

June 24, 2022

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

Subject: Comments on Draft 2022 Scoping Plan

Dear Chair Randolph and Members of the California Air Resources Board:

On behalf of the Board of Directors of the Sonoma County Transportation Authority (SCTA) and Regional Climate Protection Authority (RCPA), I am writing to provide comments on the Draft 2022 Scoping Plan.

The RCPA was formed in 2009 through locally sponsored State legislation to coordinate countywide climate protection efforts among Sonoma County's nine cities and multiple county agencies. The RCPA has three main areas of focus: decarbonization, carbon sequestration, and resilience. The RCPA's priorities are leading countywide climate planning efforts and securing funding for GHG reducing programs and projects.

In September 2019, the RCPA adopted a resolution declaring a climate emergency. By early 2021, all ten local jurisdictions in Sonoma County had adopted climate emergency resolutions, and six of these set a goal of achieving carbon neutrality by 2030.

In 2021, the RCPA adopted the Sonoma Climate Mobilization Strategy. This strategy builds on Sonoma County's previously adopted countywide climate action plan and sets a countywide goal to achieve carbon neutrality by 2030.

The proposed scenario in the Draft 2022 Scoping Plan includes many actions that are aligned with the RCPA's Sonoma Climate Mobilization Strategy, including the Priority GHG Reduction Strategies for Local Government Action in Appendix D. However, the proposed scenario does not define a pathway for California to achieve carbon neutrality by 2030. **To support Sonoma County's ambitious climate goals, we suggest that the Air Resources Board more aggressively address the scientific imperative and approve a scoping plan scenario which defines how the State will achieve carbon neutrality by 2030.**

AB 32 GHG Emission Reduction Scenarios

From a local government perspective, the sectors that are most challenging to address in reducing GHG emissions are transportation and buildings. From the RCPA's 2018 GHG Inventory Update, transportation accounts for roughly 60 percent of GHG emissions in Sonoma County and buildings account for about 22 percent. The Draft 2022 Scoping Plan alternative which appears to have the biggest impact on these sectors is Alternative 1: Carbon Neutral by 2035 which nearly phases out all combustion and requires early retirement of vehicles, appliances, and industrial equipment. Local jurisdictions in Sonoma County are already taking action to phase out combustion by adopting bans on new fossil fuel stations. To date, the cities of Petaluma, Rohnert Park, and Sebastopol have adopted bans on new fossil fuel stations; Santa Rosa, Cotati, the Town of Windsor, and the County of Sonoma are in the process of adopting similar bans.

To accelerate local climate action, we need stronger State policies to transition more rapidly to zero emission mobility solutions and electrify our building stock. We suggest that the Air Resources Board prepare a revised version of Alternative 1 that reduces emissions enough to achieve carbon neutrality by 2030 rather than 2035.

Another area of concern with the proposed GHG emission reduction scenario is the inclusion of bioenergy with carbon capture and storage as one of the carbon dioxide removal strategies. We do not support the development of new infrastructure to remove biomass from forests for the purpose of energy generation and support greater priority be given to nature-based solutions for carbon dioxide removal.

Natural and Working Lands Scenarios

We recognize that to achieve carbon neutrality we will need to both accelerate the rate at which we phase out the burning of fossil fuels and increase the ability of our natural and working lands and urban areas to sequester additional carbon dioxide. The RCPA's Sonoma Climate Mobilization Strategy focuses exclusively on nature-based solutions to achieve Sonoma County's sequestration goals. Therefore, we appreciate the inclusion of strategies addressing nature-based solutions in the Draft 2022 Scoping Plan. We suggest that the Air Resources Board recognize the important role that local governments play in implementing these solutions by including nature-based carbon sequestration on the list of priority areas described for local government climate action in the Draft 2022 Scoping Plan Appendix D – Local Actions.

In conclusion, we appreciate that the Air Resources Board evaluated scenarios for achieving carbon neutrality by 2035 and 2045 and included natural and working lands in its analysis. To achieve our local climate goals and address the scientific imperative, we need State support to significantly scale up our local actions and more rapidly transition our economy away from its dependence on fossil fuels. We suggest that the Air Resources Board consider a new scenario that enables the State to reach carbon neutrality by 2030.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Rogers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chris Rogers
Chair, SCTA/RCPA