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# California Council for Environmental and Economic Balance

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October 2, 2012

Mr. Kurt Karperos  
Assistant Division Chief, Planning & Technical Support  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

## RE: Vision for Clean Air: A Framework for Air Quality and Climate Planning

Dear Mr. Karperos:

The California Council for Environmental and Economic Balance ("CCEEB") is a coalition of California business, labor and public leaders which strives to work together to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization.

CCEEB appreciates the opportunity to offer the following comments on the draft "Vision for Clean Air: A Framework for Air Quality and Climate Planning" ("Vision" or "Framework") released by staff of the Air Resources Board ("ARB"), the South Coast Air Quality Management District and ("SCAQMD"), and, the San Joaquin Valley Air Pollution Control District ("SJVAPCD") as a coordinated effort to look at strategies needed to meet California's multiple air quality and climate goals well into the future. We hope that our comments can help further the goals and objectives of the framework document.

As the ARB begins and continues long-term air quality and climate change planning activities, CCEEB appreciates this initial effort to consider reductions of criteria pollutants and greenhouse gases in a single "vision". We understand that the document is not intended to "*identify a specific course of action to meet each air quality and climate goal. Nor are the scenarios a prediction of the actual mix of vehicle technologies, fuels, and clean energy sources expected to emerge in the long term*"<sup>1</sup>. While we believe the draft Vision does a good job of showing the magnitude of change needed, and is a first step in taking a broad view of future planning needs across multiple pollutants over the long term, we do have overarching questions regarding process and the proposed scenarios.

<sup>1</sup> *Vision for Clean Air: A Framework for Air Quality and Climate Planning*, p. 6

### **Improved Analysis**

CCEEB recognizes that the Vision does not include important areas of analysis that will ultimately inform future air plans and rulemaking. Going forward, we hope to work with the ARB, SCAQMD and SJVAPCD to both improve and strengthen the vision scenarios, as well as to conduct complementary and more detailed analysis suitable for future air plans. We would also like to see the development of a “feedback loop” where the findings from the more in-depth analyses lead to updates to the scenarios. Such in-depth analysis must include:

- a. Cost effectiveness
- b. Technological feasibility
- c. Market penetration and commercialization
- d. Infrastructure needs and feasibility

### **Process Questions**

CCEEB asks these process questions:

- a. How and with what frequency will the Vision scenarios be updated?
- b. How will new agency analysis be incorporated into the scenarios? What happens if more detailed analysis shows that the scenarios are either not feasible or otherwise not reflective of real world trends?
- c. Will ARB incorporate outside research and data into the Vision? If so, how might this be done?
- d. How will ARB engage other agencies to better identify the infrastructure requirements of its different technology scenarios? For example, ARB assumes that by 2030 about 45% of all passenger vehicles sold will be either BEV or PHEV, and then further assumes that half of the electricity needed to power these vehicles will come from within the given air basin. However, the Vision document does not describe what additional generation capacity would be needed, or the feasibility of siting them in the given air basin, nor how well this aligns with State and regional energy plans and forecasts.

### **Suggested Changes**

CCEEB offers the following suggestions to improve the utility of the scenarios:

**Leverage knowledge of industry:** It is important for CARB and the Air Districts to work with Industry to identify technologies and pathways towards implementing the most cost-effective measures to meet the state's air quality challenges. The draft Vision document only presents one basic scenario that ultimately relies on large-scale use of a few specific technologies, like electric and fuel-cell vehicles. By leveraging the knowledge base and expertise of those involved in advanced fuels and technology, the state can develop more robust scenarios that include a wider selection of economic and technologically feasible pathways that also meet air quality targets.



**Consider adding different mode-shift scenarios:** ARB assumes straight-line reductions across each mobile source category, as well as business as usual growth forecasts. However, mode shift is an important strategy and worth investigating within the scenarios. For example, the Vision document uses EMFAC forecasts for its assumptions about the growth in total number of passenger vehicles. However, unlike forecasts, scenarios should be malleable enough to test the degree to which greater mode shift to transit or active transport can help meet air quality goals. Another example is potential mode shift in freight from truck to train, which could yield significant benefits regardless of the future state of technology for either category. This ability to test mode-shift scenarios seems particularly important in light of the State's SB 375 goals and the increasing importance land use and transportation planning play in solving air quality problems.

**Consider adding different market penetration scenarios:** How the Vision scenarios play out in the real world will depend on a three-legged stool of partners: (1) government, which sets policies affecting air quality, climate change, energy and transportation; (2) businesses and researchers who develop advanced technologies; and (3) actual customers who ultimately get to decide what is deployed by voting with their dollars. Updates to the scenarios should incorporate a better understanding of consumer preferences and likely market penetration rates. It would also be good to test the impact of different commercialization scenarios, since government policies may be needed to help correct for market inefficiencies.

**Consider all technologies:** All technologies should be considered, not just zero- and near-zero emission technologies. The potential issues and trade-offs of the future mix of fuel and technology options should be fully considered.

CCEEB supports the objectives of the Vision process, and recognizes its limitations as well. We appreciate the time and effort required to develop the proposed Vision for Clean Air: A Framework for Air Quality and Climate Planning. This is an important issue to our members, and we would like to work with CARB, SCAQMD, and SJVAPCD on these issues. If you have comments or questions concerning the enclosed comments, please contact me or Ms. Kendra Daijogo of The Gualco Group, Inc. at 916/441-1392.

Thank you for your consideration of these comments.

Sincerely,



GERALD D. SECUNDY  
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cc: Honorable Matthew Rodriguez  
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