



December 16, 2016

California Air Resource Board  
1001 I Street  
Sacramento, CA 95814

**Re: Greenlining Comments to the 2030 Target Scoping Plan Update – December Draft**

California Air Resources Board:

Thank you for the opportunity to submit comments on the 2030 Target Scoping Plan Update December draft – (“2030 Scoping Plan”). The Greenlining Institute is a research and advocacy organization dedicated to advancing economic opportunity and empowerment for people of color. We seek to build a nation in which communities of color thrive and race is never a barrier to opportunity. Issues of economic inequity and environmental justice are central to our work. We offer these comments specifically to help strengthen the equity and environmental justice outcomes of the 2030 Scoping Plan. We look forward to continuing the discourse on this critical topic.

**Introduction**

We applaud the administration for setting California on a path toward meeting 2030 and 2050 goals. When it comes to fighting climate change, California is looked to as a leader amongst top polluting nations and jurisdictions. We incorporate be reference comments Greenlining submitted for the June 17 Scoping Plan Concept Paper on July 8, 2016.<sup>1</sup>

The comments below are intended to help California demonstrate to the rest of the United States and to the world that addressing climate change can uplift all communities and does not result in an inequitable distribution of burdens and benefits.

**General Comments**

- In highlighting the mandates of Executive Order B-30-15, it is important to acknowledge that executive order’s call for states to prioritize and protect vulnerable communities in climate planning and investments.
- We are happy to see the Air Resources Board immediately referencing AB 197 and look forward to the January draft that will have more detail on how the state will meet the mandates under that critical legislation.
- The section on page 50 outlining the high level scoping plan goals should include a specific goal to protect marginalized communities from unintended health and economic harms.

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<sup>1</sup> <https://www.arb.ca.gov/lists/com-attach/54-sp-concept-paper-ws-ADJRZ1VnUTIGXwNw.pdf>

The state must be intentional about ensuring that all communities are able to thrive in this transition to a clean energy economy and participate fully in its benefits.

- We are pleased to see the Air Resources Board’s commitment to including a social cost of carbon analysis in the 2030 Scoping Plan. This is an incredibly important step forward in ensuring we accurately address climate change, particularly in light of the likely interference with this work at the federal level.

### **Innovation**

The Scoping Plan accurately and appropriately flags the need to support clean energy and climate innovation to drive California toward a zero carbon future. It is also important to flag the critical need for inclusive and equitable innovation that prioritizes marginalized communities and advances health and economic benefits in those communities. When innovation leads with equity, we all win.

### **Support EJAC**

Greenlining would like to emphasize our support for the EJAC recommendations. These recommendations reflect robust community input and expert analysis of EJAC members with strong support from Air Resources Board Staff. The process for developing those recommendations was rigorous and expedited greatly for the benefit of including the recommendations in early Scoping Plan drafts. We therefore encourage Air Resources Board staff to integrate the EJAC recommendations as an important step in ensuring equitable access to benefits and protections that stem from California’s climate policies. These recommendations will overall help California accelerate forward toward a zero carbon future.

### **350 Barriers Studies**

As this Scoping Plan draft acknowledges, SB 350 mandates that the state conduct studies on the barriers and opportunities to advancing clean transportation, energy efficiency, and renewable energy technologies within low-income and disadvantaged communities. These studies provide relevant strategies to ensure that the transition to a clean energy economy is equitable and accessible to our most marginalized communities. Due to mechanization, artificial intelligence, internet communication, and other technological breakthroughs, innovation benefits have landed in the hands of few, often at the expense of many. It is critical that California lead by example and show how we can transition to a clean energy economy in a way that benefits all Californians and does not widen wealth gaps, particularly racial wealth gaps.

### **Public Health and Economic Equity**

We would like to uplift the thoughtful analysis on employment, race, income inequality, and health equity addressed in the Public Health section. We see this as a critical section that should be at the forefront of Scoping Plan implementation. We also see the need to specify the following priorities outlined by the California Department of Public Health – Office of Health Equity on achieving health equity through climate action.<sup>2</sup>

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<sup>2</sup> <https://www.arb.ca.gov/cc/scopingplan/meetings/110716/cdphpresentation.pdf>

- Promote active transportation
- Prioritize infill and transit-oriented development and include necessary anti-displacement measures
- Encourage local food systems and healthy diets
- Green the built environment – provide access to trees, parks, and green spaces
- Create healthy, energy-efficient, and sustainable homes, schools, and buildings
- Direct our climate investments to promote economic development and health equity
- Prioritize jobs creation and employment training for local residents
- Work towards income equality
- Reduce poverty
- Provide stable, permanent, living-wage jobs

### **Natural Gas**

Although cleaner than oil and diesel at the tailpipe, the natural gas sector upstream and downstream has disproportionate impacts on low-income communities and communities of color. It is critical that we look for ways to minimize impacts from this sector on heavily polluted communities that are having to manage multiple sources of environmental pollutants.

### **Equitable Modeling**

Modeling used for the Scoping Plan should create a best-case scenario for disadvantaged communities in order to better understand what scenarios will create the greatest air quality, health, and economic benefits for disadvantaged communities.

### **Conclusion**

Thank you again for the opportunity to comment. We look forward to continuing the discussion and supporting the state in its goal of creating equitable greenhouse reductions strategies that work for all Californians.

Sincerely,  
Sekita Grant  
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The Greenlining Institute