Energy Policy Initiatives Center

University of San Diego

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Mary Nichols, Chair

California Air Resource Board

1001 I Street

Sacramento, CA 95814 April 10, 2017

Dear Chair Nichols and Board Members,

Please find below our comments on the California Air Resources Board (CARB)’s 2017 Climate Change Scoping Plan Update, dated January 20, 2017. We are the Energy Policy Initiatives Center (EPIC) located at the University of San Diego. We are and have been (since 2008) closely involved with climate and energy planning and greenhouse gas mitigation analysis at the local and regional level.

1. The fact that local actions are critical for implementation of California’s ambitious climate agenda is noted throughout the draft document (eg page 27, 130, 132 etc). The impact of local GHG reduction plans, if implemented “would result in a reduction of more than 45 MMT CO2e each year by 2020, and 83 MMTCO2e each year by 2050” (page 131). It is unclear how much of these reductions are due to state measures with impacts benefitting local jurisdictions, and how much is due to local action beyond state measures. If the noted reductions are due to local measures, it is also unclear how these reductions, if achieved, are taken into account if at all, for state reductions in 2020, 2030 and 2050. Clarification would be appreciated.
2. Re: Recommended Local Plan-Level Greenhouse Gas Emissions Reduction Goals (page 130 ff.)

There are several problems associated with the new recommendations related to the introduction of per capita goals for local jurisdictions. While the second paragraph does indicate that a local jurisdiction may choose to derive a region-specific, evidence based per capita or service population GHG goal, it is unclear how a region-specific goal should be derived. There might be several ways to do this, and it can be subjective because this requires identifying the components of the regional or local economy in comparison with CARB’s inventory categories. In addition, CARB’s inventory subcategories may not be the same as what goes into subcategories in local inventories.

Second, the term “service population” is undefined and its reference to SB375 is either incorrect or not readily available. To our knowledge, SB375 is related to per capita goals, but not to per capita based on service population. The term service population is also not defined in CEQA or its guidelines. Therefore its use in this context without a definition, will lead to confusion and inconsistencies across cities, if applied.

Third, page 133, paragraph 2 states that “This local government–recommended goal expands upon the reduction of 15% from “current” (2005-2008) levels by 2020 previously recommended….” But hypothetical application of the per capita target for smaller cities in our region shows that these cities would *currently already* be emitting between 50 and 100% less than the proposed per capita (whether based on total or service population) for 2020, AND in some cases are already emitting less than the 2030 target. This may contradict CARB’s stated need for action by local governments, in particular that to reduce VMT, which requires long-term planning now. If small cities can wait until much after 2020 to begin reductions, it will also become more difficult for them to contribute their fair share of the 2050 goals, since application of the per capita targets at the local level for 2050 still requires significant action from local governments.

If small cities have already adopted climate action plans following the previous 15% less than “current levels” recommendation, and other small cities adopt climate action plans today based on the per capita target of the proposed scoping plan update, similarly sized cities will have very different reduction targets for 2020 (with some plans based on achieving 15% less than “current levels”, some based on per capita would have no measures at all, some may greatly increase emissions) and potentially even for 2030.

We do not see this difference in applying per capita targets versus the mass-based target recommended previously, for a relatively large city such as San Diego.

Therefore, clarification on the use of a per capita target is necessary for two reasons: A) to reduce significant inconsistencies due to subjective application of a per capita target across local government GHG reduction plans, B) to enable action sooner rather than later by any local jurisdiction, regardless of population, to the best of its ability, to contribute to achieving the state 2050 targets.

We would be happy to provide examples of the above effect if requested.

Thank you for the opportunity to comment.

Sincerely,

Nilmini Silva-Send, *PhD*

Assistant Director/Adjunct Professor

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