



June 21, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted via CARB's Online Portal: <https://ww2.arb.ca.gov/applications/public-comments>

Re: Comments on the Draft 2022 Climate Change Scoping Plan Update

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the draft 2022 Climate Change Scoping Plan Update (Scoping Plan). We greatly appreciate the time and effort it took to prepare the draft plan and the California Air Resources Board's (CARB) and staff's dedication to this vital plan.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the Scoping Plan and CARB staff's selection of Alternative 3, which will keep California on track to meet the SB 32 target and achieve carbon neutrality by 2045. We support Alternative 3 because it will require a substantial reduction and phase out of petroleum use, including reaching the goal of 100% sales of light-duty vehicles by 2035. However, the Scoping Plan recognizes that there will be some internal combustion engines on the road for several reasons, including internal-combustion-engine vehicles that are still owned by Californians and those vehicles owned by new or returning residents of California. The Scoping Plan correctly focuses on the actions needed to address climate change, air quality, and community exposure from combustion engines, which is the largest source of carbon emissions in California. Alternative 3 will have the least slowing effect on the economy, and drive investment in the clean energy sector. While achieving our goals is not without challenges, we believe that the Scoping Plan presents a viable path to meeting the state's greenhouse gas reduction targets.

CalETC is concerned that this important plan and its adoption are unnecessarily delaying action to update and strengthen the Low Carbon Fuel Standard (LCFS). Throughout the LCFS process, CARB staff has repeatedly indicated they will not strengthen the LCFS until the Scoping Plan is adopted.

Meanwhile, the LCFS program is weakening because of inaction on LCFS, undermining critical programs that support an equitable transition to zero-emission vehicles. While we fully support the staff's recommendations in the Scoping Plan, we do not believe this plan should delay the implementation and strengthening of the LCFS, which have already been delayed by two years. We urge staff and the Board to expedite the adoption of stronger LCFS requirements as soon as possible.

Thank you for your consideration and CalETC looks forward to continuing to work with the CARB staff and board members on the Scoping Plan.

Regards,

A handwritten signature in blue ink, appearing to read 'KAC', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition