



Chair Liane Randolph and California Air Resources Board Members
California Air Resources Board
1011 I Street
Sacramento, CA 95814

RE: Comments on Draft Scoping Plan

Dear Chair Randolph and members of the California Air Resources Board,

On behalf of California Environmental Voters (formerly, the California League of Conservation Voters), I am submitting these comments in response to the California Air Resources Board's (CARB) release of the Draft Scoping Plan. We thank CARB for their efforts in the development of the Draft Scoping Plan and for the opportunity to provide public comments.

California Environmental Voters proudly represents over 120,000 members, with a mission to protect and enhance the environment and the health of all California communities by electing environmental champions, advancing critical priorities, holding policy makers accountable, building political power to transform our political system and achieve climate justice.

In the five years since the adoption of the previous Scoping Plan, the threats of wildfires, drought, extreme heat and pollution have become more immediate and urgent. The wellbeing and futures of the 40 million who call California home are under attack by the catastrophic and existential dangers posed by climate change. The 2022 update to the Scoping Plan is a critical opportunity for our state to chart a better and more sustainable path forward so that California can remain a leader in adopting meaningful climate solutions for the nation and the world in the 21st century.

Scientists have increasingly raised the alarm that this decade is our last chance to make significant and meaningful changes in our transportation, energy, building, and other major infrastructure to prevent and irreversible climate catastrophe, which is why we are disappointed and concerned that the Draft Scoping Plan fails to accelerate the targets to reduce greenhouse gas emissions to 40% below 1990 levels by 2030 or to achieve carbon neutrality no sooner than 2045. Simply put, the Draft Scoping Plan lacks the required ambition and vision to meet the dire urgency of the climate crisis and define a safe, healthy and prosperous future for all Californians. It is imperative that CARB ultimately adopts a revised Scoping Plan that is more ambitious, one that promises more direct reductions in greenhouse gas emissions and pursues

proven climate solutions that will bring about an end to our dependence on fossil fuels. We respectfully offer the following recommendations:

1. Phase out oil and gas extraction by 2035 and oil refining by 2045.

The Draft Scoping Plan envisions a future California that relies on oil and gas production in 2045, and likely beyond. It delays the phase out of oil and gas extraction until 2045 and lacks a clear timeline and commitment to manage the decline of oil refineries. According to a widely cited report that was recently commissioned by the International Institute for Sustainable Development, wealthy oil-producing countries must phase out oil and gas production by the middle of the next decade in order to achieve the goals of the Paris Agreement. California's dynamic economy and innovative clean-technology sector provide the ideal setting to assume the leadership, at home and abroad, on phasing out oil and gas production in an accelerated and coordinated fashion.

An accelerated phase out of fossil fuel extraction by 2045 and oil refining would not only help us achieve our climate targets sooner and with more assurance, but it will also liberate the communities, most of which are low-income communities of color, from the costly health impacts of living near dirty and pollution oil and gas operations. Our frontline communities must be unburdened from the harmful health impacts of refinery pollution.

It is critical that the revised Scoping Plan commits to a coordinated phase out of oil refining by 2045 and oil and gas extraction by 2035 as part of a managed decline of fossil fuels so that impacted workers and communities can plan for and experience a just transition.

2. No new gas-powered generation and set a target of zero-emissions electricity by 2035.

It is troublesome that the Draft Scoping Plan, the blueprint for how we are going to overcome the effects of climate change for decades to come, includes significant investments in new gas-powered capacity. The Draft Scoping Plan calls for 10 gigawatts of new natural gas generating capacity, the equivalent of 33 gas power plants. The Draft Scoping Plan's inclusion of 10 gigawatts of natural gas generating capacity is especially confounding when we have more cost-effective renewable technologies than ever before that reduce carbon emissions. The building of new gas plants could increase, and not reduce, pollution, especially to historically disadvantaged communities.

In addition, the Draft Scoping Plan's proposal to build new natural gas generating capacity would set our state behind international and national carbon-free electricity ambition that has been set forth by the International Energy Agency and the Biden Administration. California has long set the bar in global and national climate action and the inclusion of new gas-powered capacity in the Draft Scoping Plan represents an abdication of the leadership role that California has played over the years in pushing for consequential and ambitious climate policy. The Scoping Plan should include a more ambitious GHG target of 0 MMT by 2035 for the electric sector and plan to phase out fossil gas-fired generation, starting with power plants located in frontline communities.

Instead of investing in new gas-powered capacity, the revised Scoping Plan should look to the vast array of affordable renewable energy technologies available today that not only cut carbon emissions but also address our state's air pollution crisis. The Scoping Plan is an opportunity to

commit to an expansion of renewable energy and storage technologies to meet our urgent climate goals.

3. Minimize reliance on unproven carbon capture technologies.

The Draft Scoping Plan relies heavily on carbon capture, utilization and sequestration (CCUS), a controversial, costly, and unproven technology. Using flawed assumptions, it calls for the use of CCUS on most refinery operations by 2030. The use of captured carbon to lock in a long-term dependence on oil and gas, for enhanced oil recovery, and to extend the lifetime of fossil fuel facilities that otherwise would be retired much sooner should not be considered as a viable climate solution.

Despite extensive research and development and billions of federal dollars invested to scale up the technology, CCUS used on fossil fuel infrastructure has not proven to be a cost-effective investment and fails to deliver on the promised reductions in almost every case. Instead CCUS has simply extended the life of fossil fuel plants. In addition, the process of capturing, compressing, transporting, and storing carbon carries a significant cost and public health and safety risks. The Draft Scoping Plan's identification of the Central Valley as having "world class CO₂ storage sites" would expose already overburdened frontline communities to more pollution and potential methane leakage.

The considerations for any carbon capture and storage related policy in the revised Scoping Plan must explicitly ensure that carbon capture and storage will not lock California into a long-term dependence on fossil fuels nor should it take precedence over the advancement of clean energy solutions and effective means of directly reducing emissions and toxic air pollutants.

4. More ambitious targets to decarbonize transportation and buildings.

The transportation sector accounts for about 50 percent of the state's greenhouse gas emissions, nearly 80 percent of nitrogen oxide pollution, and 95 percent of toxic diesel emissions. The Draft Scoping Plan must include more robust targets to reduce emissions from the transportation sector.

The Draft Scoping Plan calls for a 22% reduction in vehicle miles traveled (VMT) by 2045 to reduce vehicle emissions. The target should be improved to 30% reduction in VMT by 2035. In addition to emissions reduction, a higher and sooner realized VMT target would bring about several other critical benefits such as: more affordable and equitable housing, more livable communities, improved road safety, and more investments to support mass transit and active transportation.

The revised Scoping Plan should follow CARB's Mobile Strategy by setting a target of 75% Zero-Emission Vehicle (ZEV) for new car sales by 2030 as the state meets its goal of 100% new ZEV sales by 2035 and accelerate the phase out of new combustion medium and heavy-duty truck sales from 2040 to 2035. By doing so, it would reduce polluting vehicles on the roads as soon as possible and maximize the benefits of early ZEV deployments. It should also reflect that all polluting trucks are retired when they reach the end of their useful life and replace them with ZEVs.

The Draft Scoping Plan calls for gas appliances in commercial and residential building to be retired at the end of their useful life, without any allowance for early retirements. It calls for 80%

of all appliance sales to be electric by 2030. Since commercial and residential buildings will require the supply of gas until the appliances reach the end of their useful life, an approach without a specific target date to retire all gas end uses will delay the decommissioning of segments of the gas distribution system. In addition, as new gas appliances are designed to last longer, this would also create a scenario in which gas appliances purchased before 2035 to potentially operate for decades before they reach the end of their useful life, thus preventing their users, especially those from disadvantaged communities, from sooner and better realizing the climate and health benefits of electrification. The revised Scoping Plan should include an accelerated and full phase out of the sales of new gas appliances by 2030 and a strategic retirement of all gas end uses by 2045 rather than allowing for gas equipment to reach its end of life.

Time is of the essence, as we are in the final few years that remain to tackle the climate crisis and create a more just and vibrant future for California. The wellbeing of 40 million residents and future generations of Californians is at stake. The escalating climate crisis demands that CARB adopts a more ambitious Scoping Plan, one with the vision and conviction to provide the solutions that are needed to overcome the urgent situation that we face.

Thank you for your leadership and for your consideration of the recommendations.

Respectfully submitted,

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California Environmental Voters