



Friday, July 9, 2021

Richard Corey, Executive Officer
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cc:

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Trish Johnson, Staff Air Pollution Specialist

Rajinder Sahota, Deputy Executive Officer of Climate Change and Research

Yana Garcia, Deputy Secretary for Environmental Justice, Tribal Affairs and Border Relations at the California Environmental Protection Agency

Submitted electronically

Re: 2022 Scoping Plan

Dear California Air Resources Board members and staff,

On behalf of the undersigned, please accept these comments on the California Air Resources Board's (CARB) 2022 Scoping Plan. The Global Warming Solutions Act passed in 2006 laid the initial groundwork for creating a comprehensive, multi-year program to reduce greenhouse gas (GHG) emissions in California. In the fifteen years since its passage, some important progress has been made and yet we are far short of meeting the mandated targets, while the San Joaquin Valley and South Coast air basins continue to fail to attain health protective clean air standards. Given rapidly accelerating impacts from climate change, we must move farther, faster. Catastrophic wildfires, extreme heat, and severe drought are just a few of the impacts that climate smart strategies can address. Because people of color and lower income communities bear disproportionate impacts from both air pollution and climate change, proposed solutions must take a justice-centered and comprehensive approach. Addressing the root causes of institutionalized racism requires systems level changes. The Scoping Plan is a key opportunity to foreground environmental justice principles and priorities to improve quality of life in some of our most impacted neighborhoods across the San Joaquin Valley and California.

CVAQ recommends:

- A focus foremost on the 2030 target; “carbon neutrality” needs to be more clearly defined.
- Full electrification of the transportation sector and buildings as expeditiously as possible, with locally tailored solutions innovated from the ground up
- Significant reductions from oil and gas, transportation and goods movement, industrialized agriculture, with support and cross agency coordination on a holistic plan

to transition away from a fossil based economy that supports workers and prioritizes environmental justice communities

- A concerted effort and timeline for moving away from offsets
- Inclusion of pesticides
- Independent analysis of the proposed scenarios, including recommendations made by the Environmental Justice Advisory Committee (EJAC) and a thorough analysis of the social costs of carbon
- Deep integration of equity into current and future regulatory actions at CARB through increasing staff time, positions, and resources focused on equity and environmental justice

Given the combination of pollution sources in the San Joaquin Valley, there is an urgent need to address emissions from major industries such as development, particularly of sprawling land use, disconnected or inadequate transportation planning, and the proliferation of goods movement infrastructure like warehouses and distribution centers. The 2022 Scoping Plan and the subsequent regulatory processes triggered must not perpetuate false solutions like biomass, biogas, and the testing of unproven technology like carbon capture and sequestration in already overburdened communities, particularly those projects associated with enhanced oil recovery. These investments are short sighted and only perpetuate business as usual. While some technological fixes may be necessary to address the carbon already in the atmosphere, they should not be the focal point for achieving urgently overdue reductions¹. Adoption and rigorous enforcement of feasible and currently available measures demand our immediate attention and significant investment of resources.

California does not suffer from a lack of resources for a just transition, what it currently lacks is political will and proactive leadership. Given our experiences with the corrupt and insolvent Emissions Reduction Credit banking system in the San Joaquin Valley as well as a growing body of research showing serious issues with offsetting systems² along with directives from the current administration³, CVAQ firmly believes that California must urgently move away from reliance on market based mechanisms and focus resources on enforcement and direct reductions. Overall, the Scoping Plan should channel investments toward immediate protections for frontline communities alongside long term equitable, sustainable solutions innovated from the ground up.

Furthermore, the California Air Resources Board must continuously improve adoption and implementation of rules and regulations, for example by sharpening data collection⁴ and

¹ Temple, J. (2021). “Carbon removal hype is becoming a dangerous distraction: Corporations and nations are touting plans to suck greenhouse gases out of the air. But the crucial priority this decade is slashing emissions.” Available at <https://www.technologyreview.com/2021/07/08/1027908/carbon-removal-hype-is-a-dangerous-distraction-climate-change/> and National Public Radio. (2021). “Big oil (probably) isn’t going anywhere soon. But it’s definitely changing.” Available at <https://www.npr.org/2021/06/08/1002448099/big-oils-transition-3-takeaways-on-how-the-industry-is-and-isnt-going-green>

² One recent example: University College London. (2021). “Ten-fold increase in carbon offset cost predicted.” Available at <https://www.sciencedaily.com/releases/2021/06/210604122439.htm>

³ June 18, 2020 letter from CalEPA Secretary Jared Blumenfeld to Senator Bob Wiecowski

⁴ February 2021 State Auditor’s report cover letter available at <http://auditor.ca.gov/reports/2020-114/index.html>: “CARB has done little to measure the extent to which its incentive programs lead to emissions reductions by causing individuals and businesses to acquire clean vehicles that they otherwise would not. As a result, CARB has overstated the GHG emissions reductions its incentive programs have achieved, although it is unclear by how much. Given the

including more robust equity analyses. Staff and board members should engage in authentic dialogue with stakeholder groups such as the Environmental Justice Advisory Committee on the merits and limitations of the underlying assumptions embedded in the data and models being utilized. CARB must also continue deepening integration of equity and environmental justice into all of its programs and regulations, ensuring technical analyses are ground-truthed.

The San Joaquin Valley has earned a reputation as a land of cultural and physical abundance, producing more than half the nation's fruits and vegetables and historically as a leading oil producer. To extract these resources, community health and particularly the lifespan and quality of life of Black and Indigenous peoples and People of Color have paid an unjust, disparate toll. The Scoping Plan is a valuable opportunity to innovate solutions based on community based expertise, and the San Joaquin Valley has a similar abundance of lessons to share regarding industrialized agricultural impacts and the benefits of agroecology, the pitfalls and promise of integrated land use and transportation planning, and we are shaping what a just transition for workers and local economies from dependence on fossil fuels could look like. We urge attention to ground up, equity based and locally tailored solutions. We urge prioritization of the needs and lived realities of the everyday people of the San Joaquin Valley and California. We urge CARB to align its policies and resources toward a truly just, sustainable future and a livable planet in 2030 and beyond. Thank you for your attention to these important issues, and we look forward to continued conversations on how to make equitable progress toward California's clean air and climate justice goals.

Sincerely,

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ambitious nature of the State's climate change goals and the short time frame to meet them, California is in need of more reliable tools with which to make funding decisions."