



September 3, 2021

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

Re: ClimatePlan's comments on Scenario Concepts workshop for Scoping Plan update

Dear Chair,

ClimatePlan and our network partners are thankful for the opportunity to comment on the 2022 Scoping Plan Update. As many have stated, this is the last Scoping Plan update that could make a meaningful difference in greenhouse gas reductions. According to the recent IPCC report, global temperatures are likely to exceed 1.5 or 2 degrees without significant reductions in greenhouse gas emissions. These reductions need to happen as soon as possible because we know that our climate crisis is only getting worse. The same IPCC report finds "any additional increase of 0.5°C of global warming causes clearly discernible increases in the intensity and frequency of hot extremes, heavy precipitation, as well as agricultural and ecological droughts in some regions." **We must be ambitious in our modeling to set policies that quickly improve our air quality and eliminate the disproportionate health burdens that communities of**

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color and low-income communities bear. There needs to be urgency and intentionality around achieving these goals.

To achieve these goals, CARB must;

- **First and foremost, prioritize the feedback from the Environmental Justice Advisory Committee (EJAC).** The committee has asked for more time to understand the modeling process and that the targets set actually REDUCE greenhouse gas emissions. Their input is vital to ground-truthing the outcomes and addressing the health disparities that are seen in communities of color and low-income communities.
- **Set Aggressive Vehicle Miles Traveled Targets.** We believe ambitious VMT targets are what are necessary to adequately respond to the climate crisis. Achieving carbon neutrality by 2035 by setting 20% VMT reductions targets is a step in the right direction. With that said, we cannot just set these targets without ensuring that these reductions are not made at the expense of communities that are already burdened by inadequate land use and transportation policy. Modeling outputs should be coupled with anti-displacement measures and plans for investments in low-income communities and communities of color.
- **Accelerate building decarbonization for new buildings and the retrofit of old buildings.** We agree with the aggressive CARB recommendation for new buildings. In terms of retrofitting old buildings, we support the aggressive option on the condition that CARB cautious policies do not burden low-income and not communities of color. With these targets, there needs to ensure that communities are not displaced as a result of building electrification policy or that low-income communities are fronting the bill for electrifying our state.
- **Prioritize green natural and working lands policy.** Natural and working lands is a vital strategy in both of the options offered by CARB; there was a heavy reliance on engineered carbon removal. There needs to be a greater reliance on natural climate solutions for sequestrations. This included a bigger reliance on improving forest management.

We strongly urge that we model ambitious targets, but with thoughtful considerations for different socioeconomic contexts. ClimatePlan and our network partners look forward to working with CARB staff and the larger stakeholder community in the creation of the 2022 Scoping Plan.

Thank you,

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Policy Associate

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