

## Concerns about SB 878, with regard to the proposed 2030 statewide methane reduction target

Tuesday, January 12, 2016

Attachments: IPCC Numbers Chapter 8 PDF.pdf

To State Senator Ricardo Lara,

We are forwarding to you a recent comment that was emailed to the California Air Resources Board (CARB) in mid-December, 2015. It stresses the urgency of rapidly and dramatically reducing methane emissions within California in order to help our species retain a chance of limiting global warming on our planet to no more than 1.5 degrees Celsius. We forward it to you, as it is germane to legislation that you will soon be introducing in the California Senate.

We have just reviewed the summary of your prospective legislation, SB 878. It calls for a 40 percent reduction in methane emissions by year 2030. This target is identical to the year 2030 statewide methane reduction target presented by the CARB in its September 30, 2015 Draft Short-Lived Climate Pollutants [SLCP] Reduction Strategy (page 41, 43, and 45, <http://www.arb.ca.gov/cc/shortlived/2015draft.pdf>). In that CARB document, there is a minimal and grossly inadequate voluntary reduction target proposed for the methane emission source of dairy and livestock enteric fermentation. Over the course of 15 years, methane emissions associated with dairy and livestock enteric fermentation (which constituted about 30 percent of all statewide methane emissions in 2013 [page 42]) will be largely ignored under the proposed CARB voluntary reduction target for this emission source.

In our view, such a result would be unconscionable and inexcusable. Given the rapid warming of our planet, especially in places such as the Arctic, significant and mandatory reduction targets for all sources of SLCP must be instituted and implemented by the CARB. Without wide institution and implementation of such measures, our planet will heat up far beyond 1.5 degrees Celsius, with severe adverse impacts to both human and nonhuman residents on our planet in both the near and more-distant future.

If SB878 is enacted into law with a mandated statewide methane reduction target that largely conforms to the inadequate overall methane reduction target proposed in the CARB Draft SLCP Reduction Strategy, we believe that CARB institution and enforcement of significant, mandatory methane emission reduction measures for all major methane emission sources is unlikely to occur. We implore you to increase the proposed mandatory statewide methane emission reduction target in your bill from 40 percent to 67 percent by 2030, and specify that there be significant and mandatory reduction targets for all major sources of methane emission in California, including livestock and dairy enteric emissions.

Sincerely,

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Ara Marderosian, Executive Director, Sequoia ForestKeeper, Kernville, CA 760.378.4574

Jan Dietrich, Steering Committee, Ventura County Climate Hub, Ventura, CA 805.746.5365

Dr. Mike Hudak, Author and Environmental Advocate, Binghamton, NY 607.240.5225

Appendix: December 16, 2015 letter to the CARB

CARB SLCP Reduction Strategy and New Aspirational Target of 1.5 degrees Centigrade

December 16, 2015

To Ryan McCarthy and Craig Segall, California Air Resources Control Board

In light of recent events in Paris (in particular, the adoption of the Paris Agreement at the UNFCCC COP21), I request that CARB immediately modify its draft “comprehensive strategy to reduce emissions of SLCPs” to strongly promote achievement of the aim of the Paris Agreement parties to limit global temperature increase to no more than 1.5 degrees Celsius above pre-industrial levels.

Below is the language from the agreement concerning this objective and aim: Annex PARIS AGREEMENT Article 2

1. This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by: (a) Holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels . . . (emphasis added).

To achieve such an aim, SLCP emissions will need to be dramatically reduced very soon.

Dr. Robert Howarth, a professor at Cornell University in New York, emphasized this fact in an article recently published in The Nation: “If we continue methane production at current rates, the world will run up against the 3

1.5 degrees limit in 12 to 15 years,”[ <http://www.thenation.com/article/scientists-warn-paris-climate-agreementneeds-massive-improvement/>]

Dr. Drew Shindell, Professor of Climate Sciences at Duke University and Chair of the Climate and Clean Air Coalition (CCAC) Scientific Advisory Panel, also emphasized the urgency in aggressively targeting SLCPs for emission reduction: “we cannot get down to 1.5°C without targeting both SLCPs and CO2. We can’t even keep below two degrees without targeting both,” [ <http://www.ccacoalition.org/en/news/efforts-reduce-short-livedclimate-pollutants-strengthened-cop21>]

According to the 2013 IPCC AR5th, SLCPs already in the atmosphere will account for most of the positive atmospheric radiative forcing that will occur over the next 10 years. Even over the 20-year Time

Horizon, roughly 60 percent of the positive radiative forcing that will occur in the atmosphere will be due to SLCPs. This will be only temporarily mitigated by the short-term negative radiative forcing effect of sulfur dioxide concentrations in the atmosphere. (See attachment summarizing the IPCC tables and figures that contain the information concerning positive radiative forcing agents.)

To strongly promote achievement of this aim, the CARB will need to modify its “comprehensive strategy to reduce emissions of SLCPs” and incorporate strong, substantive mandatory annual SLCP emission reduction targets for all SLCPs and all sources of SLCPs. CARB will also need to change its accounting mechanism concerning SLCPs to conform to the 2013 IPCC AR5th recommendations, which currently constitute the best available science concerning this matter. I recommend one set of state emission reduction targets for CO2, and another set for the SLCPs, using SLCP radiative forcing values as the

metric for the latter. In practice, this would be roughly equivalent to using a 10-year or 20-year interval GWP with regard to methane.

I recommend once again that CARB "put a price" on a ton of uncaptured, unburnt methane emission. This price should be substantial, so that it will drive meaningful reductions in methane emission in California in the near future. Such a price should also help reduce the odds that another climate disaster (such as the one currently occurring in Aliso Canyon) will again occur in California.

Sincerely,

Todd Shuman, Wasteful UnReasonable Use, Camarillo, CA 805.987.8203