

Recommendations and Comments  
of the  
Environmental Justice Advisory Committee on the  
Implementation of the Global Warming Solutions Act of  
2006 (AB 32)  
on the  
Draft Scoping Plan

August 15, 2008

## General Comments

1. California should establish a three-pronged approach for addressing greenhouse gases: 1) adopting standards and regulations; 2) providing incentives; and 3) putting a price on carbon via a carbon fee. This three-pronged approach is most likely to result in a program which ensures California fundamentally changes the way we make and use energy and leads the world in achieving the long-term green-house gas reductions required to avert climate catastrophe. While the staff proposal in some ways moves in this direction, the decision to establish a price on carbon via an international trading scheme severely undermines the other two prongs of the approach. By allowing California companies to use international allowances and/or offsets to comply with California's greenhouse gas reduction targets, California's capital, jobs, infrastructure modernization, and health protections will leave California and flow to other states and countries.
2. The Committee supports, some with modification, all but three of the measures outlined by staff (Cap-and-Trade Program linked to the Western Climate Initiative, Low Carbon Fuel Standard and the Sustainable Forest Target)
3. The Committee continues to be concerned that the public health and non-economic benefits and impacts of the Plan have not been adequately presented, analyzed, or incorporated into the Scoping Plan.

## Recommendations:

1. To ensure that the overall GHG reduction targets are met in 2020, ARB should identify emissions reductions that total at least 150% of the necessary reductions to allow for inevitable losses during rule-making and implementation phases.
2. To ensure emissions limits are met in a manner that minimizes costs and maximizes benefits for California's economy, improves and modernizes California's energy infrastructure, maximizes additional environmental and economic co-benefits for California, and complements the state's efforts to improve air quality, ARB should require all emissions reductions and clean renewable energy infrastructure be achieved in-state or provide a clear analysis of how encouraging California's capital to flow from the state benefits or harms California's residents.
3. To ensure the Air Resources Board can truly understand the policy choices that lay before California, staff should provide a path for reaching the 427 MMTCO<sub>2</sub>E 2020 target which does not rely on using trading to achieve the goal.
  - a. There are still significant open questions about using trading to reach carbon emissions goals. These should be clearly addressed in the Scoping Plan.
  - b. Note South Carolina's July 2008 adopted plan
4. ARB should add as proposed measures many of the measures currently labeled as "under consideration" in the Draft Scoping Plan including:
  - a. Feebates for light duty vehicles
  - b. Additional Electricity Energy Efficiency

- c. Additional Natural Gas Energy Efficiency
- d. Expansion of Million Solar Roofs
- e. Refinery Energy Efficiency Process Improvement
- f. Removal of Methane Exemption from Existing Refinery Regulations
- g. Oil & Gas Extraction GHG Emission Reduction
- h. GHG Leak Reduction from Oil & Gas Transmission
- i. Industrial Boiler Efficiency
- j. Stationary Internal Combustion Engine Electrification
- k. Off-Road Equipment

Comments:

- 1. Transportation
  - a. The Environmental Justice community has long opposed allowing mobile to stationary source trading and would strongly suggest ARB not allow this trading
- 2. Land Use and Local Government
- 3. Electricity and Natural Gas
  - a. CARB should not support or encourage the use of carbon capture and sequestration
- 4. Water
- 5. Green Buildings
- 6. Industry
- 7. Recycling and Waste Management
- 8. Forests
- 9. High Global Warming Potential
- 10. Agriculture
  - a. Require the installation and use of anaerobic digesters/biogas recovery from animal waste lagoons
  - b. Require Barn Enclosure and Capture of Enteric Emissions
- 11. State Government