



October 12, 2021

Liane M. Randolph  
Chair, California Air Resources Board (CARB)  
1001 "I" Street  
Sacramento, CA 95814

Re: Climate Heat Impact Response Program (CHIRP)

Dear Chair Randolph,

As the climate crisis continues unabated, extreme heat will become an increasingly significant threat to public health and the economy. Governor Newsom's emergency proclamation (set to expire on October 31st) prioritizing grid stability, while understandable, poses potential problems. California must avoid shortsighted emergency actions that will only worsen pollution in the future. Rather, the state can use this moment to advance deployment of clean technologies and improve resiliency. Further, planning for extreme heat events today will minimize the need to disregard clean air rules in the future.

### **Ship emissions**

Under CARB rules, ships must plug into shore power when docked at a port. Suspending the "at-berth" rule during extreme heat events would require ships to turn on their auxiliary engines to generate electricity. Not only would this increase smog-forming pollutants, it would also mean more carcinogenic diesel particulate matter (DPM.) CARB's own data anticipated a maximum of 12.2 tons per hour per 1,000 megawatts (tph/1,000 MW) increase in oxides of nitrogen (NOx) emissions, .2 tph/1,000 MW in particulate matter (PM) and .6 tph/1,000 MW in reactive organic gases (ROGs) in ship emissions stemming from the emergency proclamation.

CARB data show the armada of idling vessels off the coasts are massive polluters. Puffs of sooty smoke are constantly emanating from ships waiting for a berth. Requiring all ships, not just those waiting in queue, to run on their auxiliary engines will only worsen pollution, creating a new obstacle to attainment of the National Ambient Air Quality Standards (NAAQS.) Further, ship emissions also have significant implications for AB 617 communities which have identified port-related emissions as a concern. While we appreciate CARB considering AB 617 CERPs in the CHIRP program, repairing the harm to these communities is vital.

CARB should require excess pollution emitters during "energy emergencies" to pay into a community pollution reduction fund. If a ship runs on diesel while at berth, or a power plant exceeds its permitted emissions, the owners should pay to mitigate all the excess emissions in impacted communities. Payments should be required for all such excess emissions during 2021, whether before or after the proclamation, so that already-overburdened communities receive some relief.

### **Backup generators and resiliency**

Extreme heat has pushed the grid to its limits, resulting in frequent Flex Alerts and more demand for back-up generators. Most large backup generators run on diesel fuel, creating smog-forming pollutants, greenhouse gases and DPM. CARB estimates diesel backup generators could have create up to 11 tph/1,000 MW in NOX, .72 tph/1,000 MW in PM and .7 tph/1,000 MW in ROGs. Backup generators have few, if any, pollution control devices. This is especially true for small, gasoline-powered generators, which will not transition towards zero-emissions until 2028.

The state has a key role in eliminating pollution from generators by avoiding their use in the first place. CARB and other state agencies should adopt policies that expedite the deployment of clean technologies, such as fuel cells, linear generators and battery storage systems. Further, the state must continue investing in grid resiliency. These actions, which were also part of the Governor's emergency proclamation, should be front and center of CARB's efforts.

### **Thermal power plants**

Lastly, we wish to express concerns about the Emergency Proclamation's effect on emissions from thermal power plants. A significant share of California's electricity comes from natural gas. Without planning, this reliance will increase after shutting down the Diablo Canyon Nuclear Power Plant. Under the emergency proclamation, power plants may emit more pollution than what their permits allow. As a result, emissions could have increased by .035 tph/1,000 MW in NOx, .015 tph/1,000 MW in PM and .01 tph/1,000 MW in ROGs, along with increases in climate damaging GHGs.

To this end, we urge CARB and all relevant agencies to accelerate the transition to 100% renewable energy. We also again urge the state to aggressively deploy microgrids and distributed energy systems. These systems will be key in displacing current non-renewable generation.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Christopher Chavez". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Christopher Chavez  
Deputy Policy Director

Cc: Richard Corey, Executive Officer, CARB  
Derek Winters, Air Resources Engineer, CARB