



October 24, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Major Businesses and Institutions Support an Ambitious 2022 Climate Change Scoping Plan Update

Dear Chair Randolph and Air Resources Board members,

As businesses and institutions with facilities or headquarters in the state of California, we appreciate the opportunity to provide public comments on the 2022 Climate Change Scoping Plan Update. We recognize and appreciate all the time and expertise that the board and staff have invested in this process. Thank you for your leadership in developing and implementing critical climate and clean air policies for California.

We support strong climate policies because climate change, water contamination, and air pollution threaten the health and livelihood of the communities in which we operate, and where our customers and employees live and work. We also recognize that these threats disproportionately harm California’s residents along racial lines. For these reasons, we stand in strong support of the [Governor Newsom’s 7/22 letter](#) calling for bolder action in the final Scoping Plan. We also want to encourage more ambitious and comprehensive actions beyond the governor’s recommendations.

Specifically, we urge you to consider four recommendations for the 2022 Climate Change Scoping Plan Update and determining the state’s pathway to carbon neutrality. These include:

1. **Prioritize direct emission reductions aligned with cuts of at least 40% by 2030 and 82% to 92% by 2045, to meet the state’s climate goals.ⁱ**
2. **Conduct a follow-up stringency rulemaking process for the state’s cap-and-trade program to ensure alignment with the state’s climate goals and update the program’s design to guarantee localized air pollution reductions in overburdened communities.ⁱⁱ**
3. **Prioritize decarbonization pathways that maximize health benefits and reduce health burdens as part of driving down emissions, based on a public health equity analysis that accounts for the cumulative social costs and benefits of carbon reductions.ⁱⁱⁱ**
4. **Maintain a high level of fidelity to the Air Resources Board’s commitments to racial equity, environmental justice, and robust community engagement.^{iv}**

California can uphold its long history as a climate leader. The rest of the U.S. looks to the state as a model for climate action and will follow its lead. Given the immediacy of the climate crisis and public health benefits of bold action, accomplishing these actions will get California back on track to meet its climate targets, enable the state and businesses to meet environmental justice and racial equity goals, and provide significant public health and economic benefits.

Thank you for your consideration.

Sincerely,

**Avocado Green Brands
Clif Bar and Company
California Outdoor Recreation Partnership
Dignity Health
DSM North America
Everlane
Grove Collaborative
Logitech**

**Patagonia
Peak Design
REI Co-op
Ritual
Salesforce
Sierra Nevada Brewing Co.
Unilever United States**

ⁱ The 82% to 92% range reflects the carbon neutrality scenarios explored by Energy and Environmental Economics in their October 2020 report, “Achieving Carbon Neutrality in California: PATHWAYS Scenarios Developed for the California Air Resources Board.”

https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.

ⁱⁱ This recommendation echoes comments already made by the [Environmental Justice Advisory Committee \(EJAC\)](#) and [Environmental Defense Fund](#).

ⁱⁱⁱ This recommendation also aligns with [EJAC’s earlier recommendations](#), as well as comments made by the [California Environmental Justice Alliance \(CEJA\)](#).

^{iv} This recommendation also aligns with [EJAC’s earlier recommendations](#), as well as comments made by the [California Environmental Justice Alliance \(CEJA\)](#).