



December 16, 2016

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

RE: 2030 Target Scoping Plan Discussion Draft

Dear Chair Nichols and Staff:

Grid Alternatives of Greater Los Angeles and Climate Resolve welcomes the opportunity to provide comments on the 2030 Target Scoping Plan Discussion Draft.

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. In order to further leverage the household and community benefits that the SASH and LIWP programs provide, houses requiring roof replacements prior to the solar installation should have access to cool roofs. Approximately 30% of households that apply and qualify are unable to access the SASH program for the sole reason their roofs are substandard and need to be replaced prior to any solar installation.

An average size home that has both a cool roof and a solar panel installation will result in approximately 70 tons of GHG savings over the lifetime of the system. As a demonstration, Grid Alternatives of Greater Los Angeles, Climate Resolve and Habitat for Humanity of Greater Los Angeles pooled resources to assisted a homeowner in South Los Angeles whose roof needed replacing prior to receiving rooftop solar. Her utility bills have been reduced by 80-90%.

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 because of its energy saving properties (effectively stretching SASH dollars even further, allowing a greater number of families to access the program), would reduce ratepayers' utility bills and, just as importantly, help occupants deal with extreme heat due to climate change. Energy savings in new residential construction is addressed every three years as Title 24 becomes more stringent but existing homes remain the final frontier in lowering energy consumption. Broadening the program helps overcome this hurdle while assisting the families most in need.

Thank you for the opportunity to provide comments. We look forward to further discussion if there are any questions or additional detail is needed regarding our comments.

Sincerely,



Michael Kadish
Executive Director
Grid Alternatives of Greater Los Angeles



Jonathan Parfrey
Executive Director
Climate Resolve