

The Coalition for Clean Air (CCA) supports a 2030 Target Scoping Plan that will ensure California meets its 2030 climate change mitigation goal, while also maximizing opportunities to address long-standing environmental injustices in communities faced with high levels of pollution and social vulnerabilities to pollution. We believe these outcomes can be best achieved by a suite of measures that prioritize a reduction in greenhouse gas emissions directly at mobile and large stationary sources, and supplemented by an emissions tax system that covers greenhouse gases as well as criteria air pollutants and toxic air contaminants. We appreciate that the 2030 Target Scoping Plan Update Discussion Draft (Discussion Draft) considers several of these issues, and emphasizes the transportation sector which is the largest source of climate-disrupting and health-damaging pollution in California.

CCA favors a carbon tax over cap-and-trade as the State's carbon pricing mechanism, because of concerns that emissions-trading programs do not mitigate localized pollution burdens adequately and could exacerbate pollution hotspots. While we recognize the challenges involved in designing and implementing an emissions tax, we urge the Air Resources Board (ARB) to make the following revisions so that references to a carbon tax in the Proposed 2030 Target Scoping Plan (Proposed Plan) present a more accurate description of this policy option and a fairer comparison with cap-and-trade. For instance, the Proposed Plan should clearly state that a carbon tax could generate revenue for climate mitigation programs and projects just as a potential post-2020 cap-and-trade program would – and likewise, carbon tax revenue could be deposited into the Greenhouse Gas Reduction Fund and adhere to state laws (SB 535 and AB 1550) regarding equitable climate investments in and benefiting disadvantaged and low-income communities. The Proposed Plan should also discuss how a cap on emissions, or other environmental integrity mechanisms, could accompany a carbon tax in order to address the issue of uncertainty in emission reductions. Furthermore, CCA requests ARB to consider in the Proposed Plan the benefits and challenges associated with expanding a carbon pricing mechanism to include air pollutants. We believe a broad tax proposal that covers both greenhouse gases and air pollutants would help achieve deep reductions in emissions needed to meet federal, health-based air quality standards and generate revenues for incentive funding at the scale required to transform California's transportation, industrial, and energy sectors. If cap-and-trade were to be extended post-2020, CCA would support and strongly urge ARB to institute all of the potential changes to the program mentioned in the Discussion Draft (page 91) so that communities living near large sources of emissions have greater assurances of lower pollution burdens and improved air quality.

The Transportation Sustainability section in the Discussion Draft includes several important measures that should be pursued. CCA supports establishing a strong target of 100 percent zero-emission vehicle (ZEV) sales facilitated by well-designed regulations and complementary incentive funding. We have and continue to support specific measures

identified in the Discussion Draft, such as sustained incentives for consumers, dealer incentives, and free or low-cost electricity that will help to accelerate the sale of ZEVs in California and make ZEV ownership more desirable to consumers.

We also appreciate the attention paid to increasing ZEV penetration in the medium- and heavy-duty vehicle sector, because of the multiple environmental, public health, social justice, and economic benefits that would result from a transition to a more sustainable freight system. Goods movement in California must be addressed more aggressively due to the severe environmental injustices associated with freight transportation, which is projected to grow considerably in the coming years. CCA recognizes ARB's efforts to improve data collection at freight hubs and facilities, and recommends including a proposal in the Proposed Plan to establish aggressive targets for ZEV penetration in freight vocations in the near term as more information is available. The interaction between on-road vehicles and freight infrastructure is also important to address, and the examples provided under the "Sustainable Freight Goals" (page 52) are useful in showing how these elements can be aligned toward a low carbon transportation system. In addition, ARB should consider expanding the support and assistance available to local and regional governments (under "Known Commitments-Vibrant Communities and Landscapes," page 55) to include planning and implementation of widespread transportation electrification infrastructure – an element likely to be incorporated into the updated Regional Transportation Plan (RTP) Guidelines in January 2017.

CCA agrees with the three main "Clean Fuel Goals" listed in Discussion Draft that are aimed at reducing emissions from transportation fuels, and recommends adding Renewable Diesel to the second point about development and deployment of low carbon fuels. We also support implementation of the known commitments for cleaner fuels, namely increasing the stringency of the Low Carbon Fuel Standard. In addition, CCA strongly urges ARB to begin development of the potential new clean fuel measures, and a Low Emission Diesel Standard in particular. This measure is urgently needed in order to make significant progress in the near-term on climate, air quality, and public health, while zero-emission technologies are developed for the heaviest-duty trucks and equipment types for which a zero-emission alternative does not yet exist. Lastly, we recommend broadening the discussion of cross-sector interactions with respect to transportation fuels to include environmental justice, though we understand the emphasis on the consequences for greenhouse gas emissions. To be specific, CCA believes policymakers should safeguard against a concentration of Natural Gas and other fueling depots (even if the fuels are low carbon) in disadvantaged communities, which would lead to increased truck traffic and attendant problems in areas already facing high cumulative environmental impacts.

As stated in our November 2016 comment letter, CCA is a strong supporter of the Refinery Measure and other potential new measures to reduce emissions from the Industrial sector. We support implementation of the main strategies described in this section of the Discussion Draft that focus on addressing emissions generated by fuel combustion, such as greater deployment of fuel cells that are renewably powered and requirements for Best Available Retrofit Control Technology at large stationary sources. Fluorinated gases, or F-gases, are also critically important to control, especially given that this is the fastest-growing greenhouse gas and with an extremely high global warming potential. A regulatory measure, coupled with a sustained incentive program, is needed and should be pursued to replace F-gases in air conditioning and refrigeration systems across the food processing and transport and building sectors of the economy.

Lastly, CCA agrees with and supports the Environmental Justice Advisory Committee's recommendation to begin planning for a just transition for incumbent workers in fossil fuel industries. Over time, these workers are likely to face a greater risk of unemployment due to changes in business operations or reductions in output to meet climate and clean air obligations. In addition to issues of fairness and equity, a just transition could yield environmental benefits if incumbent workers' accumulated knowledge and skills are leveraged in closely related occupations and industries that are aligned with a low carbon economy. California has proven that environmental protection and economic growth can be coupled and with great success on both fronts, and now is the time to ensure this extends to employment and people's livelihoods.