

The scoping process has been key to California's success in cutting greenhouse gas emissions. The process requires the government to assess past progress, project future emissions, and come up with a strategy to meet its climate goals. In contrast, in many states - and at the federal level - there's no real mechanism for a comprehensive look at climate policy. The State of New York most recently adopted the scoping process as part of an aggressive new scheme to cut greenhouse gas emissions.

Without such a comprehensive process, there's no way for the government to know whether it is on track at any given time to meet its goals, how its strategy is impacting the economy, or how well it is meeting other goals like equity toward disadvantaged communities. It's also difficult to ensure that the right steps are being taken at the right time - for instance, when there's a surge in electric vehicles, that there will be enough charging stations and enough renewable energy to keep them going.

The remainder of the post will take a closer look at the scoping process and at the current round of planning. New York has adopted a similar system, and it's something that other states should really consider as well.

The Planning Process

AB 32 requires the California Air Resources Board (CARB) to do a scoping plan every five years, and CARB is now on its third iteration. The purpose of the plan is to "ensure the greenhouse gas emissions reduction activities to be adopted and implemented by the state board are complementary, nonduplicative, and can be implemented in an efficient and cost-effective manner."

The statute imposes several procedural requirements: all agencies having jurisdiction over emission-producing activities must be consulted; the agency must consider the benefits and costs of different methods of emission reduction "the best available economic models, emission estimation techniques, and other scientific methods;" the agency must consult an environmental justice committee; and the agency has to conduct workshops across the state, including disadvantaged communities. AB32 then provides an extensive list of factors that the board must consider in crafting regulation to implement the plan.

A 2015 law, AB197, requires that the scoping plan discuss the following for each emission reduction measure:

- (a) The range of projected greenhouse gas emissions reductions that result from the measure.

(b) The range of projected air pollution reductions that result from the measure.

(c) The cost-effectiveness, including avoided social costs, of the measure.

The 2012 scoping plan was challenged in court but upheld because of the painstaking process that the Board had followed. The court noted that the Scoping Plan was adopted through an "extensive and rigorous" process that involved over 250 public workshops and 350 community meetings, as well as input from specialized committees, academic peer review, and public comment from more than 42,000 people. The court therefore concluded that the Scoping Plan appropriately reflected "sound judgment based on substantial evidence" and was in compliance with AB 32.

The 2022 Revision

In its latest iteration, agency staff considered four scenarios (really, packages of strategies) and selected one that was fairly aggressive but reasonably costly. The first two scenarios were the most aggressive, aimed at carbon neutrality by 2035. The fourth was the least aggressive. The staff recommended the third scenario as the Goldilocks strategy, stringent but not too stringent to be feasible.

The agency described the scenarios as follows:

"The first two scenarios would theoretically achieve carbon neutrality by 2035 and scenarios three and four hit that target no later than 2045. While the Alternative 1 scenario had the greatest public health benefit, it was economically and technically infeasible due to the current lack of low-carbon energy infrastructure, unavailability of technology, large job loss and high implementation costs.

"Alternatives 2 & 3 had similar public health benefits, but Alternative 2 had the second highest job losses and implementation costs. Alternative 3 has the lowest implementation costs and minimal reduction in job growth. It also reduces GHG emissions 80% below 1990 levels by 2050. Alternative 4 had lower health benefits than Alternative 3 and the third highest implementation and employment costs."

The agency's preliminary decision was that Alternative 3 hit the sweet spot: rigorous enough to meet California's ambitious goals, but prudent enough to avoid unreasonable costs. Whether or not this was the right decision, it was surely better to consider strategies as a whole rather than fighting the same battles over and over again as specific measures were considered.

