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# Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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## ENVIRONMENTAL HEALTH COALITION COMMENTS ON AB32 SCOPING PLAN

Thank you for your hard work on behalf of our communities. While the Scoping Plan is a start, there is a better way to reverse climate change and protect our communities.

- **Eliminate Cap-and-Trade.** Every child deserves to live in a clean, healthy and safe neighborhood. Cap-and-trade allows air pollution to worsen in our most polluted communities.
- **Require Local Governments to Adopt a Mandatory Reduction Goal of 15% from Current Levels by 2020, which include municipal emissions and community emissions (in parallel with the same State requirement).**
  - Language currently “encourages” local governments to adopt carbon reduction goals (p. 27).
  - We recommend that the Scoping Plan mandate reductions with incentives and penalties.
- **Require Local Governments to Adopt a Mandatory Goal of Energy Net Zero Structures by 2020 for Residences and 2030 for Commercial/Industrial Sectors (in parallel with CEC and CPUC’s stated efficiency goals).**
  - Language currently “encourages local government to raise the bar by adopting ‘beyond-code’ green building requirements.” (p. 57)
  - Given that almost 25% of CA’s greenhouse gas emissions can be attributed to buildings – we need mandatory reduction goals with incentives and penalties.
- **Require Mandatory Annual “Report Cards” for Local Government Agencies (in parallel with the Requirement for State Agencies).**
  - Report Cards will track progress to ARB for benchmarking and accountability.
- **Support 33% RPS w/ Priority for Local Renewables vs. New Transmission.**
  - Give preference to local green power sources, in line with the preferred loading order that improves efficiency and reliability -- and builds local economies with well-paying local jobs.
  - Include Feed-In Tariff to Make Small-Scale Renewable Facilities Cost-Competitive
  - Replace the Volatile “Market Price Referent” with “Reasonability” Criteria
  - Include Penalties for Noncompliance
- **Phase-Out Aging Power Plants.** Phase out aging power plants and requirements to replace that energy with cleaner, sustainable energy sources in alignment with the state’s preferred Loading Order.
  - According to the CEC report, aging power plants constitute 22 millions tons of CO<sub>2</sub> a year or 6% of the state’s global climate change emissions.
  - The ARB should require that replacement energy projects must follow the state’s preferred loading order.