short-lived climate pollutant. However, the State has not set targets for reducing wildfire emissions in order to reduce black carbon, and to protect and increase carbon storage in California's forests and grasslands.
 - i. Although the State has not accepted protocols for identifying and measuring baseline carbon and the benefits of protecting against massive wildfire because the State views wildfire as a “natural occurrence,” CalFIRE has determined that 95% of wildfires are human-caused and interventions to reduce risk are human actions that can be modeled. Additionally, emissions reduction targets are listed for “unplanned structure fires” and “unplanned vehicle fires” in the urban landscape section of the Proposed Plan. Similar targets should be set for “unplanned wildfire.”

 - ii. The emissions from the 2013 Rim Fire were equivalent to a full year of motor vehicle emissions in Los Angeles County. In order to avoid shifting our forests to become net carbon emitters that can negate the reductions achieved in other, more urban-focused programs, we recommend ARB immediately integrate the use of natural and working lands as carbon sinks and to manage them accordingly.

- iii. The [Governors' Climate and Forest Task Force](#), which California is a founding member of, developed forest protocols and project criteria and standards that could be applied to forest sector projects. The Task Force also calls for initiating pilot projects to provide feedback for revising criteria and standards – to launch projects now that have benefit while simultaneously monitoring, ground-truthing, and improving modeling and evaluation assumptions – that California could have a leading role in advancing.
- iv. While other sector strategies call for structural shifts and investment in technologies and capacity-building, the forest sector goals are limited to what can be accomplished with the resources at hand. This disconnect needs to be addressed. USFS and CalFIRE have each indicated that 500,000 acres need to be treated each year for the next 10 years to address the scale of our forest health problem. Untreated, this problem – and the cost of dealing with it – will likely grow ever more severe. We encourage ARB to embrace innovation to confront the problem at hand.
- v. We recommend using the Scoping Plan to mandate forest biomass for energy and fuel production, as well as other marketable products, as a tool to improve forest condition, reduce the impacts of tree mortality, and offset fossil fuel combustion by encouraging increased levels of forest and fuel treatments. We recommend reducing the cost of biomass energy production by instituting subsidies at pre-1997 levels to bring biomass more in line with other subsidized sources like wind and solar. We also recommend setting a bio-energy production goal in line with previous levels of production in the 850-900 MW range.
- vi. We recommend that the establishment of a biomass working group be established as quickly as possible so that coordinated statewide approaches to biomass can be quickly implemented. This is especially important considering upcoming organic diversion requirements as well as for strategies to address wood waste generated from the tree mortality crisis. This working group should include a diverse set of stake holders, including industry representatives from the agriculture and forestry sectors, as well as key local government and federal representatives.
- vii. Finally, constraints on federal land need to be addressed, which include topography and use limitations (mechanical treatment could be limited to just 20% of federal land in some locations), the lack of funding for new or upgraded technology, and funding imbalances between fire prevention vs. fighting. Additionally, important co-benefits – public health, offsetting dirtier fuels,

economic growth opportunities, forest health, and water quality – have not been adequately captured or internalized.

3. We recommend including a robust discussion on strategies to ensure full engagement and benefit across all of California for State climate investments and programs through a regional approach.
 - a. Many underserved communities and vulnerable populations, particularly in low-income rural communities, are not captured by the methodology used to identify disadvantaged communities (DAC) in CalEnviroScreen. To address this in the short-term, we recommend creating rural provisions in all programs, where practical, modeled after the Rural Innovation Project Areas in the Affordable Housing and Sustainable Communities program, to require a portion of investments within each program to be dedicated to projects in rural regions. Additionally, establishing an investment “floor” on a regional basis will help to ensure a more equitable distribution of funding across the state.
 - b. Beyond the aforementioned short-term strategy, we recommend ARB develop a regional approach that recognizes the distinctions between different parts of the state where emissions reduction goals, low-income/DAC identification, funding distribution, and technical assistance/capacity-building strategies are developed on a regional basis. Additionally, we encourage ARB to facilitate an ongoing dialogue throughout the state about rural needs and issues – without such dialogue and support, rural regions – who are home to critical watershed, carbon sinks, and other core components of California’s mitigation efforts – may shift to net emitters, and the people in these regions will remain alienated and less likely to support the policies and programs necessary to meet statewide emissions reduction targets unless proper funds and resources are allocated.
 - c. Many transportation and housing programs are structured to be implemented through metropolitan planning organizations (MPOs). However, this format excludes vast rural portions of the state that do not have MPOs or similar regional agencies. While there are fewer people living in rural areas, they typically need to drive longer distances per trip to get to work, school, grocery stores, and critical service providers such as medical centers. Additionally, rural areas are often most affected by rent burden, the percentage of their income devoted to housing, and would benefit greatly from affordable housing programs. This is another example of how a regional investment floor would help to provide benefits across all of California.
 - d. Weatherization provides multiple benefits to low-income residents throughout California – providing energy savings, improving public health, building resilience, and creating jobs. We encourage ARB to aggressively track and measure the energy savings from low-income weatherization programs funded by the Greenhouse Gas Reduction

Fund to adequately capture the full impact of this key strategy. Further analysis on a regional basis can help state agencies make strategic investments in regions that have not yet received the support needed to implement broad-scale weatherization programs.

- e. In response to California's 2000-2001 energy crisis, the California Energy Commission adopted the policy of the "loading order" of first implementing energy efficiency and demand response before installing renewable and distributed generation (with fossil fuel energy generation occurring as a last resort). California was the first state in the United States with this policy. Leveraging this early leadership, we recommend ARB continue to provide regional assistance to municipalities, other public agencies, and governmental entities including the Department of Defense to help identify barriers to energy efficiency create programs that meet energy efficiency goals in Climate Action Plans.
4. We recommend elevating health and health equity as central to the Scoping Plan.
- a. We acknowledge the considerable improvements made in the Proposed Plan compared to past versions and encourage ARB to continue making improvements to better address how climate change, in addition to air quality, impacts health. Extreme heat, extreme weather events, drought, flood, and diseases have clear public health implications, particularly for vulnerable and low-income populations that experience increased levels of risk and exhibit lower levels of adaptive capacity due to ability and/or resource constraints. We encourage ARB to conduct a health impact assessment (HIA) of the full range of emissions reduction strategies in the Scoping Plan, by leveraging research and resources that have already been conducted and developed, to quantify health impacts to the greatest extent possible prior to finalizing the Scoping Plan.
 - i. The HIA should allow for full understanding of the potential beneficial and adverse health impacts and associated costs, including an assessment of the relative health benefits and health costs of different strategies with each sector. The health impacts should go beyond those related to air pollution to include the multiple chronic disease prevention benefits associated with reduced vehicle miles traveled and associated land use patterns, physical and mental health benefits associated with urban greening and green infrastructure, and potential health impacts of biomass and storage technologies.
 - ii. The Scoping Plan should include health and health equity metrics, as well as forecasts of the health impacts of a range of climate impacts and the monetized costs of those impacts. Consideration should also be given in evaluating the impacts of locating populations along heavily used transportation corridors, and

in encouraging local government to use their broad discretion over land use, beyond CEQA, to consider these impacts.

- b. We recommend including a more robust discussion of health co-benefits from active transportation in the Scoping Plan. In addition to tracking the absolute magnitude of increases in active transport, utilizing a regional approach to prioritize investments will lead to more equitable distribution to regions that require support, such as the San Joaquin Valley, to effectively increase levels of active transport. Additionally, creating more transportation options through walking and biking can potentially have larger impacts for lower-income populations that generally have reduced access to individual motor vehicles.
 - i. We encourage ARB to include tangible strategies to increase active transportation levels local communities such as outreach and education, infrastructure improvements, pricing mechanisms, urban forestry, bike sharing services, in-fill development, and smart land use practices. The new [Increasing Walking, Cycling, and Transit: Improving Californians' Health, Saving Costs, and Reducing Greenhouse Gases](#) report released by the California Department of Public Health provides technical analyses that demonstrate positive health impacts from active transport and other transportation-related GHG mitigation strategies.
 - ii. We recommend pointing to local plans and initiatives that can serve as a model to other communities, such as the [Active Design for a Healthy Sacramento County](#), the County's design guidelines.
 - iii. We encourage ARB to integrate and leverage data from recently published reports that highlight the important connection between equity, such as [Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities](#) and [Energy Efficiency Jobs in America](#).

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 Update.

Sincerely,



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