



June 24, 2022

Dear California Air Resources Board,

The Climate Reality Project, Santa Barbara Chapter, with 71 members, would like to submit these comments in response to the 2022 Draft Climate Change Scoping Plan.

We appreciate all your work to reduce our greenhouse gases. However, considering the mandates of AB 32 and the predictions and recommendations of IPCC AR6, this draft Plan falls short of what is required by law and needed to ensure a habitable planet.

We implore you, therefore, to boldly strengthen goals and thresholds in order to reduce greenhouse gases more rapidly than proposed in the 2022 Draft Climate Change Scoping Plan. California has almost double the number of vehicles on the road of Texas or Florida, and over triple the number of cars in any of the rest of the states in the nation. We are the biggest contributor of vehicle emissions, and as such we have the biggest responsibility to reduce those emissions as quickly as possible and to set a positive example of success.

We know that the transition to electric energy and zero emission vehicles has costs and problems that need to be resolved. But, as the American Lung Association points out, "If we can't breathe, nothing else matters." The cost right now, to deal with the damaging effects of human caused climate change- increased wildfires, water shortages, health related issues, agricultural issues, and more- far exceeds the costs of problem solving and transitioning away from fossil fuel use.

We need you to boldly lead the way. Please consider the following changes to the draft plan:

1) **Drastically reduce short-lived climate pollutants:** Reduce HFC emissions by 80 percent by 2030. Reduce landfill and agricultural methane emissions by 50-75 percent by 2030. Reduce oil/gas methane emissions by 80 percent by 2030.

2) **Speed up the transition to renewable energy** by increasing renewable electricity requirements of SB 100 from 60 percent to 100 percent in 2030.

3) **Abandon cap and trade, and instead require direct reductions in greenhouse gas emissions.** Cap and trade has not been proven as effective as desired, and therefore is not an effective substitution for reducing air pollution in the first place. If you can't abandon cap and trade, at least change California's cap and trade program to more effectively achieve SB 32 by changing the 40 percent goal of reducing emissions to 80 percent. Give cap and trade a more equitable role across all emission causing entities, and require all entities to pay a much higher cost for their emissions. Cap and trade programs must be reformed to quit giving air polluters an easy free pass to avoid transitioning to cleaner emissions.

4) **Accelerate decarbonization of transportation**, and please include trucking. Encourage the sales of EVs as quickly as possible, so that secondary sales of used EVs become available as soon as possible. There need to be incentives for turning in older internal combustion vehicles prior to end of life, and to make EVs affordable and available to lower income communities.

We all rely on your agency to set the framework for reducing greenhouse gases that will lead to a healthier and more pleasant future for everyone. Please resolve to do so as quickly as possible.

We will support you fully in doing so and appreciate all your efforts. Thank you,

Brigitta Van Der Raay
Chair
Climate Reality Project, Santa Barbara Chapter