



February 20, 2014

The Honorable Mary D. Nichols  
 Chairman  
 California Air Resources Board  
 1001 I Street  
 Sacramento, CA 95814

**RE: Planning for Greenhouse Gas Emissions Reductions After 2020**

Dear Chairman Nichols and Members of the Board:

On behalf of the undersigned organizations, we would like to thank the California Air Resources Board (CARB) and its staff for their diligent work implementing the Global Warming Solutions Act of 2006 (AB 32). **We write to offer our wholehearted support for CARB to begin planning for greenhouse gas (GHG) emissions reductions beyond 2020 through the Scoping Plan update, including the recommendation that the state adopt a “midterm” limit for statewide GHG emissions in 2030.**

It is important that California continues to be a leader in addressing climate change. In passing AB 32, the Legislature declared that “[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California,” further noting California would be impacted by changes in air quality, water quality and quantity, sea level, human health, and the natural environment.<sup>1</sup> In the seven years since the law’s passage, a more refined scientific understanding of the earth’s response to global warming has only heightened the stakes for California and the world.<sup>2</sup>

<sup>1</sup> Health and Safety Code Section 38501(a)

<sup>2</sup>Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. *Indicators of Climate Change in California*. August 2013. <http://www.oehha.ca.gov/multimedia/epic/2013EnvIndicatorReport.html>; and

Fortunately, California is not acting alone. In fact, ten percent of the world's population and a third of its GDP come from areas implementing carbon caps, and just last month the European Commission released recommendations for a 40 percent reduction in GHG emissions below 1990 by 2030. In addition, California's climate leadership continues to bear fruit in Washington, D. C., and across the nation. In 2009, President Obama committed the U.S. to reduce emissions 17 percent below 2005 levels by 2020, and last June the President released a climate action plan that details how his administration will continue to lead in reducing global warming pollution.<sup>3</sup>

Moreover, it is increasingly clear that extremely deep reductions in GHG emissions are necessary to prevent dangerously disruptive climate impacts. According to the latest assessment from Intergovernmental Governmental Panel on Climate Change, the world must limit itself to a carbon budget of one trillion metric tons of carbon to have a two-thirds chance of staying below a 2°C increase in world temperature, the level agreed to by world leaders that signed the Copenhagen Accord in 2009.<sup>4</sup> Given that the world has already emitted half of that budget, steep reductions are necessary in the coming decades. As one of the world's largest emitters, California's leadership will be essential to help reduce global emissions and pave the way for others to act.

California must not wait to begin planning GHG emissions reductions beyond 2020. A recent study by Lawrence Berkeley National Laboratory (LBNL), commissioned by CARB, found that the state is on track to meet its 2020 GHG emissions target, and has the policy framework in place to get a head start toward achieving its long-term emissions reduction goal of 80 percent below 1990 levels by 2050.<sup>5</sup> However, the report also underscores the need to strengthen and expand existing policies, and adopt new policies, to ensure we stay on track after 2020. As the Scoping Plan update notes, California will need to increase the pace of reductions after 2020 to keep pace with its emission reduction targets.<sup>6</sup> With 2020 just six years away, it is only prudent to begin to plan now for the investments and infrastructure California will require to fully transition to a clean energy future, and avoid locking in emissions for years to come. Fortunately, these efforts are consistent with efforts already underway to achieve state and federal health-based air quality standards.

To guide these efforts, we strongly support CARB's recommendation to establish a statewide GHG emissions limit for 2030. We recognize that all decision-makers, including the Legislature, Governor, and other expert agencies, have a role in determining the path California takes to continue GHG emissions reductions beyond 2020. However, CARB's authority to begin planning for GHG emissions reductions beyond 2020 is beyond dispute. AB 32 clearly provides

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California Climate Change Center. 2012. *Our Changing Climate 2012, Vulnerability & Adaptation to the Increasing Risks from Climate Change in California*. California Climate Change Center.

[http://climatechange.ca.gov/climate\\_action\\_team/reports/third\\_assessment/index.html](http://climatechange.ca.gov/climate_action_team/reports/third_assessment/index.html)

<sup>3</sup> Executive Office of the President, *The President's Climate Action Plan*, June 2013

<http://www.whitehouse.gov/sites/default/files/image/president27sclimateactionplan.pdf>

<sup>4</sup> Intergovernmental Panel on Climate Change, *Climate Change 2013, The Physical Science Basis*, 2013.

<http://www.ipcc.ch/report/ar5/wg1/>

<sup>5</sup> Greenblatt, Jeffrey B., *Estimating Policy-Driven Greenhouse Gas Emissions Trajectories in California: The California Greenhouse Gas Inventory Spreadsheet (GHGIS) Model*, Ernest Orlando Lawrence Berkeley National Laboratory, November 2013. <http://eetd.lbl.gov/sites/all/files/lbnl-6451e.pdf>

<sup>6</sup> California Air Resources Board, *Proposed First Update to the Climate Change Scoping Plan: Building on the Framework*, February 2013, 37. <http://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm>

that the 1990 statewide GHG limit remains in effect unless otherwise amended or repealed.<sup>7</sup> As the recent LBNL report underscores, simply remaining at 1990 GHG levels beyond 2020 will require significant additional planning and policy development in the face of population and economic growth.<sup>8</sup> AB 32 also reflects the Legislature’s clear intention for CARB to “maintain and continue reductions in emissions of [GHGs] beyond 2020” and requires CARB to “make recommendations to the Governor and the Legislature on how to continue reductions of [GHGs] beyond 2020.”<sup>9</sup> CARB included a brief discussion of GHG emissions reductions after 2020 in the original 2008 Scoping Plan.<sup>10</sup> Thus, it is entirely consistent, appropriate and lawful to continue and refine that discussion in the 2014 Scoping Plan update. Moreover, planning for emissions reductions beyond 2020 will send a market signal to support continued investment and innovation in low-carbon technologies.

The Scoping Plan represents the guiding document for the state’s emission reduction goals. While prepared by CARB, it reflects the input of many state agencies, the Climate Action Team, multiple advisory committees, and a diverse array of stakeholders solicited over the course of a robust public process. As the state begins to plan for the next phase of its comprehensive climate mitigation program, the Scoping Plan update is the appropriate forum to initiate these discussions. We strongly support CARB’s work to start planning beyond 2020 to ensure California stays on track to achieve its long-term climate goals.

Sincerely,

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<sup>7</sup> Cal. Health & Safety Code § 38551(a)

<sup>8</sup> Greenblatt, Jeffrey B., 2013.

<sup>9</sup> Health and Safety Code Section § 38551

<sup>10</sup> California Air Resources Board, *Climate Change Scoping Plan, a framework for change*, December 2008, ES-12.  
[http://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf)

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