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Sept 3. 2021

Liane Randolph, Chair

California Air Resources Board

**RE: Recommendations re 2022 Scoping Plan**

Dear Chairperson Randolph:

**Move LA urges CARB staff to prepare an alternative emission reduction scenario for the Scoping Plan which enhances the program’s ambition beyond SB 32 (as suggested in Option A on p14 of the CARB staff presentation). New targets in such an alternative should be at least as ambitious as those provided in the recently released IPCC Sixth Assessment Report, Climate Change 2021.**

**It is vital that the next Scoping Plan reflects the sense of urgency that permeates the IPCC Report. Making maximum emission reductions over this next decade are likely crucial to avoid the most damaging impacts of climate change, including the possible loss of many lives.**

While emission reductions must be pursued aggressively across all source categories, meeting more ambitious targets will require making significantly enhanced investments in deployment of clean transportation technologies and reductions of short lived climate pollutants (SLCPs), especially methane.

We believe a successful effort in this next decade will thus require seeking significantly enhanced resources, well beyond those provided through current programs. **These resources can come from the Legislature and Governor – or better, from California voters as soon as November 2022.**

We say“better” because a voter approved funding measure, compared to the legislative budget process, can provide significantly enhanced resources, continued over a prescribed duration with greater reliability and continuity of purpose. This may well be necessary to give manufacturers the confidence they need that, if they ramp up production of advanced technologies in the near term, their risks are much more likely to be rewarded.

**Why should we consider such an alternative?**

Many events have highlighted for us all this year that climate change is not only an existential threat but also an imminent threat to the well-being of life on this planet, human life in particular. Droughts, wildfires, more frequent and more powerful storms and hurricanes are real threats in themselves, but, more, they are also indicators that a calamitous future may well be closer than we think.

When the IPCC issued its 2018 Report on Global Warming, we were told that, unless significant progress was made on reducing greenhouse gas emissions by 2030, we risked losing our ability to contain the climate spiral that would otherwise occur. The IPCC issued an update this year doubling down on that assessment. ***It is now likely we will hit global temperatures of 1.5C in the early 2030s, rather than a decade later*.**

What have we seen since 2018 to give us confidence that our momentum heading toward 2030 is strong?

Some things to be sure.

* Continued progress on renewable power - thanks to improving technologies and the benefits of economies of scale;
* a growing array of manufacturers actually producing zero emission light-duty vehicles - all in response to CARB’s ZEV program; and
* a growing set of truck manufacturers stating their intentions to produce zero emission product - partly in response to CARB’s Advanced Clean Truck Rule. Unfortunately, there is little actual product yet out on the road.

Battery electric power is convincing many, while hydrogen alternatives show increasing viability in hard-to-electrify sectors like long-haul trucking.

All good, all promising, but still incremental in a moment that calls for a more aggressive sustained effort. Are our institutions, designed for the long haul, capable of responding with real urgency? Clean trucks are coming – but a key question is, how quickly can manufacturers of ZE trucks ramp up production to scale? How do we facilitate that outcome? **We believe, we look to California voters.**

**We must act, not recklessly, but with urgency**. Now is clearly the time for bolder, sustained action to address the immediate challenge of climate change. We can see no institution capable of such action and leadership other than the State of California. You and your legislative partners, our representatives, or our voters, are the agents of such action. **On this matter, as goes California, so goes the world**.

The preparation and approval of the Scoping Plan by the California Air Resources Board is that singular opportunity to create the framework that will guide California’s efforts. Revised every five years, this must be the moment for a Scoping Plan that measures up to the 2030 targets of the IPCC. If we have but one decade to avoid a climate calamity, the program we will need will have a much more aggressive set of recommendations and a greater need for public capital than we might otherwise consider.

We strongly urge the CARB board to direct its staff to include, as part of the development of the Draft Scoping Plan to be released in Spring of 2022,*a program alternative likely to achieve emission reduction targets for 2030 that exceed the targets of SB 32 and that measures up to the targets recommended by the IPCC 2021 Report.*

* Both you and we need to know the scale of accelerated emission reductions of both CO2 and short lived climate pollutants needed to meet the IPCC’s 2030 target.
* In preparing such an alternative the staff should include ***an assessment of the magnitude of funding needed to achieve such reductions by 2030***, whether employed as incentives or as direct investments in infrastructure or as investments in mitigation measures.

Only with such information can the legislature consider what it’s real budgeting choices are in light of this climate emergency - or whether success will require the placement of a funding measure before California voters in the near future, perhaps even as early as the November 2022 ballot.

We urge that you not presuppose constraints on resources based on what you imagine are the political constraints. ***We need to know what is required***. The Legislature, the Governor and the voters may very well surprise us all when confronting the existential challenge of our time. We have reviewed polling data showing, even in the midst of a pandemic, that there was over 60% voter support for revenue sources to raise up to $3 B per year for just such an effort.

We urge you to give to us the best program of emission reductions possible - ***over this next decade especially*** - that the science or the state of technology supports, seeking maximum emission reductions constrained only to ensure that justice, fairness and equity is provided for disadvantaged communities and for any members of California’s workforce who may be adversely affected.

Thus, our advice and our request is that you think as expansively and as aggressively as the nature of the challenge itself.

Of course, such a plan, if it is to truly serve the goals of global deliverance from catastrophic climate change, must offer the potential that other states or even nation’s might see it as a template for similar action as well. California has a global leadership role to play. **Let our ambition be as BIG as the challenge**.

Sincerely



Denny Zane  
Move LA