October 30, 2013

**CCA Comments to Air Resources Board on Discussion Draft for 2013 Update to AB 32 Scoping Plan**

 The Coalition for Clean Air was an early supporter of the Global Warming Solutions Act of 2006 (AB 32, Nuñez-Pavley) and has been actively involved in its implementation. We continue to strongly support the law as a meaningful response by the largest state in the U.S. to the grave threat of rapid changes in our planet’s climate. We believe that AB 32 has been mostly successful so far, and we’re pleased to hear ARB’s projection that the state is on target to meet the 2020 requirement. We need to continue that progress in order to meet 2050 goal.

 We believe that the discussion draft addresses the range of emission sources that California must control in order to meet our climate goals. **The final plan should detail the specific control measures necessary to reduce emissions from each sector, including a schedule of regulations and incentives that will be adopted.**

1. **2030 Target**

As the draft acknowledges, it will be essential to have a 2030 numerical target to drive continued progress toward the 2050 goal. We recommend that the final Scoping Plan include criteria for setting the interim target.

1. **Integrate Air Quality and Climate Planning**

We believe that ARB should integrate climate planning with air quality planning more than in the past, as anticipated by “Vision for Clean Air: A Framework for Air Quality and Climate Planning” (Public Review Draft, 6/27/12).

1. **Prioritize Short-Lived Pollutants**

We are pleased to see that the draft addresses the scientific research on the importance of the shorter-lived pollutants, including methane, black carbon (soot), smog, carbon monoxide, and hydrofluorocarbons. These pollutants, many of which are also harmful at ground level, are sharply increasing the risk of catastrophic climate change. The urgency of the climate crisis requires that we grapple with the 20-year time horizon for pollutants demonstrated by Table 1 and Figure 1. ARB has measures already in place that have brought about significant reductions in these pollutants, and needs to build on that success with additional measures. We support the draft’s proposal for a research-driven strategy on short-lived climate pollutants, and we recommend moving up the date for that strategy to 2015.

Their short lives mean that we can reduce greenhouse forcing relatively quickly by cutting emissions of these pollutants. Soot and smog, for example, have a disproportionate impact on snowy and icy regions such as the snowpack, so reducing them would help preserve our water supply. Veerabhadran Ramanathan, a professor of climate science at the Scripps Institution of Oceanography in San Diego, has said that “By cutting down the short-lived climate pollutants, in addition to cutting down CO2, we can keep the warming under two degrees Celsius, at least up to mid-century.”

These pollutants should be directly regulated, not put into a trading program. ARB should put in place strong standards to reduce methane leakage from landfills and from oil and gas extraction and distribution. ARB should also work with the air districts to continue to reduce emissions of particulates, nitrogen oxides and carbon monoxide, reductions that will save lives and improve health while also reducing greenhouse forcing.

1. **Invest Auction Revenues**

 Last year the Governor signed SB 535 (de León), which was conceived and sponsored by Coalition for Clean Air, and AB 1532 (Speaker Pérez). Taken together, these laws require that

revenues generated by California’s Global Warming Solutions Act through the sale of pollution allowances be used to reduce greenhouse gas pollution in ways that also improve air quality and create jobs; at least 25% of the funds are to be spent in those communities most afflicted by pollution and poverty, as identified by Cal/EPA’s new EnviroScreen map. The administration gathered public testimony, much of it from CCA and our allies, and published an investment plan full of good ideas to spend the money – but then decided not to spend any of it in this fiscal year.

When justifying the Governor’s loaning of $500m in those revenues to the General Fund, the administration said it was waiting for the Scoping Plan update, so that update needs to follow through and call for expenditure of the revenues – including a one-year payback of the loan – for the purposes of AB 32. A minimum of 25%, preferably more, must be spent for the benefit of the communities most burdened by pollution and socioeconomic distress (as defined by Cal/EPA’s EnviroScreen), with at least 10%, preferably more, to be spent directly in those communities, as required by SB 535. Our SB 535 Coalition has recommended that those investments focus on transit service, energy efficiency, low-income solar, affordable housing near transit, and urban greening.

1. **Auction the Allowances**

Virtually all of the pollution allowances in the cap-and-trade program should be auctioned off, as recommended by the expert economists who advised ARB on establishing the program, rather than given away to big polluters. Instead of rewarding early action on the part of industry to plan, invest, and innovate to reduce its pollution, free allocation only rewards stalling, delay, and obstruction of necessary cleanup. ARB should ensure allowance value is put to use where it can be certain it will benefit all Californians and help achieve the goals of AB 32.

1. **Transportation**

The Actions for 2020 for the transportation sector should be more aggressive, particularly for

freight transport. We need to go beyond developing a freight strategy to seizing opportunities where we can begin to implement a strategy that ensures that technology, infrastructure and policies are in place to support zero or near zero emission freight movement. The San Pedro Bay Ports and South Coast AQMD have been working on identifying and demonstrating technology that can reduce GHGs, as well as PM and NOx, from heavy duty diesel trucks, ocean going vessels, cargo handling equipment and harbor craft. The Scoping Plan should include a regulatory schedule that states when the owners and operators of freight equipment will be expected to transition their equipment to zero or near zero emission technology. This would provide regulatory certainty to the developers of the technology and owners of the technology, therefore setting a platform by which stakeholders can feel more comfortable in setting and meeting emission standards and being competitive.  Meeting our future goals for both climate and air quality will depend on dramatic reductions of emissions from the freight sector.

CCA strongly supports the Zero-Emission Vehicle Standard for light-duty vehicles, which is already working to provide motorists with a variety of options for battery-electric and plug-in hybrid vehicles. We are disturbed to hear reports of dealers frustrating the attempts of consumers to buy or lease EVs.

We support the continued implementation of the Low-Carbon Fuel Standard. The LCFS is already helping to diversify the state’s transportation fuel mix with increased use of electricity and natural gas, and we believe it will eventually do the same for hydrogen and cellulosic biofuels. The LCFS’s life-cycle analyses are moving biofuels into a more sustainable direction.

1. **Land Use**

We support reducing GHG emissions through Sustainable Community Strategies and suggest that the Scoping Plan avoid unintended consequences of gentrification and displacement of low income people residing in Transit Oriented Development areas. Several studies have shown that

market rate for housing can increase in TOD areas and ultimately price out low income households.  Low-income households tend to have higher transit ridership and lower car ownership on average-therefore provide greater GHG reductions. To ensure the GHG reductions we are expecting from implementing the SCS, the Scoping Plan needs to ensure that a priority in investment should be to provide transit oriented housing to very low income households. Therefore, we agree with the draft’s call for the preservation and enhancement of affordable housing in transit-rich areas (p. 80).

The Scoping Plan Update should include an update of the regional targets for reducing GHGs through improvements in land use, pursuant to SB 375 (Steinberg, 2008). Changes in land use patterns can reduce emissions significantly by 2050 if smart-growth policies are put in place now.

In addition, we support a prompt implementation by the Office of Planning and Research of the changes to CEQA guidelines required by SB 731 (Steinberg, 2013). Replacing the Level of Service requirement for traffic with a metric based on vehicle miles travelled will help to remove a significant obstacle to the type of infill development that can reduce GHGs, as envisioned by SB 375.

1. **Electricity**

In order to reduce reliance on fossil-fuelled electricity generating plants, California’s energy-policy leaders should prioritize efficiency, demand response and renewable generation. Energy planning must support, not undermine, our climate goals. In particular, our energy and air agencies should not allow overbuilding of new fossil-fuelled power plants in the Southern California as an over-reaction to the shutdown of the San Onofre nuclear plant.

1. **Waste**

We commend CalRecycle and ARB for taking a comprehensive approach to analyzing the waste management sector, and we support most of the key recommended actions for this sector. In order to capitalize on the tremendous greenhouse gas reduction potential of waste reduction, recycling, and composting, the agencies should prioritize the development of regulations to phase out the disposal of organic waste, and support Extended Producer Responsibility systems. Recycled content manufacturing and increased processing of recyclables in-state offer an incredible opportunity for economic and environmental benefits, and strategies to increase them warrant additional development.

Landfills are a major source of methane emissions and should be targeted for additional regulation, by ratcheting down the current landfill emissions rule.

CalRecycle and ARB should resist the inclusion of incineration, which increases greenhouse gas emissions and undermines the preferred practices of reducing, reusing, recycling and composting.

Respectfully Submitted,



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