

June 21, 2022

Governor Gavin Newsom  
California State Capitol  
Sacramento, California 95814

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

**RE: A Call for a Climate Change Scoping Plan that Addresses the Needs of the Climate, the People and the Environment**

Dear Gov. Newsom, Chair Randolph and Members of the California Air Resources Board,

We are writing to you on behalf of our 163 organizations, representing hundreds of thousands of members across California, as well as many other groups around the country, to urge you to revise the 2022 Draft Scoping Plan to address the needs of our climate, our communities, and the environment. The goals and benchmarks in California's plan must end emissions at the source and avoid the pursuit of a so-called carbon neutrality that will prop up industry scams like carbon markets, carbon capture, bioenergy, hydrogen and direct air capture that will only serve to worsen the climate crisis, exacerbate water shortages, and continue the disproportionate harm our current energy system has on frontline communities.

Governor Newsom has rightly recognized climate change as an "existential threat" and stated that "no challenge poses a greater threat to our way of life, prosperity, and future as a state than climate change," and yet today California regulations still fail to address increased fossil fuel emissions and the ongoing violence of environmental injustice. Instead, policies reflect the power of polluting industries and their attempts to greenwash technological and market-based systems that are a smokescreen. In this line, the Draft Scoping Plan proposal fails to slash emissions at the pace or scale that climate science requires and does little to protect communities on the frontlines of fossil fuel pollution. We are deeply concerned that this plan will also increase environmental injustice in other states and the global south by continuing reliance on cap-and-trade and a low carbon fuels standard that rely on offsets that commercialize climate dead ends.

**First and foremost, a revised plan must establish the target of near zero greenhouse gas emissions by 2035.** It is appalling that CARB has proposed both to delay "carbon neutrality" until 2045 and to rely even more heavily on accounting scams and false solutions than initially modeled. As the world's scientists have repeatedly warned, we are out of time to act on climate.

We simply cannot afford any further delay of needed pollution reductions. The 2045 goal for “carbon neutrality” would facilitate further delay and must be discarded. To protect our state, CARB must establish a goal of near zero emissions by 2035 as science and justice demand.

The plan must also include the following measures to ensure success and maximize the many benefits of rapid action: (1) fully phasing out fossil fuel production in California by 2030, (2) requiring 100% electric vehicle sales by 2030 and scaling up clean public transit, (3) ensuring no new gas-fired power plants are built, starting today, and a transition to 100% clean renewable electricity by 2030, (4) ending sales of new gas appliances by 2025, and (5) excluding false solutions like biofuels, hydrogen, and carbon capture and storage.

California must consult with Indigenous Peoples to obtain their free, prior, and informed consent before adopting and implementing measures that may affect them.

### **Rapidly phase out fossil fuels and transition to 100% clean renewable electricity by 2030**

The United States must end all existing oil and gas production by 2031 to have a reasonable chance of limiting global temperature rise to 1.5°C. California must do its part by immediately ending all new fossil fuel infrastructure and all oil and gas operations within at least 3,200 feet from homes, schools, and other sensitive locations. The plan must effectuate a rapid phase out of all fossil fuel production by 2030, prioritizing near term reductions and driving overall emissions to near zero by 2035. This must accompany a rapid build out of a 100% clean, renewable and just energy system by 2030 powered entirely by proven, cost-effective solutions like community-based distributed renewable solar, wind energy, and battery storage. We also need huge investments in increased energy efficiency.

### **Reject Industry Scams that Lock in Pollution and Promote Environmental Injustice**

Dirty polluting interests are working to convince policy makers and the public that capturing carbon, producing hydrogen, burning bioenergy, and carbon trading schemes are necessary and important. In reality these expensive and unnecessary schemes will delay the transition to clean energy, enable polluters to continue business-as-usual, exacerbate climate disaster and promote environmental injustice.

Every dollar we waste on these industry scams are resources taken from communities and efforts to facilitate a real transition away from energy sources that are causing climate change intensified disasters like wildfires, flooding and droughts, while polluting our communities.

### **Rapidly Create More Sustainable and Safer Communities**

California’s car-centric, fossil-fueled transportation and building sectors are a massive driver of the climate emergency, pumping out 40% and 25% of the state’s total climate pollution

respectively, while also leaving working-class communities of color to bear a heavier pollution burden. The plan must rapidly accelerate the path to 100% electric vehicles and buildings by making necessary investments that will support safer communities. We need a massive expansion of infrastructure for public transit, as well as a focus on reducing travel distances, building more bike lanes and ensuring safe walkable neighborhoods for all.

We must end the use of fossil fuels in new construction immediately, and require the same for upgrades and replacement infrastructure for heating, cooking, and hot water by 2025, while providing adequate resources to support low and moderate income households in the transition.

By 2030 all light duty cars and trucks, buses and passenger rails purchased in California must be electric or battery powered. All new gasoline powered light duty cars and trucks sold before 2030 must include a 7% annual emissions reduction. The plan must speed up the timeline for all medium- and heavy-duty truck sales to be 100% electric by 2035, at the latest. Additionally, the Scoping Plan must set ambitious targets for the transition of freight trains, ports and shore power, and cargo equipment to clean renewable energy.

### **Support Sustainable Land Practices with No Carbon Offsets to Justify Pollution Elsewhere**

The Scoping Plan must prioritize ambitious *direct* emissions reductions across all sectors to achieve near zero emissions by 2035 without including offsets that justify pollution elsewhere. At the same time, the Scoping Plan must support the protection of forests, shrublands, wetlands, and other ecosystems that act as enormous carbon storehouses that pull carbon dioxide out of the air, easing the climate crisis, in addition to providing many other benefits such as wildlife habitat, recreation, flood and erosion control, and clean air and water. Because forest ecosystems provide critical carbon storage and sequestration, California must stop deforestation and forest degradation by ending commercial logging and thinning on public lands that depletes forest carbon stocks, emits carbon pollution, lowers carbon sequestration capacity, and makes the landscape more vulnerable to the climate crisis. The Scoping Plan must also set more ambitious targets for pesticide reduction, organic agriculture, and urban greening and urban forestry. California must also collaborate with Indigenous Peoples and Indigenous Nations to uplift and support traditional land practices such as cultural burning.

### **Ensure Equity and Environmental Justice in the Transition**

As California electrifies its energy and transportation system, officials must not repeat mistakes of the past that disproportionately harm frontline communities of color and Indigenous Peoples. This includes ensuring adequate resources to support low and moderate income households, impacted workers, and communities in the transition as well as ending sources of harmful emissions that are poisoning communities. The plan must put an emphasis on providing

sufficient investment to overcome barriers to electrification of buildings and transportation in the hardest-to-serve communities.

To support local energy infrastructure, the plan must prioritize a minimum 25% distributed renewables, including rooftop and community solar, battery storage, and microgrids. This will help bring substantial benefits for energy democracy, electricity affordability, climate resilience, and local economic recovery.

The plan must end all sources of combustion based energy that are disproportionately harming disadvantaged communities, such as waste incineration, bioenergy including biomass, biofuels, factory farm gas, landfill gas, and wood pellets; and eliminate all market-based carbon accounting systems like offsets that have shown to increase pollution in disadvantaged communities.

We must ensure that our transition to clean energy does not harm communities along the supply chain. Metals mining and extraction is one of the world's dirtiest industries, responsible for at least 10% of greenhouse gas emissions, environmental destruction, and human rights abuses. As California transitions to a clean energy future, we can reduce the risk of harm from metals mining by requiring electric vehicle manufacturers to maximize recyclability, minimize toxicity, conduct mandatory due diligence on their supply chains, and where new mining is necessary, require they follow the best standards for environmental protection and respect for human rights.

By adopting this bold agenda, you can show the nation and the world that California is serious about meeting the challenge of the climate crisis. Half measures won't cut it - what is needed is transformative action rooted in justice. We're looking to you for leadership and action.

Sincerely,

*California-Based Groups and National Organizations with Members in California*

1. 350 Bay Area Action
2. 350 Butte County
3. 350 Conejo / San Fernando Valley
4. 350 Contra Costa
5. 350 Santa Barbara
6. 350 Silicon Valley
7. 5 Gyres Institute
8. Acterra: Action for a Healthy Planet
9. Active San Gabriel Valley
10. Alliance of Nurses for Healthy Environments
11. Benicians for a Safe and Healthy Community

12. Biodiversity First!
13. Biofuelwatch
14. Breast Cancer Action
15. CA Youth Vs Big Oil
16. California Alliance for Community Energy
17. California Democratic Party Environmental Caucus
18. California Kitchen
19. California Nurses for Environmental Health and Justice
20. Center for Biological Diversity
21. Center for Community Action and Environmental Justice
22. Center for Environmental Health
23. Central California Asthma Collaborative
24. Central California Environmental Justice Network
25. Central Coast Climate Justice Network
26. Climate Action Campaign
27. Climate First: Replacing Oil & Gas
28. Climate Hawks Vote
29. Climate Health Now
30. Climate Tzedek Committee of Congregation Netivot Shalom
31. Cool LA
32. Courage California
33. Del Norte Climate Justice Alliance
34. Earth First!
35. Earth Justice Ministries
36. Earthworks
37. EcoEquity
38. Ecology Center
39. Endangered Habitats League
40. Environmental Democrats
41. Environmental Justice Coalition for Water
42. Environmental Protection Information Center- EPIC
43. Environmental Working Group
44. Extinction Rebellion San Francisco Bay Area
45. Families for Clean Air
46. Food & Water Watch
47. Fresnoans against Fracking
48. Fridays For Future Sacramento
49. Good Neighbor Steering Committee of Benicia
50. Greenpeace USA
51. Idle No More SF Bay

52. Indigenous Environmental Network
53. Indivisible San Jose
54. Indivisible SF
55. Interfaith Climate Action Network of the Interfaith Council of Contra Costa County
56. Interfaith Solidarity Network, L.A.
57. John Muir Project of Earth Island Institute
58. Jug Handle Creek Farm & Nature Center
59. Klamath Forest Alliance
60. Let's Green CA!
61. Long Beach 350
62. Long Beach Alliance for Clean Energy
63. Los Padres ForestWatch
64. Movement Rights
65. NDN Collective
66. Nuclear Age Peace Foundation
67. Oil and Gas Action Network
68. Oil Change International
69. Organic Consumers Association
70. Our Revolution
71. Physicians for Social Responsibility - Los Angeles
72. Physicians for Social Responsibility/Sacramento
73. Planning and Conservation League
74. Progressive Democrats of America
75. Protect Wild Petaluma
76. San Francisco Bay Physicians for Social Responsibility
77. San Francisco Baykeeper
78. Santa Barbara County Action Network
79. Santa Barbara Standing Rock Coalition
80. Santa Barbara Urban Creeks Council
81. Santa Cruz Climate Action Network
82. Santa Cruz for Bernie
83. Save Our Shores
84. SEE (Social Eco Education)
85. Seeding Sovereignty
86. SLO Climate Coalition
87. SoCal 350 Climate Action
88. Social Justice Ministry, Live Oak Unitarian Universalist Congregation
89. Society of Native Nations
90. Sonoma County Climate Activist Network (SoCoCAN!)
91. Stand.earth

92. Story of Stuff Project
93. Sunflower Alliance
94. Sunrise Movement Santa Barbara
95. Sunrise San Luis Obispo
96. Sustainable Mill Valley
97. The Climate Alliance of Santa Cruz County
98. The Last Plastic Straw
99. TIAA-Divest!
100. Upstream
101. Venice Resistance
102. Water Climate Trust
103. West Berkeley Alliance for Clean Air and Safe Jobs
104. Wild Nature Institute
105. Youth Vs Apocalypse

*Organizations Based Outside of California*

106. 350 Seattle
107. Accelerate Neighborhood Climate Action
108. ActionAid USA
109. Aliança RECOs - Redes Comunitárias Sem Fronteiras
110. Buffalo River Watershed Alliance
111. Businesses for a Livable Climate
112. Call to Action Colorado
113. CatholicNetwork US
114. CDP - Energy and Environmental Initiative
115. Citizens Against Longwall Mining
116. Citizens Alliance for a Sustainable Englewood
117. Clean Energy Action
118. CO Businesses for a Livable Climate
119. Coalition Against Pilgrim Pipeline - NJ
120. Community for Sustainable Energy
121. Concerned Health Professionals of Pennsylvania
122. CWA Local 1081
123. Don't Gas the Meadowlands Coalition
124. Dooda (NO) Helium Extraction Organization
125. Earth Action, Inc.
126. Empower Our Future
127. Environment Matters
128. Fossil Free Tompkins

129. Fox Valley Citizens for Peace & Justice
130. Greater New Orleans Housing Alliance
131. Honor the Earth
132. I-70 Citizens Advisory Group
133. Indivisible Ambassadors
134. Landelijk Netwerk Bossen- en Bomenbescherming
135. Larimer Alliance for Health, Safety and Environment
136. Mayfair Park Neighborhood Association Board
137. Mental Health & Inclusion Ministries
138. Montbello Neighborhood Improvement Association
139. Movimento Mulheres pela P@Z!
140. National Family Farm Coalition
141. New Mexico Climate Justice
142. New Mexico Environmental Law Center
143. North Range Concerned Citizens
144. NYC Grassroots Alliance
145. Partnership for Policy Integrity
146. Physicians for Social Responsibility-Iowa
147. Pueblo Action Alliance
148. RapidShift Network
149. Resilient Denver & Prosperous Planets
150. Save EPA (former employees)
151. Save Our Illinois Land
152. Small Business Alliance
153. Southwest Organization for Sustainability
154. SouthWest Organizing Project
155. Spirit of the Sun, Inc.
156. System Change Not Climate Change
157. The Green House Connection Center
158. Unite North Metro Denver
159. Wall of Women
160. Waterspirit
161. Western Slope Businesses for a Livable Climate
162. Womxn from the Mountain
163. Working for Racial Equity