

September 3, 2021

Rajinder Sahota

Deputy Executive Officer

California Air Resources Board

1001 “I” Street

Sacramento, CA 95814

Re: Scoping Plan Workshop Response to Staff Questions

Dear Rajinder Sahota,

We appreciate the learning from the workshop and concur wholly with the comments by Earthjustice and Sierra Club California that CARB aim for "carbon neutrality" by 2035 and a critical 80% minimum interim GHG reduction target by 2030 by urgently rolling out the Governor’s request for more aggressive climate action. To achieve the necessary reductions we support their recommendations as follows:

* Exclude CCS for Fossil Fuel Combustion
* Avoid CCS for Industrial Processes
* Include Carbon Removal (but restrict from use as offset)
* No CCS with industrial process, except where electrification or green hydrogen is genuinely infeasible which also applies to the Industrial Sector questions.
* Expedite Carbon Dioxide Removal through Direct Air Capture and enhanced natural sequestration by community-led, transparent approaches disallowing offsets that continue pollution.
* Aim for 90% RPS by 2030.
* Aim for a zero-carbon electric grid by 2035.
* No biomass combustion to generate electricity.
* No combustion of RNG or green H2 to replace fossil gas for reliability.
* Only use green hydrogen in fuel cells (no combustion) and only in a limited role for grid reliability.
* Vehicle fleet electrification:
* Light Duty: 100% Sales by 2030
* Transit Buses: 100% Sales by 2030
* Medium and Heavy Duty: 100% Sales by 2035
* Off-road: 100% Sales by 2030
* Put the Advanced Clear Cars II rule into ambitious alignment with the Mobile Source Strategy and stop offering excessive flexibility in the use of credits.
* Keep target for 100% ZE drayage sales by 2023, and push for aggressive early action.
* Focus on target of 100% ZE fleet for MHD by 2035.
* Set the Advanced Clean Fleet rule at 100% ZE MHD sales by 2035.
* Strengthen early year targets for Advanced Clean Truck Rule with MSS’s projections from 2029-2035 for Class 4-8 trucks as a requirement across all truck categories.
* All new buildings all-electric by 2026
* 100% all-electric appliance sales by 2030
* All existing buildings retrofitted by 2045
* Focus now on strategic gas system decommissioning with proactive, progressive trimming.
* Decommission the entire low-pressure fossil gas and RNG distribution system for residential and commercial.

We recognize the legal requirements of the Scoping timeline and public engagement process, but the oil, gas and utilities industries are displaying inordinate political influence over the legislature, civilization is in seriously dire straits, and mitigation is moving far too slow. These are ‘no-brainer’ policies and programs obvious to all of us who bother to do the simple math on the carbon budget. You need to begin implementing these programs now.

Yours,

Jan Dietrick, MPH, Policy Team Leader

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