

Priority EJAC Recommendations

General Themes:

1. **Equity:** CARB has acknowledged that environmental justice communities are more heavily impacted by climate change and exposure to pollution, but has yet to acknowledge the pitfalls of current AB 32 programs in either perpetuating or not fully addressing that inequity. All policies and sectors discussed within the Scoping Plan need to have equity and environmental justice analyses to identify any inequity and give space to CARB staff to identify how the policy may be further improved to address the identified inequity. CARB also needs to include tangible metrics for each sector and policy so staff and the communities can track the implementation of the Scoping Plan and quickly address issues as they arise. In recognition of the need to consider timing and feasibility of some recommendations, staff should use a “loading order” to help prioritize actions: reduce fossil fuel use FIRST, reduce emissions through technology and innovation SECOND, and THIRD (if the other two aren’t possible) prevent emissions from increasing.
2. **Partnership with Environmental Justice Communities:** CARB needs to highlight the need and opportunity for community-level solutions, citizen science and monitoring of programs and impacts, as well as community involvement in Scoping Plan implementation more generally throughout the final Plan. CARB also needs to mandate equity and environmental justice trainings for all staff to promote the culture shift that is needed to effectively communicate and partner with our communities.
3. **Coordination:** CARB has been given a mandate to create a Scoping Plan to address greenhouse gas emissions, but does not have within its authority all of the tools to take adequate action to achieve our 2030 and 2050 climate goals. We do not believe that it was the intent of AB 32 and SB 32 to limit actions to only CARB’s programs and policies, thus we think that AB 32 and SB 32 require CARB to work with and coordinate actions with other state, regional, and local agencies to ensure that California can meet our ambitious climate goals. CARB shouldn’t just drop important implementation pieces, like expanding the clean energy economy and addressing barriers to low income Californians, just because they don’t know how to do it; they can coordinate agencies and groups who have expertise.
4. **Economic Opportunity:** CARB has acknowledged that modeling within the Scoping Plan with regard to job loss or gain is limited to the current economic activities – in other words, when our models say we can expect job loss or job gain, it is in a fossil fuel based economy that those job shifts are happening. While it is very important to understand the impact policies will have on current jobs, it is even more important to envision and develop ways to build a new economy based on sustainable economic endeavors (green energy, agriculture, urban greening, etc.), and to prioritize job training and business development in environmental justice communities. This move away from a polluting economy toward a sustainable economy that includes workers from and benefits to disadvantaged communities is also known as a Just Transition. These jobs should be intentional about hiring local first, and identify ways to hire folks with employment

barriers (such as a history in the justice system). This includes prioritizing local organizations and individuals for state contracts and grant programs, not out-of-state or out-of-community organizations.

5. **Long-Term Vision:** CARB has been given a mandate to achieve 2030 and 2050 targets, but our actions must look well beyond those timelines. We must take every action we can, and reduce emissions as much and as quickly as possible, if we are to honor the Earth we will leave to our children and grandchildren.

Industry:

- The EJAC's top priority is emissions reduction in environmental justice communities per the intent of AB 197. In addition to 20-30% refinery emissions reduction measures, CARB needs to identify and prioritize emissions cuts from other large stationary sources like power plants, cement plants, etc. CARB needs to specify which strategies within the Scoping Plan achieve emissions reductions in EJ communities. CARB should work with OEHHA to continue their studies on emissions impacts on EJ communities. CARB needs to develop and expand a real-time air monitoring network to better track and address inequalities in air pollution exposure as they occur. CARB should activate and expand the Adaptive Management program to monitor and address changes in toxic and criteria air pollutant emissions, and implement no-trading zones for EJ communities to ensure no localized pollution increases occur.
- CARB should abandon the Cap and Trade system for a non-trading system option like Carbon Tax (also referred to by staff as Cap and Tax), Cap-and-Dividend, Fee-and-Dividend, or command and control regulations. These options would eliminate free allowances and offsets, and allow CARB to set facility caps. CARB should conduct full economic analyses of these alternatives. CARB needs to fully transition to using the social cost of carbon for all scenarios, which would include broadening the definition of economy to include costs to the public and health care costs of pollution. Funds generated from carbon pricing should be used for emissions reduction programs, dividend to lower income households to alleviate energy price spikes, and a Just Transition Fund to train industrial workers and impacted communities to gain jobs in the clean energy economy.

Natural and Working Lands:

- CARB must reconsider the assumption that burning biogenic carbon is "sustainable" or "renewable" because biomass can be regrown. The time scales necessary to recapture carbon are too long, and the incentives for regulated entities to burn biomass are much higher than the incentive to leave it in place.

Waste Management:

- CARB should mandate that local jurisdictions manage the waste they create, and do not export it outside of the community. Local jurisdictions should be given clear direction that the goal is to reduce waste and redirect 100% of the waste that is recyclable or compostable, not just to divert waste; diversion penalties are contradictory to our goal to get households and individuals to purchase more responsibly and stop disposing of waste at such a high and unsustainable rate. All jurisdictions should be mandated to have recycling and composting programs.
- CARB must not consider biomass burning or biodigestors as "renewable."

Energy, Green Buildings, Water:

- Set a moratorium on new oil and gas operations (refineries, power plants, fracking wells, etc.). We cannot simultaneously be expanding fossil fuel infrastructure (multi-decade commitment) while reducing emissions to reach CA climate goals. Include guidance for strong health-based standards, buffer zones around locations affected by emitting facilities, and capture and measurement of leaking methane.
- Stop investing in dirty energy. Eliminate subsidies and financing for fossil fuels and in technologies such as corn-based biofuels, agricultural methane, biomass burning, waste-to-energy, or other unsustainable technologies that result in negative impacts on EJ communities. Use funds instead for clean energy projects in EJ communities.

Transportation:

- CARB needs to examine transportation regionally through SB 375 and beyond, as each region in our state faces unique barriers to reducing emissions from transportation. The Scoping Plan should identify specific language and targets about how the various regions in the state can address mobility and emission issues specific to their communities. This includes an analysis of how to increase infrastructure for bikes, electric vehicles and charging stations, and other low emission vehicles. This also includes restricting truck routes and limiting new trucking and freight operations to reduce the impact that industry has on disadvantaged communities.
- Under “Local Action,” CARB needs to delete the following sentence that describes a new local carbon market proposed by CAPCOA: “Where further project design or regional investments are infeasible or not proven to be effective, it may be appropriate and feasible to mitigate project emissions through purchasing and retiring carbon credits issues by a recognized and reputable accredited carbon registry.” Carbon trading schemes tend to negatively impact EJ communities.