



June 21, 2022

Chair Liane M. Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2022 Scoping Plan

Dear Governor Newsom and Chair Randolph,

Hammond Climate Solutions Foundation is a climate change nonprofit fighting for a transition to a just and livable future. We are writing to you to request revisions to the 2022 Draft Scoping Plan as we do not believe that the plan in its current form meets the urgency of the current climate crisis. We urge you to consider the following changes to the plan, which we believe is the bare minimum to meet our current climate targets. We urge you to take bolder actions and have California be the gold standard for states committed to ending climate racism and slowing the impacts of the rapidly-accelerating climate crisis.

Phase out fossil fuel extractions by 2035

The plan in its current form calls for the phase of oil extractions by 2045. This target is simply unacceptable and we cannot wait 23 more years to phase out dirty energy extraction. California needs a plan that will transition the state off of fossil fuels ASAP. Fossil fuels not only play a huge role in accelerating our climate crisis, but also perpetuate climate injustices and climate racism across the state.

Transition our transportation system to be more transit based and reduce vehicle miles traveled (VMT) by 30% by 2035

Transforming our transportation sector is the biggest opportunity for reducing greenhouse gas emissions. The plan as currently written has little detail for how the state will work to achieve higher reduction targets to VMT. Transportation is the largest source of greenhouse gas pollutants and yet, the plan calls for only 22% reduction in VMT by 2045. Not only does the percentage goal fall short of where California needs to be, but the timeline is also too far out. We urgently need to lower emissions and we feel that a 30% reduction in VMT by 2035 is not only reasonable, but necessary.

Phase out gas appliances and decommission the gas distribution system by 2045

Jurisdictions across the state have already taken steps to require all-electric new construction in the next few years and the State should ensure they are setting ambitious targets as well. At the minimum, all-electric new construction for residential and commercial buildings should be implemented by 2026. The state should prioritize and encourage incentives for electric appliances in order to better facilitate this transition and aim to fully decommission the gas distribution system by 2045.

Exclude unproven technologies

The current draft relies heavily on carbon capture and storage, which is not a viable solution for solving our climate emergency. This pathway only prolongs to continued use of fossil fuels. The process for carbon capture and storage in itself is energy intensive and the plan does not lay out any additional resources that California will need to meet the uptake in using this technology. The plan should exclude unproven technologies, which will be expensive and provide minimal benefits, and instead focus on rapidly transitioning to renewable energy which will also address the issues the state is having with methane leakage and hyper local pollution.

In conclusion, while we prefer to see much more aggressive targets, we believe the aforementioned changes to the plan are absolutely necessary to put California on the right track to meeting our climate goals and helping address the climate crisis. The targets Hammond Climate Solutions Foundation is addressing are attainable and truly are the minimum targets the state should plan for. Tackling the climate crisis requires bold policy decisions and we truly believe that California has the right decision makers who will make California a leader in addressing the climate emergency. We thank you for your consideration and leadership.

Sincerely,

Karina Gonzalez
Climate Justice Policy Manager
Hammond Climate Solutions Foundation