# May 26, 2016

California Air Resources Board

1001 I Street

Sacramento, CA 95814

# Re: Comments on Proposed Short Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis

The Coalition for Clean Air urges the Air Resources Board to finalize and adopt the Proposed Short Lived Climate Pollutant Reduction Strategy and begin implementing it as soon as possible. Reducing these SLCPs, or “super-pollutants,” is essential to slowing the rapid warming of the planet; in addition, many of the SLCPs are hazardous to human health at ground level, so curbing them provides significant benefits to public health. Action by California can help to spur other states, as well as other nations, to reduce super pollutants.

During legislative consideration of the California Global Warming Solutions Act (AB 32, Nuñez/Pavley, 2006) and during the early years of its implementation, some experts and advocates urged ARB to take quick and aggressive action, as warranted by scientific data, to reduce the generation of SLCPs; but, as former Board Chair Robert Sawyer testified at the May 26 Board Hearing, ARB staff at that time opposed taking such action. We commend ARB’s change of course in recent years to a much more pro-active stance on curbing super-pollutants.

Our organization worked closely with Senators Lara and Pavley on the passage of SB 605 (2014), which requires ARB to develop a plan to reduce emissions of SLCPs no later than January 1, 2016. We believe the Proposed Strategy is a faithful implementation of that law, other than the fact that it is several months overdue – which only emphasizes how important it is to move quickly to put the plan into action.

**The proposed target emission levels are crucial.** The urgency of the climate crisis requires that SLCPs be brought down by substantial amounts by 2030.We believe the proposed science-based targets for black carbon, methane, and hydrofluorocarbons are achievable, and would represent significant progress in the battle against global warming.

**Using a 20-year value for global warming potential is essential.** We agree with the Proposed Strategy’s use of 20-year values for GWP. Curbing SLCPs quickly offers the opportunity to buy some time while carbon dioxide emissions are brought down. Time is short to prevent catastrophic climate change, so a horizon of 20 years – or fewer – must be the standard.

**Restrict Oil and Gas Methane Emissions.** ARB should adopt a final rule this year limiting greenhouse gas emissions from crude oil and natural gas facilities. These major methane sources have gone too long without this kind of regulation. ARB, The Division of Oil, Gas and Geothermal Resources and the other relevant regulatory agencies should take quick and aggressive action to assure that the disastrous methane leak at Aliso Canyon is never repeated.

**Continue Progress on Reducing Black Carbon.** Control measures by ARB and air districts have succeeded in reducing black carbon by 90 percent over the last 50 years; for the sake of human health and climate stabilization we must continue this progress, primarily be reducing particulate matter from diesel exhaust and wood burning. This progress will depend on successful implementation of the proposed Sustainable Freight Action Plan as well as the Mobile Source Strategy.

**Eliminate the Disposal of Organic Waste.** We strongly support the organic waste diversion goals proposed in the SLCP strategy, and we specifically support the commitment to adopt regulations to phase out the disposal of organic waste in landfills. The Proposed Strategy lays out an effective regulatory strategy to prevent the creation of these inherently avoidable emissions by virtually eliminating the landfill disposal of organic waste by 2025. We encourage ARB to continue its close collaboration with CalRecycle, which testified in favor of the Proposed Strategy. We support the more detailed comments filed by Californians Against Waste, including the call for more stringent limits on landfill emissions.

**Regulate Methane Emissions from Dairies.** We support the Proposed Strategy’s call for developing and implementing mandatory regulations to reduce methane from manure management in the animal agriculture industry. The agriculture industry has been exempt from climate standards for too long, and dairies are by far the largest source of methane emissions in California. It is past time for dairies to take responsibility for their methane emissions through enforceable standards.

**ARB Should Move Quickly to Implement SLCP Reduction Measures.** While we support SB 1383 (Lara), we also note that ARB already has authority, under the Global Warming Solutions Act and the California Clean Air Act, to adopt measures to reduce these super pollutants. We urge ARB to adopt the Proposed Strategy and move quickly to implement these measures.

Respectfully,

Bill Magavern

Policy Director

Coalition for Clean Air