



California Council for Environmental and Economic Balance

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July 15, 2021

Rajinder Sahota
Deputy Executive Officer
Climate Change and Research
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Scoping Plan June 8-10 Kick-off Workshops

Dear Ms. Sahota:

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), we appreciate the opportunity to comment on recent California Air Resources Board (ARB) Scoping Plan “Kick-Off” workshops. CCEEB is a non-profit and non-partisan coalition of business, labor, and public leaders that advances balanced policies for a strong economy and a healthy environment.

Along with CARB, CCEEB appreciates that the 2022 Scoping Plan update will be the most ambitious to date, with a planning horizon spanning more than twenty years into the future that must assess possible technology, energy, and fuel deployment pathways for every sector and facet of California and its economy. CCEEB further agrees with the objective to assess progress towards the SB 32 target of reducing emissions 40 percent below 1990 levels by 2030, as well as the objective to lay out a path to achieving carbon neutrality no later than 2045, as envisioned by Governor Brown’s Executive Order B-55-18. To this, we would add the direction of the legislature to extend the cap-and-trade program through 2030 while doubling the stringency of the “cap,” as enacted by AB 398 (Garcia, 2017).

CCEEB Carbon Neutrality Principles

In order to support our engagement with CARB and other stakeholders, CCEEB has spent almost two years developing a set of principles on carbon neutrality principles which reflect the diverse industries and workforces within our membership. We believe they can help inform the structure and framing of issues for the 2022 Scoping Plan and related policy development at CARB and other state agencies, and have attached them to our letter.

Scoping Plan Scenarios and Modeling

Additionally, CCEEB strongly supports the development and modeling of scenarios that can explore what mix of mitigation and sequestration strategies will be needed to balance the

state's interrelated goals and objectives for carbon neutrality, including a look at possible tradeoffs among benefits, costs, leakage, technological feasibility, and equity. In regards to how we define equity, CCEEB looks at both the negative impacts of climate change on communities and residents, with the goal of avoiding disproportionate impacts, as well as what is needed for a "just transition" to a carbon neutral economy that protects Californian workers and quality of life to the fullest extent possible. CCEEB believes well-grounded models can help the state improve environmental and economic outcomes overall, not just avoid harm. Our caution, however, is that long-range modeling should not be mistaken as a forecast of the future.

As part of this work, CCEEB requests that CARB and its contractors conduct its modeling through an open, public process, whereby stakeholders can understand model operability. This could be done through a series of technical workshops or work group meetings, which would allow stakeholders to ground-truth and validate inputs and assumptions based on their sector-specific knowledge and expertise, including input from the perspectives of labor and communities. To the extent possible, CARB should allow users to suggest their own scenarios for comparison and testing of different mixes of technologies and policy options.

Conclusion

The Scoping Plan is a technical exercise with many nuances, necessitating an unprecedented level of stakeholder and interagency coordination. We look forward to closely working with ARB board members, staff, the EJAC, and other stakeholders to find as many credible pathways as possible for achieving California's climate goals.

Thank you for your consideration of our comments. We look forward to discussing them or answering any questions you may have at your convenience. Please contact me or Jackson R. Gualco, Kendra Daijogo or Mikhael Skvarla, CCEEB's governmental relations representatives at The Gualco Group, Inc. at (916) 441-1392 should you have any questions or comments.

Sincerely,

WILLIAM J. QUINN
CCEEB President & CEO

Attachment: CCEEB's Carbon Neutrality Principles

cc: Members of the Air Resources Board
Mr. Richard Corey
Ms. Chanell Fletcher
Mr. Matthew Botill
The Gualco Group, Inc.