

July 9, 2021

Ms. Liane Randolph  
Chair, California Air Resources Board  
1001 I St  
Sacramento CA 95814

Dear Chair Randolph,

On behalf of our more than 44,000 supporters in California, The Union of Concerned Scientists (UCS) is pleased to provide comments to the California Air Resources Board (CARB) related to the 2022 Scoping Plan Update, a critically important process that will lay out a path for an actionable statewide blueprint to align key statutes, executive orders, and existing programs to achieve the state's climate goals and reach net-negative emissions as soon as possible, and no later than 2045.

We want to thank staff and board members for their hard work in kicking off this scoping plan process. UCS looks forward to engaging on this over the next year and a half and we want to highlight a few issues we hope the board and staff will focus on as this process moves forward:

**Transportation Sector:**

- The Governor's Executive Order EO N-79-20 includes goals to decarbonize the transportation sector. Specifically, UCS advises that the scoping plan be held accountable to the **goal of transitioning all medium- and heavy-duty trucks on the road, not just sales, to zero-emission by 2045 and ensure all light-duty vehicle sales are zero tailpipe emissions vehicles by 2035**. The scoping plan also needs to ensure that the light-duty sales targets in 2030 reflect the increased pace of electrification in the sector and the urgency in reducing gasoline consumption. Conventional combustion-powered vehicles sold in 2030 will have a useful lifespan well into the 2040s and therefore increasing the fraction of ZEV as quickly as possible will be needed to meet emissions targets.

**Oil Refineries:**

- Driving down oil refinery emissions is also critical in reducing heat-trapping emissions and reducing exposure to air pollution in overburdened communities. Reducing gasoline and diesel demand from California cars and trucks will likely reduce refinery emissions but will not guarantee their reduction. For example, continued demand for these fuels outside of California could stall emission reductions at California refineries. Therefore, **explicit measures to reduce emissions at refineries should be included in the scoping plan to ensure overall climate targets are achieved**.

**Electricity Sector:**

- An updated electricity sector emission reduction range is necessary to meet California climate goals. The 2017 Scoping Plan suggested that the electric sector must reduce its emissions down to between 30 and 53 million metric tons (MMT) by 2030. The CPUC has been planning for emissions reductions within this range, and they are poised to plan for a lower greenhouse gas emissions target of 38 MMT to ensure the state reaches its 2030 emissions reduction goals. Accordingly, **the new range in the 2022 Scoping Plan Update should have a maximum value of 38 MMT, in alignment with current CPUC planning, and the minimum value should**

**correspond to achieving the SB 100 100% clean electricity goal by 2030, on an accelerated schedule.** In addition, in this planning process for 2045, CARB should be aggressive and adopt a greenhouse gas emission range that includes a target amount that aligns with the no combustion scenario in the SB 100 Joint Agency Report.

**Environmental Justice:**

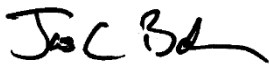
- **UCS supports the environmental justice (EJ) organizations calling for more integration of environmental justice and more opportunities for meaningful involvement of EJ groups in the scoping plan process** – including implementing their recommendations in this scoping plan process. We all will benefit from environmental justice groups' expertise being incorporated into the plan, particularly the expertise of the ARB's own Environmental Justice Advisory Committee.

**Focus on Ambitious and Detailed 2030 Planning:**

- While planning for 2045 is important, UCS believes one of the most **important objectives of this scoping plan should be the creation of an ambitious and detailed plan to meet California's emission reduction goals for 2030.** When designing mitigation scenarios, we also encourage ARB to **include further modeling and analysis for more aggressive GHG emission reduction targets for 2030.** Many other states and countries are now more ambitious in their GHG reduction targets than California.<sup>1</sup> The severe costs of recent years' extreme weather, wildfire, and drought – all accelerated by climate change – demand aggressive action and more stringent reduction targets.

Thank you for the opportunity to comment on the development of the 2022 Scoping Plan. We look forward to continued conversations as the process moves forward.

Sincerely,



Jason Barbose  
Western States Sr. Policy Manager  
Union of Concerned Scientists



Erin Rodriguez  
California Policy Advocate  
Union of Concerned Scientists

---

<sup>1</sup> Numerous jurisdictions have global warming emission targets that are more ambitious than California's 2030 emissions limit: (1) the Biden Administration set a goal for the U.S. to reduce emissions at least 50% from 2005 levels by 2030. The same goal in California would be slightly more ambitious than the state's current statutory requirement. (2) Massachusetts recently passed legislation that established a goal of 50% reduction by 2030 compared to 1990. (3) EU member states have a target of 55% reduction by 2030 compared to 1990. (4) The United Kingdom has a target of 68% reduction by 2030 compared to 1990.