**Earth Day Los Angeles Comments on the ARB Climate Change Scoping Plan First Update Draft, February 2014**

Submitted via webpages:

<http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=proposed-sp-ws&comm_period=1>

<http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=drafteaspu14&comm_period=N>

Earth Day Los Angeles appreciates the opportunity to provide these comments to the California Air Resources Board on the Climate Change Scoping Plan First Update Draft dated February 2014. We endorse the Sierra Club comments submitted November 1, 2013, on ARB’s Discussion Draft AB 32 Scoping Plan Update, which has many details on our main points below.

1. **New GHG targets**. We urge ARB to initiate a state process to set more aggressive California greenhouse-gas reduction targets for 2020, 2030 and beyond. ARB should recognize that Governor’s Executive Order S-3-05 is no longer adequate, and a new state trajectory should be mandated, through a new process that is informed by the latest climate science, including IPCC’s new urgency and new methane GHG values. Stabilization of greenhouse gas emissions at 450 ppm and targets of less than 2ºC increase are insufficient to minimize the risk of catastrophic outcomes.[[1]](#footnote-1) We believe it is technically possible and economically feasible by 2030 to cut GHG emissions from the electric sector by 80% over 1990 levels and from the transportation sector by 50%.

2. **Higher RPS.** We urge ARB to call upon CPUC to increase the state’s Renewable Portfolio Standard (RPS) to 40% by 2020 and set a 2030 standard at 70%. We believe a pathway is possible to achieve these targets using only available and feasible current technologies. An open public process should develop sector-by-sector near-term and medium-term targets. New RPS targets should have substantial carve-outs for distributed renewable energy systems, far beyond the governor’s goal of 12 GW.

3. **Total Decarbonization by 2050**. We recommend that ARB formulate the state’s ultimate 2050 target as total elimination of GHG from the electrical and transportation sectors. We believe that even this may not be sufficient to moderate climate disruption to safer levels and avoid catastrophic outcomes, and we recognize the need also for serious work to remove substantial amounts of anthropogenic carbon already in the atmosphere.

4. **New Utility Model**. We recommend that ARB and other state agencies begin to examine and develop a New Utility Business Model as well as a New Regulatory Model. The traditional utility business model was developed many decades ago for industrial-scale, central-station, one-way flow, primarily fossil-fuel energy and is no longer suited to advanced, emerging renewable technologies, new flexible information flows, carbon reduction exigencies, and new economic and consumption conditions.

5. **No More Big Gas-Fueled Plants**. We urge ARB to urge all agencies to stand firm against any more new, major gas-fired generation capacity in California. Climate targets will not accommodate more dirty fossil-fueled electricity. There is now a sufficient array of clean alternatives to integrate rapidly growing quantities of renewables without more gas power plants, either baseload or peakers, particularly if market penetration of the full span of possibilities of decentralized power is facilitated by the agencies. (Some new, highly efficient combined heat-and-power could be the exception to getting off gas.)

6. **Clean** **Transportation.** The Draft Scoping Plan Update does a good job of laying out the challenge and need to achieve and extend movement toward zero and near-zero vehicles. We are glad the plan recognizes that the Clean Air Act requires NOx reductions on the order of 90% below 2010 levels to meet 2032 ozone requirements in South Coast and San Joaquin Valley, which will necessitate much greater use of ZEVs.

We also appreciate the proposal to advance the use of zero and near-zero vehicles in the freight sector. However, planning must assure a sufficiently comprehensive charging infrastructure to support not just the initial ZEVs but also eventually a mostly-ZEV fleet.

However, the draft Scoping Plan’s transportation discussion falls short in a number of areas. Although the Transportation Working Paper, page 36, states, “ARB will assess the role of natural gas in the low-carbon transportation fuel future,” the plan appears to advocate for increasing dependence on natural gas as a fuel source, when it states on p. 55, “A heavy-duty vehicle Phase 2 standard, … Under these standards, natural gas (NG) trucks will likely be deployed in large numbers.” This makes no sense given that natural gas extraction throughout the country, especially through fracking technologies, is linked to high levels of methane leakage, making the climate impacts of natural gas much worse than diesel. Additionally, developing a larger natural gas infrastructure to fuel vehicles will drain investment from truly clean vehicle fuels and infrastructure.

Additionally, the state has in the past played a stronger, greater role in helping ensure effective mass transit within cities, especially through funding incentives and other methods. The Scoping Plan should discuss ways in which the state can help accelerate mass transit development and improve existing mass transit operations.

Important market mechanisms can be advanced by new regulations, laws and incentives, such as road use fees, appropriately adjusted for differing emissions levels of vehicles. We appreciate the mention of parking cash out (in the Transportation Working Paper, page 23), but unbundling the pricing of parking is also an important option. The scoping plan should note this and offer recommendations that encourage the use of reasonable pricing mechanisms.

The Scoping Plan should also note that in certain cases, modal shifts may be the best route to accelerating emissions reductions in the freight sector.

Finally, the ARB must set much higher targets for MPO VMT reductions required under SB 375, so that they at least meet the requirements of Executive Order S-3-05. An example of the current ARB targets being too low is shown in the case of the San Diego Association of Governments (SANDAG). ARB required only 13% reduction, which was exactly what SANDAG requested (and which would allow all of their planned freeway expansions). However, the California Attorney General sued SANDAG, and the judge found that the EIR for the SANDAG transportation plan was “impermissibly dismissive of S-3-05.” We request the next set of targets be transparently calculated to show how each of the regional transportation plans will meet at least the requirements of S-3-05, and hopefully the higher standard required by the latest climate science.

1. “Climate impacts accompanying global warming of 2ºC or more would be highly deleterious. Already there are numerous indications of substantial effects in response to warming of the past few decades. That warming has brought global temperature close to if not slightly above the prior range of the Holocene. We conclude that an appropriate target would be to keep global temperature at a level within or close to the Holocene range. Global warming of 2ºC would be well outside the Holocene range and far into the dangerous range.” Hansen, J., et al., PLOS ONE, **8**, e81468 (2013). [↑](#footnote-ref-1)