



July 9, 2021

Clerk's Office

Liane M. Randolph, Chair California Air Resources Board

1001 I Street

Sacramento, CA 95814

Re: Comments on the AB 32 Scoping Plan for 2022

Dear Chair Randolph and Staff,

Please find our initial comments on the AB 32 Scoping Plan-2022. We appreciate all of the work that staff at CARB, other agencies and members of the EJAC put into the workshops in June and for sharing the many associated materials and presentations. We look forward to working with you as the plan continues to be developed, revised and finalized for board review and adoption in 2022.

In 2020 Governor Newsom, while reviewing the scene at one of California's record breaking wildfire disasters, referred to our current situation as a "*Climate damn emergency*". In the opening Scoping Plan workshop Secretary Blumenthal, Chair Randolph and Executive Secretary Corey all spoke to the great sense of urgency that must be addressed in the 2022 Scoping Plan. As one of the largest and most active networks of grassroots climate activists in Northern California we agree. We are now in a climate emergency and must achieve a more rapid and complete implementation of our existing climate goals while leaning into the latest climate science and real world signs and signals of accelerating climate impacts and tipping points.

The recently leaked draft of the forthcoming IPCC (Feb. 2022) report of climate science and impacts contains these warnings:..."*The choices societies make now will determine whether our species thrives or simply survives as the 21st century unfolds*".... "*dangerous thresholds are closer than once thought, and dire consequences stemming from decades of unbridled carbon pollution are unavoidable in the short term*". And, "*The worst is yet to come, affecting our children's and grandchildren's lives much more than our own*".

Closer to home, prominent scientists who advise the state on climate research call in [Accelerating the timeline for climate action in California](#) for California to *ramp up its leadership by aligning its climate goals with the most recent science, coordinating actions to make 2030 a point of significant accomplishment. This entails dramatically accelerating its carbon neutrality and net-negative emissions goal from 2045 to 2030, including advancing clean energy and clean transportation standards, and accelerating nature-based solutions on natural and working lands.*

The 2022 Scoping Plan must ensure **at least 40% below 1990 levels no later than 2030**. CARB must treat this 2022 Scoping Plan as the final plan to ensure that we meet these goals. The plan measures must include sufficient detail to form a clear basis for all the implementing regulations, including cost-benefit analyses, co-benefits, land use and conservation, and environmental and social justice. The 2027 Scoping Plan can only be used to tweak some measures because there will not be enough time to draft and implement regulations to have any significant impact on meeting 2030 emissions goals.

The plan should also include accountability for meeting the goals and requires **measurable milestones, which** consider the measurements used, full lifecycle analysis, modeling used with appropriate consideration of sensitivity analyses and validation where the data are fuzzy. An Independent/neutral assessment could be conducted at the measurement level but it also could be a “second opinion” eg on modeling. This accountability should extend back into the implementing agency modelling/decision making, so that models and decisions aren't a done deal before they get to CARB.

Modeling: We support *The Climate Center's* call for CARB to include modeling of emissions reduction pathways in California that could achieve net negative emissions by 2030. We also support members of the EJAC asking for early engagement in designing the scenarios to be modeled and considering input from community and justice perspectives.

## **GHG Inventory**

Methane must be more accurately accounted for in the GHG inventory. The GHG inventory indicates a steady rise in methane across sectors and a steep increase in HWP pollutants in the commercial and residential buildings and distribution infrastructure. California should figure out how to change its accounting for these powerful warming gases over the relevant near term 20-year period (86 times CO<sub>2</sub>). Early actions on these gases are critical for helping us gain more time and space to reduce other emissions.

### **Accelerating early actions NOW**

Although it is early in the Scoping Plan process, we feel that more accelerated efforts in certain areas are going to be necessary to meet the 2030 goals. We want to urge CARB to consider these actions as part of the Scoping Plan development.

### **Do much more to phase out the sale of internal combustion vehicles (ICEV) by 2030**

The State's goal of phasing out ICEV sales by 2035 is laudable, but as the Mobile Source Strategy shows, it means that over 20% of the cars on the road in 2045 will still be ICEVs. This is incompatible with a zero carbon goal without expensive and highly speculative carbon capture technologies. By 2025 EVs will be no more expensive to buy than ICEVs, and they are already much less expensive to operate and maintain. There is no reason to continue to permit the sale of ICEVs past 2025, or perhaps 2030 at the latest.

We are also concerned that the ARB Mobile Source Plan fails to clearly identify HOW it will achieve the required GHGe reductions. At this point in our planning and execution of transitions away from ICEVs and towards ZEVs, we MUST clearly identify the necessary steps, resources and timelines for meeting critical benchmarks for that transition.

### **Stronger actions to reduce VMT:**

We urge CARB to collaborate with Cal STA to incorporate CAPTI measures into the Scoping plan. We especially support strategies to grapple with the persistent gap in goals set by ARB and the MPO goals and realities to reduce VMT. This must include increasing focus and investments in transit, infill development, smart planning, active transportation, and use of rail for heavy duty transportation (among other actions). CARB's own goal of reducing VMT per capita by 17% by 2045 needs much greater attention and effort given that we are woefully behind in achieving this goal.

**Aim to reach 100% renewable electricity as soon as possible** including moving up the state's goal to 2035, since that is the date in the Biden Climate proposal for the entire US overall. SB 100 calls for a 100% zero carbon electricity by 2045, but wind and solar are already the cheapest sources of electricity, and by 2030, with battery storage and hydroelectric power for the evening peak, we should be able to eliminate fossil fuels entirely in electricity production on a faster timeline than 2045.

### **Accelerate Building Decarbonization**

The scoping plan should support all-electric new buildings starting now--they are cost effective, healthier, and safer than buildings that use gas for water and space heating, dryers, and stoves.

In addition, all new appliances installed in existing buildings when existing appliances need replacement should be electric by 2030. These retrofits will need modest subsidies, but will

also create tens of thousands of new jobs and improve the health and well-being of all Californians. Right now, local governments are leading the charge on building decarbonization efforts in the state. Bold and consistent leadership and resources are needed from the state to match these important local initiatives.

## **Industry**

The scoping plan should provide more direction on deep reductions in emissions associated with cement and concrete.

### **Fossil fuel(FF) extraction, production, processing and exports**

Much more detail and stronger commitments are needed in this sub-sector, beyond what was presented by authors of the AB 74 studies. Decommissioning oil refineries, ramping down and phasing out oil extraction, phasing out exports (of oil and coal) and developing a just transition plan for specific communities and workers should be part of the plan. We look forward to more discussion and development of “High Road Jobs” and economic development for communities disproportionately impacted by fossil fuel industries.

Re-training refinery and other FF workers in green economy jobs (installing heat pumps, EV charging systems, building solar and wind energy, building ZEV cars, trucks and buses, oil well-remediation, and more) should be part of the plan. Protecting the health of communities adjacent to fossil fuel industries and high traffic/pollution corridors must be a central part of this planning for action process.

## **Energy sector**

Decarbonization of the energy sector has been a success story but needs to accelerate in order to meet the 2030 column. Targets for building decarbonization and transportation electrification will have greater impact with higher proportions of renewable energy provided by the grid. The workshop estimated that California’s electricity load may increase by 40 to 90 % over the coming decade. The escalation of California electricity prices needs to be understood and controlled to achieve affordability and equity concerns.

The California Energy Commission has estimated that California will need to triple the amount of renewable generation to meet the 2030 goal. Several speakers at the workshop acknowledged the increasing proportion of electricity costs due to rapidly rising long-distance transmission costs, as well as interconnection delays and capacity constraints in the current transmission system.

We strongly urge CARB and relevant state agencies to:

- incorporate wholesale energy generation and storage on the distribution grid in their modeling and planning.
- assure that the full cost of transmission is incorporated into modeling utility-scale solar
- that the land use implications of utility-scale solar and accompanying new transmission be considered. Specifically, the carbon sequestration potential of undisturbed desert lands and the land conservation objectives in the governor's 30 by 30 executive order need to be considered in scenario modelling

- The CPUC makes decisions on optimal generation mix using cost-effectiveness models which do not incorporate equity value such as health impact and air quality impact. Environmental Justice values should be incorporated in agency decision-making, not considered after decisions have already been made
- There needs to be better estimation of methane leakage throughout the energy system including out-of-state imports for gas generation. Also biomethane from e.g. dairy digesters is one of the scenarios considered by E3; that scenario should account for SLCP impact of methane leakage along the distribution system for transport and utilization of that biomethane.

## **Natural and Working Lands**

Carbon sequestration from Natural and Working Lands is substantially more cost-effective than sequestration using Carbon Capture Use and Storage (CCUS) or Direct Air Capture methods. In addition, Natural and Working Lands sequestration has the potential to be near term feasible and scalable. Realizing that potential will require refining the strategies and GHG consequences, improving our models, investing targeted resources and using greater geographic detail and independent verification to assure that long-term sequestration is accomplished. We are very concerned about an over-confident acceptance of early CCUS technologies and feel like these strategies must be much more thoroughly analyzed and vetted. We feel that NWL approaches and direct phasing out of fossil fuel products should be prioritized by CARB, NRA and other state agencies.

## **Support for the EJAC and Environmental Justice as a core and essential part of this Scoping Plan**

We strongly support the EJAC's request that environmental and social justice voices and vantage points be adequately represented across the entire scoping plan process. This may require that additional resources and time are allocated to support the functioning of the EJAC and for scoping plan outreach, and consultation among equity, health and community partners and stakeholders which are critical to developing an integrated and justice-informed scoping plan.

## **Build an ongoing Public Education and Engagement program to help the state achieve our climate goals**

Despite efforts undertaken by the [Upgrade California](#) and more recently the *Keep It Golden* media campaigns, the state is largely lacking a coherent and compelling public education and engagement campaign on climate related actions which can inform and mobilize our diverse population. PPIC surveys on Ca and their Environment have consistently shown a high level of concern and willingness to support actions on climate change among California's diverse population. In fact, survey findings consistently show striking demographic differences responses on these issues (people of color exhibit higher concern /support for action than white respondents)..

As an organization that interacts with thousands of residents (*not just environmentalists*) across the Bay Area on a wide range of issues related to climate change we find a large and unmet public interest in finding out what actions people can take to address the growing climate crisis. CARB et al should use the Scoping Plan process to examine what (else) can be done to foster public interest, engagement, leadership and mobilization in support of stronger climate actions. You have only to look at the broad, dynamic and inspirational Youth Climate Strike/Fridays for the Future movement (at home and internationally) to see the power of public action on behalf of Climate Justice. Mobilizing our diverse California public in support of the goals and actions addressed in the scoping plan (and our many local governments' climate plans and actions) is absolutely essential to achieve the results we need.

Thank you for this opportunity to offer our suggestions and recommendations for the early scoping plan process and we look forward to interacting with state agency staff and other stakeholders in this important process.

Sincerely,

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