



December 16, 2016

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https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=sp2030disc-dec16-ws&comm_period=1

Re: Comments on 2030 Target Scoping Plan Discussion Draft and Dec 16 Public Workshop

Esteemed Ms. Sahota:

On behalf of Friends of the Earth – United States (FOE-US) this letter is provided as comment on the *2030 Target Scoping Plan Discussion Draft (Draft) and Dec 16 Public Workshop (Workshop)*. As with previous submissions, this letter is not comprehensive, but the comments we provide do go to the heart of our environmental and social justice concerns regarding the road map for future California climate policy as it is presented in the Draft. Clearly there are tremendous challenges to be met, and we appreciate the enormity of the task put before the Air Resources Board (ARB) staff for developing an economically just, ecologically literate, and scientifically defensible plan for the State of California to meet greenhouse gas emissions reductions goals.

We commend the State of California political leadership for taking a vocal and public stance challenging those political forces that would suggest that global climate change does not present tremendous risks and existential threats to human society and the planet's life systems. Though we have acute concerns that many of the proposals put forth by state agencies are misguided and lacking in scientific rigor and adequate socio-economic analysis, we are steadfast in our belief that making a priority of addressing climate change is an imperative for the State of California, and we appreciate the public stance regarding the importance of addressing climate change that has been taken by political leadership in the state government.

California Can and Must Provide Fair and Transparent Processes for Public Participation

There is a lot that California can do to reduce our state's climate impact, and public participation in the development of the 2030 Target Scoping Plan Update is one of the most promising process for insuring that climate policy in the state of California is scientifically defensible, economically equitable, and socially just. We commend the Air Resources Board (ARB) for all the steps taken that insure that the development of policy is transparent and inclusive. The lack of notice, the short period for public comment, and the delay or absence of integration of previous public input that surround the presentation of the Draft and corresponding Dec 16 workshop are however grounds for concern that climate policy planning in the State of California is being pushed forward in disregard of the public and civil society.

Disconnect Between Rhetoric Regarding Environmental Justice and Substance of Discussion Draft

We have consistently and emphatically offered our public support for the priority that the ARB has given to the processes and recommendations of the Environmental Justice Advisory Committee (EJAC) in the

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Scoping Plan Update process. The increase in material and institutional support of the EJAC has been instrumental in strengthening public participation in the Scoping Plan Update process. We hope and expect that the role of the EJAC will continue to be expanded. The EJAC is without question one of the most promising vehicles for insuring that California climate policy is built from the bottom up, and not imposed from the top down.

Based on the experience of FOE-US in the State of California, nationally in the United States, and internationally as a member of a federation of more than 70 organizations in 70 countries around the world we raise a red flag regarding the disconnect between the rhetoric regarding Environmental Justice and the substance of cornerstone policy proposed in the Draft. The Draft goes to great lengths to address Environmental Justice issues and confirm the widely-understood importance of the EJAC to developing climate change mitigation policy that is socially equitable and scientifically defensible. Unfortunately, it appears ARB staff are just paying lip service to Environmental Justice dynamics and issues.

In reviewing the EJAC recommendations which are included in the Appendix of the Draft even a casual reader would be struck by the way the policy proposals disregard the most important recommendations. For instance, the EJAC makes an explicit recommendation, one that has been made repeatedly by the EJAC in the various incarnations of the committee, to not make Cap-and-Trade (market-based market mechanism) a cornerstone of future climate policy. In defiance of the law, the best available science and the ARB rhetoric concerning environmental justice the Draft and accompanying scenarios reflect the intention of ARB staff to stubbornly push onwards with unjust and scientifically questionable pollution trading. The EJAC recommendations also are explicit in articulating the need to exclude International Sector-Based Offsets (REDD offsets) out of the California Cap-and-Trade program. Yet the Draft completely ignores those recommendations. The implications of this disconnect are so obvious that they do not need to be stated.

Addressing Deforestation and Forest Degradation in California Is an Imperative

On repeated occasions the ARB and other relevant California natural resource management agencies have spoken of the importance of forests in understanding, mitigating and responding to climate change. We support that position and are in favor of forest conservation in principle. As we have said before, and even if the ARB is not explicit in saying so, we strongly support establishing measurable and aggressive goals in reducing emissions from deforestation and forest degradation in the forests of California. This will most likely require a suite of policies that will reduce the use of the most destructive forest management activities such as clearcutting and high-density variable retention, as well as more wholistic approaches to addressing the economic motors of forest destruction in California's globally important forests.

To that end we believe that there exists an imperative that a frank and science-based assessment of the legacy and current climate impacts of silviculture applications (i.e. industrial forestry and timber harvest) in California is provided as soon as possible. This includes addressing the legacy impacts of such practices in creating a landscape that is evolved to fire disturbance but exhibits volatile fire disturbance behaviors related to past deforestation and mono-culture plantation management. We are steadfast in our support for the ARB taking a key role in forging a just and equitable transition to a low emissions economic development path, most especially here at home in rural California. Having accurate data that informs a robust science-based evaluation of the climate impacts of forest management practices is crucial to California providing the international global climate leadership that ARB is so eager to promote.

Our organization attended both the Nov 7 workshop on "Natural and Working Lands" and the Dec 14 workshop regarding carbon sequestration modeling. We have some concerns that there exists an absence of context when past deforestation is not adequately taken into consideration in modelling and policy development. This absence of context obfuscates the damage that has been done and continues to be done to California's forest carbon stocks from industrial timber harvest. What is clear is that the loss of

biomass from California's wildland ecosystems is severe. Much of this contemporary and historic loss is due to deforestation and forest degradation resulting from human economic activities, such as timber harvest, mining, and cattle grazing. Reducing the climate damage from these industrial activities must be made a priority. The staff of ARB go to great extents in the Draft to suggest that global forest conservation would be one of the best climate change mitigation strategies. Our organization wholeheartedly agrees, though we would contend that the ARB needs to raise the bar when it comes to reducing emissions from deforestation and make a priority of California's forests. One of those first steps in raising the bar is a frank and transparent admittance that dramatic deforestation in California's forests has occurred and still is occurring. Deforestation in the world's most important forests is not a phenomenon that occurs in an idealized and romantic land far far away, it is a serious historic and current problem in California and it needs to be addressed in an urgent manner for the state to establish effective climate change mitigation policy.

High Risk International Sector-Based Offsets Must be Dropped as a Policy Recommendation

Protecting tropical forests is fundamental to effective climate change mitigation strategies. For this reason, FOE-US works extensively domestically and internationally to address the main economic drivers of tropical deforestation. Those drivers are largely the production and extraction of commodity resources for consumption on global markets, including in California, one of the wealthiest economies in the world. We commend the ARB for suggesting that addressing commodity chains could foreseeably be part of California climate policy in the future.

However, the commitment expressed in the Draft to pursue linkage with Acre, Brazil, to open the door to the inclusion of International Sector-Based Offsets in California Cap-and-Trade is misdirected and colonialist. This highly controversial proposal is replete with human rights, lands rights, and indigenous rights concerns that have been extensively documented. Our organization has provided extensive comment to the ARB regarding the high-risk proposal of including International Sector-Based Offsets in the California carbon market. There are many promising opportunities for California to engage in the international arena for supporting socially just and scientifically defensible climate mitigation efforts. The expansion of California pollution trading under the rubric of Cap-and-Trade to include REDD-based offsets is not defensible scientifically nor in terms of social justice. To be clear, the fundamental premise behind the inclusion of International Sector-Based Offsets in the California Cap-and-Trade program, the idea that it is possible to "neutralize" the emissions from burning fossil fuels with carbon sequestration in forest ecosystems, is based on an erroneous assumption regarding the atmospheric impacts of human disruption of global carbon cycles. In this age of egregious climate science denial, it is exceptionally dangerous that the State of California and the proponents of including REDD-based offsets in the California Cap-and-Trade program continue perpetuating a scientifically questionable policy proposal. It is necessary for the State of California to finally move on from this high risk and dubious scheme, and as such it is essential that the International Sector-Based Offsets regime be eliminated from future California climate policy.

Carbon Offsets Undermine Real Innovation and Will Make Things Worse

It is unfortunate that in this era of egregious climate science denial that ARB staff remain hypnotized by the scientifically dubious utilization of carbon offsetting as a climate change mitigation tool. The ongoing reliance on and proposed use of carbon offsets in various elements of California climate policy is without scientific legitimacy and is dangerously misleading. Informed analysis concludes that offsetting is worse than doing nothing because it almost certainly contributes to a net increase in the absolute rate of global emissions growth. It may look good on paper, but in the atmosphere such Enron accounting is not convincing as it is a spurious argument that offsets reduce emissions to levels at or before those that would have transpired had the activity being offset not occurred.

A central problem with carbon offsetting is that the false promise of carbon neutrality triggers a rebound away from meaningful mitigation and towards the ongoing reliance on and development of further high carbon infrastructures at a time when a rapid and drastic transition needs to be undertaken by human society away from a high carbon economy. When offsetting is deemed to have equivalence with real emissions reductions at the source the incentive to move to lower carbon technologies, behaviors and practices is reduced accordingly. As we have already seen in California, carbon offsetting militates against market signals to improve low carbon travel and technologies, while politically facilitating the ongoing pursuit of capital-intensive development of high-carbon infrastructure. Our organization, based on our experience around the world, recommends that California make a strong move away from the False Solution of relying on carbon offsetting in climate policy, whether it be for local development projects or with the market-based mechanism of the California Cap-and-Trade Program. FOE-US has communicated our opposition to Cap-and-Trade being included in the 2030 Target Scoping Plan update process in another letter.

Develop Robust Scenarios for Consideration in the Scoping Plan Update

The scenarios offered for consideration with the Draft were woefully inadequate. The need to provide robust alternative scenarios to inform the Scoping Plan Update should be crystal clear to responsible officials, unless it is that the entire process is simple window dressing to disguise an executive agenda that has already been pre-determined. An authentic effort will be built around detailed and informed presentation of distinct scenarios that contain a thorough and detailed exploration of a variety of options, including well developed scenarios that feature a carbon tax that generates substantial revenue for climate change mitigation projects that would be implemented across all of California as well as providing a financial incentive for greenhouse gas emitters to reduce their climate impact. We strongly suggest that scenarios be developed that are constructed around the Greenhouse Gas Reduction Fund (GGRF) with a fair and in-depth exploration of the various instruments that could be utilized for securing revenue for the GGRF. The rudimentary scenarios as presented in the Scoping Plan Update Concept Paper were woefully inadequate. Legislation that was passed this summer was explicit in setting ambitious emissions reductions goals and prioritizing direct emissions reductions at the source. This legislation was also explicit in not providing authorization for the Cap-and-Trade Program beyond that which was already provided in the 2006 Global Warming Solutions Act. It is incumbent upon the ARB to develop scenarios for the future of California climate policy that are not based upon predetermined outcomes, that do not favor polluting industry, and that are scientifically defensible, economically equitable, and socially just.

Thank you for your attention to this letter. Our organization will remain engaged with and attentive to ARB leadership in developing climate policy in our state that provides global and national leadership.

Respectfully,



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