

WRITTEN COMMENT LETTER TO CALIFORNIA AIR RESOURCES BOARD

Re: Proposed Amendments to the California Cap On Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation

In order to meet our state's greenhouse gas emissions goals, it is essential that the California Air Resources Board (CARB) reduce the emissions cap used in California's cap and trade (C&T) program. As has been reported by independent analyses, the annual caps through the year 2030 are actually higher than current projected emissions.^{1,2,3} This over-allocation of credits means that the cap and trade program will likely end up having no effect on state emissions at all.

In other words, assuming that the C&T program didn't exist, emissions from the covered sectors would already be lower than the proposed caps leading up to 2030. It's as if a law stated that you were allowed to pollute 100 units next year, even though your best analysis predicts that you weren't going to pollute more than 90 units to begin with. Such a law would have no effect on behavior. The correct remedy would be to set the allowed pollution rate to something like 80 units—otherwise you would simply continue to pollute at 90 units annually.

The IPCC has estimated that annual emissions need to be reduced by around 50% by 2030 to avoid catastrophic effects due to climate change. Since GHGs remain in the atmosphere for up to thousands of years, more emissions in this decade will mean we need to make deeper reductions later, even needing to go to negative emissions. It is crucial that California meet our targets in this decade, especially since our state is on the forefront of this effort.

Though the first C&T priority must be for CARB to reduce emissions caps, we also urge state lawmakers to create additional stronger *local* caps on concentrations of toxins and particulates from fossil fuel combustion.

We are residents of California, aware of our unparalleled role on the front lines of the climate war. There is no other American state that has a size, reputation, regulatory reach, and innovation ecosystem that can counteract the federal government's abhorrent climate policies.

Therefore *we have a unique responsibility* to get the policies right. We request that (a) CARB lower emissions caps to a level that will ensure that we meet 2030 emission goals and that (b) CARB consider additional rules to address the inadequacies in protecting health among local communities. This is about more than just emissions from the Golden State itself—the rest of the world relies on us to set a new gold standard for climate policies, which we can begin to do by fixing the serious flaws in current policy.

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1. <http://wp.nearzero.org/wp-content/uploads/2018/07/Near-Zero-comment-letter-June-2018-workshop.pdf>
 2. <https://calmatters.org/articles/checking-the-math-on-cap-and-trade-some-experts-say-its-not-adding-up/>
 3. <https://lao.ca.gov/Publications/Report/3719>

Signatures:

350 Silicon Valley, Nicole Kemeny, President

Transitions Palo Alto, Jan Rubens, Lead

Carbon Free Silicon Valley, James Tuleya, Board Chairperson

Minerva Ventures, Marianna Grossman, Managing Partner

Mothers Out Front, Adelita Serena, Climate Action Organizer

Carbon Free Palo Alto, Bruce Hodge, Chair

Silicon Valley Courageous Resistance, Cheryl Weiden, Lead, Environmental Interest Group

Fossil Free Mid-Peninsula, Carol Cross, Co-Convenor

ZW Block Leader, Shannon McEntee

Peninsula Interfaith Climate Action, Debbie Mytels, Chair

CuriOdyssey, Rachel Meyer, Executive Director