

Comments to California Air Resources Board

Hearing on Proposed Short-Lived Climate Pollutants Strategy

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I'm here today from SCS Global Services, a California benefit corporation providing third-party environmental and sustainability certification services and standards development for 3 decades. Among other things, we are a certifier of carbon footprints and offset credits for several schemes, including California's Cap-and-Trade Program.

First I'd like to thank the Governor and compliment everyone on the California Air Resources Board for your significant commitment and work to address our climate change crisis. As each of you well know, the news is not good:

- 1) Disappointing rainfall during this El Nino year and prospects of a prolonged state-wide drought.
- 2) The increasing stress on the health of our forests, with associated increased risks of massive and deadly wildfires, such as what we've witnessed in Alberta.
- 3) Rapidly advancing acidification and heating of the oceans, impacting coral reefs and the biodiversity of our oceans, now compounded by observed deoxygenation.

And of course, the list goes on: extreme storms and flooding, changes in the Arctic, and accelerating sea level rise and global temperatures, to name a few. Just yesterday, NOAA announced that the earth just recorded its 12th straight month of record temperatures, with the most recent global mean temperature anomaly hitting just shy of 1.2-degrees Celsius.

In reciting this news, it is particularly sobering to realize that these changes have occurred well below the temperature maximum goal of 2-degrees Celsius, and even below the aspirational goal of 1.5-degrees Celsius, agreed to in Paris. In other words, we don't have until 2050, or even 2030, to get our ducks lined up. Indeed, net radiative forcing is rapidly increasing from our present level of about +2.3 Watts per square meter (W/m^2) toward +2.6 W/m^2 , the level that will push us past the 2-degrees Celsius target. We must take prompt and concerted action within the next 5-10 years to hold the lid on this increase. Even if current COP national commitments are fully implemented, we are on a path toward +3.7-degrees or more by the end of the century. So California's leadership is more crucial than ever.

With the publication of the Proposed Short-Lived Climate Pollutant Strategy, CARB has made significant progress toward addressing key issues that hitherto were not addressed within the AB-32 framework, including the identification of a range of very important mitigation opportunities for methane, black carbon and f-gases. What is needed to complement this work is an updated analytical framework to assess the relative benefits, costs, and trade-offs of these mitigation options, including an ability to determine whether the scale of the project can meaningfully influence climate change.

Fortunately, work is now nearing completion to finalize an American National Standard that provides updated climate accounting metrics based on the latest climate science as reflected in the IPCC's Fifth Assessment Report, with support from leading climate scientists. The new metrics integrate the

framework used by the IPCC to generate its Representative Concentration Pathway scenarios with advanced life cycle assessment (LCA) midpoint characterization. This approach makes it possible to evaluate each mitigation opportunity in terms of the scale of its potential benefits, as well as the full range of potential environmental trade-offs. The net result is the ability to more clearly identify and prioritize projects to optimize our expenditures to attain the results we need. And I'm pleased to report that efforts are also underway to introduce these same advanced accounting principles into the international community through the International Organization for Standardization (ISO) 14000-series standard. The state of California should consider taking a place at the table in these national and international proceedings, both to inform the process from its own experiences and to become more acquainted with the details and ramifications of updated accounting methods as it implements AB-32 and the Proposed SLCP strategy.

A few additional comments:

- It would be extremely beneficial if the scope of projects under the Proposed Strategy could be expanded. For instance, California could establish guidelines for upstream vendors to the state, both in the public and private sectors, whose operations occur outside of California. An example is beef production, given that grass-fed beef results in less methane production than grain-fed beef. There is plenty of precedent. For instance, CARB's Airborne Toxic Control Measure (ATCM) 93120 established formaldehyde emission requirements for all composite wood products sold into the state. Likewise, we must be careful to ensure that our initiatives don't simply shift climate burdens beyond our borders. For instance, our power system is integrally linked to the Western states power grid. Electrons are electrons -- a shift in power sources to reduce our carbon footprint here might simply result in increased impacts elsewhere in the grid.
- We would ask the state to more explicitly address the emissions that are linked to tropospheric ozone, which is an extremely potent GHG compared to CO₂. The co-benefits to human health should make this addition a win-win for the state; additionally, it should help to reduce heat islands that increase the need for air conditioning and thereby help avoid additional CO₂ emissions. Avoiding CO₂ is among the most important steps we can take to address CO₂ in the long-run, along with soil carbon sequestration and sustainable forestry practices.

We appreciate this chance to provide comments, and would welcome an opportunity to share more information in support of these comments with you. Thank you.