

7/7/2023

Re: SEIU-USWW Public Comments on June 14, 2023 Workshop on Potential Amendments to Cap-and-Trade Regulation

Our Union & Member Communities

SEIU United Service Workers West (USWW) represents nearly 45,000 janitors, security officers, entertainment & stadium workers across California, including thousands of workers at LAX, SFO and other airports throughout the state. Our membership primarily consists of workers within low-wage industries, including aviation. Many of our members reside in communities near major airports and within their flight paths. For decades, these communities - largely Black and Brown - have endured exposure from an array of toxic pollutants produced by airport operations, adding on to the decades of environmental racism these cities and neighborhoods have faced from other sources.

SEIU USWW recognizes the detrimental health impacts on our membership and communities produced by commercial aviation's dependency on fossil fuel consumption. For years, we've fought to raise industry standards at the bargaining table, but more recently have been expanding our commitment to confronting the environmental racism and inequity that our members and their communities face as a result of this industry's continued and ever-expanding operations.

Aviation in the GHG Emission Inventory

As CARB considers changes to the Cap-and-Trade Program and the Greenhouse Gas Emission Inventory, it should take a close look at finally reckoning with the emissions impact of the aviation sector. Currently, all of aviation's interstate and international emissions are exempt from the official totals in the inventory - even though the data itself is still collected and published as an "excluded emission."

Aviation's intrastate emissions *are* included in the official inventory, at 4.2 million tonnes of CO₂ equivalent (MtCO₂e) in 2019.¹ Except those figures pale in comparison to the industry's exempted emissions: 18.3 MtCO₂e for interstate jet fuel combustion and 18.9 for international in the same year. **This means that barely 10% of the GHG emissions coming from aviation activity in California are actually part of the accounting inventory.**

This has effectively concealed one of the most significant sources of emissions in the state. If all aviation emissions from burning jet fuel were actually formally included in the inventory, they would combine for 41.3 MtCO₂e in 2019. The total would exceed the state's entire emissions inventory for all possible residential categories that same year (30.9 MtCO₂e), all agriculture and forestry uses (31.4 MtCO₂e), and would make aviation's GHG impact larger even than the output associated with the total of all types of electricity generated in the state (38.6 MtCO₂e).

¹ CARB, CA GHG Inventory for 2000-2020 - by Sector and Activity, 10/26/22

7/7/2023

Next Steps

CARB should endorse, or at the very least explore, the prospect of finally including all of these emissions in the full inventory and work to put aviation's substantial climate impact into perspective alongside every other industry. At SEIU USWW, we would strongly support efforts to hold this industry accountable for its true climate impact, and believe this could be an excellent opportunity to do just that.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Huerta', with a large, stylized flourish at the end.

David Huerta

President - SEIU United Service Workers West & SEIU California