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**WSPA Comments and Citations Part 1 on Draft SB 237 Assessment
and Draft TFTP 23-ICFAC-01**

Additional submitted attachment is included below.



Jodie Muller
President & CEO

July 24, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Uploaded to Dockets
23-SB-02 and 23-ICFAC-01

RE: WSPA Comments on the Draft SB 237 Assessment and Draft Transportation Fuels Transition Plan [CEC Docket #23-SB-02] and Fourth ICFAC Meeting [#23-ICFAC-01]

The Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft Senate Bill (SB) 237 (2025) Assessment¹ and the California Air Resources Board (CARB) and CEC's SB X1-2 (2023) Draft Transportation Fuels Transition Plan² and the June 23, 2026, fourth meeting of the Independent Consumer Fuels Advisory Committee (ICFAC).³ WSPA is concerned that both documents seem to be based on an enduring hope that California will reach its ambitious emissions reduction targets, rather than meaningfully evaluating real-world challenges impacting the competitiveness of California's critical petroleum sector and statewide energy and transportation policies – which were already attempting to reduce affordable and reliable fuel supplies faster than consumers can afford. WSPA recognizes the challenges California faces in meeting its emissions reduction goals, and that the transportation sector is integral in any solution. However, any actions taken to further these goals must also strike an appropriate balance between environmental protection, and affordability and reliability for consumers in the Western region.

WSPA believes that further State policy measures are needed to stabilize California's petroleum sector. Ongoing investments into California's critical petroleum infrastructure will be required to meet current and future consumer demand throughout the Western region in a competitive manner – including for neighboring consumers in Arizona and Nevada. We therefore urge policymakers to refocus on supply stabilization efforts so California's industry can remain competitive and continue providing consumers with the affordable and reliable fuel supplies the California legislature envisioned under SB X1-2. To summarize the main points of this letter:

- **Hope is not a plan.** Neither document adequately reflects real-world challenges nor the need to plan for and meet consumer needs at an affordable cost. The State seems so focused on its 2045 vision that the planning period surrounding 2030 is almost forgotten, even though a longer, more complex transition is expected – potentially leaving California in a more compromised position. For example, the Draft Transportation Fuels Transition Plan (Draft TFTP) assumes that movement away from petroleum transportation fuels rests with the adoption of zero-tailpipe emission transportation technologies. The adoption of such remains highly uncertain over the medium term. The State assumes that it will positively prevail in pending litigation over the recent revocation of Clean Air Act waivers that would allow California to re-establish technology-forcing regulations, and significant State-backed financial incentives to encourage the uptake of these zero-tailpipe emissions vehicles. In the absence of such mandates or large-scale financial incentives, the transition away from petroleum fuels rests on consumer choices and the free market. Without a

¹ See "Draft Senate Bill 237 Assessment" in 23-SB-02 Docket Log, posted May 1, 2026; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-SB-02>.

² See "Draft Transportation Fuels Transition Plan" and associated "Appendix A" and "Appendix B" in 23-SB-02 Docket Log, posted May 1, 2026; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-SB-02>.

³ See Fourth Meeting of the Independent Consumer Fuels Advisory Committee; available at: <https://www.energy.ca.gov/event/workshop/2026-06/fourth-meeting-independent-consumer-fuels-advisory-committee>.

mature market for zero-tailpipe emissions vehicles it is difficult to accurately estimate the acceptance and the transition away from petroleum fuel over the medium term.

- **More State action is needed to stabilize and protect California's petroleum assets.** The State plays a critical role in providing holistic, long-term investment confidence to stabilize its critical petroleum supply. WSPA remains opposed to any regulatory burdens that would compromise this.
- **The Draft SB 237 Assessment makes unrealistic assumptions.** The CEC must plan *now* for ongoing and realistic investment needs to meet consumer demand, rather than hoping that ideal scenarios will incorporate transportation technology-forcing mandates,⁴ an extraordinary ramp-up in the availability of affordable alternative energy sources, the presumed orderly retirement of petroleum assets, and that consumers will support increasingly ambitious policies at any cost.
- **The Draft TFTP discounts near-term needs.** While the Draft TFTP acknowledges some short- and medium-term options to manage California's changing fuel supply, it generally focuses on longer-term (2030's to 2040's) needs, amplifying concerns noted above. Furthermore, the ICF Model does not provide a credible approach to determine refinery closures and the Draft TFTP itself ignores the important role maritime fuels have in California's transportation sector.

NEED FOR REAL-WORLD PLANNING

California has been steadfast in its commitment to reach its ambitious 2030 emissions reduction target under SB 32 (2016) and towards achieving carbon neutrality no later than 2045 under AB 1279 (2022). However, we remain concerned that the plan to ultimately reach carbon neutrality – as stated in CARB's "2022 Scoping Plan for Achieving Carbon Neutrality" – is one "fundamentally based on hope,"⁵ and fails to confront real-world challenges. Since CARB finalized their Scoping Plan in December 2022, real world circumstances have changed significantly for the fuels sector: multiple California refineries announced permanent closures across the State;^{6,7,8,9} proposed State policies prompted fuel supply reliability and cost concerns from California policy leaders and leaders in neighboring states;^{10,11} a new federal administration took office; significant economic and geopolitical uncertainties have emerged, with a sluggish California economy and new federal import tariffs creating additional cost pressures;¹² a military conflict with Iran is ongoing; and California consumers are increasingly demanding meaningful action to address the high costs of living and doing business in the State.^{13,14}

⁴ CARB adopted an Emergency Vehicle Emissions Regulation, in response to Federal disapprovals of three preemption waivers previously granted by the United States Environmental Protection Agency to enforce its Advanced Clean Cars II and Advanced Clean Trucks, amongst other regulations. CARB argued that these waiver disapproval resolutions "introduced an unprecedented degree of uncertainty into the California market for new motor vehicles." See CARB Emergency Amendment and Adoption of Vehicle Emissions Regulations, at 2. Available at: <https://ww2.arb.ca.gov/rulemaking/2025/emergencyvehemissions>.

⁵ See CARB "2022 Scoping Plan for Achieving Carbon Neutrality," dated and adopted December 2022, at page 11; available at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

⁶ See Governor Gavin Newsom letter to California Energy Commission Vice Chair Siva Gunda, dated April 21, 2025; available at: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>.

⁷ See CEC Vice Chair Siva Gunda's response to Governor Gavin Newsom letter to California Energy Commission Vice Chair Siva Gunda, dated June 27, 2025; available at: https://www.energy.ca.gov/sites/default/files/2025-07/CEC%27s_Response_to_Governor_Newsom%27s_Letter_June-27-2025_ada.pdf.

⁸ See Phillips 66 October 16, 2024, news release, "Phillips 66 provides notice of its plan to cease operations at Los Angeles-area refinery;" available at: <https://investor.phillips66.com/financial-information/news-releases/news-release-details/2024/Phillips-66-provides-notice-of-its-plan-to-cess-operations-at-Los-Angeles-area-refinery/default.aspx>.

⁹ See Valero Energy Corporation April 16, 2025, news release, "Valero Announces Notice to the California Energy Commission Regarding its Benicia, California, Refinery;" available at: <https://investorvalero.com/news/news-details/2025/Valero-Announces-Notice-to-the-California-Energy-Commission-Regarding-its-Benicia-California-Refinery/default.aspx>.

¹⁰ See joint letter to Governor Gavin Newsom from Nevada Governor Joe Lombardo and Arizona Governor Katie Hobbs dated September 10, 2025; available at: https://mcusercontent.com/44a5186aac69c13c570fca36a/files/f17ba49c-ebb4-79e6-6aa1-0a921b12d52a/Final_Arizona_and_Nevada_Letter_to_Governor_Newsom_and_CEC_9.10.24_1_.docx_1_.pdf.

¹¹ See Nevada Governor Joe Lombardo to Governor Gavin Newsom dated March 9, 2026; available at: https://www.2news.com/townnews/hydrography/governor-lombardo-sends-letter-to-governor-newsom-about-california-fuel-regulations/article_2b607cd7-7ea2-44e2-a1ff-ca7e21e5a6b6.html.

¹² See Legislative Analyst's Office "The 2026-27 Budget California's Fiscal Outlook," dated November 19, 2025, available at: <https://lao.ca.gov/Publications/Report/5091>.

¹³ See Assembly Speaker Robert Rivas remarks, "Renew the California Dream," at State Legislature's Organizational Session on December 2, 2024; available at: <https://speaker.asmdc.org/press-releases/20241202-speaker-rivas-full-remarks-organizational-session>.

¹⁴ See Public Policy Institute of California's survey findings, "Most Californians Expect Little Change to Their Finances Despite Economic Uncertainty;" available at: <https://www.ppic.org/blog/most-californians-expect-little-change-to-their-finances-despite-economic-uncertainty/>.

This complex fuel challenge is outlined in the Draft SB 237 Assessment: the CEC acknowledges that in-State refining capacity is generally declining faster than California's demand for refined products (especially gasoline) and that the premature loss of critical infrastructure can increase costs and emissions and affect interrelated operations. Yet the desired transition is only complicated when the State simultaneously makes it more difficult to bring more affordable alternative fuels to California's market¹⁵ while steadily increasing electricity bills that "compound affordability challenges across the state."¹⁶ As such, we remain concerned that the State may be overestimating assumed consumer benefits while underestimating anticipated compliance costs in a "managed transition" away from petroleum fuels for consumers across California, Arizona, and Nevada.

Further State action is needed to stabilize California's petroleum assets. The State plays a critical and outsized role in providing the holistic, long-term investment confidence necessary to ensure that refiners continue seeing the value in serving California's market and the broader Western region with an affordable and reliable supply of transportation fuels for decades to come. It is therefore surprising that the Draft SB 237 Assessment fails to address known policy issues WSPA and its member companies have raised, repeatedly, to meet a stated goal of SB 237: to identify methods to ensure a reliable supply of affordable and safe transportation fuels.

WSPA believes that real-world circumstances outlined above requires a renewed focus on "Bucket 1" issues. California has **not** sufficiently stabilized its refining sector; indeed, the Draft SB 237 Assessment admits that in-State refining restructuring is occurring both faster than California's demand decline rate and faster than the adoption of energy alternatives otherwise necessary to meet that demand. If the State's hope is that focusing on "Bucket 2" and "Bucket 3" transition issues will innately address very real-world "Bucket 1" policy issues, it will not. One cannot expect a wholesale transition of California's entire transportation system to alternative forms of energy to proceed in record time, as initially hoped, when there are known constraints compromising the stability of the underlying transportation fuels infrastructure that Californians, and consumers in neighboring states, depend upon every single day.

WSPA has repeatedly explained policy issues that require immediate State attention, including:

- **Imposing more mandates worsens California's investment viability.** WSPA has raised concerns^{17,18,19,20,21,22,23} that imposing additional mandates, such as refinery resupply and holding minimum inventories, could adversely impact California's market. It could also harm Arizona and Nevada consumers if refineries are required to withhold supply for only the perceived benefit of California's consumers. While the State may hope that is not the case, these types of impacts could lead to costly litigation for California's interference with interstate commerce. We strongly recommend that the CEC further analyze whether such requirements are needed – and at what cost, without compromising safety or supply reliability across the Western region.
- **Need to address escalating AB 32 compliance costs.** While notable, CARB's recently adopted changes to the Cap-and-Invest Regulation only helps address steadily increasing stationary source

¹⁵ CARB adopted Low Carbon Fuel Standard amendments in November 2024, which included strengthening the carbon intensity reduction target from 20% to 30% by 2030 and added a 90% by 2045 target, adding a biofuel cap (which could compromise access to ethanol), and adding biofuel sustainability certification requirements. See: <https://ww2.arb.ca.gov/rulemaking/2024/lcfs2024>.

¹⁶ See the California Public Utilities Commission's Public Advocates Office Q1 2026 Electric Rates Report, dated March 2026; available at: <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260430-public-advocates-office-q1-2026-electric-rates-report.pdf>.

¹⁷ See "Western States Petroleum Association Comments - WSPA Comments on AB X2-1 Resupply Framework Pre-Rulemaking Workshop 25-PIIRA-01," filed March 11, 2025; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-PIIRA-01>.

¹⁸ See "WSPA Comments on Second AB X2-1 Refinery Resupply Pre-Rulemaking Workshop," filed March 17, 2025; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-PIIRA-01>.

¹⁹ See "Western States Petroleum Association Comments - WSPA Comments on 9-24-2025 Petroleum Supply Stabilization OIIP Workshop 10-8-2025 Docket 25-OIIP-02," filed October 8, 2025; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-OIIP-02>.

²⁰ See "Western States Petroleum Association Comments - WSPA Comments on Gasoline Supply Reliability Workshop 9-10-2024 (Docket #23-SB-02)," filed September 10, 2024; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-SB-02>.

²¹ See "Western States Petroleum Association Comments - WSPA Preliminary Comments on Gasoline Supply Reliability Workshop (Docket 23-SB-02)," filed August 29, 2024; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-SB-02>.

²² See "WSPA Comments on CEC DRAFT Transportation Fuels Assessment," filed May 17, 2024; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-SB-02>.

²³ See "WSPA Comments and Citations Third ICFAAC Meeting," filed January 6, 2026; available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-ICFAC-01>.

compliance obligations for California refineries for the next four years. Those changes provide no certainty beyond 2030 to protect against or minimize emissions and economic leakage – which is also required under California’s climate laws.²⁴ WSPA believes that current cost containment price tiers are not set at levels that will adequately protect against adverse program impacts. Additional long-term measures are still needed to address policy uncertainties and better incentivize investments to help stabilize in-State operations while improving air quality. WSPA has also expressed concerns with the dramatic escalation of costs under CARB’s Cost of Implementation Fee Regulation, which reverse budgets AB 32 programs across a multitude of State agencies onto regulated entities – principally, California’s petroleum sector.

- **Need to address marine terminal capacity and regulatory compliance constraints.** Minimal work has been done to assess marine terminal infrastructure and technological constraints, nor cost impacts associated with CARB’s Ocean-Going Vessels At-Berth Regulation, which impacts tanker vessel calls at California ports that began in 2025 (for Southern California) and will expand in 2027 (for Northern California). WSPA has called for further analysis of statewide port capacity to determine whether enough space can be made available. These are critical issues if the State’s plan is to transition California’s transportation fuel system to an import-first model to meet future demand. One cannot hope for sufficient port capacity and affordable real-world compliance options without addressing real world constraints that simultaneously prevent compliance pathways.
- **Uncertainties will affect planning scenarios.** The State should be aware of implementation barriers if it hopes to transition nearly the entire transportation system onto the electric grid (e.g., high electric bills, local power and charging infrastructure availability, vehicle/equipment costs, geographic and socioeconomic constraints, etc.) – as well as additional uncertainty due to the revocation of federal clean vehicle tax credits and key federal regulatory waivers (e.g., Advanced Clean Cars II, Advanced Clean Trucks, At-Berth) that only inserts further doubt into potential planning feasibility in the real world. For any assessment to be a credible planning document, stakeholders must be apprised of the effects of these known barriers as well as any affordable alternatives. WSPA most recently addressed implementation alternatives as part of CARB’s Mobile Source Strategy update.
- **Robust statewide coordination is needed for California’s refining sector to be competitive.** California needs a coherent intergovernmental strategy related to decisions made by the State, localities, and Air Districts which can substantially impact whether in-State refiners can be competitive and reliably supply affordable fuels for consumers. Punitive penalty and self-ratcheting fee structures exist across multiple levels of government, including policies and permitting decisions at the Air District level, that contributes to California’s uncompetitive business environment and ultimately increase costs to consumers while providing few benefits. The CEC can play an important coordinating role to align policy and permitting decisions with energy needs and benefits to communities. Unfortunately, while the Legislature’s interest in permitting reform for key petroleum infrastructure was acknowledged, little has been done to date to coordinate and streamline permitting processes that could bring more lower carbon fuels to market. Yet the Draft SB 237 Assessment recommends against consolidating permitting authority at the State level, arguing that this would require significant new resources to rebuild what already exists and would take substantial time and resources to implement. Instead, the CEC would recommend prioritizing and expanding the Petroleum Strategy Task Force’s voluntary coordination on permitting petroleum import, storage, and distribution infrastructure, with a focus on identifying bottlenecks. We are unclear how industry would benefit from this approach when it is not currently involved in it.
- **Impacts to neighboring states must be considered.** WSPA remains concerned that any decisions California makes could easily put the entire fuel supply chain at risk – including for Nevada and Arizona, whose fuel supplies are firmly dependent on the viability of California’s petroleum supply chain and most notably, California’s remaining refiners. California’s refineries provide most of Nevada’s transportation fuels and nearly half of Arizona’s.

²⁴ See AB 32 (2006), SB 32 (2016), AB 398 (2017), and AB 1207 (2025).

- **Ongoing need to stabilize in-State crude oil production and transport.** Minimal efforts have been made thus far to stabilize in-State crude oil production – a crucial component for pipeline operators and the refineries that depend on in-State crude. While SB 237 narrowly focused on provisions regarding Kern County’s Second Supplemental Environmental Impact Report, ongoing local production constraints have put substantial pressure on other parts of the petroleum system, including crude oil pipelines serving California’s remaining refineries in the Los Angeles Basin and San Francisco Bay Area, which could risk closure if forced to run at critically low volumes.

While WSPA appreciates the CEC’s desire to maintain fuel supplies while meeting California’s ambitious climate policies, we believe the State’s petroleum sector – especially the remaining refiners – need strong signals to have the certainty necessary to continue investments. The entire industry has been asking for a more predictable regulatory environment, one that is critical for investment decisions to provide the transportation fuels that will remain in demand for decades to come.

We will continue urging the CEC to work with WSPA and our member companies in efforts that support supplying fuels to the market, does not raise additional barriers for in-State refineries, and does not compromise safety while seeking to mitigate potential consumer impacts. This includes working to prevent further refinery closures, incentivize infrastructure improvements to minimize “leakage” and allow for additional imported fuels as needed to balance California’s demand, and encourage in-State crude production to help lower crude oil and transportation costs.

WSPA COMMENTS ON ICF MODEL AND ASSUMPTIONS USED IN TFTP

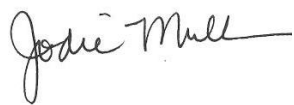
WSPA believes that the ICF Model’s barrel-balancing approach does not provide a credible economic assessment. It is inadequate to estimate refinery closure timelines without factoring in variables that are essential to determine if a refinery is profitable or to determine if closure is imminent. We note that recent decisions to close California refineries were unlikely to have been determined by ICF’s model, but rather based on economic viability, including production costs, that are unique to a refinery. For example, ICF’s barrel-balancing and refinery shutdown trigger of 60% is unrealistically low. Refineries cannot economically operate at such a low utilization level – *especially* for a refinery with high overhead costs, as is the case in California. Indeed, ICF notes (on page 23) that “the study optimistically assumes 60% as a floor.” Furthermore, it ignores maritime fuels entirely and the significant regulatory considerations from CARB’s At-Berth rule – which would limit port traffic, presumably expecting that industry will somehow resolve outstanding issues – all of which have important global shipping impacts. This is a considerable assumption, and one we believe should be reconsidered – unless CARB intends to grant flexibility. Finally, focusing on export capacity as a key limiter of refinery viability is not a realistic assumption. In-State refineries do not have favorable cost structures to be consistent exporters when they must compete against global refineries that do not face similar environmental regulations.

CONCLUSION

WSPA appreciates the opportunity to provide these comments on fuel supply issues of critical importance to all California consumers – and consumers of other states dependent on California’s fuel supply chain, who rely on affordable and reliable sources of transportation fuel every single day. We reserve the right to amend these comments or add to the docket as necessary.

Please do not hesitate to contact me with any additional questions.

Sincerely,



Jodie Muller
President & CEO

Title 13 and Title 17, California Code of Regulations

California Air Resources Board

5-Day Public Notice and Comment Period

Readoption of Emergency Amendment and Adoption of Vehicle Emissions Regulations

The California Air Resources Board (CARB or Board) proposes to readopt emergency vehicle emissions regulations (the “Emergency Vehicle Emissions Regulations”) for an additional 90 days under California Government Code, section 11346.1, subdivision (h). CARB adopted the Emergency Vehicle Emissions Regulations on September 15, 2025, amending California Code of Regulations, titles 13 and 17, and adopting new sections into California Code of Regulations, titles 13 and 17. The Emergency Vehicle Emission Regulations confirm that, until a court resolves the uncertainty created by the federal government’s actions, certain antecedent regulations (displaced by Advanced Clean Cars II and Omnibus) remain operative (as previously adopted) with the caveat that CARB may enforce Advanced Clean Cars (ACC) II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolutions purporting to disapprove those waivers.

The Emergency Vehicle Emissions Regulations became effective on October 2, 2025. Unless permanently adopted within a period of 180 days from the effective date or readopted for an additional 90 days, the Emergency Vehicle Emissions Regulations will expire on April 1, 2026. (Cal.Gov. Code, § 11346.1, subds. (e) & (h).) This readoption would extend the effectiveness of the Emergency Vehicle Emissions Regulations from April 1, 2026, to June 30, 2026.

This Notice incorporates by reference the “5-Day Public Notice and Comment Period for the Emergency Amendment and Adoption of Vehicle Emissions Regulations,” dated September 15, 2025, and the entire rulemaking record of Office of Administrative Law (OAL) Regulatory Action Number 2025-0922-01E.

Summary of OAL Regulatory Action Number 2025-0922-01E

CARB adopted, in an emergency rulemaking, entitled “Emergency Vehicle Emissions Regulations” to clarify that protective emission standards for vehicles and engines remain operative, while ensuring manufacturers can sell vehicles and engines into California despite the emergency the federal government has created through unconstitutional congressional resolutions targeting certain preemption waivers.

To ensure that new motor vehicles can continue to be sold in California, despite the ongoing uncertainty introduced by the federal government into the State’s longstanding regulatory program, CARB staff proposed to amend its regulations to clarify that the criteria pollution provisions of the Low-Emission Vehicle (LEV) III regulation (adopted as part of ACC I) and

associated on-board diagnostic requirements remain operative, with the caveat that CARB may enforce the more recently adopted LEV IV requirements (adopted as part of ACC II) to the extent permitted by law, in the event a court of law holds invalid the resolution purporting to disapprove that waiver.

CARB staff similarly proposed to amend its medium- and heavy-duty regulations to clarify that the provisions antecedent to Omnibus¹ remain operative, with the caveat that CARB may enforce the Omnibus regulation, to the extent permitted by law, in the event a court of law holds invalid the resolution purporting to disapprove that waiver.

The Emergency Vehicle Emission Regulations became effective on October 2, 2025, and remain in effect until April 1, 2026, unless permanently adopted or readopted for an additional 90 days. (Cal. Gov. Code, § 11346.1.)

CARB continues to accept and process certification applications for the LEV IV and Omnibus emission standards. Hence, both sets of standards are present in the California Code of Regulations during this period of unprecedented uncertainty. Regulated parties may choose to follow either the LEV IV or Omnibus standards or the antecedent LEV III and pre-Omnibus provisions. Regulated parties, however, assume the risk if they choose to certify only to the antecedent provisions, and the congressional resolutions disapproving the waivers of federal preemption under the Clean Air Act are declared invalid.

Proposed Readoption

The regulatory text in this proposed readoption will remain unchanged from the initial emergency adoption. The proposed readoption of the Emergency Vehicle Emissions Regulations will allow protective emissions standards for vehicles and engines to remain operative and ensure that new motor vehicles can continue to be sold in California, despite the ongoing uncertainty introduced by the federal government into the State's longstanding regulatory program.

The proposed regulatory text for the readoption remains identical to the regulatory text adopted with the initial Emergency Vehicle Emissions Regulations, Regulatory Action Number 2025-0922-01E, the entire contents of which are incorporated by reference in this readoption notice.

Written Comment Period and Submittal of Comments

Government Code section 11346.1, subdivision (a)(2) requires that, at least five working days prior to submission of the proposed emergency rulemaking to the Office of Administrative Law (OAL), CARB provides a notice of the proposed emergency rulemaking to every person who has filed a request for notice of regulatory action. After submission of the proposed emergency

¹ These regulations encompass provisions for OBD systems for light-, medium-, and heavy-duty engines and vehicles, greenhouse gas emissions from medium- and heavy-duty vehicles, and related requirements in the sections of titles 13 and 17 listed as encompassed in this proposal.

rulemaking to OAL, interested parties will be provided five calendar days to submit comments on the proposed emergency regulations, as set forth in Government Code section 11349.6.

CARB intends to submit this proposed readoption of Emergency Vehicle Emissions Regulation to OAL on March 16, 2026. The submitted action will appear on the list of “Emergency Regulations Under Review” on OAL’s website at:

https://oal.ca.gov/emergency_regulations/Emergency_Regulations_Under_Review/.

Comments must be submitted in writing **directly to OAL**:

Postal mail:

OAL Reference Attorney
Office of Administrative Law
300 Capitol Mall, Suite 1250
Sacramento, California 95814
Fax Number: (916) 323-6826

Electronic submittal: staff@oal.ca.gov

CARB requests that comments submitted via email include a carbon copy (“cc”) to cotb@arb.ca.gov. Additionally, CARB requests but does not require that interested parties submit written comments reference the title of the proposal in their comments to facilitate review.

Please note that under the California Public Records Act (Government Code section 7920.000 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Finding of Emergency

On January 6, 2025, the United States Environmental Protection Agency (U.S. EPA) published its notices of decision granting California’s requests for Clean Air Act preemption waivers, authorizing the enforcement of the LEV IV regulations (as part of the Advanced Clean Cars II regulation) and the Omnibus regulation.² On June 12, 2025, President Trump signed congressional resolutions that purported to disapprove these and one other waiver not at issue here.³ California and a coalition of states promptly filed suit to challenge these resolutions targeting three waiver actions granted to California.⁴ That case remains pending.

The congressional resolutions have introduced an unprecedented degree of uncertainty into the California market for new motor vehicles. Specifically, the resolutions purported to disapprove preemption waivers authorizing enforcement of more recently adopted (and more stringent) vehicle emission standards, which themselves had displaced earlier-adopted regulations (applicable to all future model years), for which preemption had also been waived.

² 90 Fed. Reg. 642 (Jan. 6, 2025), 90 Fed. Reg. 643 (Jan. 6, 2025).

³ H.J. Res. 88 (119th Congress), H.J. Res. 89 (119th Congress).

⁴ *State of California, et al., v. United States of America, et al.*, (ND Cal., case no. 3:25-cv-04966).

This unprecedented action has created confusion and left questions about which regulations apply.

More recently, in an exhibit to a court filing on September 4, 2025, vehicle manufacturers argued that CARB's earlier-adopted vehicle certification requirements—for which CARB has received a separate waiver not affected by the congressional resolutions and not at issue in the litigation described above—are invalid because those requirements became “defunct” when the more recent, more stringent standards displaced them.⁵ Thus, according to the vehicle manufacturer challengers, “amending state law” would be required to revive the earlier-adopted standards even if the displacing standards are ultimately found to be unenforceable on account of Congress's actions. Vehicle manufacturers have reiterated and amplified their arguments in litigation that CARB's vehicle certification requirements are preempted.⁶ CARB disagrees.

Nevertheless, in the event the vehicle manufacturer's claim were to be deemed correct—that CARB must affirmatively revive its earlier-adopted emissions requirements before it can resume enforcement of them—then CARB was compelled to take immediate action to maintain a stable vehicle market in the state and prevent the sale of vehicles into the state that would not be certified to *either* set of standards—*neither* the more recent ones that are subject to the recent congressional action *nor* the earlier-adopted ones that are undisputedly authorized by a federal waiver. Otherwise, in light of these unprecedented circumstances, there may remain questions—for the first time since CARB's program began decades ago—as to whether *any* California standard is in effect. There is therefore an emergency need to clarify the law to confirm that, at a minimum, CARB's earlier-adopted standards, which have extant federal preemption waivers not subject to the recent congressional resolutions, are operative. This emergency regulation thus responds to an unprecedented and unanticipated set of circumstances: the federal government taking unprecedented and illegitimate actions to purportedly disapprove of waiver decisions, and the suggestion by a regulated party that, for the first time in half a century, CARB has *no* operative emissions standards to which it can certify new motor vehicles to be sold in the State.

Every day that passes without clarity in this matter risks the health of millions of Californians, CARB's ability to enforce its long-standing vehicle emissions certification program (including its ability to ensure vehicles meet emission requirements as sold into California and over their full useful lives), and the stability of the California vehicle market. There are currently over 27 million light-, medium-, and heavy-duty vehicles that operate on California roads, traveling an estimated 305 billion miles annually. Each day, these vehicles emit 290 tons of nitrogen oxides (NOx) and over 200 tons of reactive organic gases (this includes evaporative emissions, if just exhaust emissions the number is 83 tons/day) – both of which are smog precursors – and 11.9 tons of particulate matter smaller than 2.5 microns (Fine PM or PM_{2.5}).

To clarify and ensure that new vehicles and engines can continue to be sold in California, despite the ongoing uncertainty created by the federal government's actions, CARB has taken several steps, including its initial proposal to adopt the Emergency Vehicle Emissions

⁵ Pl. Mot. For Leave to File Reply in Support of Mot. For Admin. Relief to Expedite, *Daimler Truck North Am. LLC v. CARB*, Case No. 2:25-cv-02255-DC (Sep. 4, 2025), at Exh. 1, page 2 n.3.

⁶ Corrected First Amended Complaint for Declaratory Judgment and Injunctive Relief, *Daimler Truck North Am. LLC v. CARB*, Case No. 2:25-cv-02255-DC (Jan. 26, 2026), para. 10.d.78, 99.c.109.e., 113.,

Regulations and this proposal to readopt those regulations. The amendments proposed here would confirm that, until a court resolves the uncertainty created by the federal government's unprecedented actions, then at a minimum certain earlier-adopted regulations remain operative (as previously adopted) with the caveat that CARB may enforce ACC II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolutions purporting to disapprove the waivers for those more recent regulations.

Update to the Finding of Emergency

The emergency circumstances that led to the adoption of the emergency rulemaking remain substantially unchanged. The emergency conditions that existed at the time of the initial adoption of the Emergency Vehicle Emissions Regulations remain because, in the short 180-day window granted by the initial adoption of the emergency rulemaking, several pending court cases, including *State of California, et al., v. United States of America, et al.*, (N.D. Cal., case no. 3:25-cv-04966) that could resolve the uncertainty of whether the congressional resolutions purporting to disapprove California's waivers of preemption relating to enforcement of the LEV IV regulations and the Omnibus regulations, remain pending. The facts asserted in the initial finding of emergency remain the same at the time of this proposed readoption of the Emergency Vehicle Emissions Regulation, which are incorporated by reference.

Progress Towards Permanent Regulations

CARB has made substantial progress in finalizing a regular rulemaking to permanently adopt the Emergency Vehicle Emission Regulations. CARB issued a Notice of Public Hearing⁷ and has proceeded with diligence toward making the emergency regulations permanent in accordance with section 11346.1, subdivision (e) of the Government Code. CARB has also prepared and released an Initial Statement of Reasons for permanently adopting the Emergency Vehicle Emissions Regulations on September 23, 2025, along with appendices, including costs and economic assessments.⁸ On November 7, 2025, the originally noticed hearing date of November 20, 2025, was postponed; however, it is expected to be noticed again soon.

Authority and Reference

This emergency regulation is proposed under the authority granted in California Health and Safety Code, sections 38501, 38505, 38510, 38560, 39002, 39003, 39010, 39500, 39600, 39601, 39602.5, 39614, 39658, 39667, 40000, 43000.5, 43013, 43016, 43018, 43100, 43101, 43102, 43104, 43105, 43105.5, 43106, 43154, 43200, 43200.1, 43204, 43205, 43205.5, 43210, 43211, 43212, 43214, 43600 and 43806, and Vehicle Code sections 27156 and 28114. This action is proposed to implement, interpret, and make specific sections 38501, 38505, 38510, 38560, 38562, 38580, 39002, 39003, 39010, 39500, 39600, 39601, 39602.5, 39614,

⁷ Notice of Public hearing to Consider Proposed Amendments to the On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard Regulations, and to Permanently Adopt the Emergency Vehicle Regulations (Sept. 23, 2025), [Notice of Public Hearing, Regulatory](#).

⁸ [On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard, and Emergency Vehicle Emissions Regulations | California Air Resources Board](#).

39658, 39667, 40000, 43000, 43000.5, 43013, 43016, 43018, 43018.5, 43100, 43101, 43102, 43104, 43105, 43105.5, 43106, 43107, 43154, 43200, 43200.1, 43204, 43205, 43205.5, 43211, 43212, 43214, 43600 and 43806 of the California Health and Safety Code; and California Vehicle Code section 28114.

Informative Digest of Proposed Action and Policy Statement Overview (Gov. Code, § 11346.5, subd. (a)(3))

Sections Affected:

Proposed amendments to California Code of Regulations, title 13, sections: 1900, 1956.8, 1961.2, 1961.3, 1962.2, 1962.3, 1965, 1968.2, 1968.5, 1969, 1971.1, 1971.5, 1976, 1978, 2035, 2036, 2037, 2038, 2040, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2121, 2123, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2133, 2137, 2139, 2139.5, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2166, 2166.1, 2167, 2168, 2169, 2169.1, 2169.2, 2169.3, 2169.4, 2169.5, 2169.6, 2169.7, 2169.8, 2170, 2317, 2423, 2485, and 2903.

Proposed adoption of new sections 1900.0.1, 1956.8.1, 1961.2.1, 1961.3.1, 1962.2.1, 1962.3.1, 1965.0.1, 1968.2.1, 1968.5.1, 1969.0.1, 1971.1.1, 1971.5.1, 1976.0.1, 1978.0.1, 2035.0.1, 2036.0.1, 2037.0.1, 2038.0.1, 2040.0.1, 2111.0.1, 2112.0.1, 2113.0.1, 2114.0.1, 2115.0.1, 2116.0.1, 2117.0.1, 2118.0.1, 2119.0.1, 2121.0.1, 2123.0.1, 2125.0.1, 2126.0.1, 2127.0.1, 2128.0.1, 2129.0.1, 2130.0.1, 2131.0.1, 2133.0.1, 2137.0.1, 2139.0.1, 2140.0.1, 2141.0.1, 2142.0.1, 2143.0.1, 2144.0.1, 2145.0.1, 2146.0.1, 2147.0.1, 2148.0.1, 2149.0.1, 2317.0.1, 2423.0.1, 2485.0.1, 2903.0.1 in title 13 of the California Code of Regulations.

Proposed amendments to California Code of Regulations, title 17, sections 95300, 95301, 95302, 95303, 95304, 95305, 95306, 95307, 95308, 95309, 95310, 95311, 95312, 95660, 95661, 95662, 95663, and 95664.

Proposed adoption of new sections 95300.0.1, 95301.0.1, 95302.0.1, 95303.0.1, 95304.0.1, 95305.0.1, 95306.0.1, 95307.0.1, 95308.0.1, 95309.0.1, 95310.0.1, 95311.0.1, 95312.0.1, 95660.0.1, 95661.0.1, 95662.0.1, 95663.0.1, and 95664.0.1.

Documents Incorporated by Reference (Cal. Code Regs., tit. 1, § 20, subd. (c)(3)):

See APPENDIX A: Documents Incorporated by Reference.

Existing Advanced Clean Cars and Medium- and Heavy-Duty Vehicle and Engine Regulatory Requirements

Passenger cars and light trucks are a significant source of NO_x, other smog-forming emissions and PM_{2.5} in California, with over 26 million such vehicles on the road, which are estimated to travel over 285 billion miles in 2025. Heavy-duty vehicles add approximately 1 million additional vehicles and an additional 15+ billion miles.

California's LEV III regulations, adopted on January 26, 2012, and subsequently updated, tightened light-duty and chassis-certified medium-duty vehicle criteria pollutant standards for

2015 through 2025 and subsequent model years.⁹ U.S. EPA granted California's request for a Clean Air Act preemption waiver, authorizing enforcement of these regulations, in 2013.¹⁰ As part of the ACC II regulations adopted on June 9, 2022, CARB established more stringent criteria-emission standards known as LEV IV for 2026 and subsequent model years, thereby displacing the LEV III criteria pollutant regulation beginning with the 2026 model year.

California first regulated heavy-duty vehicle exhaust emissions in 1969. In 2005 and 2010, U.S. EPA granted waivers for California's medium- and heavy-duty engine and vehicle regulations for diesel and Otto-cycle engine standards.¹¹ In 2017, U.S. EPA granted California a waiver of federal preemption for several sets of amendments to CARB's emission standards for medium- and heavy-duty vehicles adopted in 2011, 2008, 2007, and 2006.¹² In 2016, U.S. EPA granted California's requests for waivers for its on-board diagnostic (OBD) systems for light-, medium-, and heavy-duty vehicles adopted in 2013 (the OBD II and HD OBD regulations).¹³ California's Omnibus regulations, adopted in 2020 and amended in 2023, tightened CARB's criteria pollutant standards for medium- and heavy-duty vehicles.¹⁴ Omnibus and Advanced Clean Cars encompass OBD requirements. In 2016, U.S. EPA also granted California a waiver for its Phase 1 Greenhouse Gas emission standards adopted in 2013.¹⁵

On January 6, 2025, U.S. EPA published its notices of decision granting California's requests for Clean Air Act preemption waivers, authorizing, in part, the enforcement of the LEV IV regulations and amendments to OBD requirements (as part of the ACC II regulation) and the Omnibus regulation (including its amendments to OBD requirements).¹⁶ On June 12, 2025, President Trump signed the congressional resolutions that purported to disapprove these and one other waiver not at issue here.¹⁷ California and a coalition of states promptly filed suit to challenge these resolutions targeting three waiver actions granted to California.¹⁸ That case remains pending.

The congressional resolutions have introduced an unprecedented degree of uncertainty into the California market for new motor vehicles. Specifically, the resolutions purported to disapprove preemption waivers authorizing enforcement of recently adopted, more stringent vehicle emission standards that had displaced earlier standards that themselves were applicable to all future model years and for which preemption has been waived. That has left questions for at least some regulated parties about which regulations apply, as evinced in the

⁹ The LEV III regulations were subsequently amended in 2012 (Register 2012, No. 32 and Register 2013, No. 1), 2015 (Register 2015, No. 41), and 2018 (Register 2018, No. 50).

¹⁰ 78 Fed. Reg. 2,113 (Jan. 9, 2013). Other parts of this waiver—covering other standards than those at issue here—were purportedly withdrawn in 2019 but reinstated in 2022.; 87 Fed. Reg. 14,332 (Mar. 14, 2022) [restoring waiver].

¹¹ 70 Fed. Reg. 50,322 (Aug. 26, 2005); 75 Fed. Reg. 70,238 (Nov. 17, 2010).

¹² 82 Fed. Reg. 4,867 (Jan. 17, 2017).

¹³ 81 Fed. Reg. 78,143 (Nov. 7, 2016); 81 Fed. Reg. 78,149 (Nov. 7, 2016).

¹⁴ See Register 2020, No. 4 (26-Z), and Register 2024, No. 22 (31-Z).

¹⁵ The Proposed Greenhouse Gas (GHG) Regulations For Medium- And Heavy-Duty Engines And Vehicles, Optional Reduced Emission Standards For Heavy-Duty Engines, And Amendments To The Tractor-Trailer GHG Regulation, Diesel-Fueled Commercial Motor Vehicle Idling Rule, And The Heavy-Duty Hybrid-Electric Vehicles Certification Procedures, adopted 2014, Register 2014, No. 49; 81 Fed. Reg. 52,680 (June 9, 2016).

¹⁶ 90 Fed. Reg. 642 (Jan. 6, 2025); 90 Fed. Reg. 643 (Jan. 6, 2025).

¹⁷ H.J. Res. 88 (119th Congress); H.J. Res. 89 (199th Congress).

¹⁸ *State of California, et al., v. United States of America, et al.*, (ND Cal., case no. 3:25-cv-04966).

court filing by a manufacturer described above. To clarify and ensure that new vehicles and engines can continue to be sold in California, despite the ongoing uncertainty created by the federal government's actions, CARB has taken several steps, including the adoption of the Emergency Vehicle Emissions Regulations, the proposal for permanent adoption of the Emergency Vehicle Emissions Regulations in a separate, regular rulemaking process, and this proposed 90-day readoption of the Emergency Vehicle Emissions Regulations.

Summary of the Proposed Regulatory Actions

The Emergency Vehicle Emissions Regulations became effective on October 2, 2025, and will expire on April 1, 2026, unless permanently adopted or readopted for an additional 90 days. (Cal. Gov. Code § 11346.1, subd. (h).) This proposed action would readopt the Emergency Vehicle Emissions Regulations and extend their effectiveness to June 30, 2026, while CARB continues the actions described above to permanently adopt the Emergency Vehicle Emissions Regulations. Because, as discussed above, the emergency conditions remain, CARB must readopt the Emergency Vehicle Emissions Regulations now.

Objectives and Benefits of the Proposed Regulatory Action:

The goal of the Emergency Vehicle Emissions Regulations was to clarify and ensure that new motor vehicles can be sold in California despite the unprecedented uncertainty introduced by the federal government into CARB's longstanding regulatory program. The proposed readoption of the Emergency Vehicle Emissions Regulations will continue to ensure that new vehicles and engines sold in California will, at a minimum, meet the emission standards and requirements for which U.S. EPA has granted a waiver that was not targeted by the congressional resolutions.

Environmental and Health Benefits

CARB's Emergency Vehicle Emissions Regulations provided clarity and ensured that, at a minimum, the pollutant emission standards for new passenger cars, light trucks, and chassis-certified medium-duty vehicles up to 14,000 pounds, which had become status quo starting with the 2017 model year, remain operative beyond the 2025 model year. The Regulations also clarified that the standards antecedent to the Omnibus regulations remain in operation. CARB has enforced LEV III and pre-Omnibus standards, or stricter standards, since those standards went into effect. The proposed readoption of the Emergency Vehicle Emissions Regulation will continue to keep existing standards in operation, and thus the proposed regulatory action has no adverse environmental or health impact.

Economic Impacts

In the economic impacts analysis for the Emergency Vehicle Emissions Regulations, CARB did not anticipate any cost or economic impacts because the compliance pathways available to manufacturers have already been understood for years; and manufacturers have either already achieved or planned to achieve one or more of the compliance pathways. The prior economics impacts analysis applies to this proposed readoption because there are no changes to the regulatory text and the surrounding circumstances have not changed in ways

that would support a different determination. Thus, CARB does not anticipate any cost or economic impacts from its readoption of the Emergency Vehicle Emissions Regulations.

Comparable Federal Regulations:

Both California and U.S. EPA have authorities to set emissions standards for new motor vehicles and for new motor vehicle engines. U.S. EPA's authority is contained in Section 202, subdivision (a)(1) of the Clean Air Act.¹⁹

The California Legislature has placed the responsibility of controlling vehicular air pollution on CARB, and has designated CARB as the state agency that is "charged with coordinating efforts to attain and maintain ambient air quality standards, to conduct research into the causes of and solution to air pollution, and to systematically attack the serious problems caused by motor vehicles, which is the major source of air pollution in many areas of the State."²⁰ CARB is authorized to adopt standards, rules and regulations needed to properly execute the powers and duties granted to and imposed on CARB by law.²¹ Health and Safety Code sections 43013 and 43018 broadly authorize and require CARB to achieve the maximum feasible and cost-effective emission reductions from motor vehicles, including the adoption and implementation of vehicle emission standards and in-use performance standards²² and by improving emission system durability and performance,²³ resulting in an expeditious reduction of NOx emissions from diesel vehicles, "which significantly contribute to air pollution problems."²⁴

CARB is further authorized to adopt and implement emission standards for new motor vehicles and new motor vehicle engines that are necessary and technologically feasible.²⁵ CARB also has the authority to adopt test procedures and any other procedures necessary to determine whether vehicles and engines are in compliance with the emission standards established under Division 26, Part 5 of the Health and Safety Code.²⁶ Finally, CARB has the authority to not certify a new motor vehicle or motor vehicle engine unless the vehicle or engine meets the emission standards adopted by CARB pursuant to Division 26, Part 5 of the Health and Safety Code under test procedures adopted pursuant to section 43104.²⁷

On January 24, 2023, U.S. EPA adopted the EPA-NOx rule which established criteria pollutant emissions standards and test procedures for 2027 and subsequent model year heavy-duty engines that are comparable in stringency to the 2027 model year heavy-duty Omnibus requirements.

For 2026 model year, U.S. EPA's Tier 3 criteria pollutant standards are similar to the LEV III requirements for non-methane organic gas (NMOG) plus NOx, but not as stringent for particulate matter. On March 20, 2024, U.S. EPA adopted their Multi-Pollutant Emissions

¹⁹ 42 U.S.C. § 7521.

²⁰ Cal. Health & Saf. Code, §§ 39002, 39003.

²¹ Cal. Health & Saf. Code, §§ 39600 and 39601.

²² Cal. Health & Saf. Code, §43013(a).

²³ Cal. Health & Saf. Code, § 43018(c)(2)

²⁴ Cal. Health & Saf. Code, § 43013(h).

²⁵ Cal. Health & Saf. Code, §43101.

²⁶ Cal. Health & Saf. Code, § 43104.

²⁷ Cal. Health & Saf. Code, § 43102.

Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles Rule, that sets new Tier 4 standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. Portions of this rule are identical to elements of the LEV IV requirements for those model years, but are more stringent once they are fully phased in by the 2033 model year than the LEV III requirements would be.

On August 1, 2025, U.S. EPA published a notice of reconsideration and proposed repeal of its greenhouse gas emission standards for light-, medium-, and heavy-duty vehicles.²⁸ U.S. EPA finalized that proposal, repealing the greenhouse gas emission standards for light-, medium-, and heavy-duty vehicles on February 18, 2026.²⁹

An Evaluation of Inconsistency or Incompatibility with Existing State Regulations (Gov. Code, § 11346.5, subd. (a)(3)(D)):

During the process of developing the Emergency Vehicle Emissions Regulations, CARB conducted a search of similar regulations on this topic and concluded that the Emergency Vehicle Emissions Regulations, which are identical to the proposed regulatory action to readopt these regulations, are neither inconsistent nor incompatible with existing state regulations.

Other Statutory Requirements (Gov. Code, § 11346.5 subd. (a)(4))

The Emergency Vehicle Regulations clarified that certain antecedent regulations remain operative. The restoration of these antecedent regulations would continue to be in effect under this proposed readoption of the Emergency Vehicle Emissions Regulations. When these regulations were adopted, any other matters prescribed by statute applicable to CARB or these specific regulations or class or regulations were identified. These antecedent regulations were identified in OAL File Numbers:

- Z-00-1010-10 [Consider Requiring Certain California Light-and Medium-Duty Vehicles to be Subject to Federal Tier 2 Exhaust Standards, and Adopting Additional Exhaust Emission Standards for Heavy-Duty Gasoline Vehicles and Engines];
- Z-01-0828-14 [Amendments Adopting More Stringent Emission Standards for 2007 and Subsequent Model Year New Heavy-Duty Diesel Engines];
- Z-02-0917-02 [Consider the Incorporation of Federal Exhaust Emission Standards for 2008 and Later Model-Year Heavy-Duty Gasoline Engines and the Adoption of Minor Amendments to the Low-Emission Vehicle Regulations];
- Z-2011-1129-12 [Amendments To The California Greenhouse Gas And Criteria Pollutant Exhaust And Evaporative Emission Standards And Test Procedures And To The On-Board Diagnostic System Requirements For Passenger Cars, Light-Duty Trucks, And Medium-Duty Vehicles, And To The Evaporative Emission Requirements For Heavy-Duty Vehicles];

²⁸ 90 Fed. Reg. 36,288 (Aug. 1, 2025).

²⁹ 91 Fed. Reg. 7686 (Feb. 18, 2026).

- Z-2012-0626-07 [Proposed Revisions to On-Board Diagnostic System Requirements for Heavy-Engines, Passenger Cars, Light-Duty Trucks, Medium-Duty Vehicles and Engines];
- Z-2012-0831-01 [Proposed Amendments To The New Passenger Motor Vehicle Greenhouse Gas Emission Standards For Model Years 2017-2025 To Permit Compliance Based On Federal Greenhouse Gas Emissions Standards And Additional Minor Revisions To The LEV III And ZEV Regulations];
- Z-2013-1015-07 [Proposed Greenhouse Gas (GHG) Regulations For Medium- And Heavy-Duty Engines And Vehicles, Optional Reduced Emission Standards For Heavy-Duty Engines, And Amendments To The Tractor-Trailer GHG Regulation, Diesel-Fueled Commercial Motor Vehicle Idling Rule, And The Heavy-Duty Hybrid-Electric Vehicles Certification Procedures];
- Z-2014-0819-06 [Proposed Amendments To The LEV III Criteria Pollutant Requirements For Light- And Medium-Duty Vehicles, The Hybrid Electric Vehicle Test Procedures, And The Heavy-Duty Otto-Cycle And Heavy-Duty Diesel Test Procedures];
- Z-2018-0724-07 [Proposed Amendments to the Low-Emission Vehicle III Greenhouse Gas Emission Regulation]; and
- Z-2018-0821-02 [Amendments to California Specification for Fill Pipes and Openings Of Motor Vehicle Fuel Tanks].

Fiscal Impact/Local Mandate Determination Regarding the Proposed Action (Gov. Code, § 11346.5, subds. (a)(5)&(6)):

The determinations of the Board's Executive Officer concerning the costs or savings incurred by public agencies and private parties and businesses in reasonable compliance with the proposed regulatory actions are presented below.

Under Government Code sections 11346.5, subdivision (a)(5) and 11346.5, subdivision (a)(6), the Executive Officer has determined that the proposed regulatory actions would not create costs or savings to any State agency, would not create costs or savings in federal funding to the State, would not create costs or mandates to any local agency or school district, whether or not reimbursable by the State under Government Code, title 2, division 4, part 7 (commencing with section 17500), or other nondiscretionary cost or savings to State or local agencies.

Cost to Any Local Agency or School District Requiring Reimbursement Under Gov. Code Section 17500 et seq.:

The readoption of the Emergency Vehicle Emissions Regulations proposal is not expected to result in a cost to any local agency or school district requiring reimbursement under Government Code section 17500 et seq. (state-mandated costs under California Constitution Article XIII B, section 6, i.e., “unfunded mandate”), where the proposal is clarifying that regulations that have been in place for years remain operative, in light of the unusual circumstances here, and manufacturers were planning to achieve, or already were achieving, compliance with more stringent standards.

Cost or Savings for State Agencies:

The readoption of the Emergency Vehicle Emissions Regulations proposal is not expected to result in a change to fiscal impacts on state government, where the proposal is clarifying that regulations that have been in place for years remain operative in light of the unusual circumstances here, and manufacturers were planning to achieve, or already achieving, compliance with more stringent standards.

Other Non-Discretionary Costs or Savings on Local Agencies:

The readoption of the Emergency Vehicle Emissions Regulations proposal is not expected to have non-discretionary costs or savings on local agencies, where the proposal is clarifying that regulations that have been in place for years remain operative in light of the unusual circumstances here, and manufacturers were planning to achieve, or already achieving, compliance with more stringent standards.

Cost or Savings in Federal Funding to the State:

The readoption of the Emergency Vehicle Emissions Regulations proposal is not expected to impose any costs or savings in federal funding to the state.

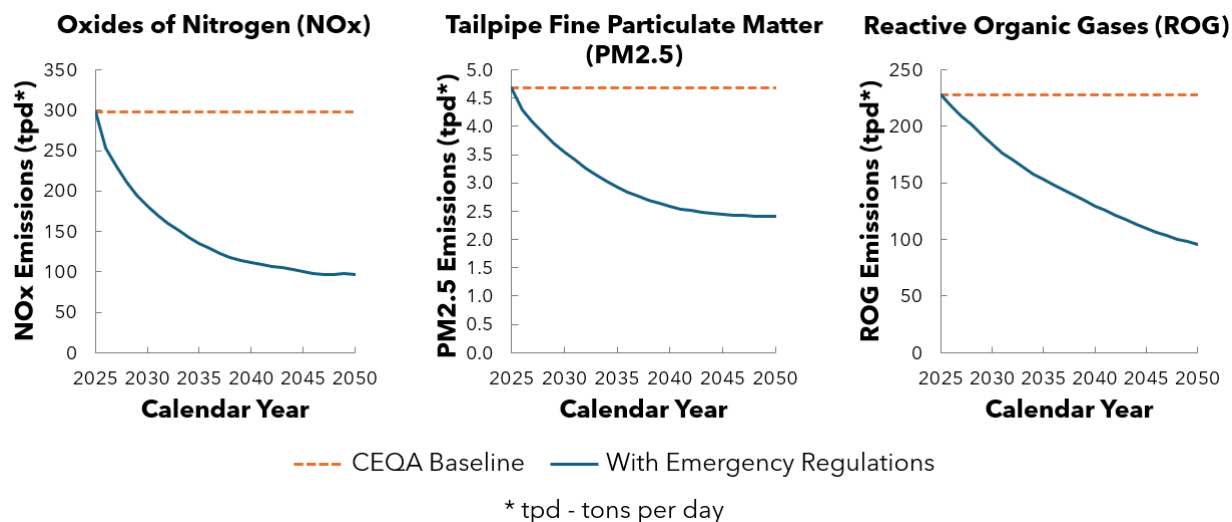
Environmental Analysis

The current Emergency Vehicle Emissions Regulations became effective on October 2, 2025, and will expire on April 1, 2026, unless permanently adopted or readopted for an additional 90 days. (Cal. Gov. Code § 11346.1, subd. (h)). This proposed action would readopt the Emergency Vehicle Emissions Regulations and extend their effectiveness by 90-days to June 30, 2026, while CARB continues the actions described above to permanently adopt the Emergency Vehicle Emissions Regulations. The proposed readoption of the Emergency Vehicle Emissions Regulations does not make any alterations to the text of the current Emergency Vehicle Emissions Regulations previously adopted and currently in effect through April 1, 2026. The proposed regulatory action will continue to provide clarity and confirm that, until a court resolves the uncertainty created by the federal government's actions, certain antecedent regulations (displaced by Advanced Clean Cars II and Omnibus) remain operative (as previously adopted) with the caveat that CARB may enforce Advanced Clean Cars II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolutions purporting to disapprove those waivers.

Therefore, CARB, as the lead agency under the California Environmental Quality Act (CEQA), has concluded the proposed readoption of Emergency Vehicle Emissions Regulation is exempt pursuant to CEQA Guidelines, section 15061, subdivision (b)(3)(common sense exemption), of title 14 of the California Code of Regulations. CARB has also determined this proposal is exempt pursuant to CEQA Guidelines in title 14 of the California Code of Regulations, sections 15307 (actions for protection of natural resources) and 15308 (actions for protection of the environment). This conclusion is supported by CARB's analysis which demonstrated that future projections of emissions of three common vehicle pollutants – oxides of nitrogen (NO_x), fine particulate matter (PM_{2.5}), and reactive organic gases (ROG) – would decrease over time with the Emergency Vehicle Emissions Regulations in effect, in

comparison to the 2025 CEQA baseline year (representing current environmental conditions at the time CARB developed the proposal) as shown in Figure 1, below.

Figure 1. Projected criteria pollutant emissions from light-duty, medium-duty, and heavy-duty vehicles in California (Compared to CEQA current conditions baseline)



Agency Contact Persons

Inquiries concerning the substance of this proposal may be directed to the agency representative Daniel Hawelti, Staff Air Pollution Specialist, On-Road Heavy-Duty Diesel Section, at (951) 542-3195 and daniel.hawelti@arb.ca.gov or the designated back-up contact Mitzi Magtoto, Staff Air Pollution Specialist, On-Road Heavy-Duty Diesel Section, at (279) 208-7363 and mitzi.magtoto@arb.ca.gov.

Availability of Documents

A copy of the readoption of the emergency rulemaking documents, including the full text of the proposed regulatory language, identical to the text of the initial Emergency Vehicle Emissions Regulations, may be accessed on CARB's website listed below, on Friday, March 6, 2026. Additionally, copies of the initial emergency rulemaking documents, including the full text of the proposed regulatory language, in underline and strikeout format to allow for comparison with the existing regulations, and proposed new text, may be accessed on CARB's website at: <https://ww2.arb.ca.gov/rulemaking/2025/emergencyvehemissions>.

All rulemaking documents in a separate proposal relating to the permanent adoption of the Emergency Vehicle Emissions Regulations will be posted, as they become available, on CARB's website at: <https://ww2.arb.ca.gov/rulemaking/2025/orhdomnibus>

Please contact Lindsay Garcia, Regulations Coordinator, at Regulations@arb.ca.gov or (916) 546-2286 if you need physical copies of the documents. Pursuant to Government Code section 11346.5, subdivision (b), upon request to the Regulations Coordinator, physical copies would be obtained from the Public Information Office, California Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814.

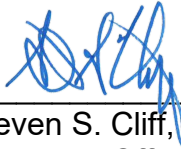
Further, the agency representative to whom non-substantive inquiries concerning the proposed administrative action may be directed is Lindsay Garcia, Regulations Coordinator, (916) 546-2286. CARB staff has compiled a record for this rulemaking action, which includes all the information upon which the proposal is based. This material is available for inspection upon request to the contact persons.

Internet Access

This Notice and the proposed regulatory text, and all subsequent regulatory documents, when completed, are available on CARB's website for this rulemaking at:

<https://ww2.arb.ca.gov/rulemaking/2025/emergencyvehemissions>

California Air Resources Board



Steven S. Cliff, Ph.D.
Executive Officer

Date: March 6, 2026

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see [CARB's website](https://ww2.arb.ca.gov) (ww2.arb.ca.gov).

APPENDIX A: Documents Incorporated by Reference

CARB hereby incorporates by reference the rulemaking record of the Emergency Vehicle Emissions Regulations, Office of Administrative Law (OAL) Regulatory Action Number 2025-0922-01E. The Emergency Vehicle Emissions Regulations previously incorporated by reference the documents below, as identified in OAL File Numbers:

- Z-00-1010-10 [Consider Requiring Certain California Light-and Medium-Duty Vehicles to be Subject to Federal Tier 2 Exhaust Standards, and Adopting Additional Exhaust Emission Standards for Heavy-Duty Gasoline Vehicles and Engines];
- Z-01-0828-14 [Amendments Adopting More Stringent Emission Standards for 2007 and Subsequent Model Year New Heavy-Duty Diesel Engines];
- Z-02-0917-02 [Consider the Incorporation of Federal Exhaust Emission Standards for 2008 and Later Model-Year Heavy-Duty Gasoline Engines and the Adoption of Minor Amendments to the Low-Emission Vehicle Regulations];
- Z-2011-1129-12 [Amendments To The California Greenhouse Gas And Criteria Pollutant Exhaust And Evaporative Emission Standards And Test Procedures And To The On-Board Diagnostic System Requirements For Passenger Cars, Light-Duty Trucks, And Medium-Duty Vehicles, And To The Evaporative Emission Requirements For Heavy-Duty Vehicles];
- Z-2012-0626-07 [Proposed Revisions to On-Board Diagnostic System Requirements for Heavy-Engines, Passenger Cars, Light-Duty Trucks, Medium-Duty Vehicles and Engines];
- Z-2012-0831-01 [Proposed Amendments To The New Passenger Motor Vehicle Greenhouse Gas Emission Standards For Model Years 2017-2025 To Permit Compliance Based On Federal Greenhouse Gas Emissions Standards And Additional Minor Revisions To The LEV III And ZEV Regulations];
- Z-2013-1015-07 [Proposed Greenhouse Gas (GHG) Regulations For Medium- And Heavy-Duty Engines And Vehicles, Optional Reduced Emission Standards For Heavy-Duty Engines, And Amendments To The Tractor-Trailer GHG Regulation, Diesel-Fueled Commercial Motor Vehicle Idling Rule, And The Heavy-Duty Hybrid-Electric Vehicles Certification Procedures];
- Z-2014-0819-06 [Proposed Amendments To The LEV III Criteria Pollutant Requirements For Light- And Medium-Duty Vehicles, The Hybrid Electric Vehicle Test Procedures, And The Heavy-Duty Otto-Cycle And Heavy-Duty Diesel Test Procedures];
- Z-2018-0724-07 [Proposed Amendments to the Low-Emission Vehicle III Greenhouse Gas Emission Regulation]; and
- Z-2018-0821-02 [Amendments to California Specification for Fill Pipes and Openings Of Motor Vehicle Fuel Tanks].

The following documents are incorporated in the Emergency Vehicle Emissions regulatory action by reference as specified by the following sections of emergency regulations or by the original regulatory section in which they were adopted, and are noted here for completeness.

- “California 2015 And Subsequent Model Criteria Pollutant Exhaust Emission Standards and Test Procedures And 2017 And Subsequent Model Greenhouse Gas Exhaust Emission Standards and Test Procedures For Passenger Cars, Light-Duty Trucks, And Medium-Duty Vehicles”, amended December 6, 2012, incorporated by reference in title 13, CCR, sections 1961.2.1, 1965.0.1, 2037.0.1, and 2038.0.1.

- “California Evaporative Emission Standards and Test Procedures For 2001 And Subsequent Model Motor Vehicles”, amended December 2012, incorporated by reference in title 13, CCR, section 1976.0.1.
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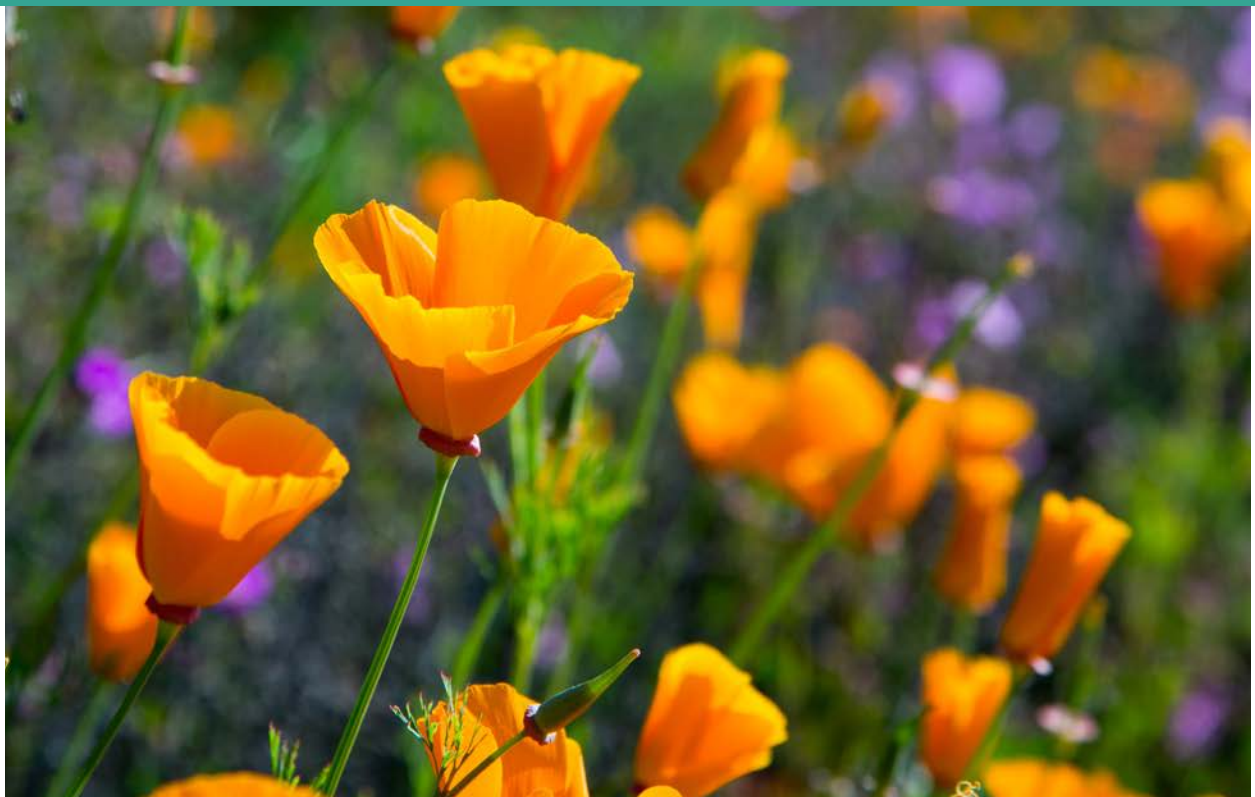
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2022 Scoping Plan for Achieving Carbon Neutrality





CARB's mission is to promote and protect public health, welfare, and ecological resources through effective reduction of air pollutants while recognizing and considering effects on the economy. CARB is the lead agency for climate change programs and oversees all air pollution control efforts in California to attain and maintain health-based air quality standards.

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Abbreviations

°F	Fahrenheit
°C	Celsius
AB	Assembly Bill
AQMD	Air Quality Management District
AR5	IPCC Fifth Assessment Report
BECCS	bioenergy with carbon capture and storage
CAISO	California Independent System Operator
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CalSTA	California State Transportation Agency
CAP	climate action plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CCS	carbon capture and sequestration
CCUS	carbon capture, utilization, and storage
CDFA	California Department of Food and Agriculture
CDPH	California Department of Public Health
CDR	carbon dioxide removal
CE	common era
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CES	CalEnviroScreen
CH ₄	methane
CMAQ	Community Multiscale Air Quality
CNRA	California Natural Resources Agency
CO ₂	carbon dioxide
COPD	chronic obstructive pulmonary disease

CORE	Clean Off-Road Equipment
CPUC	California Public Utilities Commission
CVM	Climate Vulnerability Metric
DAC	direct air capture
DPR	Department of Pesticide Regulation
Draft EA	Draft Environmental Analysis for this Scoping Plan
EA	Environmental Analysis
ED	emergency department
EIA	U.S. Energy Information Administration
EJ	environmental justice
EJ Advisory Committee	Environmental Justice Advisory Committee
EO	executive order
EV	electric vehicle
F-gas	fluorinated gas
FCEV	fuel cell electric vehicle
GCF	Governors' Climate and Forests Task Force
GDP	gross domestic product
GHG	greenhouse gas
GSP	gross state product
GW	gigawatt
GWh	gigawatt-hour
GWP	global warming potential
HDV	heavy-duty vehicle
HD ZEV	heavy-duty zero-emission vehicle
HFC	hydrofluorocarbon
IBank	Infrastructure and Economic Development Bank
ICE	internal combustion engine
IPCC	Intergovernmental Panel on Climate Change

IPT	incidence-per-ton
IWG	Interagency Working Group
LCFS	low-carbon fuel standard
LDV	light-duty vehicle
MDV	medium-duty vehicle
MMT	million metric tons
MMTCO _{2e}	million metric tons of carbon dioxide equivalent
MOU	memorandum of understanding
MRR	Mandatory Reporting of GHG Emissions
MTCO _{2e}	metric tons of carbon dioxide equivalent
MW	megawatt
N ₂ O	nitrous oxide
NEMS	National Energy Systems Model
NF ₃	nitrogen trifluoride
NOAA	National Oceanic and Atmospheric Administration
NO _x	nitrogen oxides
NRDC	National Resources Defense Council
NWL	Natural and Working Lands
OEHHA	Office of Environmental Health Hazard Assessment
OGV	Ocean-Going Vessel
OPR	Governor's Office of Planning and Research
OTC	once-through cooled
PFC	perfluorocarbon
PHMSA	Pipelines and Hazardous Materials Safety Administration
PM	particulate matter
PM _{2.5}	fine particulate matter
PPP	public-private partnership
RFS	renewable fuel standard

ROG	reactive organic gases
RPS	Renewables Portfolio Standard
SB	Senate Bill
SC-CH ₄	social cost of methane
SC-CO ₂	social cost of carbon
SC-GHG	social cost of greenhouse gases
SC-N ₂ O	social cost of nitrous oxide
SF ₆	sulfur hexafluoride
SGIP	Self-Generation Incentive Program
SLCP	short-lived climate pollutant
TSD	Technical Support Document
UC	University of California
UCLA	University of California, Los Angeles
UNFCCC	United Nations Framework Convention on Climate Change
U.S. EPA	United States Environmental Protection Agency
VMT	vehicle miles traveled
WUI	wildland-urban interface
ZEV	zero-emission vehicle

Executive Summary

This Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth¹ largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. This is a challenging but necessary goal to minimize the impacts of climate change. There have been three previous Scoping Plans. Previous plans have focused on specific greenhouse gas (GHG) reduction targets for our industrial, energy, and transportation sectors—first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. This plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon these earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. This plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches.



What this means for California is an ambitious and aggressive approach to decarbonize every sector of the economy, setting us on course for a more equitable and sustainable future in the face of humanity's greatest existential threat, and ensuring that those who benefit from this transformation include communities hardest hit by climate impacts and the ongoing pollution from the use of fossil fuels. The combustion of fossil fuels has polluted our air—particularly in low-income communities and communities of color—for far too long and is the root cause of climate change. This Scoping Plan helps us chart the path to a future where race and class are no longer predictors of disproportionate burdens from harmful air pollution and climate impacts.

The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution. It also means phasing out the use of fossil gas used for heating our homes and buildings. It means clamping down on chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide (CO₂). It means providing our communities with sustainable options for walking, biking, and public transit to reduce reliance on cars and their associated expenses. It means continuing to build out the solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation. It also means scaling up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed. Successfully achieving the outcomes called for in this Scoping Plan would reduce demand for liquid petroleum by 94 percent

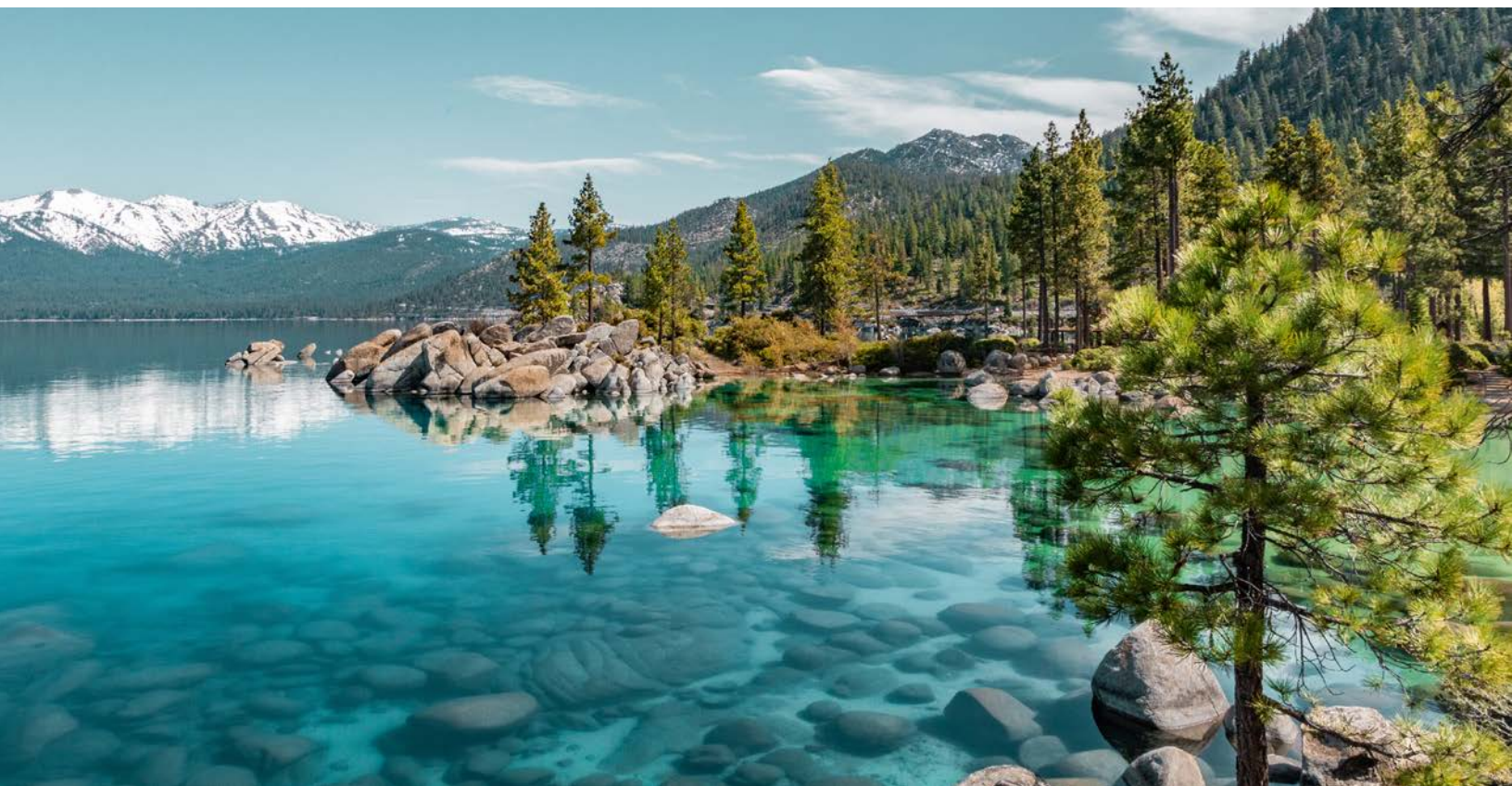
¹ In October 2022, California was poised to become the world's fourth largest economy.

and total fossil fuel by 86 percent in 2045 relative to 2022.² Despite these world-leading efforts, some amount of residual emissions will remain from hard-to-abate industries such as cement, internal combustion vehicles still on the road, and other sources of GHGs, including high global warming chemicals used as refrigerants.

The plan addresses these remaining emissions by re-envisioning our natural and working lands—forests, shrublands/chaparral, croplands, wetlands, and other lands—to ensure they play as robust a role as possible in incorporating and storing more carbon in the trees, plants, soil, and wetlands that cover 90 percent of the state’s 105 million acres while also thriving as a healthy ecosystem. Modeling indicates that natural and working lands will not, on their own, provide enough sequestration and storage to address the residual emissions. For that reason, it is necessary to research, develop, and deploy additional methods of capturing CO₂ that include pulling it from the smokestacks of facilities, or drawing it out of the atmosphere itself and then safely and permanently utilizing and storing it, as called for in recent legislation. Carbon removal also will be necessary to achieve net negative emissions to address historical GHGs already in the atmosphere.

This is a plan that aims to shatter the carbon status quo and take action to achieve a vision of California with a cleaner, more sustainable environment and thriving economy for our children. This ambitious plan will serve as a model for other partners around the world as they consider how to make their transition. As we have so often in the past, California can continue to serve as a leader in innovation that has produced not only the fifth largest economy on the planet, but ultimately one of the most energy-efficient economies, with a track record of demonstrating the ability to decouple economic growth from carbon pollution. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, this plan identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.

2 See *CARB's energy demand reductions*.



- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California’s dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California’s most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state’s GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

The path forward is informed by robust science. The recent Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO₂ have increased by 50 percent since the industrial revolution and continue to increase at a rate of two parts per million each year.³ By the 2030s, and no later than 2040, the world will exceed 1.5°C warming unless there is drastic action. While every tenth of a degree matters—every incremental increase in warming brings additional negative impacts—climate-related risks to human health, livelihoods, and biodiversity are projected to increase further under 2°C warming, compared to 1.5°C.⁴ For example, at 1.5°C of global warming, we would experience increasing heat waves, longer warm seasons, and shorter cold seasons, but at 2°C of global warming, heat extremes would more often reach critical tolerance thresholds for human health and agriculture.⁵ We are already seeing unprecedented climate change impacts, such as continued sea level rise, that are “irreversible” for centuries to millennia, and we are dangerously close to hitting 1.5°C in the near term.⁶ To avoid climate catastrophe and remain below 1.5°C with limited or no overshoot of that threshold, global net anthropogenic CO₂ emissions need to reach net zero by 2050.

3 IPCC. 2021. *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*. [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press. In Press.

4 IPCC. 2018. *Global Warming of 1.5°C*. World Meteorological Organization. Geneva, Switzerland. 32 pp.

5 IPCC. 2021. *Climate change widespread, rapid, and intensifying – IPCC*. August.

6 United Nations. 2021. *IPCC report: ‘Code red’ for human driven global heating, warns UN chief*. August 9.

It has been 16 years since the Global Warming Solutions Act of 2006 was passed and signed into law. In 2017, the second update to the Assembly Bill (AB) 32 Climate Change Scoping Plan⁷ (2017 Scoping Plan) laid out a cost-effective and technologically feasible path to achieve the 2030 GHG reduction target. At the time, many characterized the plan and the AB 32 target as unachievable, citing that it would lead to massive business and job loss, and excessive costs. Those predictions proved to be incorrect as California achieved its AB 32 target years ahead of schedule, all the while growing our economy, with the state distinguishing itself as a hub for green technology investment. This Scoping Plan draws on a decade and a half of proven successes and additional new approaches to provide a balanced and aggressive course of effective actions to achieve carbon neutrality in 2045, if not before, in addition to the 2030 goal.

California's economy is projected to grow vigorously in the coming years and decades. In 2045, under a Reference Scenario, the gross state product would be \$5.1 trillion, nearly \$2 trillion more than in 2021, and allow growth that would add hundreds of thousands of jobs. Under the Scoping Plan scenario, impacts to economic and job growth would be negligible in both 2035 and 2045, while delivering \$199 billion of benefits in the form of reduced hospitalizations, asthma cases, and lost work and school days due to the cleaner air supported by this plan. This should come as no surprise given the tremendous growth of California's economy since the Great Recession of 2007–2009, even as the state has taken drastic measures to lower emissions. As noted, the savings associated with ambitious climate action are extensive, both in terms of avoided climate impacts and health costs. As described in Chapter 1, the health costs of climate and air pollution in the U.S. are well over \$800 billion today and will continue to grow in the coming years⁸ without robust action. Similarly, the costs of delayed or insufficient climate action could cost the U.S. upwards of \$14.5 trillion over the next 50 years.⁹ We can either take action now or pay the cost of inaction, both now and later.



Grows CA's economy
to \$5.1 trillion by 2045



New jobs
▲ 4 million



Health costs
▼ \$200 billion

We cannot take on this unprecedented challenge alone. Collaboration with the federal government, other U.S. states, and other jurisdictions around the world will continue to be fundamental for California to succeed in achieving its climate targets, especially as the pace of our efforts increases in the coming years. We believe this collaboration and coordination also creates a race to the top, encouraging and enabling other jurisdictions to achieve climate and air quality goals as well, and often providing lessons for national action.

One example of fruitful collaboration is California's longstanding vehicle emissions standards programs, which have repeatedly been freely adopted by other states, consistent with the federal Clean Air Act. California's programs frequently pioneer more rigorous standards or new technologies—such as the now-standard catalytic converter and the rules that led directly to the nation-leading numbers of zero-emission vehicles on our roads today. From initial standards for cars

⁷ CARB. 2017. *California's 2017 Climate Change Scoping Plan*.

⁸ Alwis, D. D., and V. S. Limaye. No date. *The Costs of Inaction: The Economic Burden of Fossil Fuels and Climate Change on Health in the United States*. NRDC, The Medical Society Consortium on Climate and Health, and WHPCA.

⁹ Deloitte. 2022. *The Turning Point: A New Economic Climate in the United States*.

and trucks decades ago to the world-leading Advanced Clean Trucks program currently helping to electrify heavy-duty vehicles, this partnership continues to offer regulatory options and spread innovative technologies. A major example of future work is the Advanced Clean Cars II program, which lays out California's legally binding path to achieving 100 percent zero emission vehicle (ZEV) sales in 2035.¹⁰ The California Air Resources Board (CARB) continues to work closely with many other states that also see zero-emission vehicles as critical to their climate and public health goals and expects many states to choose to adopt this regulation as well. This partnership with other states also creates market certainty for automakers, which in turn helps to ensure that California consumers have access to a variety of ZEVs at multiple price points.

The Scoping Plan Process

Four scenarios were extensively modeled to develop this Scoping Plan, with the objective of informing the most viable path to remain on track to achieve our 2030 GHG reduction target: a reduction in anthropogenic emissions by 85% below 1990 levels and carbon neutrality by 2045. All four have their merits and are informed by stakeholder input. The scenario ultimately chosen as the basis of this Scoping Plan is the alternative that most closely aligns with existing statute and Executive Orders. It was selected because it best achieves the balance of cost-effectiveness, health benefits, and technological feasibility.

For the first time, this Scoping Plan includes modeling and quantification of GHG emissions and carbon sequestration in natural and working lands (NWL). To date, the focus has been only on reducing the emissions of GHGs from our transportation, energy, and industrial sectors. The state's 2020 and 2030 GHG reductions targets only include these sources, as they are the primary drivers of climate change and disproportionate harmful air pollution in our vulnerable communities. This Scoping Plan, through the lens of carbon neutrality, expands the scope to more meaningfully consider how our NWL contribute to our long-term climate goals. For the first time, new and cutting-edge modeling tools allow us to estimate the quantitative ability of our forests and other landscapes to remove and store carbon under different scenarios. These cutting-edge tools were developed through a stakeholder process and in coordination with other agencies for the purpose of this update and will continue to be refined over time and made available to others seeking to do similar work.

¹⁰ Executive Department. State of California. Executive Order N-79-20.



As recent data and Scoping Plan modeling shows, our NWL also can act as a source of emissions, principally in the form of wildfires. California's forests are experiencing a deadly combination of drought and heat combined with a century of misguided fire suppression management. Scoping Plan modeling shows that, at this time and until our forests reach a balance through appropriate treatments, California's NWL will act as a net source of emissions, not a sink. As such, the Scoping Plan includes policy direction and actions intended to quickly move the sector toward being a net sink and a more natural state, where wildfires will continue to be an important part of the healthy forest cycle but not at the intensity and frequency observed in recent years.

Development of this Scoping Plan also includes careful consideration of, and coordination with, other state agencies, consistent with Governor Gavin Newsom's whole-of-government approach to tackling climate change. State agency plans and regulations, including the SB 100 Joint Agency Report,¹¹ State Implementation Plan, Climate Action Plan for Transportation Infrastructure,¹² AB 74 Studies on Vehicle Emissions and Fuel Demand and Supply,^{13,14,15} Short-Lived Climate Pollutant Strategy (SLCP Strategy),¹⁶ CARB's Achieving Carbon Neutrality Report,¹⁷ Climate Smart Lands Strategy,¹⁸ Natural Working Land Implementation Plan,¹⁹ and the California Climate Insurance Report: Protecting Communities, Preserving Nature, and Building Resiliency,²⁰ among others, provided critical inputs and data points for this plan. This Scoping Plan is the product of work by multiple agencies across the Administration, including dozens of public workshops and years of rigorous analysis and economic modeling by California's leading institutions. This cooperation on planning lays the foundation for even closer coordination among and between state agencies to put the plan into effect.

The plan is also the product of tireless efforts of, and recommendations from, the AB 32 Environmental Justice Advisory Committee (EJ Advisory Committee). The EJ Advisory Committee, created by statute, plays a critical role to inform the development of each Scoping Plan and helps to ensure environmental justice is integrated throughout the plan. CARB reconvened the EJ Advisory Committee in early 2021 to advise on the development of this Scoping Plan. In their advisory role, the EJ Advisory Committee has worked together to provide inputs to CARB to inform the development of scenarios and the associated modeling. And in April 2022, the EJ Advisory Committee provided draft preliminary recommendations in advance of the Draft 2022 Scoping Plan to help ensure the draft plan meaningfully addresses environmental justice. The CARB Board and EJ Advisory Committee held a joint board hearing on September 1, 2022, where the EJ Advisory Committee presented their final recommendations on the Scoping Plan. Over five dozen of the recommendations are reflected in the Scoping Plan. Going forward, as this plan is ultimately acted on by the Board, ongoing input from the EJ Advisory Committee will be essential to address environmental justice and achieve the ambitious vision outlined in the plan throughout its implementation in the coming years.

11 *California Public Utilities Commission (CPUC), California Energy Commission (CEC), and CARB. 2021. SB 100 Joint Agency Report.*

12 *California State Transportation Agency (CalSTA). 2021. Climate Action Plan for Transportation Infrastructure.*

13 *California Environmental Protection Agency (CalEPA). 2021. Carbon Neutrality Studies.*

14 *Brown, A. L., et. al. 2021. Driving California's Transportation Emissions to Zero. University of California Institute of Transportation Studies.*

15 *Deschenes, O. 2021. Enhancing equity while eliminating emissions in California's supply of transportation fuels. University of California Santa Barbara.*

16 *CARB. Short-Lived Climate Pollutants.*

17 *Energy and Environmental Economics, Inc. 2020. Achieving Carbon Neutrality in California: PATHWAYS Scenarios Developed for the California Air Resources Board. October.*

18 *California Natural Resources Agency (CNRA). 2021. Draft Climate Smart Lands Strategy.*

19 *CARB. 2019. Draft California 2030 Natural and Working Lands Climate Change Implementation Plan.*

20 *California Department of Insurance. 2021. Protecting Communities, Preserving Nature, and Building Resiliency.*



Importantly, per legislative direction, the Scoping Plan development includes modeling and analyses of emissions, economics, air quality, health, jobs, and public health. This work is important to inform the discussion around trade-offs and how to balance the various legislative direction in identifying a path to achieve the state’s climate goals. The technical work serves as a backdrop to what this means to Californian’s daily lives—to how they will work, play, and live as we act to eliminate fossil fuel combustion and achieve the many public health and environmental benefits that will result from that action.

Ensuring Equity and Affordability

The state has a long history of public health and environmental protection. However racist and discriminatory practices such as redlining have resulted in low-income communities and communities of color being disproportionately exposed to health hazards and pollution burdens.²¹ These communities are often located adjacent to major roadways and large stationary sources that not only emit GHGs, but also harmful localized air pollution. The plan delivers on the promise to transform the way we move, live, and work by nearly eliminating our dependence on fossil fuels. It includes effective actions to move with all possible speed to clean energy, zero-emission cars and trucks, energy-efficient homes, sustainable agriculture, and resilient NWL. And it prioritizes working with the communities most impacted to ensure that these strategies address their needs.

An important part of our equity consideration is ensuring the transition to a zero-emission economy is affordable and accessible, and that it uplifts disadvantaged, low-income communities and communities of color. Some aspects of the transition will have associated costs (e.g., escalating efforts to retrofit existing homes and businesses to support electric appliances and vehicles and increased costs of insurance). The state must ensure that these costs do not disproportionately burden consumers. In addition, the state has an important role to play in providing financial incentives, especially to low-income consumers, to allow for uptake of clean technologies. The Department of Community Services and Development’s Low Income Weatherization Program is a prime example of this approach, enabling low-income Californians to be part of the zero-emission transition, all while lowering energy bills. The program provides low-income households with solar

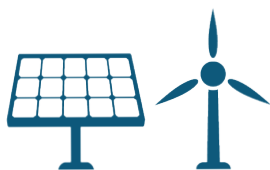
21 CalEPA. 2021. *Pollution and Prejudice: Redlining and Environmental Injustice in California*. August 16.

photovoltaic systems and energy efficiency upgrades at no cost to residents, helping cushion the impact of climate change on vulnerable communities.

With this Scoping Plan, the state also adds another tool to help identify and close climate change impact gaps that will emerge over time. As California invests in climate mitigation and adaptation, it is essential to understand the relative impact of climate change across the state’s diverse communities. We know not all communities are equally resilient in the face of climate impacts due to persisting health and opportunity gaps. We also know that a global metric such as the Social Cost of Carbon cannot adequately capture the incremental additional impact faced by overly burdened communities. The Climate Vulnerability Metric (CVM) is specifically focused on quantifying the community-level impacts of a warming climate on human welfare.

Energy and Technology Transitions

To support the transformation needed, we must build the clean energy production and distribution infrastructure for a carbon-neutral future. The solution will have to include transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. In almost all sectors, electrification will play an important role. That means that the grid will need to grow at unprecedented rates and ensure reliability, affordability, and resiliency through the next two decades and beyond. It also means we need to keep all options on the table, as it will take time to fully grow the electricity grid to be the backbone for a decarbonized economy. We also know that electrification is not possible in all situations. As such, this plan systematically evaluates and identifies feasible clean energy and technology options that will bring both near-term air quality benefits and deliver on longer-term climate goals.



4x
solar & wind
generation



1,700x
renewable hydrogen



100%
ZEV sales by 2035

This transition will not happen overnight. It will take time and planning to ensure a smooth transition of existing energy infrastructure and deployment of new clean technology. And while this Scoping Plan has the longest planning horizon of any Scoping Plan to date, this 25-year horizon is still relatively short in terms of transforming California’s economy. We must avoid making choices that will lead to stranded assets and incorporate new technologies that emerge over time. Importantly, given the pace at which we must transition away from fossil fuels, we absolutely must identify and address market and implementation barriers to be successful. The scale of transition includes adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply.

As we transition our energy systems, we must also rapidly deploy the clean technologies that rely on a decarbonized grid. As called for in Executive Order N-79-20, all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045. This means the percentage of fossil fuel combustion vehicles will continue to rapidly decrease, becoming a fading vision of the past. Successful implementation of this Executive

Order (EO) and other zero-emission priorities will have to be attractive to consumers. As an example, electric and hydrogen transportation refueling must be readily accessible, and active transportation and clean transit options must be cheaper and more convenient than driving.

Cost-Effective Solutions Available Today

Ultimately, to achieve our climate goals, urgent efforts are needed to slash GHG emissions. Fortunately, cost-effective solutions are available to do so in many cases. In short, this plan relies on existing technologies—it does not require major technological breakthroughs that are highly uncertain.

For example, targeted action to reduce methane emissions can be achieved at low or negative cost, and with significant near-term climate and public health benefits. In many cases, renewable energy and energy storage are cheaper than polluting alternatives, and are already firmly part of our business-as-usual approach; modeling related to the most recent integrated resource planning process at the California Public Utilities Commission (CPUC) has shown that scenarios associated with the best emissions outcomes had the lowest average rates. As another example, research from Energy Innovation shows that the U.S. can achieve 100 percent zero-carbon power by 2035 without increasing customer costs.²²

The same is either already true, or soon to be true, for zero-emission vehicles as well. Myriad studies show cost parity for light-duty and heavy-duty ZEVs being achieved by mid-decade or shortly thereafter. A carbon neutrality study conducted by the University of California (UC) Institute of Transportation Studies and funded by the California Environmental Protection Agency (CalEPA) shows that achieving carbon neutrality in the transportation sector will save Californians \$167 billion through 2045.²³ Similar research from the Goldman School of Public Policy at UC Berkeley finds that achieving 100 percent light-duty ZEV sales nationwide would save consumers \$2.7 trillion through 2050; equivalent to \$1,000 per household, per year, for 30 years.²⁴

22 Phadke, A. et al. 2020. "Illustrative Pathways to 100 Percent Zero Carbon Power by 2035 Without Increasing Customer Costs, Energy Innovation." September.

23 Brown, A. L., et al. 2021. *Driving California's Transportation Emissions*.

24 Goldman School of Public Policy. 2021. *2035: The Report: Transportation*. UC Berkeley. April.





Many of these outcomes are a direct result of California’s vision and policy development to advance clean energy and climate solutions, including through the Renewables Portfolio Standard, Advanced Clean Cars II regulations, SLCP Reduction Strategy, and others. While the world collectively has not yet fully deployed clean energy and climate solutions at the scale needed to adequately address climate change, California has made tremendous progress—even since the last Scoping Plan update in 2017. Continued ambition, leadership, and climate policy development from California will help the state achieve the scale of emissions reductions needed from technologies and strategies that are already cost-effective or close to it today, and will move additional technologies and strategies to that point in the near future. Achieving those outcomes and reducing costs for the entire array of climate solutions needed to achieve carbon neutrality and then maintain net-negative emissions will prove the true measure of California’s success. This will enable California to not just meet our own climate targets, but to ultimately develop the replicable solutions that can scale globally to address global warming.

Continue with a Portfolio Approach

Over the past decade and a half, the state has undertaken a successful three-pronged approach to reducing GHGs: incentives, regulations, and carbon pricing. The 2017 Scoping Plan leveraged existing programs such as the Renewables Portfolio Standard, Advanced Clean Cars, Low Carbon Fuel Standard, Short-lived Climate Pollutant Strategy, mobile source measures to achieve federal air quality targets, and a Cap-and-Trade Program, among others, to lay out a technologically feasible and cost-effective path to achieve the 2030 GHG reduction target. When looking toward the 2045 climate goals and the deeper GHG reductions needed across the AB 32 GHG Inventory sectors, all of the existing programs must be evaluated and, as necessary, strengthened to support the rapid production and deployment of clean technology and energy, as well as the increased pace and scale of actions on our natural and working lands.

The challenge before us requires us to keep all tools on the table. Given the climate mitigation co-benefits, critical actions to deliver near-term air quality benefits, such as those included in the State Implementation Plan to achieve the federal air quality standards, are incorporated into this Scoping Plan, as are new legislative mandates to decarbonize the electricity and cement sectors. And, if additional gaps are identified, new programs and policies must be developed and implemented to

ensure all sectors are on track to reduce emissions. Opportunities to leverage these programs to address ongoing air quality disparities must also be considered, along with targeted environmental justice policies such as the AB 617 Community Air Protection Program and the investments made possible through the California Climate Investments Program.

Conclusion

California has never undertaken such a comprehensive, far-reaching, and transformative approach to fighting climate change as that called for in this plan. Once implemented, it will place every aspect of how we live, work, play, and travel in California on a more sustainable footing, with a focus on directly benefitting those communities already most burdened by pollution. This comprehensive approach reflects how climate change is already changing life in California. We have all experienced the impacts of devastating wildfires, extreme heat, and drought. Despite much progress, California still has some of the worst air pollution in the nation, especially in the San Joaquin Valley and the Los Angeles Basin, which is driven by the continued use of fossil fuel-powered trucks and cars.

This Scoping Plan provides a solution; a way forward and a vision of a California where we can and will address those impacts. This plan is fundamentally based on hope. It is a hope grounded in experience and science that we can fundamentally improve the California we leave to future generations. The plan is built on the legacy of effective actions and on the conviction that we can effectively marshal the combined capabilities of California—from state, regional, tribal, and local governments to industry to our research institutions, and most importantly, to the nearly 40 million Californians who will benefit from the actions laid out in the plan. It addresses the challenge of our generation by laying out a pathway and guideposts for action across three decades. But the Scoping Plan is only that: a plan. The hard work—and hopeful work—is putting its recommendations into action. And there is no time to waste.

Post-adoption of the Scoping Plan

As with previous Scoping Plans, CARB Board approval is the beginning of the next phase of climate action. Specifically, approval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies. The unprecedented rate of transition will also require the identification and removal of market and implementation barriers to the production and deployment of clean technology and energy. All of these actions and more will be needed if we are to achieve our climate goals.

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Chapter 1: Introduction

“The debate is over around climate change. Just come to the state of California. Observe it with your own eyes.”

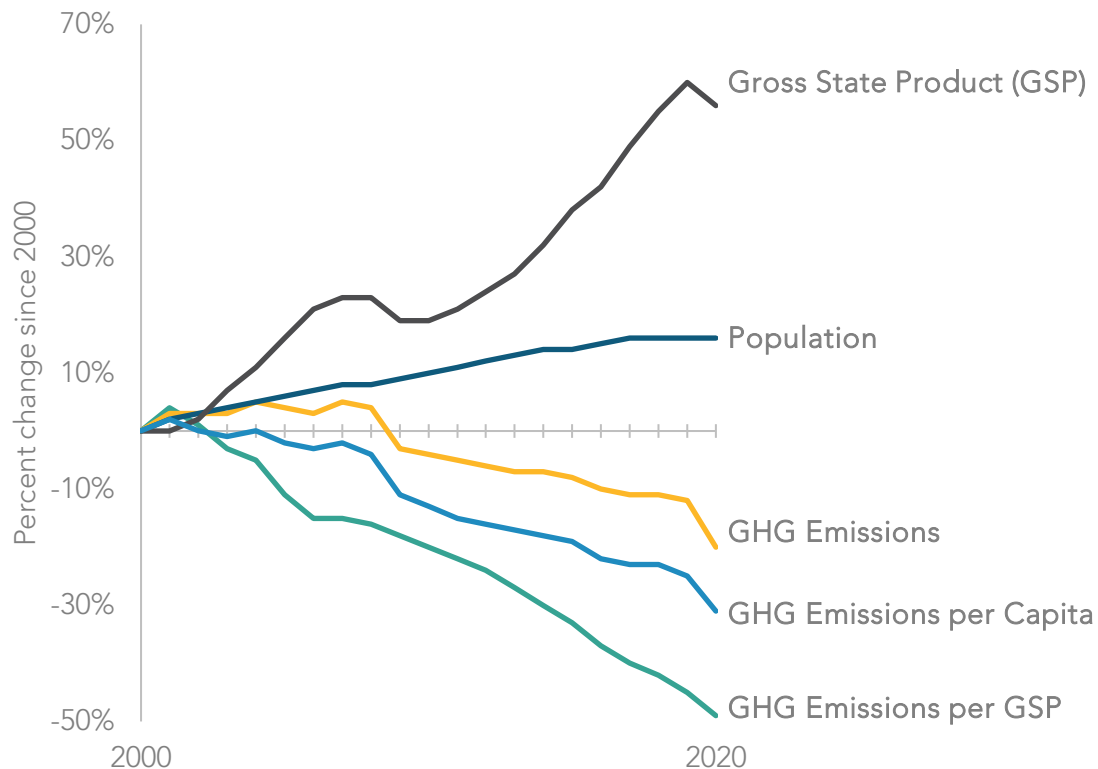
- California Governor Gavin Newsom in September 2020 after surveying the devastation caused by catastrophic wildfires

The impacts of climate change are no longer a distant threat on the horizon—they are right here, right now, with a growing intensity that is adversely affecting our communities and our environment, here in California and across the globe. The science that, decades ago, predicted the impacts we are currently experiencing is even stronger today and unambiguously tells us what we must do to limit irreversible damage: we must act with renewed commitment and focus to do more and do it sooner. That science is indisputable. Unless we increase ambition, we will be faced with more fire, more drought, more temperature extremes, and deadly, choking air pollution. The future of our state—our communities, economy, and ecosystems—is inextricably tied to the way we respond in this decade and the partnerships we forge along the way.

The impacts of climate change fall most heavily on frontline communities that bear the brunt of extreme heat, drought, wildfires, and other effects. Low-income communities and communities of color are also disproportionately impacted by fossil fuel combustion-related air pollution and related health problems. The continued phaseout of fossil fuel combustion will advance both climate and air quality goals and will deliver the greatest health benefits to the most impacted communities.

As it has responded to this climate crisis, California has established itself as a global leader in science-based, public health-focused climate change mitigation and air quality control. The California Legislature has worked with both Republican and Democratic governors to advance action on public health and environmental protections—and California has made progress on addressing climate change during periods of both Republican and Democratic federal administrations. Since the passage of Assembly Bill 32 (AB 32) (Núñez and Pavley, Chapter 488, Statutes of 2006), California has developed bold, creative, and durable policy solutions to protect our environment and public health, all while growing our economy. In fact, California met the target established in AB 32—a return of greenhouse gas (GHG) emissions to 1990 levels by 2020—years ahead of schedule, even as the state established itself as the one of the largest economies in the world. As Figure 1-1 below shows, California’s emissions and economic growth have continued to decouple, and California is now the fifth largest economy in the world.

Figure 1-1: California total and per capita GHG emissions²⁵



Recognizing both California's early successes in achieving GHG emissions reductions while growing the economy, as well as the worsening impacts of climate change, our governors and legislators have continued to enact ambitious goals. California's unwavering commitment to address climate change is based on indisputable science and data. This commitment is also informed by our collective efforts to address environmental justice and advance racial equity, such that race will no longer be a predictor for disproportionate environmental burdens faced by low-income communities and communities of color. As the Office of Environmental Health Hazard Assessment's

²⁵ Due to the global pandemic, 2020 is an outlier year and should not be considered indicative of a trend; emissions are likely to increase as economies recover from the impacts of the pandemic.

(OEHHA's) recent analysis of race/ethnicity and air pollution vulnerability and CalEnviroScreen 4.0 scores demonstrate, much work remains to be done.²⁶

Many of California's environmental policies have served as models for similar policies in other U.S. states, and at national and international levels. Moving forward, California will continue its pursuit of collaborations and advocacy for action to address climate change at all levels of government. While California is responsible for just one percent of global GHG emissions, and we must do our part, we also play an important role in exporting both political will and technical solutions to address the climate crisis globally.

Today, we have a chance to re-envision California's future and set the state on a path to be carbon neutral no later than 2045 while advancing equity, addressing environmental justice, and continuing to grow our economy. This Scoping Plan provides a roadmap outlining key policies we can implement to achieve our climate goals while improving the health and welfare of Californians and addressing disparities in health outcomes to create a more equitable future. It will enable us to turn the corner in our efforts to protect and preserve our critical natural and public resources, all while providing unparalleled opportunities for clean, pollution-free economic growth.

Severity of Climate Change Impacts

With the increasing severity and frequency of drought, wildfire, extreme heat, and other impacts, Californians just have to look out their windows to know that climate change is real and rapidly getting worse. The impacts we thought we would see in the decades to come are happening now. We must act decisively to both reduce our GHG emissions and build resilience to these impacts for ourselves, future generations, and our iconic landscapes.

Wildfires

Of the twenty largest wildfires ever recorded in California, nine occurred in 2020 and 2021. The worst wildfire season in California's recorded history was in 2018, with over 24,226 structures damaged or destroyed and over 100 lives lost. The largest wildfire season ever recorded in state history was in 2020, where more than 4.3 million acres burned, albeit at different intensity and with varying ecological impacts, and over 112 million metric tons of

²⁶ OEHHA and CalEPA. 2021. Analysis of Race/Ethnicity and CalEnviroScreen 4.0 Scores. <https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40raceanalysisf2021.pdf>.

carbon dioxide (CO₂) emitted into the atmosphere.²⁷ The economic damage of these fires was estimated to be over \$10 billion in property damage and over \$2 billion in fire suppression costs.²⁸ The Camp Fire, which destroyed much of Paradise, California, was the world's costliest natural disaster in 2018, with overall damages of \$16.5 billion.²⁹ It was also the deadliest fire in California history, with 85 civilian fatalities. Wildfires have always been part of California's natural ecology and will continue to be. However, changes to the state's climate and precipitation expands the footprint of wildfire threat, severity, and intensity, with one quarter of California—more than 25 million acres—now classified as being under very high or extreme fire threat.³⁰

The impacts of wildfire smoke have been linked to respiratory infections, cardiac arrests, low birth weight, mental health conditions, and exacerbated asthma and chronic obstructive pulmonary disease.³¹ In 2020, with all of California covered by wildfire smoke for over 45 days—and 36 counties for at least 90 days—maximum fine particulate (PM_{2.5}) levels persisted in the “hazardous” range of the Air Quality Index for weeks in several areas of the state.^{32, 33}

Catastrophic wildfire damages extend beyond human health and the economy. The Castle Fire in 2020 and the KNP Complex and Windy Fires in 2021 led to the loss of an unprecedented number of giant sequoias: an estimated 13 to 19 percent of the giant

²⁷ CARB. 2020. Public Comment Draft Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities.

https://ww3.arb.ca.gov/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf.

²⁸ News18. 2021. San Francisco Bay Area Receives its First Wildfire Warning of 2021, After California Concludes its Driest Year. <https://www.news18.com/news/buzz/san-francisco-bay-area-receives-its-first-wildfire-warning-of-2021-after-california-concludes-its-driest-year-3722897.html>.

²⁹ Munich RE. 2019. Extreme Storms, Wildfires and Droughts Cause Heavy Nat Cat Losses In 2018. <https://www.munichre.com/en/company/media-relations/media-information-and-corporate-news/media-information/2019/2019-01-08-extreme-storms-wildfires-and-droughts-cause-heavy-nat-cat-losses-in-2018.html#-1808457171>.

³⁰ CARB. No date. Wildfires. <https://ww2.arb.ca.gov/our-work/programs/wildfires/about>.

³¹ Reid, C. E., M. Brauer, F. H. Johnston, M. Jerrett, J. R. Balmes, and C. T. Elliott. 2016. “Critical Review of Health Impacts of Wildfire Smoke Exposure.” *Environmental Health Perspectives* <http://dx.doi.org/10.1289/ehp.1409277>.

³² Vargo J. A. 2020 (updated in 2021 using the [NOAA Hazard Mapping System](#)). “Time Series of Potential US Wildland Fire Smoke Exposures.” *Frontiers in Public Health* <https://doi.org/10.3389/fpubh.2020.00126>.

³³ CalFire. 2020 Fire Siege Report. <https://www.fire.ca.gov/media/hsviuuv3/cal-fire-2020-fire-siege.pdf>.

sequoia population in the Sierra Nevada. An iconic species, giant sequoias are the largest trees on earth, with exceptional longevity outside of climate extremes.^{34,35}

It is clear that we must take drastic measures to prepare for future wildfires, which is why California invested \$2.7 billion in wildfire resilience from fiscal years 2020 to 2023. The exponential increase in funding launched more than 552 wildfire resilience projects in less than a year, and CAL FIRE met its 2025 goal of treating 100,000 acres a full three years ahead of schedule. Since Fiscal Year 2019–20, treatment work has significantly increased, and CAL FIRE has averaged 100,000 acres treated each fiscal year.

Although we are making progress, we have a lot more work to do in order to achieve our goal of treating one million acres annually by 2025. The Governor's Wildfire and Forest Resilience Strategy details 99 actions needed to address the key drivers of catastrophic wildfires, ramp up the pace and scale of forest management, and make threatened communities more resilient to catastrophic fires. It is also important to note that natural wildfire cycles are a part of a sustainable forest ecosystem and will continue to play a role in a healthy forests' future. We should not expect wildfires to cease, but we must manage our lands to address catastrophic wildfires that result from buildup of carbon stocks due to our interventions to suppress wildfires and from climate change resulting from fossil fuel combustion.

Drought

Drought is a recurring feature of the California climate that has been intensified by increasingly warmer average temperatures. Anthropogenic climate trends have exacerbated drought conditions; human-caused climate change accounts for 19 percent of drought severity and 42 percent of the soil moisture deficit in this region since 2000. The governor declared a drought state of emergency in October 2021, and as of September 2022, 94 percent of California was in severe drought, and 99.8 percent³⁶ of the state was in at least moderate drought. The first three months of 2022 were the driest January, February, and March on record in California.³⁷ The harsh drought conditions affecting California are part of a larger megadrought—a drought lasting more than two

³⁴ Shive, K., C. Brigham, T. Caprio, and P. Hardwick. 2021. 2021 Fire Season Impacts to Giant Sequoias. The Nature Conservancy and National Park Service. <https://www.nps.gov/articles/000/2021-fire-season-impacts-to-giant-sequoias.htm>.

³⁵ Shive, K. L., A. Wuenschel, L. J. Hardlund, S. Morris, M. D. Meyer, and S. M. Hood. 2022. "Ancient Trees and Modern Wildfires: Declining Resilience to Wildfire in the Highly Fire-adapted Giant Sequoia." *Forest Ecology and Management* 511, 120110. <https://doi.org/10.1016/j.foreco.2022.120110>.

³⁶ Drought.gov. California. National Oceanic and Atmospheric Administration (NOAA) and the National Integrated Drought Information System. <https://www.drought.gov/states/california>.

³⁷ Drought.ca.gov. September 26, 2022. California Drought Update. <https://drought.ca.gov/media/2022/09/Weekly-CA-Drought-Update-09262022-FINAL.pdf>.

decades—that has been ongoing in the Southwestern region of North America since 2000. The past 22 years have been the region’s driest period since at least 800 CE.³⁸

While large urban water districts with diversified sources of water supply have maintained water deliveries to customers through the drought, hundreds of individual well owners and some small water systems have suffered disruption. The state is providing funding for water system consolidation and modernization projects in small communities, emergency repairs and replacements for dry wells, and bottled and hauled water deliveries. A 2021 law requires small suppliers to create drought contingency plans. During the drought of the last three years the state has delivered emergency drinking water assistance to nearly 10,000 households and 150 water systems.

California agriculture is responsible for more than half of all U.S. domestic fruit and vegetable production, and in 2021 drought resulted in the fallowing of nearly 400,000 acres of fields.³⁹ Direct crop revenue losses were approximately \$962 million, and total economic impacts were more than \$1.7 billion, with over 14,000 full- and part-time job losses.⁴⁰ During the 2011–2017 drought, California’s agricultural industry suffered at least \$5 billion in losses.⁴¹ The 2022–23 budget includes \$100 million to support agricultural water conservation practices, provide on-farm technical assistance, and provide direct relief to small farm operators.

Though native California species are adapted to drought, human engineering has altered most streams and wetlands in the state, making drought increasingly stressful to fish and wildlife. The state has conducted hundreds of fish and amphibian rescues in this drought to move creatures from diminished habitat, upgraded hatcheries, and boosted hatchery production, and has hauled millions of young hatchery salmon to San Francisco Bay to avoid adverse river conditions. State biologists monitor dozens of streams statewide and have negotiated voluntary agreements with landowners and water users to improve stream flows and temperatures.

California has started to implement major policies to build resilience to combat drought—such as the Sustainable Groundwater Management Act of 2014, the governor’s Water Resilience Portfolio (2020), the governor’s Water and Supply Strategy (August 2022), and

³⁸ Williams, A. P., B. I. Cook, and J. E. Smerdon. 2022. “Rapid Intensification of The Emerging Southwestern North American Megadrought in 2020–2021.” *Nature Climate Change* <https://doi.org/10.1038/s41558-022-01290-z>.

³⁹ Medellín-Azuara, J. 2022. *Economic Impacts of the 2021 Drought on California Agriculture*. University of California Merced. https://wsm.ucmerced.edu/wp-content/uploads/2022/02/2021-Drought-Impact-Assessment_20210224.pdf.

⁴⁰ Medellín-Azuara. *Economic Impacts of the 2021 Drought*.

⁴¹ National Resources Defense Council (NRDC). 2019. Climate Change and Health in California. Issue Brief. <https://www.nrdc.org/sites/default/files/climate-change-health-impacts-california-ib.pdf>.

new standards for indoor, outdoor, and industrial water use. However, it is crucial that we take further actions to minimize the impacts of drought in the years to come.

Extreme Heat

California's hottest summer on record was 2021.⁴² Death Valley recorded the world's highest reliably measured temperature (130°F) in July 2021, breaking its own record (129°F) from summer 2020.⁴³ Meanwhile, Fresno also broke one of its own records, with 64 days over 100°F in 2021.⁴⁴ This is part of a trend: the daily maximum average temperature, an indicator of extreme temperature shifts, is expected to rise 4.4°F–5.8°F by 2050 and 5.6°F–8.8°F by 2100.⁴⁵ Heat waves that result in public health impacts are also projected to worsen throughout the state. By 2050, these heat-related health events are projected to last two weeks longer in the Central Valley and occur four to ten times more often in the Northern Sierra region.⁴⁶

Heat ranks among the deadliest of all climate hazards in California, and heat waves in cities are projected to cause two to three times more heat-related deaths by mid-century.⁴⁷ Climate vulnerable communities⁴⁸ will experience the worst of these effects, as heat risk is associated and correlated with physical, social, political, and economic factors. Aging populations, infants and children, pregnant people, and people with chronic illness are especially sensitive to heat exposure.^{49,50} Combining these characteristics and existing health inequities with additional factors such as poverty, linguistic isolation,

⁴² NOAA. 2022. Climate at a Glance. https://www.ncdc.noaa.gov/cag/statewide/time-series/4/tavg/3/8/1895-2021?base_prd=true&firstbaseyear=1901&lastbaseyear=2000.

⁴³ Masters, J. 2021. Death Valley, California, breaks the all-time world heat record for the second year in a row. Yale Climate Connections. <https://yaleclimateconnections.org/2021/07/death-valley-california-breaks-the-all-time-world-heat-record-for-the-second-year-in-a-row/>.

⁴⁴ NOAA. Climate Data Online Search. Accessed on 16 March 2022. <https://www.ncdc.noaa.gov/cdo-web/search>.

⁴⁵ Governor's Office of Planning and Research (OPR), CEC, and CNRA. 2018. *California's Fourth Climate Change Assessment*. Page 23. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

⁴⁶ OPR, CEC, and CNRA. *California's Fourth Climate Change Assessment - Statewide Summary Report*. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

⁴⁷ Ostro, B., S. Rauch, and S. Green. 2011. "Quantifying the health impacts of future changes in temperature in California." National Library of Medicine. <https://pubmed.ncbi.nlm.nih.gov/21975126/>.

⁴⁸ CARB. Priority Populations. California Climate Investments. <https://www.caclimateinvestments.ca.gov/priority-populations>.

⁴⁹ Basu, R. 2009. "High Ambient Temperature and Mortality: A Review of Epidemiologic Studies from 2001 to 2008." National Library of Medicine. <https://pubmed.ncbi.nlm.nih.gov/19758453/>.

⁵⁰ Basu, R., and B. Malig. 2011. "High Ambient Temperature and Mortality in California: Exploring the Roles of Age, Disease, and Mortality Displacement." National Library of Medicine. <https://pubmed.ncbi.nlm.nih.gov/21981982/>.

housing insecurity, and the legacy of racist redlining practices, can put individuals at a disproportionately high risk of heat-related illness and death.^{51,52} Rising temperatures will also speed up smog-forming chemical reactions, leading to worse asthma, reduced lung function, cardiac arrest, and cognitive decline. African American, American Indian/Alaskan Native, and Puerto Rican Californians are particularly sensitive to smog, as they are between 28.6 and 132.5 percent more likely to be diagnosed with asthma than white Californians.⁵³

In addition to the dangers to public health, California's September 2022 heat wave is particularly illustrative of how more frequent extreme heat strains the state's infrastructure we depend on to adapt to a changing climate. For example, as all-time high temperature records were broken in Sacramento, San Jose, Santa Rosa and Fairfield, electricity demand for air conditioning threatened to overwhelm the state power supply.⁵⁴

California has taken major steps to protect communities from the impacts of extreme heat. Our recent budgets invest \$800 million to cool our schools and neighborhoods, including projects to reduce urban overheating. The Extreme Heat Action Plan, released in April 2022, outlines the all-of-government approach California is taking to reduce urgent risks and build long-term resilience to the impacts of extreme heat. In September 2022, Governor Newsom signed multiple bills addressing extreme heat, including AB 2238 (Rivas, Chapter 264, Statutes of 2022), which will create the nation's first extreme heat advance warning and ranking system to better prepare communities ahead of heat waves. The Administration is committed to addressing extreme heat, but we still have a lot of work to do.

Wildfires, drought, and extreme heat are some of the most pronounced climate impacts California is experiencing, but they are not the only ones. Sea level rise, rising ocean temperatures, ocean acidification, and inland flooding are also already having devastating impacts on our communities, ecosystems, and economy, and will continue to do so in the years and decades to come. The decisions and actions that we take today will determine how strongly we will feel the impacts of climate change in the future.

⁵¹ Hoffman, J. S., V. Shandas, and N. Pendleton. 2020. "The Effects of Historical Housing Policies on Resident Exposure to Intra-Urban Heat: A Study of 108 US Urban Areas." MDPI. <https://www.mdpi.com/2225-1154/8/1/12/html>.

⁵² U.S. Climate Resilience Toolkit. No date. Heat and Social Inequity in the United States. <https://toolkit.climate.gov/tool/heat-and-social-inequity-united-states>.

⁵³ NRDC. 2019. Climate Change and Health. Issue Brief. <https://www.nrdc.org/sites/default/files/climate-change-health-impacts-california-ib.pdf>.

⁵⁴ Samenow, Jason. 2022. No September on record in the West has seen a heat wave like this. *The Washington Post*. September 9. <https://www.washingtonpost.com/climate-environment/2022/09/08/western-heatwave-records-california-climate/>.

Imperative To Act

Consequences of Further Warming

The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) found that it will not be possible to keep global warming within the threshold of 1.5°C to avoid the most severe impacts of climate change unless we make immediate and large-scale reductions in GHG emissions. It finds that atmospheric concentrations of CO₂ have increased by 50 percent since the industrial revolution, and that they continue to increase at a rate of two parts per million each year.⁵⁵ Without immediate action, the world will exceed 1.5°C (or 2.7°F) warming by the 2030s, and no later than 2040.

While every tenth of a degree matters—every incremental increase in warming brings additional negative impacts—climate-related risks to human health, livelihoods, and biodiversity are projected to increase further under 2°C (or 3.6°F) warming, compared to 1.5°C.⁵⁶ To remain below 1.5°C with limited or no overshoot of that threshold, global net anthropogenic CO₂ emissions need to be cut by about half by 2030 and reach net-zero by 2050.

If we fail to make rapid changes, we may not be able to limit global warming to 2°C,⁵⁷ and the consequences of inaction would be catastrophic. Our planet is already 1.2°C warmer than pre-industrial times due to human-induced warming, and many impacts we are already experiencing, such as sea level rise, are “irreversible” for centuries to millennia.⁵⁸ Californians with the fewest resources, who are disproportionately low-income communities and communities of color, are the most vulnerable to the impacts of climate change. While the human costs associated with health impacts can never be fully monetized, a recent report finds that the health costs of climate and air pollution in the U.S. are well over \$800 billion today and will continue to grow in the coming years.⁵⁹

⁵⁵ IPCC. 2021. *Climate Change 2021: The Physical Science Basis*. <https://www.ipcc.ch/report/ar6/wg1/>.

⁵⁶ IPCC. 2018. *Special Report: Global Warming of 1.5°C*. World Meteorological Organization. <https://www.ipcc.ch/sr15/>.

⁵⁷ IPCC. 2021. Summary for Policymakers. In: *Climate Change 2021: The Physical Science Basis*. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. In Press. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf.

⁵⁸ United Nations. 2021. IPCC report: ‘Code red.’

<https://news.un.org/en/story/2021/08/1097362#:~:text=%27Code%20red%20for%20humanity%27&text=We%20are%20at%20imminent%20risk,%2C%20to%20keep%201.5%20alive.%22>.

⁵⁹ Alwis, D. D., and V. S. Limaye. No date. *The Costs of Inaction*.

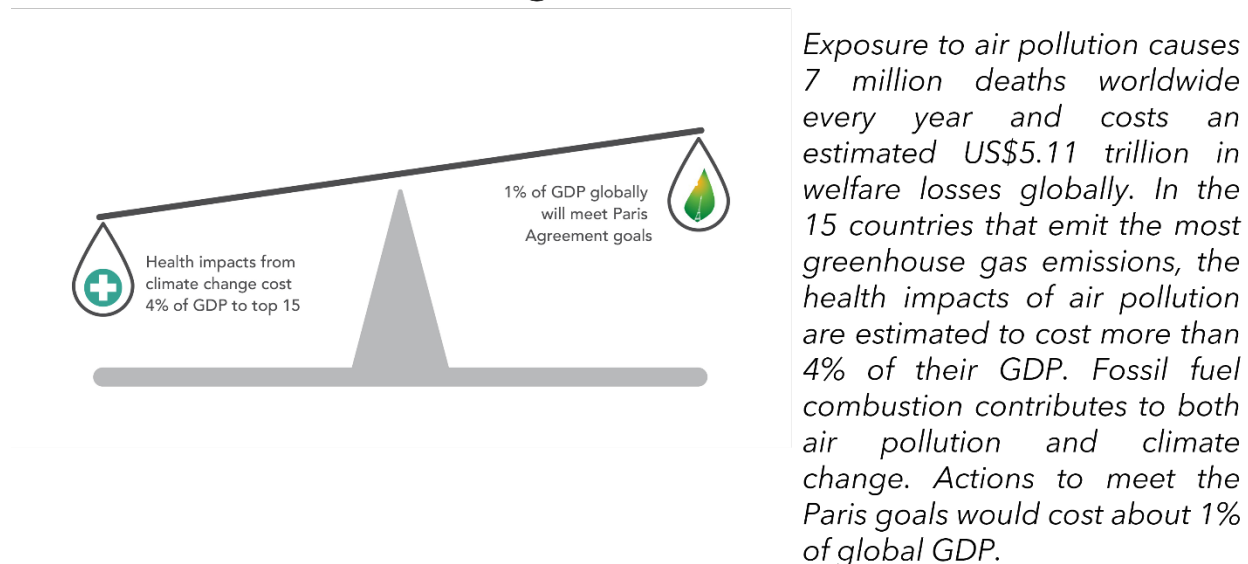
<https://www.nrdc.org/sites/default/files/costs-inaction-burden-health-report.pdf>.

Any delays in action or insufficient action are a threat to public health and the environment. The impacts to our economy would be devastating as well. While not specific to California, a 2022 report from Deloitte Economics Institute finds that failing to take sufficient action to reduce emissions could result in economic losses to the U.S. of more than \$14.5 trillion over the next 50 years.⁶⁰ On a hopeful note, however, the report finds that if the country invests now and in the coming years in a net-zero economy, \$3 trillion could be added to the economy over the next 50 years. The U.S. annual gross domestic product (GDP) would be 2.5 percent higher in 2070 in this fast-action scenario than in the delayed action scenario. The lessons for California from these analyses are clear: invest now or pay the price later. As shown in Figure 1-2, inaction can lead to negative consequences for individuals, communities, the economy, and society as a whole. As discussed later, Governor Newsom and the Legislature have accepted this imperative and made significant investments in climate action. This Scoping Plan combined with the historic investments and policy direction from the governor and Legislature, will result in unprecedented action to address the climate crisis.

⁶⁰ Deloitte. 2022. *The Turning Point*.
<https://www2.deloitte.com/content/dam/Deloitte/us/Documents/about-deloitte/us-the-turning-point-a-new-economic-climate-in-the-united-states-january-2022.pdf?id=us:2el:3dp:wsjspon:awa:WSJSBJ:2021:WSJFY22>.

Figure 1-2: The real costs of inaction⁶¹

Costs of Inaction Outweigh Costs of Action for World's Largest 15 GHG Emitters



Scoping Plan Overview

Previous Scoping Plans

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least one every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. This Scoping Plan is the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual.⁶² The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 limit and made the case for addressing

⁶¹ Katowice, P. 2018. *Health benefits far outweigh the costs of meeting climate change goals*. WHO. <https://www.who.int/news/item/05-12-2018-health-benefits-far-outweigh-the-costs-of-meeting-climate-change-goals>.

⁶² CARB. 2008. *Climate Change Scoping Plan*. https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

short-lived climate pollutants (SLCPs).⁶³ The most recent update, the 2017 Scoping Plan,⁶⁴ also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the Senate Bill 32 (SB 32, Pavley, Chapter 249, Statutes of 2016) target of reducing GHGs by at least 40 percent below 1990 levels by 2030.

Overview of this Scoping Plan

It is paramount that we continue to build on California's success by taking effective actions and doubling down on implementation of the strategies outlined here. As such, this Scoping Plan builds on and integrates efforts already underway to reduce the state's GHG, criteria pollutant, and toxic air contaminant emissions by identifying the clean technologies and fuels that should be phased in as the state transitions away from combustion of fossil fuels. By selecting and pursuing a sustainable and clean economic path, the state will continue to successfully execute existing programs, work to eliminate air pollution inequities, demonstrate the coupling of economic growth and environmental progress, and enhance new opportunities for engagement within the state to address and prepare for climate change.

The 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.⁶⁵ The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. Modeling for this Scoping Plan shows that this decade must be one of transformation on a scale never seen before to set us up for success in 2045.

The relatively longer path assessed in this Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, this Scoping Plan also includes discussion for the first time of the Natural and Working Lands (NWL) sectors as both sources of emissions and carbon sinks. Chapter 2 of this document

⁶³ CARB. 2014. *First Update to the Climate Change Scoping Plan*.

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

⁶⁴ CARB. 2017. *California's 2017 Climate Change Scoping Plan*.

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

⁶⁵ CARB. 2017. *California's 2017 Climate Change Scoping Plan*.

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

includes a description of a suite of specific actions to drastically reduce GHGs across all sectors. Chapter 3 provides the air quality and economic evaluations of the actions. Chapter 4 provides a broader description of the many actions needed across all sectors to achieve carbon neutrality. Chapter 5 provides an overview of the next steps and partnerships needed to implement this Scoping Plan. Guided by legislative direction, the actions identified in this Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low carbon economy. This Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and subsequent updates while identifying new, technologically feasible, and cost-effective strategies.

Principles That Inform Our Approach to Addressing the Climate Challenge

California has decades of experience addressing the climate challenge. Through this experience, and based on extensive engagement with stakeholders through our regulatory and program development processes, we have developed a set of principles to inform our approach.

Unprecedented Investments in a Sustainable Future

The scale of transformation needed over this decade to avoid the worst impacts of climate change and meet our ambitious climate goals is extraordinary. This is why Governor Newsom and the Legislature invested over \$15 billion in climate action through the 2021–2022 California Comeback Plan, and why the 2022–2023 budget marks the beginning of the California Climate Commitment—the governor’s multi-year plan to invest \$54 billion in climate action. The enacted budgets (Figure 1-3) and the California Climate Commitment represent investments of a historic scale and will advance precisely the type of all-of-government approaches necessary to create the whole-of-society changes described in this Scoping Plan that will enable us to avert the worst impacts of climate change.

Figure 1-3: Comprehensive California climate change investments



The [California Climate Commitment](#) includes the following game-changing elements:

- \$10 billion for zero-emission vehicles (ZEVs), including \$1.5 billion for electric school buses to protect students' health and \$3 billion to build an accessible charging network. ZEV investments will particularly focus on programs such as heavy-duty vehicle and port electrification that will reduce emissions and protect public health in low-income communities.
- \$2.1 billion for clean energy investments, such as long duration storage, offshore wind, green hydrogen,⁶⁶ and industrial decarbonization.
- \$13.8 billion for programs that reduce emissions from the transportation sector, such as improving public transportation while also funding walking, biking, and adaptation projects.
- Over \$720 million for California's higher education institutions and research that will support the next generation of climate innovations.

⁶⁶ For the purposes of this Scoping Plan, "renewable hydrogen" and "green hydrogen" are interchangeable and are not limited to only electrolytic hydrogen produced from renewables.

- Nearly \$1 billion to build sustainable, affordable housing and over \$1 billion to help low-income Californians realize energy cost savings through building decarbonization.
- Nearly \$9 billion for wildfire risk reduction, drought mitigation, extreme heat resilience, and nature-based solutions.

These investments are incredibly important in the context of this Scoping Plan in that they accompany and help support implementation of the many policies and regulations that will continue to be necessary to achieve our 2030 and carbon neutrality targets. In addition, these incentive programs jump-start emission reduction strategies for priority sectors, sources, and technologies, leveraging private-sector investment and building sustainable, growing markets for clean and efficient technologies. Many of California's incentive programs work in concert with federal and other state programs to drive emission reductions. As an example, as California pushes to move to 100% sales of new zero emission-vehicles, including plug-in hybrid vehicles, the Newsom Administration continues to invest heavily in incentive programs that allow families, communities, and businesses to choose zero-emission vehicles. This is done while simultaneously working with the federal government, other states, and jurisdictions around the world to align policies, regulations, and incentives, creating market certainty for the automakers that serve our markets.

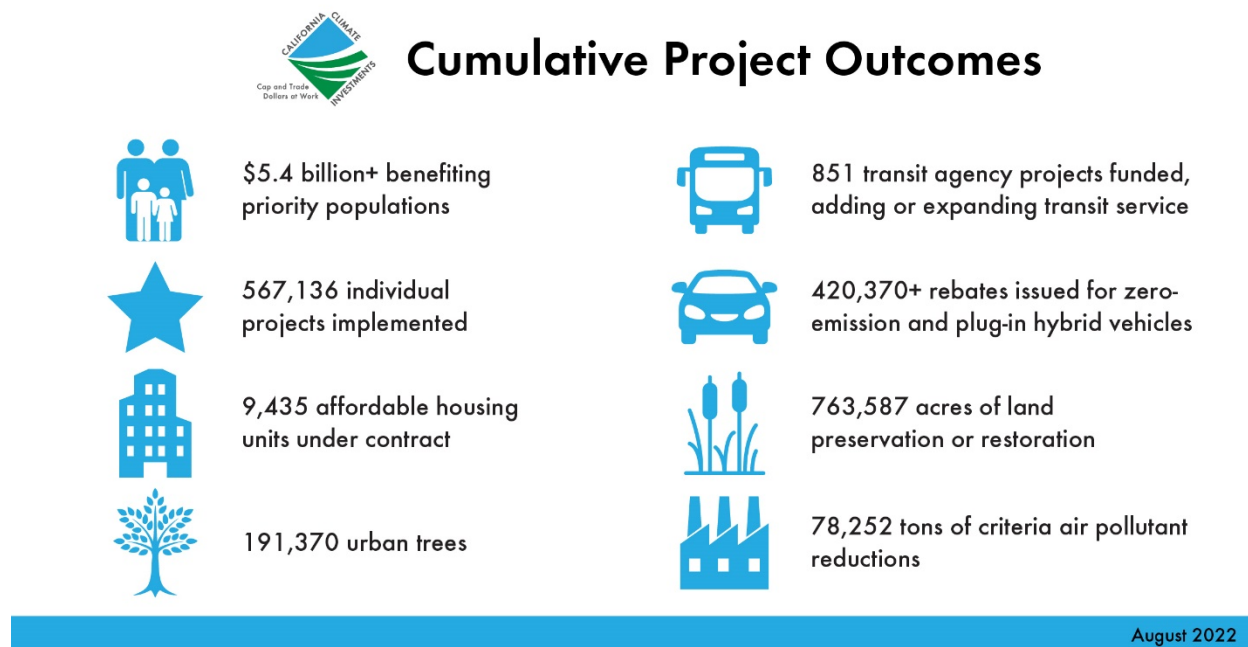
Centering Equity

Prioritizing equity is just as important as the magnitude of the climate investments California is making. Addressing climate change and advancing our equity and economic opportunity goals cannot be decoupled. In line with the governor's Executive Order⁶⁷ to take additional actions to embed equity analysis and considerations, this plan works to center equity by addressing disparities for historically underserved and marginalized communities. California strives to ensure that our climate and air research, regulations, investments, and plans include provisions that specifically address and advance equity. This includes reducing and eliminating air pollution disparities, removing barriers that can prevent frontline communities from accessing benefits, lowering costs for low-income Californians, and promoting high-quality jobs. CARB's incentive programs regularly surpass their mandated equity targets, and CARB has incorporated equity-focused provisions in our research, planning, and regulatory efforts. For instance, statute requires that a minimum of 35 percent of California Climate Investments benefit low-income households along with disadvantaged and low-income communities (referred to as *priority*

⁶⁷ Executive Department. State of California. 2022. Executive Order N-16-22. [GSS 9320 2-20220912152941 \(ca.gov\)](https://www.gss.ca.gov/gss-9320-2-20220912152941).

populations). However, 48 percent—over \$5.4 billion—of implemented California Climate Investments project funding is benefiting priority populations, greatly exceeding the statutory minimums (see Figure 1-4). Senate Bill 535 (De León, Chapter 830, Statutes of 2012) and AB 1550 (Gomez, Chapter 369, Statutes of 2016) direct state and local agencies to make significant investments using auction proceeds to assist California's most vulnerable communities. Under these laws, a minimum of 25 percent of the total investments are required to be located within and provide benefits to disadvantaged communities, and at least 10 percent of the total investments must benefit low-income communities and households. Moving forward, the state will continue to devote a greater share of incentive funding to priority populations, with the light-duty vehicle incentive program as just one example. We can simultaneously confront the climate crisis and build a more resilient, just, and equitable future for all communities.

Figure 1-4: California climate investments cumulative outcomes^{68,69}



Role of the Environmental Justice Advisory Committee

To inform the development of the Scoping Plan, AB 32 calls for the convening of an Environmental Justice Advisory Committee (EJ Advisory Committee) to advise CARB in developing the Scoping Plan, and any other pertinent matter in implementing AB 32. It requires that the Committee be comprised of representatives from communities with the most significant exposure to air pollution, including communities with minority populations and/or low-income populations. On January 25, 2007, CARB appointed the first

⁶⁸ CARB. 2022. California Climate Investments program implements \$10.5 billion in greenhouse gas-reducing programs, expected to reduce 76 million metric tons of emissions. April 11. <https://ww2.arb.ca.gov/news/california-climate-investments-program-implements-105-billion-greenhouse-gas-reducing-projects>.

⁶⁹ SB 535 and AB 1550 require investments located in and benefiting low-income communities and households, which are termed *priority populations*. *Disadvantaged communities* are currently defined by CalEPA as the top 25 percent of communities experiencing disproportionate amounts of pollution, environmental degradation, and socioeconomic and public health conditions according to the Office of Environmental Health Hazard Assessment's [CalEnviroScreen tool](#), plus certain additional communities including federally recognized Tribal Lands. Low-income communities and households are defined by statute as those with incomes either at or below 80 percent of the statewide median or below a threshold designated as low-income by the Department of Housing and Community Development.

Environmental Justice Advisory Committee to advise it on the Initial Scoping Plan and other climate change programs.

For this Scoping Plan, CARB reconvened the EJ Advisory Committee in May 2021. The committee is currently comprised of 14 environmental justice and disadvantaged community representatives, including the EJ Advisory Committee's first tribal representative, who was appointed in February 2022. In October 2021, the EJ Advisory Committee formally created eight workgroups. These workgroups are a space for EJ Advisory Committee members to better understand specific sectors of the Scoping Plan and to assist the EJ Advisory Committee in the development of recommendations on this Scoping Plan. In December 2021, the EJ Advisory Committee provided scenario input responses to help shape the modeling for this Scoping Plan. In February 2022, San Joaquin Valley EJ Advisory Committee members hosted their first community workshop, with over 100 attendees. In March 2022, the CARB Board held a joint public meeting with the EJ Advisory Committee to discuss their draft preliminary recommendations for this Scoping Plan. In June 2022, over 165 attendees participated in a statewide community workshop held by EJ Advisory Committee members. The full schedule of EJ Advisory Committee Meetings and meeting materials are available on CARB's website.⁷⁰ This Scoping Plan includes references where EJ Advisory Committee Final Recommendations⁷¹ are included in the document. The final recommendations were discussed at a joint CARB and EJ Advisory Committee Hearing on September 1, 2022.

The integration of environmental justice is critical to ensure that certain communities are not left behind. The AB 32 EJ Advisory Committee provided recommendations on September 30 in advance of the final Scoping Plan. There are footnotes to indicate where there is alignment between the AB 32 EJ Advisory Committee's recommendations and this Scoping Plan. While the language in the text may not fully incorporate the specific EJ Advisory Committee's recommendation, the footnotes do acknowledge the places in the text where there is general alignment with the spirit of the EJ Advisory Committee's recommendation.

Partnering with Tribes

⁷⁰ CARB. Environmental Justice Advisory Committee Meetings and Events.

<https://ww2.arb.ca.gov/environmental-justice-advisory-committee-meetings-and-events>.

⁷¹ Environmental Justice Advisory Committee. September 30, 2022. 2022 Scoping Plan Recommendations.

<https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/finalejacrecs.pdf>.

There are 109 federally recognized tribes and over 60 non-federally recognized tribes in California.⁷² In 2011, Governor Brown issued Executive Order B-10-11, recognizing and reaffirming the inherent right of tribes to exercise sovereign authority over their members and territory and directing state agencies to engage in government-to-government consultation with tribe and to work to develop partnerships and consensus.⁷³ In 2019, Governor Newsom issued Executive Order N-15-19, which acknowledges and apologizes on behalf of the state for the historical “violence, exploitation, dispossession and the attempted destruction of tribal communities.”⁷⁴ Establishing partnerships with tribal leaders to incorporate their priorities, traditional expertise, and knowledge will be important to achieving California’s climate goals. The Scoping Plan includes actions that tribal partners can voluntarily implement for sources under their jurisdiction (e.g., transitioning to zero emission fleets, installing infrastructure and control technologies, conducting climate smart land management). The Scoping Plan also uplifts the importance of having our tribal partners help guide actions that may impact tribal cultural resources and of benefitting from tribal input.

We also need alignment between state and local partners and tribes on actions related to land-use decisions. This means respecting and reinforcing tribal sovereignty and self-determination. As tribes do not always draw clear lines between the “natural” and “cultural” resources of a place, taking a holistic perspective will result in positive impacts in ability to address the complex issues of land management and regulatory undertakings.

Tribes have an intimate and historical knowledge of places and should be engaged early on to inform planning and future management related to activities that may impact tribal resources and areas including potential funding opportunities, technical assistance, and capacity building, where appropriate. Additionally, tribes should be involved in the identification of their own significant resources and areas of use. As decisions are made related to Scoping Plan undertakings, agencies should recognize and appropriately consider cultural resources and management from the beginning, not as an afterthought; and consider how the project could impact tribes.

⁷² These numbers are subject to change depending on determinations made by the Bureau of Indian Affairs (BIA) and the Native American Heritage Commission (NAHC). Please consult the most current Federal Register for a list of federally recognized tribes and the NAHC for a list of non-federally recognized tribes in California. As of the date of the Scoping Plan, the current list for federally recognized tribes is located at 87 Fed. Reg. 4636 (Jan. 28, 2022).

⁷³ Executive Order B-10-11.

<https://www.ca.gov/archive/gov39/2011/09/19/news17223/index.html#:~:text=EXECUTIVE%20ORDER%20B-10-11%20Published%3A%20Sep%2019%2C%202011%20WHEREAS,and%20affirmed%20in%20state%20and%20federal%20law%3B%20and.>

⁷⁴ Executive Order N-15-19. <https://tribalaffairs.ca.gov/wp-content/uploads/sites/10/2020/02/Executive-Order-N-15-19.pdf>.

Finally, to the extent allowed by law, traditional ecological knowledge and culturally sensitive information should be protected, as this is information that may not be common knowledge and may not be known outside the tribe, as each tribe is unique and influenced by its local environment and cultural practices. Protection of this information will help foster productive relationships with tribes and should be included as part of the process. CARB and other agencies should continue to foster relationships with tribal partners.

Maximizing Air Quality and Health Benefits

The state has over 50 years of experience successfully cleaning the air in California by addressing criteria pollutants and toxic air contaminants from mobile and stationary sources. CARB has been a leader in measuring, evaluating, and reducing sources of air pollution that impact public health. Its air pollution programs have been adapted for national programs and emulated in other countries. Significant progress has been made in reducing diesel particulate matter (PM), which is a designated toxic air contaminant, and many other hazardous air pollutants. CARB partners with local air districts to address stationary source emissions and adopts and implements state-level regulations to address sources of criteria and toxic air pollution, including mobile sources. CARB also collaborates with federal agencies to address air pollution from sources primarily under federal jurisdiction. In many instances, actions to reduce fossil fuel combustion and achieve federal air quality standards also help to reduce GHG emissions.

However, air pollution disparities still exist, and more must be done to ensure the most vulnerable populations have safe air to breathe. California must continue to evaluate opportunities to harmonize our climate and air quality programs through innovative policymaking and by building on existing programs like the Low Carbon Fuel Standard (LCFS) and Community Air Protection Program. The LCFS includes a provision that allows electric utilities to opt-in and generate residential electric vehicle (EV) charging credits, where some of the revenues are invested back into rebate programs that address air quality and climate pollution.⁷⁵ The Community Air Protection Program⁷⁶ is the first of its kind in the country and brings together diverse stakeholders, including CARB, local air districts, and residents of environmental justice communities to increase local air monitoring and develop community-led plans to improve air quality in the communities most impacted by air pollution.

This Scoping Plan identifies actions that will deliver near-term air quality benefits to communities with the highest exposures and provide long-term GHG benefits. Many of the actions in this Scoping Plan are key elements of the 2022 State Strategy for the State

⁷⁵ CARB. LCFS Utility Rebate Programs. <https://ww2.arb.ca.gov/resources/documents/lcfs-utility-rebate-programs>.

⁷⁶ CARB. Community Air Protection Program. <https://ww2.arb.ca.gov/capp>.

Implementation Plan to meet federal air quality standards,⁷⁷ which has a primary focus of reducing harmful air pollution and achieving federal air quality targets. California's approach of leveraging air quality and GHG policies together has yielded results. A 2022 report by the Office of Environmental Health and Hazard Assessment (OEHHA)⁷⁸ that evaluated GHG and harmful air pollution emissions from the heavy-duty vehicle (HDV) and large stationary source sectors found declines in emissions in both sectors, with the greatest declines in disadvantaged communities. Both sectors are subject to state GHG and air quality policies, in addition to federal and local rules on harmful air pollution. Because of historically racist and discriminatory practices such as redlining, both types of sources are disproportionately located adjacent to vulnerable communities, which are predominantly communities of color.⁷⁹ The key findings from the OEHHA report are as follows:

- Both HDVs and facilities subject to the Cap-and-Trade Program have reduced emissions of co-pollutants, with HDVs showing a clearer downward trend when compared to stationary sources. These emission reductions have major health benefits, including a reduction in premature pollution-related deaths.
- The greatest beneficiaries of reduced emissions from both HDVs and facilities subject to the Cap-and-Trade Program have been in communities of color and in disadvantaged communities in California, as identified by CalEnviroScreen (CES). This has reduced the emission gap between disadvantaged and non-disadvantaged communities, but a wide gap still remains.
- The transition to zero-emission HDVs will expedite further emissions reductions.
- While the progress observed is encouraging, inequities persist, and federal, state, and local climate and air quality programs must do more to reduce emissions of GHGs and co-pollutants to reduce the burden of emissions on disadvantaged communities and communities of color.

It will take all tools at all levels of government, with robust enforcement, to ensure that vulnerable communities continue to see improvements in air quality until no disparities exist in air pollution across the state.

⁷⁷ CARB. 2022 State Strategy for the State Implementation Plan.

<https://ww2.arb.ca.gov/resources/documents/2022-state-strategy-state-implementation-plan-2022-state-sip-strategy>.

⁷⁸ OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits within Disadvantaged Communities: Progress Toward Reducing Inequities*. <https://oehha.ca.gov/environmental-justice/report/ab32-benefits>.

⁷⁹ CalEPA. 2021. Pollution and Prejudice.

<https://storymaps.arcgis.com/stories/f167b251809c43778a2f9f040f43d2f5>.

Economic Resilience

The state's efforts to tackle the climate crisis will create economic and workforce development opportunities in the clean energy economy in communities across the state. Transitioning existing skills and expanding workforce training opportunities in climate-related fields are critical for reducing harmful emissions and supporting workers in transitioning to new, high-quality jobs. The Administration's recent budgets acknowledge the challenges facing workers in industries most affected by the state's response to climate change—especially those in the fossil fuel industry. It will invest \$1 billion in regional partnerships and economic diversification to create new jobs and support a local tax base and workforce transition and development once opportunities are identified. It also will invest in safety nets to protect, and support impacted communities as part of the transition to a carbon neutral economy. Specifically, the Community Economic Resilience Fund Program⁸⁰ (CERF) supports communities and regional groups in producing regional roadmaps for economic recovery and transition that prioritize the creation of accessible, high-quality jobs in sustainable industries. The budget investments create the opportunity to future-proof and increase economic resilience in the face of more frequent climate impacts and shifting economic conditions. For these investments and implementation of the Scoping Plan to be successful in supporting the transition to a carbon neutral economy, workers and affected communities must be included in ongoing dialogue to ensure a high-road transition for regional economies.

That state also recognizes it can play a more direct role in supporting a sustainable work force through its incentive programs. In 2021, Assembly Bill 680 (AB 680) (Burke, Chapter 746, Statutes of 2021) was signed into law, requiring CARB to work with the California Labor and Workforce Development Agency to update the Funding Guidelines to include new workforce standards. CARB's Funding Guidelines currently include requirements for administering agencies to, wherever possible, foster job creation within California, provide employment opportunities or job training tied to employment, and target these opportunities to priority populations. The Funding Guidelines also recommend administering agencies prioritize investments in projects that directly support jobs or a job training and placement program, and that they report the estimated employment benefits and employment outcomes for projects that meet specified criteria. These new requirements apply to agencies administering certain California Climate Investments

⁸⁰ Office of Planning and Research. Community Economic Resilience Fund. <https://opr.ca.gov/economic-development/cerf/>.

programs that receive continuous appropriations from the Greenhouse Gas Reduction Fund and fall into the following six categories of standards:

- fair and responsible employer standards,
- inclusive procurement policies,
- prevailing wage for construction work,
- community workforce agreements for construction projects over one million dollars,
- preference for projects with educational institutions or training programs, and
- creation of high-quality jobs. CARB will be updating the Funding Guidelines through a public process over the next year to operationalize these new requirements.

Partnering Across Government

The Scoping Plan is an actionable plan to identify and align programs and policies to achieve California's climate targets. To realize the outcomes and deliver results in any Scoping Plan, action is critical. For this Scoping Plan, there are also actions that rely on our federal partners to take on sources primarily under their jurisdiction (such as aviation, and federally owned/managed lands) while they also continue to develop national programs for GHG reductions. The federal government is already taking major steps to advance these types of programs. The Inflation Reduction Act of 2022⁸¹ includes \$369 billion for domestic energy production and manufacturing and is expected to lead to U.S. GHG emission reductions of roughly 40 percent by 2030. Direct incentives will include those for clean vehicles and ENERGY STAR appliances, as well as improving transportation and clean energy in underserved communities.

We also need our local partners to align on actions related to land-use decisions that support sustainable, resilient, low-carbon communities and permitting for clean energy production facilities and infrastructure; diversion of organics from landfills; and other climate-related projects. State agencies also should use the Scoping Plan to review and update their own programs and policies to support the actions identified in this Scoping Plan. Importantly, the Scoping Plan also can serve as a resource as the Legislature considers new legislative direction and funding to support the state's path to carbon neutrality and continue action to address near-term air pollution disparities.

Partnering with the Private Sector

Government cannot achieve our climate targets alone. The scale of investment needed requires both private-sector investment and partnerships with philanthropies. Public

⁸¹ Pub.L. No. 117-169 (August 16, 2022).

sector dollars, accompanied by strong and steady policy signals, must be a catalyst for deeper and broader investments by the private sector in both reducing emissions and building the resilience of our communities. Governor Newsom is committed to working collaboratively with businesses, including small businesses, to deploy the technologies, capital, and ingenuity that are hallmarks of the private sector.

California structures our climate policies and regulations to create market signals and certainty that spur private sector investment. For example, the Governor's Executive Order on Zero-Emission Vehicles⁸² set 2035 as the target year for 100 percent zero-emission vehicle sales, creating a time horizon that allows automakers to scale up zero-emission fleets and sending a clear signal to the companies and utilities that would deploy charging infrastructure. The Executive Order has been followed by development and adoption of the Advanced Clean Cars II regulation. CARB convened auto manufacturers, environmental justice groups, labor organizations, and many other stakeholders to provide input into development of the regulation in a robust and transparent manner; again, with the aim of providing certainty for producers and consumers.

California also pursues public-private partnerships (PPP) as a mechanism to advance our collective climate goals. We know these vehicles can be effective at increasing the impact of public sector dollars and helpful in moving markets in a direction aligned with state policy. A new PPP the Administration is advancing is the Climate Catalyst Revolving Loan Fund, housed at the state's Infrastructure and Economic Development Bank (IBank). The fund offers a range of financial instruments—including flexible credit and credit support—to help bridge financing gaps currently preventing advanced climate solutions from scaling in the marketplace. The Catalyst Fund's initial areas of investment include forest biomass management and utilization (unlocking innovation to reduce wildfire threats), climate-smart agriculture, and clean energy transmission. The fund leverages public sector investments by mobilizing private finance for shovel-ready projects that are stuck in the deployment phase. As such, IBank is ideally positioned as the state's all-purpose "Green Bank," with increasing connection to federal financing programs such as US DOE's Loan Programs Office and the United States Environmental Protection Agency's (U.S. EPA) Greenhouse Gas Reduction Fund.

The Catalyst Fund builds from existing IBank financing programs that are themselves increasingly focused on the climate imperative. The IBank's Infrastructure State Revolving Fund provides supportive capital to climate-aligned projects promoted by local governments and certain nonprofit entities, and will be refining its criteria and market outreach strategies to increase its level of service. IBank's bonds program has supported

⁸² Executive Department. State of California. Executive Order N-79-20. <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>.

multiple large environmental projects, including more than \$2 billion in “green bonds,” and is poised to help expand access to the state’s deep and liquid bond capital market. Within IBank’s Small Business Finance Center, the new Climate Tech Loan Guarantee program encourages commercial banks to back climate-focused small businesses, leveraging federal capital to insure a portion of the private bank’s loan. And through IBank’s Expanding Venture Capital Access Fund program, the state is promoting greater diversity in the venture capital community, including climate equity and climate justice.

All of these financing programs exist to leverage private capital in support of the state’s climate goals, and to partner with state policy agencies driving the transition. IBank will also continue to collaborate closely with the State Treasurer’s Office in its provision of capital support to climate solutions, ensuring that funding flows to programs best positioned to deliver success. This partnership of public and private capital, responsive to and in communication with the climate policy community, will ensure that California gets the maximum possible benefit from its allocation of scarce resources.

Supporting Innovation

Reaching our ambitious, deep decarbonization goals will require continued technological innovation. Investment in research, development, and deployment of clean technologies has never been more critical. Sending clear and sustained market and policy signals will encourage large and small companies alike to pursue innovation that can be scaled up and deployed here and beyond our borders. The full suite of AB 32 policies⁸³ has touched nearly every sector of California’s economy and spurred technology innovation in the state, including the growth of technology developers, manufacturers, processors, and assemblers in many areas. Specifically, AB 32 policies and programs support both the supply side and the demand side to build new markets in California. On the supply side, AB 32 policies support businesses to demonstrate and refine technologies, and to help establish critical supply chains. On the demand side, AB 32 policies and programs provide outreach, education, and incentives—as well as disincentives—to motivate everyone from consumers to institutional purchasers to utility planners to adopt new, climate smart technologies. Innovations resulting directly from the state’s climate policies include the following:

- In the past 10 years, a growing market for heavy-duty zero-emission vehicles (HD ZEVs) was established in California, and this market now represents the largest single share of North American supply and demand for HD ZEVs. Vehicle

⁸³ CARB. Climate Change Programs. <https://ww2.arb.ca.gov/our-work/topics/climate-change>.

and component manufacturers are making long-term investments to develop and produce HD ZEVs within California.

- Total consumption of renewable diesel in the California LCFS market has skyrocketed from approximately 1.8 million gallons in 2011 to nearly 589 million gallons in 2020. The LCFS is a key driver of market development for renewable diesel and its coproducts. While the federal renewable fuel standard (RFS) and blenders tax credit also benefit producers, an analysis of their respective contributions to market development, and interviews with industry representatives and independent experts, point to LCFS as a more important factor in market development, at least in recent years.
- In the past five years, a market for small-scale energy storage in California was created where none previously existed. As of 2020, 185 megawatts (MW) of small-scale energy storage projects have been interconnected to the grid. The significant increase in deployment in the last five years is a result of the Self-Generation Incentive Program (SGIP), which significantly reduces the upfront costs to purchase and install small-scale energy storage devices, and of growing customer interest in disaster resiliency in the face of increasing risk from wildfire and related utility outages. These systems have already provided disaster resiliency benefits for residential and non-residential customers.

We have seen how quickly market barriers can be overcome in response to strong policy signals, as occurred in the solar panel and electric vehicle battery space. Government-stated priorities have a significant role in guiding private and public research, development, and deployment. This Scoping Plan unequivocally puts the marker down on the need for innovation to continue in non-combustion technologies, clean energy, CO₂ removal options, and alternatives for SLCPs. The five-year update to the Scoping Plan allows for a periodic evaluation of new tools to add to the state's toolkit.

Engagement with Partners to Develop, Coordinate, and Export Policies

California works closely with other states, tribal governments, the federal government, and international jurisdictions to identify the most effective strategies and methods to reduce GHGs, manage GHG control programs, and facilitate the development of integrated and cost-effective regional, national, and international GHG reduction programs. For example, the state's Cap-and-Trade Program has been linked with Québec's since 2014, and CARB staff regularly engage with jurisdictions throughout the world on the design features of our Cap-and-Trade Program through memoranda of understanding (MOUs) and venues such as the International Climate Action

Partnership.⁸⁴ Low carbon fuel mandates similar to California's LCFS have been adopted by the U.S. EPA and by other jurisdictions, including Oregon, Washington, British Columbia, the European Union, and the United Kingdom. Many other jurisdictions from Japan to New Zealand, Australia, and the European Commission also continue to seek information and technical experience on our LCFS. California has and will continue to share information and encourage ambitious emissions reductions with interested jurisdictions, with a focus on China, India, Mexico, Canada, and the European Union. California's early action to reduce super-pollutants such as methane and other SLCPs was reaffirmed by the 2021 Global Methane Pledge signed by the U.S. and over 100 other countries at the 26th Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC).⁸⁵

In addition, under the Clean Air Act, the federal government is authorized to allow California to set more stringent vehicle emissions regulations than federal standards. California's goals and regulations to transition to 100 percent sales of new zero-emission passenger vehicles by 2035 (including plug-in hybrid vehicles), to drayage trucks by 2035, and other trucks and buses where feasible by 2045 are being emulated by partner states across the U.S. and in jurisdictions around the world. CARB's Advanced Clean Cars II regulation,⁸⁶ which codifies these targets, was approved in August 2022, and already at least four other states have announced their plans to adopt this regulation. Earlier in June 2020 CARB adopted the Advanced Clean Truck regulation, which requires truck manufacturers to meet increasing sale targets of zero-emission trucks in California through 2035. Since adoption, at least five other states—20 percent of the U.S. truck market—have adopted this regulation. These kinds of coordinated policies help signal to vehicle manufacturers a widespread and growing demand for zero-emissions technology, which in turn helps scale production and lower costs for consumers.

With the Mexican Secretariat for Environment and Natural Resources (SEMARNAT), California has engaged in a technical exchange on clean vehicle policies and helped to establish Mexico's Emissions Trading System (being piloted in 2022). A 2019 MOU signed between California and Environment and Climate Change Canada enables in-depth collaboration on policies and programs to decarbonize vehicles, engines, and fuels. This partnership has led to tangible emissions reductions, from aligning vehicle emissions targets and policies to collaborating on emissions testing and research critical to enforcing

⁸⁴ International Carbon Action Partnership (ICAP). Homepage.

<https://icapcarbonaction.com/en?msclkid=dac30cb7b4f511ec94ccd0f1ae323e98>.

⁸⁵ Global Methane Pledge. Homepage. <https://www.globalmethanepledge.org/>.

⁸⁶ Cal. Code Regs., tit. 13, §§ 1900, 1961.2, 1961.3, 1962.2, 1962.3, 1962.4, 1962.5, 1962.6, 1962.7, 1962.8, 1965, 1968.2, 1969, 1976, 1978, 2037, 2038, 2112, 2139, 2140, 2147, and 2903; and Test Procedures located here: <https://ww2.arb.ca.gov/rulemaking/2022/advanced-clean-cars-ii>.

emissions limits for vehicle manufactures. At the national level, China has looked to California for cutting-edge requirements for car diagnostics and policies that promote zero-emissions vehicles. At a local level, Beijing has adopted California's vehicle emissions standards and several other progressive environmental regulations. California will continue and renew such efforts across China, including through a 2022 MOU signed with China's Ministry of Ecology and Environment.

Between 2021 and 2023, California also will serve as president of the Transport Decarbonisation Alliance, a global network of countries, regions, cities, and companies that come together to share experiences and technical expertise, and to increase the ambition and accelerate the deployment of targeted transportation decarbonization policies across freight, electric vehicle infrastructure, and active mobility. Throughout its presidency, California will focus its leadership on decarbonizing the cross-jurisdiction network of medium- and heavy-duty vehicles, both to ensure cleaner air in freight-adjacent communities and to stem the effects of climate change.

Over the years, California has also asserted the importance of and supported the ongoing efforts of state and local clean air and climate leadership. Through our participation in the Pacific Coast Collaborative alongside British Columbia, Washington, and Oregon,⁸⁷ the Under2 Coalition,⁸⁸ the U.S. Climate Alliance,⁸⁹ the International ZEV Alliance,⁹⁰ the Transportation Decarbonisation Alliance, and many more organizations, California has and will continue to build climate partnerships with state and local governments.

California also recognized the need to address the substantial emissions caused by the deforestation and degradation of tropical and other forests, and continues its work alongside other subnational governments as part of the Governors' Climate and Forests Task Force (GCF).⁹¹ Founded in 2008, there are currently 39 GCF members, including states and provinces in Brazil, Colombia, Ecuador, Indonesia, Ivory Coast, Mexico, Nigeria, Peru, Spain, and the United States—all of whom are considering or operating programs to reduce emissions from deforestation, land-use, and rural development, and to benefit local and indigenous communities. CARB's California Tropical Forest Standard provides a rigorous methodology to assess jurisdiction-scale programs that reduce deforestation and to incentivize responsible action and investment.⁹² The standard

⁸⁷ Pacific Coast Collaborative. Homepage. <https://pacificcoastcollaborative.org/>.

⁸⁸ Under2 Coalition. Homepage. <https://www.theclimategroup.org/under2-coalition>.

⁸⁹ United States Climate Alliance (USCA). Homepage. <https://www.usclimatealliance.org/>.

⁹⁰ ZEV Alliance. Homepage. Accelerating the Adoption of Zero-Emission Vehicles. <https://zevalliance.org/>.

⁹¹ Governors' Climate and Forests Task Force. University of Colorado Boulder: Colorado Law. <https://www.gcftf.org/>.

⁹² CARB. California Tropical Forest Standard. <https://www2.arb.ca.gov/our-work/programs/california-tropical-forest-standard>.

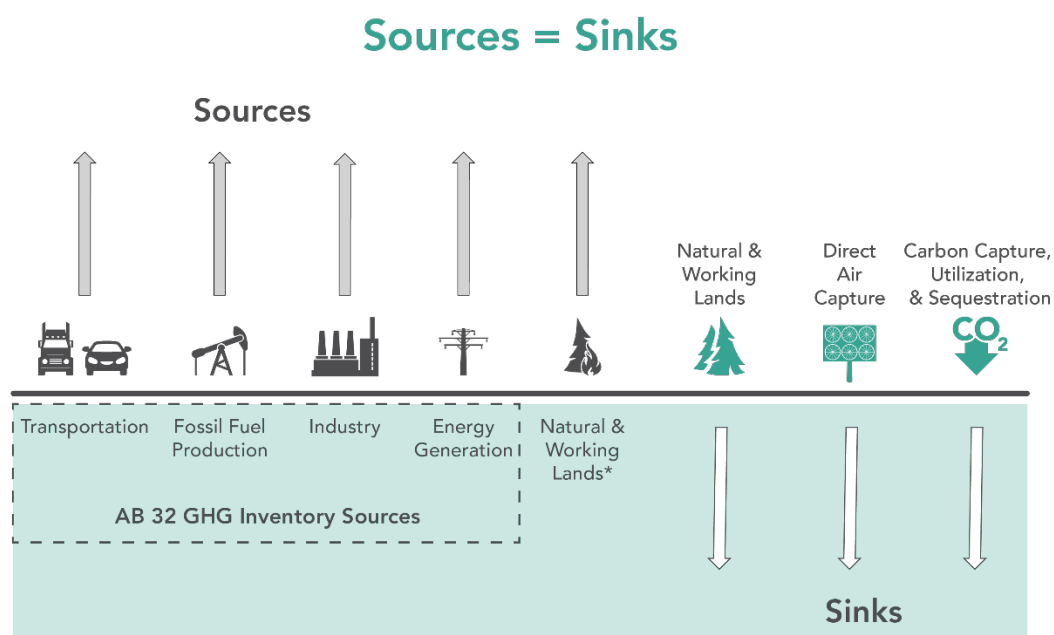
provides a strong signal to value the preservation of tropical forests over continued destructive activities such as oil exploration and extraction and ensures rigorous social and environmental safeguards for indigenous peoples and local communities.

Working Toward Carbon Neutrality

To date, California and many other regions have focused on reducing GHG emissions from the industrial, energy, and transportation sectors. As defined in statute, the state's 2020 and 2030 targets include all in-state sources of GHG emissions—and those emissions associated with imported power that is consumed in the state. By moving to a framework of carbon neutrality, the scope for accounting is expanded to include all sources and sinks. As such, carbon neutrality is achieved when the GHG fluxes are at equilibrium—when sources equal sinks. Figure 1-5 depicts the sources included in the AB 32 GHG Inventory and the new sources and sinks added in this Scoping Plan under the framework of carbon neutrality. Natural and working lands are able to sequester carbon and therefore play an increasingly important role in this framework. However, modeling for this plan shows that carbon sequestration in our natural and working lands alone will be insufficient to achieve carbon neutrality no later than 2045. Therefore, this plan also considers the role of carbon capture and sequestration, as well as biological and mechanical carbon sequestration processes that are included in the IPCC Sixth Assessment Report,⁹³ as necessary tools for climate change mitigation.

⁹³ IPCC. 2021. *Climate Change 2021: The Physical Science Basis*. <https://www.ipcc.ch/report/ar6/wg1/>.

Figure 1-5: Carbon neutrality: Balancing the net flux of GHG emissions from all sources and sinks



*Natural and working land emissions come from wildfires, disease, land and agricultural management practices, and others.

Supporting Healthy and Resilient Lands

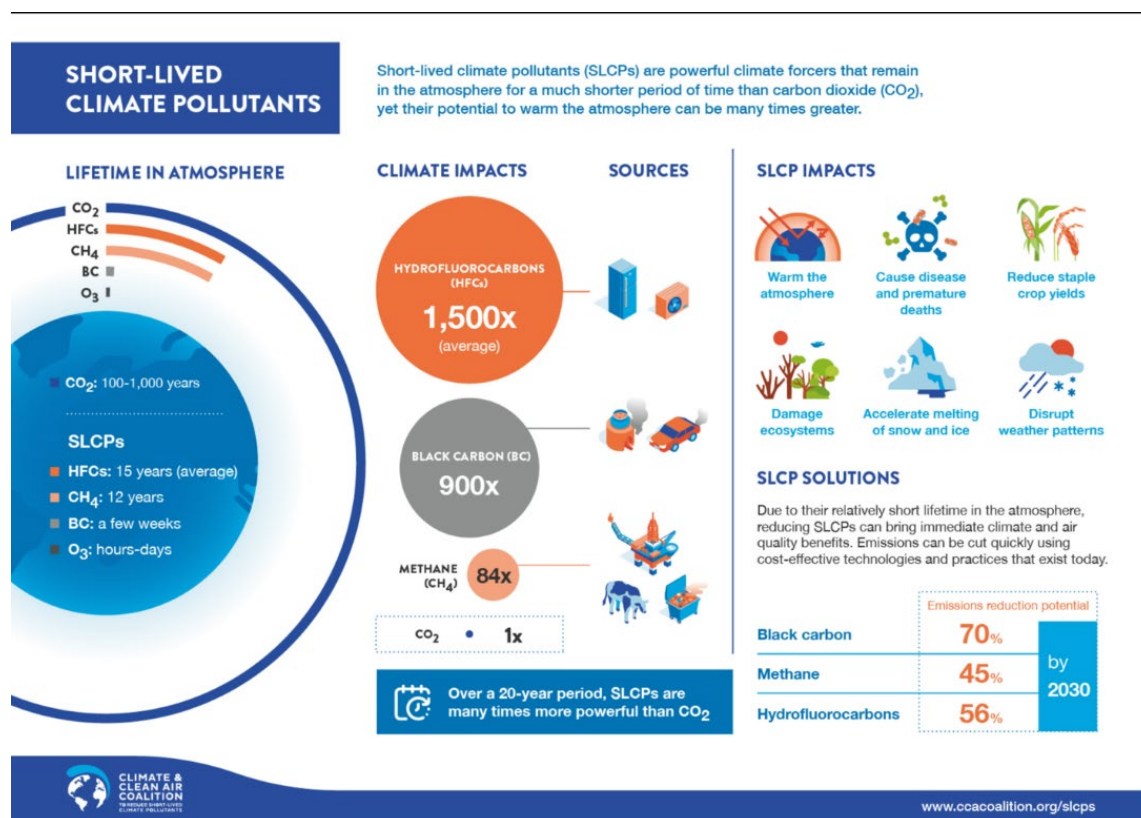
Our natural and working lands are an important piece in California’s fight to achieve carbon neutrality and build resilience to the impacts of climate change. Healthy land can sequester and store atmospheric carbon dioxide in forests, grasslands, soils, and wetlands. Healthy lands can also reduce emissions of powerful short-lived climate pollutants, limit the release of future GHG emissions, protect people and nature from the impacts of climate change, and build our resilience to future climate risks. Unhealthy lands have the opposite effect—they release more GHGs than they store and are more vulnerable to future climate change impacts. Through climate smart land management that focuses on supporting healthy living systems, we can support our carbon neutrality goals, reduce emissions, advance sequestration, and support healthy and more climate-resilient lands.

Maintaining the Focus on Methane and Short-Lived Climate Pollutants

Given the urgency of climate change, the often-disproportional impacts already being felt by underserved populations across California and the world, and the need to rapidly decarbonize and avoid climate tipping points as identified in the most recent IPCC assessment, efforts to reduce short-lived climate pollutants are especially important. SLCPs include methane (CH₄), black carbon (soot), and fluorinated gases (F-gases,

including hydrofluorocarbons, or HFCs), and they are among the most harmful pollutants to both human health and the global climate. SLCPs are more potent than CO₂ in terms of their impact on climate change (and subsequently, global warming) and have a much shorter lifetime in the atmosphere than CO₂ does. That means they have an outsized impact on climate change in the near term—they are responsible for up to 45 percent of current climate forcing. It also means that targeted efforts to reduce short-lived climate pollutant emissions can provide outsized climate and health benefits, within weeks to about a decade (see Figure 1-6).

Figure 1-6: Short-lived climate pollutant impacts⁹⁴



California has been a leader in addressing SLCP emissions. As part of the 2014 Scoping Plan,⁹⁵ CARB committed to developing a dedicated strategy to reduce SLCP emissions.

⁹⁴ Climate and Clean Air Coalition. Short-Lived Climate Pollutants (SLCPs).

<https://www.ccacoalition.org/en/content/short-lived-climate-pollutants-slcp>.

⁹⁵ CARB. 2014. *First Update*.

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

The resulting SLCP Reduction Strategy,⁹⁶ adopted by CARB in 2017, implements targets codified in SB 1383 (Lara, Chapter 395, Statutes of 2016) to reduce methane and HFC emissions by 40 percent by 2030 and anthropogenic black carbon emissions by 50 percent. California worked with several other states through the U.S. Climate Alliance to establish a similar goal to reduce SLCP emissions in line with the requirements of the Paris Agreement,⁹⁷ identifying the potential to reduce SCLPs by 40 to 50 percent by 2030 across the U.S. Climate Alliance.⁹⁸

Process for Developing the Scoping Plan

This Scoping Plan was developed in coordination with the Governor's Office and state agencies, in accordance with direction from the Chair and Members of CARB, through engagement with the Legislature, with advice from the EJ Advisory Committee, in consultation with tribes, and with open and transparent opportunities for stakeholders and the public to engage in workshops and other meetings. Appendix A (Public Process) includes details of the public workshops, and Chapter 5 includes details of the EJ Advisory Committee's role in the Scoping Plan update process.

Guidance from the Administration and Legislature

This Scoping Plan reflects existing and recent direction in the Governor's Executive Orders and Statutes. Table 1-1 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

⁹⁶ CARB. 2017. *Short-Lived Climate Pollutant Reduction Strategy*.

https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf.

⁹⁷ UNFCCC. 2015. Paris Agreement. https://unfccc.int/sites/default/files/english_paris_agreement.pdf.

⁹⁸ USCA. 2018. *From SLCP Challenge to Action: A Roadmap for Reducing Short-Lived Climate Pollutants to Meet the Goals of the Paris Agreement*. <http://www.usclimatealliance.org/slcp-challenge-to-action>.

Table 1-1: Major climate legislation and executive orders enacted since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) <i>The California Climate Crisis Act</i>	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in this Scoping Plan.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) <i>Carbon Capture, Removal, Utilization, and Storage Program</i>	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The Scoping Plan modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) <i>Diablo Canyon Powerplant: Extension of Operations</i>	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The Scoping Plan explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird,	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040.

Chapter 361, Statutes of 2022) <i>Clean Energy, Jobs, and Affordability Act of 2022</i>	It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The Scoping Plan describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) <i>Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors</i>	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) <i>Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases</i>	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes

	associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in this Scoping Plan.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) <i>California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands</i>	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO₂, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This Scoping Plan describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) <i>Hydrofluorocarbon gases: sale or distribution</i>	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021)	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO₂ removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state

<i>Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects</i>	that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in this Scoping Plan as CO₂ removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) <i>Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy</i>	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The Scoping Plan modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.

	Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs this Scoping Plan.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero-electric passenger vehicles, medium- and heavy-duty

	vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The Scoping Plan modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state’s pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees’ Retirement System, California State Teachers’ Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than \$5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state’s 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government’s carbon footprint. Finally, it tasks CARB with accelerating progress toward California’s goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector.

	The Scoping Plan modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) <i>Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program</i>	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) <i>Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans</i>	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals.

	This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. This Scoping Plan is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) <i>California Renewables Portfolio Standard Program: emissions of greenhouse gases</i>	SB 100 mandates that the CPUC, CEC, and CARB plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. This bill also updates the state’s Renewables Portfolio Standard (RPS) to include the following interim targets: • 44% of retail sales procured from eligible renewable sources by December 31, 2024. • 52% of retail sales procured from eligible renewable sources by December 31, 2027. • 60% of retail sales procured from eligible renewable sources by December 31, 2030. Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. This Scoping Plan reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) <i>Electric Vehicle Charging Infrastructure: Assessment</i>	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40% below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in this Scoping Plan.

Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) <i>Insurance: Climate Change</i>	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) <i>Near-zero-emission and Zero-emission Vehicles</i>	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this Scoping Plan.

Consideration of Relevant State Plans and Regulations

Development of this Scoping Plan also included careful consideration of, and coordination with, other state agency plans and regulations, including the SB 100 Joint Agency Report,⁹⁹ the 2022 State Strategy for the State Implementation Plan,¹⁰⁰ Climate Action Plan for Transportation Infrastructure,¹⁰¹ AB 74 Studies on Vehicle Emissions and Fuel Demand and Supply,^{102,103,104} Short-Lived Climate Pollutant Strategy (SLCP Strategy),¹⁰⁵

⁹⁹ CPUC, CEC, and CARB. 2021. *SB 100 Joint Agency Report*. <https://www.energy.ca.gov/sb100>.

¹⁰⁰ CARB. January 31, 2022. Draft 2022 State Strategy for the State Implementation Plan. https://ww2.arb.ca.gov/sites/default/files/2022-01/Draft_2022_State_SIP_Strategy.pdf.

¹⁰¹ CalSTA. 2021. *Climate Action Plan*. <https://calsta.ca.gov/subject-areas/climate-action-plan>.

¹⁰² CalEPA. 2021. Carbon Neutrality Studies. <https://calepa.ca.gov/climate/carbon-neutrality-studies/>.

¹⁰³ Brown, A. L., et. al. 2021. *Driving California's Transportation Emissions*. <https://escholarship.org/uc/item/3np3p2t0>.

¹⁰⁴ Deschenes, O. 2021. *Enhancing equity*. <https://zenodo.org/record/4707966#.YKPiaKhKi73>.

¹⁰⁵ CARB. Short-Lived Climate Pollutants. <https://ww2.arb.ca.gov/our-work/programs/slcp>.

CARB's Achieving Carbon Neutrality Report,¹⁰⁶ Climate Smart Strategy,¹⁰⁷ and draft Natural and Working Lands Implementation Plan,¹⁰⁸ among others.

Input from Partners and Stakeholders

CARB also collaborated with other state agencies, held consultations with tribes, and solicited comments and feedback from affected stakeholders, including labor organizations and the public. The process to update the Scoping Plan began with kickoff workshops in early June 2021,¹⁰⁹ followed by over a dozen public workshops, including engagement with tribes,¹¹⁰ and featured a series of EJ Advisory Committee and environmental justice community meetings.¹¹¹ The June 2021 workshop and several others were a joint agency effort, as there are many agencies with direct authority or jurisdiction over different sectors of the economy. Consultation with agencies also included bi-weekly, monthly, and weekly meetings.

During the summer of 2022 CARB held three community listening sessions, hosted by the CARB Chair and Board, in communities around the state, along with one virtual community listening session and one tribal listening session specifically for tribes. Many tribes provided written feedback, which was incorporated into this Scoping Plan. In addition, CARB respects tribal sovereignty and also engaged in a consultation campaign with tribes, which resulted in government-to-government consultations, and this Scoping Plan is reflective of this process.¹¹²

Emissions Data That Inform the Scoping Plan

Greenhouse Gas Emissions

AB 32 includes which GHGs are to be regulated, reduced, and included in the state's targets and goals. That list includes seven GHGs: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs),

¹⁰⁶ Energy and Environmental Economics, Inc. 2020. *Achieving Carbon Neutrality*. https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.

¹⁰⁷ CNRA. 2022. Natural and Working Lands Climate Smart Strategy. <https://resources.ca.gov/Initiatives/Expanding-Nature-Based-Solutions>.

¹⁰⁸ CARB. 2019. *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan*. <https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft>.

¹⁰⁹ Appendix A (Public Process).

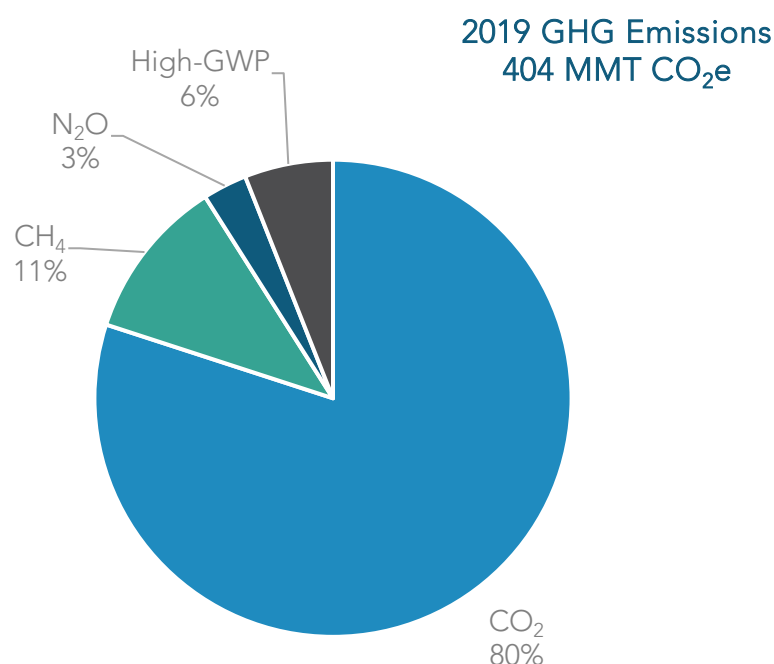
¹¹⁰ CARB. Scoping Plan Meetings & Workshops. <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops>.

¹¹¹ CARB. Environmental Justice Advisory Committee Meetings and Events. <https://ww2.arb.ca.gov/environmental-justice-advisory-committee-meetings-and-events>.

¹¹² CARB. 2018. Tribal Consultation Policy. October. https://www.arb.ca.gov/regact/nonreg/2018/california_air_resources_board_tribal_consultation_policy.pdf.

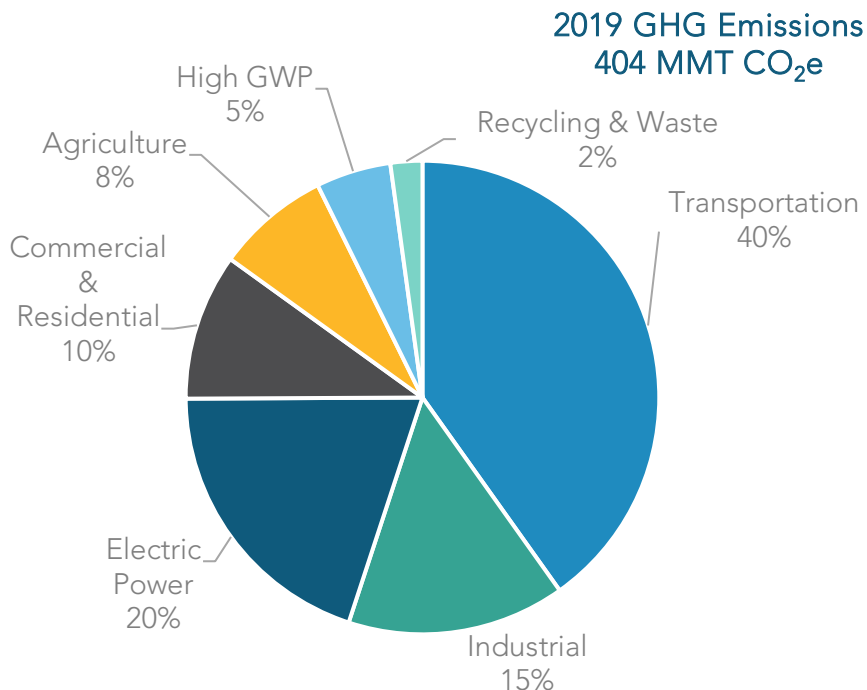
perfluorocarbons (PFCs), and nitrogen trifluoride (NF₃). Carbon dioxide is the primary GHG emitted in California, accounting for 83 percent of the total GHG emissions in 2019, as shown in Figure 1-7 below. Figure 1-8 illustrates that transportation (primarily on-road travel) is the single largest source of CO₂ emissions in the state. Upstream transportation emissions from the refinery and oil and gas sectors are categorized as CO₂ emissions from industrial sources and constitute about 50 percent of the industrial source emissions. When including these emissions, the transportation sector accounts for approximately half of statewide GHG emissions. Other significant sources of CO₂ include electricity production, industrial sources like refineries and cement plants, and residential sources like fossil gas. Figures 1-7 and 1-8 show state GHG emission contributions by GHG and sector based on the 2020 Greenhouse Gas Emission Inventory; GHG emissions for 2019 are shown because 2020 was an outlier due to the global pandemic. Emissions in Figure 1-8 are depicted by Scoping Plan sector, which includes separate categories for high-global warming potential (GWP) and recycling/waste emissions that are otherwise typically included within other economic sectors.

Figure 1-7: 2019 State GHG emission contributions by GHG¹¹³



¹¹³ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020: Trends of Emissions and Other Indicators*. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

Figure 1-8: 2019 State GHG emission contributions by Scoping Plan sector¹¹⁴



The scope of the AB 32 GHG Inventory encompasses emission sources within the state's borders, as well as imported electricity consumed in the state. This construct for the inventory is consistent with IPCC practices to allow for comparison of statewide GHG emissions with those at the national level and with other international GHG inventories. Statewide GHG emissions calculations use many data sources, including data from other state and federal agencies. However, a significant source of data comes from reports submitted to CARB through the Regulation for the Mandatory Reporting of GHG Emissions (MRR). The MRR requires facilities and entities with more than 10,000 metric tons of carbon dioxide equivalent (MTCO₂e) of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. Furthermore, this regulation requires that reports from entities that emit more than 25,000 MTCO₂e be verified by a CARB-

¹¹⁴ The High GWP sector includes high global warming potential gas emissions from releases of ozone depleting substance (ODS) substitutes, SF₆ emissions from the electricity transmission and distribution system, and gases that are emitted in the semiconductor manufacturing process. ODS substitutes, which are primarily HFCs, are used in refrigeration and air conditioning equipment, solvent cleaning, foam production, fire retardants, and aerosols.

accredited third-party verification body. More information on MRR emissions reports can be found at CARB's Mandatory Greenhouse Gas Emissions Reporting website.¹¹⁵

All data sources used to develop the GHG Emission Inventory are listed in CARB's inventory supporting documentation.¹¹⁶

Natural and Working Lands

For natural and working lands, the 2018 ecosystem carbon inventory (NWL Inventory)¹¹⁷ shows there are approximately 5,340 million metric tons (MMT) of carbon in the carbon pools¹¹⁸ (reservoirs of carbon that have the ability to both take in and release carbon) that CARB has quantified (see Figure 1-9). For purposes of comparison, 5,340 MMT of ecosystem carbon stock is equivalent to 19,600 MMT of atmospheric CO₂. Forests and shrublands contain the majority of California's carbon stock because they cover the majority of California's landscape and have the highest carbon density of any land cover type. All other land categories combined comprise over 35 percent of California's total acreage, but only 15 percent of carbon stocks. Roughly half of the 5,340 MMT of carbon resides in soils and half in plant biomass.

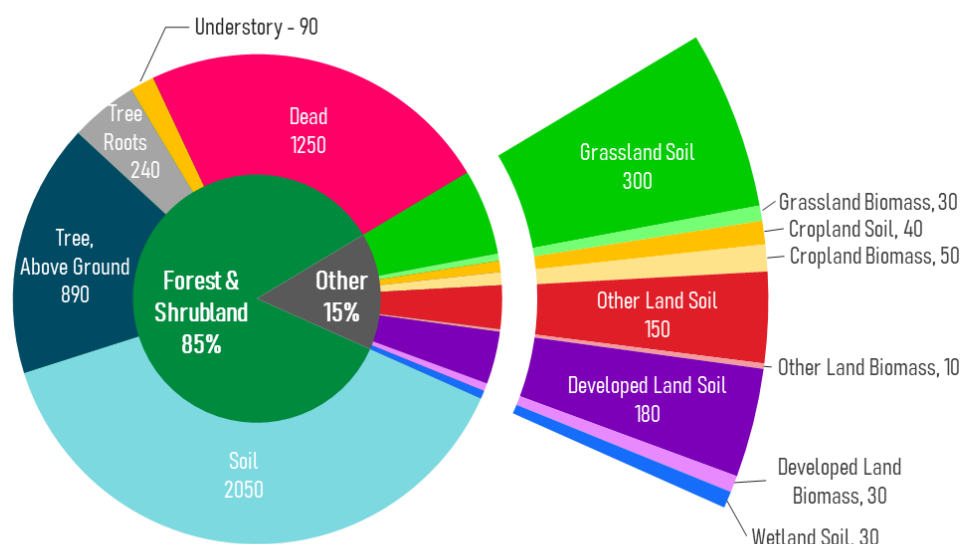
¹¹⁵ CARB. Mandatory Greenhouse Gas Emissions Reporting. <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting>.

¹¹⁶ CARB. Current California GHG Emission Inventory Data. www.arb.ca.gov/cc/inventory/data/data.htm.

¹¹⁷ CARB. 2018. *An Inventory of Ecosystem Carbon in California's Natural and Working Lands*. https://ww3.arb.ca.gov/cc/inventory/pubs/nwl_inventory.pdf.

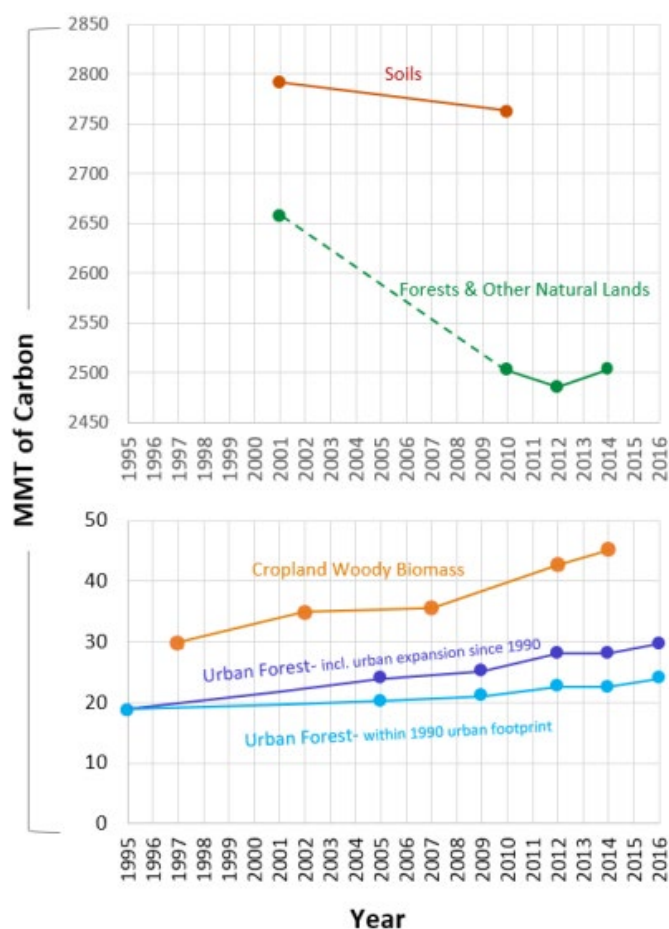
¹¹⁸ "Carbon pools" are Above-Ground Live Biomass (boles, stems, and foliage in shrubs, trees, grasses, and herbaceous vegetation), Below-Ground Live Biomass (roots in shrubs, trees, grasses, and herbaceous vegetation), Dead Organic Matter (standing or downed dead wood and litter), Harvested Wood Products (all wood and bark material that leaves harvest sites regardless of whether it is eventually incorporated into merchandisable products), and Soil Organic Matter (organic carbon in the top 30 centimeters of soil).

Figure 1-9: Carbon stocks in natural and working lands (MMT carbon)



In addition to providing an estimate of the ecosystem carbon that exists on California's landscape, the NWL Inventory also shows how those carbon stocks are changing (see Figure 1-10). The inventory attributes stock change to human activity, such as land use change, or to disturbances, such as wildfire. CARB's inventory shows these lands were a source of GHG emissions from 2001 to 2011, releasing more carbon than they stored, and then they returned to be a slight carbon sink from 2012 to 2014. These trends highlight the interannual and interdecadal variability of lands and their ability to be both a source and a sink of carbon.

Figure 1-10: Changes in carbon stock by landscape type



For natural and working lands, California’s inventory is also based on IPCC methods for tracking ecosystem carbon over time, providing for comparability with other national and subnational inventories and carbon accounting. As such, the NWL Inventory is an important tool for tracking both carbon stock changes in California over time and the impacts that interventions such as those identified in this Scoping Plan, actions identified in the Climate Smart Land Strategy, and others have on NWL carbon stocks.

All data sources used to develop the NWL Inventory are listed in the technical support documentation at CARB’s California Natural & Working Lands Inventory website.¹¹⁹

¹¹⁹ CARB. California Natural & Working Lands Inventory. <https://ww2.arb.ca.gov/nwl-inventory>.

Black Carbon

In addition, CARB has developed a statewide emission inventory for black carbon in support of the SLCP Strategy. The inventory is reported in two categories: non-forestry (anthropogenic) sources and forestry sources.¹²⁰ The black carbon inventory is calculated using existing PM_{2.5} emission inventories combined with speciation profiles that define the fraction of PM_{2.5} that is black carbon. The black carbon inventory helps support implementation of the SLCP Strategy, but it is not part of California's GHG Inventory that tracks progress toward the state's climate targets under AB 32 or SB 32. The state's major anthropogenic sources of black carbon include off-road transportation, on-road transportation, residential wood burning, fuel combustion, and industrial processes. CARB estimated 2017 black carbon emissions to be approximately 8 MTCO₂e.¹²¹ The majority of anthropogenic sources come from transportation—specifically, heavy-duty vehicles. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion. The forestry category includes non-agricultural prescribed burning and wildfire emissions.

Tracking Life-Cycle and Out-of-State Emissions

In recent years there has been increased interest in the embedded carbon in products, also known as *life-cycle emissions*. A life-cycle accounting framework refers to all of the GHG emissions generated from the sourcing, production, and transportation of products to an endpoint. In doing such assessments for a product, emissions may be associated with sourced materials and production activity outside a jurisdiction's borders. While life-cycle emissions can provide a more comprehensive picture of the emissions associated with the goods we consume and ongoing demand, life-cycle inventories are inconsistent with IPCC standards, as they would result in double counting of emissions across jurisdictions. Other countries and regions do produce their own inventory reports consistent with IPCC methods and are taking action to reduce emissions within their jurisdictions. In addition, jurisdictions often lack legal authority to regulate sources outside of their borders. Finally, it is difficult to obtain accurate data for sources and production activities outside of a region's border that would impact the accuracy of such an inventory. For these reasons, the inventory used in the Scoping Plan does not use a life-cycle

¹²⁰ SB 1383. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB1383.

¹²¹ This is a preliminary estimate developed for this Scoping Plan. Official Black Carbon emissions estimates are provided in the SLCP inventory here: <https://ww2.arb.ca.gov/ghg-slcpl-inventory>.

approach and remains consistent with international accounting standards and consistent with how other countries and regions track emissions within their jurisdictions.

However, GHG mitigation action may cross geographic borders as part of subnational and international collaboration, or as a natural result of implementation of regional policies. In addition to the state's existing GHG inventory, CARB will develop an accounting framework that reflects the benefits of our policies accruing outside of the state. This accounting framework will be important to better understand the true impact of the state's policies on what is emitted into the atmosphere. For example, the LCFS incentivizes GHG reductions along the entire supply chain for the production and delivery of transportation fuel imported for use in the state. However, our inventory only captures the change in emissions from the tailpipe of when that fuel is used in California and does not capture any GHG reductions that occur in the production process if the fuel is produced out of state.

Natural and working lands forestry actions are another example, where California's policies are inspiring forest management actions in other states that result in increased permanent carbon sequestration. California's NWL inventory does not capture the increased carbon stocks resulting from forestry projects happening outside of California, and the CO₂ removals resulting from these projects are not applied in either CARB's NWL inventory or CARB's AB 32 GHG Emissions Inventory. For GHG reductions outside of the state to be attributed to our programs, those reductions must be real, quantifiable, verifiable, and permanent.

It also will be important to avoid any double counting (including claims to those reductions by other jurisdictions) and to transparently indicate whether any extra-jurisdictional emissions reductions might be included in another region's inventory. CARB is collaborating with other jurisdictions to ensure GHG accounting rules are consistent with international best practices, as robust accounting rules instill confidence in the reductions claimed and maintain support for joint action across jurisdictions. The policy goals of consistency and transparency are critical as we work together with other jurisdictions on our parallel paths to achieve our GHG targets with real benefits to the atmosphere.

Tracking Progress

Historically, the AB 32 GHG Inventory has been the primary metric to track progress toward achieving climate targets.¹²² However, we must now deploy clean technology at unprecedented rates. The emissions modeling underpinning this Scoping Plan and

¹²² Starting with the 2022 Edition of the AB 32 GHG inventory, the inventory development now relies more directly on the annually reported and third-party verified emissions from the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

targets for clean technology in statute can serve as leading indicators across the economy on how our actions compare to the pace of action needed to be on track to achieve carbon neutrality. The California Climate Dashboard¹²³ was launched in 2022 and provides high-level metrics for clean energy production and technology deployment. Statistics such as the deployment of zero emission vehicles and clean electricity generation are just some of the examples of metrics across the economy that can be tracked, in addition to GHG emissions, to understand if the state is on track to meet its climate goals. A key indicator to track will be building of new energy infrastructure and deployment of clean technology as evaluated in the uncertainty analysis in Chapter 2. CARB will coordinate with state agencies to establish and make public similar metrics across all economic sectors to help provide transparency on the state's progress in deploying clean technology at the pace and scale needed to achieve carbon neutrality no later than 2045.

¹²³ CalEPA. California Climate Dashboard. <https://calepa.ca.gov/climate-dashboard/>.

Chapter 2: The Scoping Plan Scenario

This chapter describes the Scoping Plan Scenario, which for the first time includes sources in both the AB 32 GHG Inventory and Natural and Working Lands (NWL). It begins with a short description of the alternatives evaluated. Four scenarios for the AB 32 GHG Inventory and NWL were considered separately and helped to inform the Scoping Plan Scenario. Each of the alternatives were considered in terms of the important criteria and priorities that the state's comprehensive climate action must deliver, including the need for GHG reductions that are not only technologically feasible and cost-effective, but also can deliver health and economic benefits for the state. All the scenarios were set against what is called the *Reference Scenario*—that is, what the GHG emissions would look like if we did nothing at all beyond the existing policies that are required and already in place to achieve the 2030 target of at least 40 percent below 1990 levels, or those expected with no new actions in the NWL sector. For this Scoping Plan, two sets of modeling tools were used to evaluate the AB 32 GHG Inventory and NWL sectors because no single model can assess both AB 32 sectors and NWL together. As a result, two different sets of scenarios were developed for each sector type. While this chapter breaks out discussion separately for the two sector types, the Scoping Plan Scenario reflects the combined actions across both sectors by choosing an alternative from each sector type. The modeling provides point estimates; however, that does not imply precision. As discussed in the uncertainty section, several types of uncertainties are associated with any outcomes projected by the modeling results. There will be ranges of estimates associated with each point that are not shown in the graphs or results.

Scenarios for the AB 32 GHG Inventory Sectors

The Reference Scenario for the AB 32 GHG Inventory sectors shows continuing but modest GHG reductions beyond 2030 that level off toward mid-century. The comprehensive analysis of all four alternatives indicates that the Scoping Plan Scenario is the best choice to achieve California's climate and clean air goals while balancing the legislative direction on prioritizing direct emissions reductions, reducing anthropogenic emissions by at least 85 percent by 2045, being technologically feasible, and being cost-effective. It also protects public health, provides a solid foundation for continued economic growth, and drastically reduces the state's dependence on fossil fuel combustion and does not disproportionately impact disadvantaged communities. Each of the alternative scenarios was the product of a process of development informed by public input, the

governor,¹²⁴ CARB, legislative direction, and input by the EJ Advisory Committee.^{125, 126} Future updates to the Scoping Plan may consider new clean technologies and fuels beyond those included in this Scoping Plan.

The four scenarios evaluated shared many similarities. They each embodied the following characteristics:

- Drastic reduction in fossil fuel dependence, with some remaining in-state demand for fossil fuels for aviation, marine, and locomotion applications, and for fossil gas for buildings and industry
- Ambitious deployment of efficient non-combustion technologies such as zero emission vehicles and heat pumps
- Rapid growth in the production and distribution of clean energy such as zero carbon electricity and hydrogen
- Progressive phasedown of fossil fuel production and distribution activities as part of the transition to clean energy
- Remaining emissions of fugitive SLCPs such as refrigerants and fugitive methane
- Strong consumer adoption of clean technology and fuel options
- Removal of remaining CO₂ emissions to achieve carbon neutrality
- Some reliance on carbon capture and sequestration (CCS)

While the four scenarios had a lot in common, they also had some differences:

- Year in which carbon neutrality is achieved (2035 or 2045)
- Rate of deployment of clean technology and production and distribution of zero carbon energy
- Remaining amount of demand for fossil energy in the year carbon neutrality is achieved
- Constraints on technology and fuels deployed in certain sectors
- Consumer adoption rates of clean technologies and fuels
- Degree of reliance on CO₂ removal
- Degree of reliance on CCS

¹²⁴ Newsom, Gavin. July 22, 2022. Letter from Governor Newsom to CARB Chair Liane Randolph. Retrieved from <https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf>.

¹²⁵ EJ Advisory Committee. December 2, 2021. EJ Advisory Committee Responses for the CARB Scenario Inputs. https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Final%20Responses%20to%20CARB%20Scenario%20Inputs_12_2_21.pdf.

¹²⁶ CARB. January 25, 2022. Update on PATHWAYS Scenario Modeling Assumptions. https://ww2.arb.ca.gov/sites/default/files/2022-01/Scenario%20Slides%20for%20Jan25%20EJAC%20Mtg_01242022.pdf.

The summary below provides an overview of the alternatives designed and considered for the energy and industrial sectors in this update. Full details of each scenario considered can be found in the [Draft 2022 Scoping Plan Update](#)

Scoping Plan Scenario (modeling scenario Alternative 3 from the Draft): carbon neutrality by 2045, deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor

Alternative 1: carbon neutrality by 2035, nearly complete phaseout of all combustion, limited reliance on carbon capture and sequestration and engineered carbon removal, and restricted applications for biomass-derived fuels

Alternative 2: carbon neutrality by 2035 and aggressive deployment of a full suite of technology and energy options, including engineered carbon removal

Alternative 4: carbon neutrality by 2045, deployment of a broad portfolio of existing and emerging fossil fuel alternatives, slower deployment and adoption rates than the Scoping Plan Scenario, and a higher reliance on CO₂ removal

Other considerations for the AB 32 GHG Inventory sectors include the following:

- To what extent does an alternative meet the statewide targets and any sector targets, and also deliver clean air benefits (especially in the near term) to address ongoing healthy air disparities, prioritize reductions for mobile and large stationary sources, and emphasize continued investment in disadvantaged communities?
- Does an alternative support California in building on efforts to collaborate with other jurisdictions and include exportable policies based on robust science?
- Does an alternative provide for compliance options and a cost-effective approach to reduce GHG emissions?
- Does the alternative present a realistic and ambitious path forward consistent with statute and science, and support economic opportunities, particularly in anticipated growth sectors?

Scenarios for Natural and Working Lands

For the natural and working lands sector, the Reference Scenario shows that NWL will continue to emit GHGs and lose carbon stocks into the future as the combined effects of past unhealthy management practices and climate change impact our lands. Relative to the Reference Scenario, the four NWL scenarios represent different scales of land management on seven landscapes (forests, shrublands/chaparral, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands) to support carbon neutrality.

The analysis of the four NWL scenarios shows that the Scoping Plan Scenario is the preferred choice because it prioritizes sustainable land management to sequester carbon over the long term, GHG and air pollution reductions, ecosystem health and resilience, and implementation and technological feasibility and cost-effectiveness. The Scoping Plan Scenario reduces catastrophic wildfire risk to the state; increases the health and resilience of California's forests, shrublands, and grasslands; increases soil health; and protects, restores, and enhances California's natural and working lands for future generations. The Scoping Plan Scenario takes into consideration the priority landscapes and nature-based strategies identified in California's Climate Smart Strategy¹²⁷ and reflects the state's priorities to manage lands in ways that support the multiple benefits they provide. The Scoping Plan Scenario, as well as each of the alternative NWL scenarios, were informed by input from other agencies, the public, and the EJ Advisory Committee. Additional landscapes and land management activities will be added and evaluated in future Scoping Plan updates and in response to AB 1757.

Each of the NWL scenarios have several similarities, including the following:

- Prioritizing NWL management actions on forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands. These actions can reduce GHG emissions from these lands, protect ecosystems against future climate change, protect communities, and enhance the ecosystem benefits they provide to nature and society.
- Exploring the potential impacts of different levels of NWL management actions that are designed to achieve the objective associated with each scenario.
- Analyzing the carbon impacts of land management actions, climate change, wildfire, and water use on California's diverse natural and working lands through 2045.

There are also differences across the four NWL scenarios. These include:

- The level of NWL management actions taken on each landscape, such as varying the acres of healthy soils practices for croplands.
- The types of NWL management actions taken on each landscape, such as prescribed burning or thinning for forests, grasslands, and shrublands.

¹²⁷ CNRA. 2022. Natural and Working Lands Climate Smart Strategy. https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible_Compressed.pdf.

The summary below provides an overview of the alternatives designed and considered for the NWL sectors in this Scoping Plan. Full details of each scenario considered can be found in the *Draft 2022 Scoping Plan Update*.

Scoping Plan Scenario (NWL Alternative 3 from the Draft): land management activities that prioritize restoration and enhancement of ecosystem functions to improve resilience to climate change impacts, including more stable carbon stocks

NWL Alternative 1: land management activities that prioritize short term carbon stocks in our forests and through increased climate smart agricultural practices on croplands

NWL Alternative 2: land management activities representative of California's current commitments and plans

NWL Alternative 4: land management activities that prioritize reducing catastrophic wildfires in forests, shrublands, and grasslands

Evaluation of Scoping Plan Alternatives

CARB staff solicited feedback from topical experts, affected stakeholders, and the EJ Advisory Committee, including a tribal representative, at public meetings to assemble input assumptions for four carbon neutrality scenarios to model using PATHWAYS. Revisions to the Draft Scoping Plan were informed by direction in statute, the Governor's Executive Orders, public comments, and the recommendations of the EJ Advisory Committee. The three alternative scenarios were designed to explore the potential speed, magnitude, and impacts of transitioning California's energy demand away from fossil fuels. The modeling assumptions listed below identify the primary fossil fuel alternative that is commercially available and technically feasible for widespread use by 2045 for each sector. CARB assumes that any energy demand that remains after the alternative technology or fuel is applied—such as on-road internal combustion engines, industrial processes, and gas use in existing buildings that have not yet decarbonized—will continue to be met by fossil fuels, resulting in residual GHG emissions.

NWL Scoping Plan Alternatives

For the NWL sectors, staff significantly expanded the scale of the scientific analysis for NWL from previous Scoping Plan efforts. CARB staff utilized modeling tools for this expanded analysis to assess both the carbon and other ecological, public health, and economic outcomes of management actions on forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands. CARB staff aligned the scenarios with both the landscape types and actions identified in other efforts called for in Governor Newsom's Executive Order N-82-20 (e.g., California's Climate Smart Strategy and Pathways to 30x30). As part of this Scoping Plan, CARB staff modeled as many of the management actions identified in the Natural and Working Lands Climate

Smart Strategy as were feasible. The management actions that were included in the model were selected because of the State of California's previous work to quantify these actions' impacts. It was not feasible to model every land management strategy for NWL, and so it is possible that larger volumes of sequestration (e.g., in soils or in oceans) could result from additional non-modeled activities. California's Natural and Working Lands Climate Smart Strategy includes a more comprehensive listing of priority nature-based solutions and management actions. It is important to note that the absence of a particular management action or its climate benefit in the modeling is not an indication of its importance or potential contributions toward meeting the target or toward supporting the carbon neutrality target for California.

Forests: Management strategies were modeled for forests: biological/chemical/herbaceous treatments (e.g., herbicide application), clearcut, various timber harvests (e.g., variable retention, seed tree / shelterwood, selection harvesting), mastication, other mechanical treatments (e.g., piling of dead material, understory thinning), prescribed burning, and thinning. Avoided land conversion to another land use was also included in the modeling. Wildfire was modeled and is responsive to management strategies and climate conditions.

Shrublands and chaparral: Management strategies were modeled for shrublands and chaparral: biological/chemical/herbaceous treatments, prescribed burning, mechanical treatment (e.g., mastication, crushing, mowing, piling), and avoided conversion from shrubland to another land use. Wildfire was modeled and is responsive to management strategies and climate conditions.

Grasslands: Management strategies were modeled for grasslands: biological/chemical/herbaceous treatments, prescribed burning, and avoided land conversion from grasslands to another land use. Wildfire was modeled and is responsive to management strategies and climate conditions.

Croplands: Management strategies were modeled for row crops: cover cropping, no till, reduced till, compost amendment, transition to organic¹²⁸ farming, avoided conversion of annual crop agricultural land through easements, establishing riparian forest buffers, alley cropping, establishing windbreaks/shelterbelts, establishing tree and shrubs in croplands, and establishing hedgerows. For perennial crops, windbreaks/shelterbelts, hedgerows, conversion from annual crops to perennial crops, and avoided conversion to other land uses were modeled.

¹²⁸ Note: N₂O reductions from decreases in synthetic fertilizer application in organic farming were not modeled.

Developed lands: Management strategies were modeled for developed lands: Increasing tree canopy cover through planting trees and improved management of existing trees, and removing vegetation surrounding structures in accordance with the CAL FIRE Defensible Space PRC 4291.

Wetlands: Management strategies were modeled for wetlands: Restoring wetlands through submerging cultivated land in the Sacramento-San Joaquin Delta and avoided land conversion in the Sacramento-San Joaquin Delta.

Sparsely vegetated lands: Management strategies were modeled for sparsely vegetated lands: Avoided conversion of sparsely vegetated lands to another land use.

Scoping Plan Scenario

The Scoping Plan Scenario achieves GHG emission reductions that exceed the levels expected based on existing policies represented in the Reference Scenario, keeping California on track to achieve the SB 32 GHG reduction target for 2030 and become carbon neutral no later than 2045. Actions that reduce GHG emissions and transition AB 32 GHG Inventory sources away from fossil fuel combustion affect each economic sector. Actions that lead to improved carbon stocks affect each landscape.

AB 32 GHG Inventory Sectors

The AB 32 GHG Inventory Sector Reference scenario is the forecasted statewide GHG emissions through mid-century, with existing policies and programs but without any further action to reduce GHGs beyond those needed to achieve the 2030 limit. The Reference Scenario was developed based on other projections of business-as-usual conditions. Sources of data and policies included are:

- California Energy Demand Forecast¹²⁹
- The two transportation carbon neutrality studies required by AB 74¹³⁰
- The Mobile Source Strategy¹³¹
- SB 100 60 percent Renewables Portfolio Standard
- A Low Carbon Fuel Standard carbon intensity reduction target of 20 percent

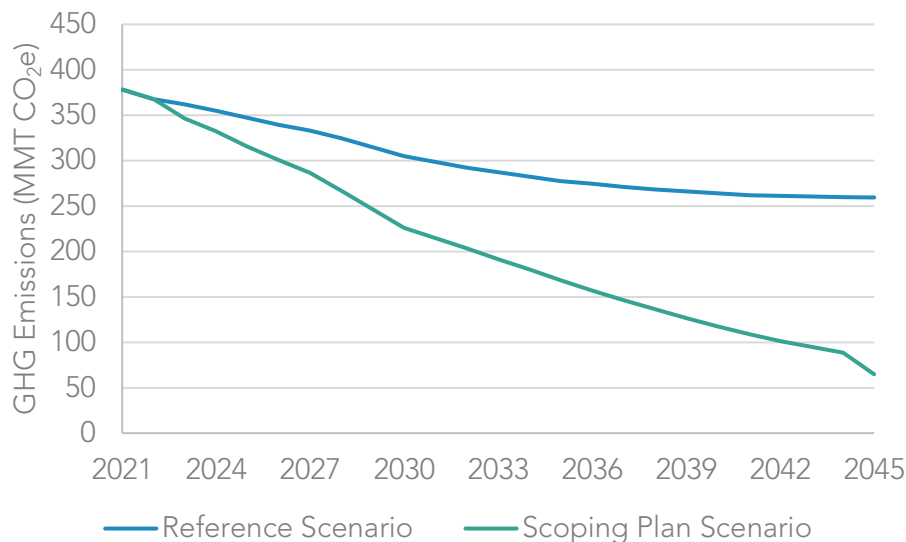
Policies that are under study or design, such the Advanced Clean Fleets regulation, are not included. The Reference Scenario reflects current trends and expected performance of policies identified in the 2017 Scoping Plan—some of which are performing better (such as the RPS and LCFS) and others that may not meet expectations (such as vehicle miles traveled [VMT] reductions and methane capture). Figure 2-1 provides the modeling results for a Reference Scenario for the AB 32 GHG Inventory sectors compared to the Scoping Plan Scenario.

¹²⁹ California Energy Commission (CEC). 2020. *2019 Integrated Energy Policy Report*. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>.

¹³⁰ Brown et al. 2021. *Driving California's Transportation Emissions*. <https://escholarship.org/uc/item/3np3p2t0> and Deschenes et al. 2021. *Enhancing equity*. <https://zenodo.org/record/4707966#.YI72RNrMKUn>.

¹³¹ CARB. 2021. *2020 Mobile Source Strategy*. https://ww2.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf.

Figure 2-1: Reference and Scoping Plan Scenario GHG emissions¹³²



The Scoping Plan Scenario is summarized in Table 2-1. The table shows the types of technologies and energy needed to drastically reduce GHG emissions from the AB 32 Inventory sectors. It also includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Each action is expected to both reduce GHGs and help improve air quality, primarily by transitioning away from combustion of fossil fuels. The Scoping Plan Scenario achieves the AB 1279 target of 85 percent below 1990 levels by 2045 and identifies a need to accelerate the 2030 target to 48 percent below 1990 levels.

¹³² The drop in emissions in 2045 reflects both the need to achieve an 85% reduction below 1990 levels in anthropogenic emissions per AB 1279 and Governor Newsom's request for a 100 MMT CO₂e carbon removal and capture target in 2045. This was modeled by extending CCS to electric sector emissions.

Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory sectors

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
GHG Emissions Reductions Relative to the SB 32 Target ¹³³	40% below 1990 levels by 2030	SB 32: Reduce statewide GHG emissions. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. In response to Board direction and EJ Advisory Committee recommendations
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory 2035 target aligns with the EJ Advisory Committee recommendation.

¹³³ While the SB 32 GHG emissions reduction target is not an Action that is analyzed independently, it is included in this table for reference.

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report)	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Reduce demand for petroleum aviation fuel and reduce GHGs. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter to CARB Chair Liane Randolph
Ocean-going Vessels (OGV)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Freight and Passenger Rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO₂e) in 2030 and 30 MMTCO₂e in 2035 Retail sales load coverage¹³⁴ 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources.	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter, Board direction, and EJ Advisory Committee recommendation
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter

¹³⁴ SB 100 speaks only to retail sales and state agency procurement of electricity. The *2021 SB 100 Joint Agency Report* reflects the agency authors' understanding that other loads—wholesale or non-retail sales and losses from storage and transmission and distribution lines—are not subject to the law.

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom’s July 2022 letter
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom’s July 2022 letter
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	Reduce demand for fossil gas and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Combined Heat and Power	Facilities retire by 2040.	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Reduce demand for petroleum fuel and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane ¹³⁵ blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

¹³⁵ *Biomethane* is also known as renewable natural gas (RNG).

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	SB 1383: Reduce short-lived climate pollutants.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 1383: Reduce short-lived climate pollutants.

Natural and Working Lands

The Reference Scenario for NWL represents the amount of land management that occurred between 2001 and 2014, and projects the outcomes from maintaining the 2001–2014 levels of land management until 2045. The management and land use practices that occur within the Reference Scenario were derived from empirical data used by staff. For forests, shrublands/chaparral, and grasslands, the Reference Scenario constitutes approximately 250,000 acres of annual statewide treatments. For croplands, the Reference Scenario represents no healthy soil practices because during this period the healthy soil program did not yet exist. For land use change within all land types that consider land use change, historical rates of land conversion from 2001–2014 also were taken from empirical data and modeled into the future for the Reference Scenario.

Table 2-2 summarizes the Scoping Plan Scenario. The table also includes references to relevant statutes and Executive Orders where available.

Table 2-2: Actions for the Scoping Plan Scenario: NWL sectors

Sector	Action	Statutes, Executive Orders, Outcome
Natural and Working Lands	Conserve 30% of the state’s NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions. SB 1386: NWL are an important strategy in meeting GHG reduction goals.

Sector	Action	Statutes, Executive Orders, Outcome
Forests and Shrublands	At least 2.3 million acres ¹³⁶ treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	Restore health and resilience to overstocked forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization. EO B-52-18: CARB to increase the opportunity for using prescribed fire. AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.

¹³⁶ The 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045.

Sector	Action	Statutes, Executive Orders, Outcome
Grasslands	At least 2.3 million acres ¹³⁷ treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.	Help to achieve climate targets, improve air quality, and reduce health costs.
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/ conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	Reduce short-lived climate pollutants. Increase soil water holding capacity. Increase organic farming and reduce pesticide use. SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands. Target increased in response to Governor Newsom's direction to prioritize sustainable land management.

¹³⁷ The 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045.

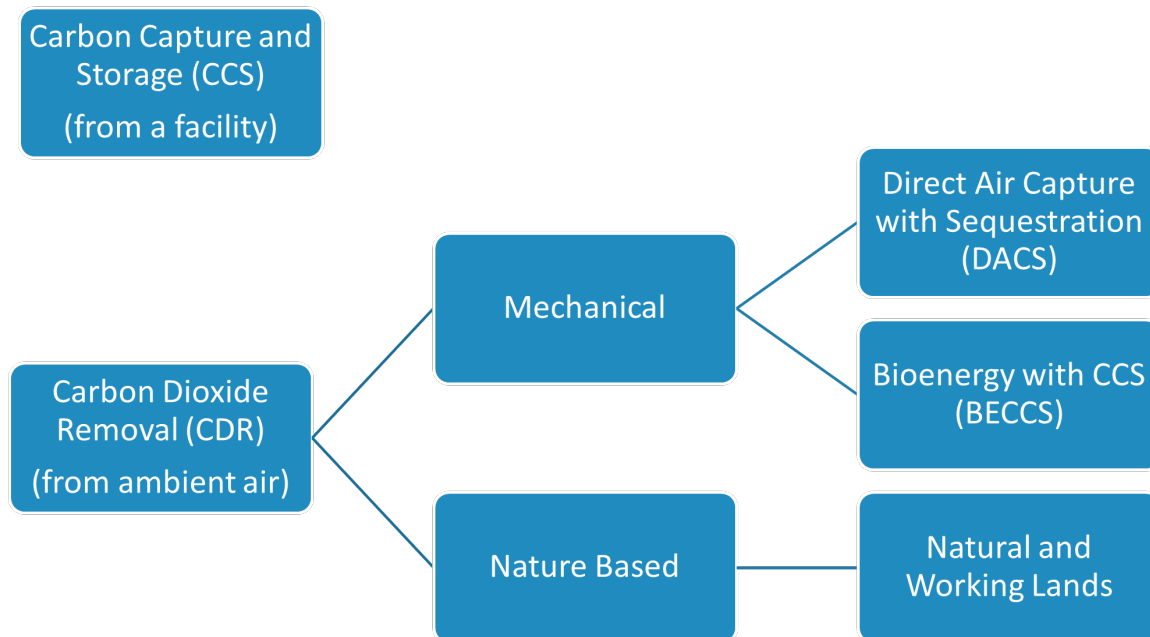
Sector	Action	Statutes, Executive Orders, Outcome
Developed Lands	Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	Increase urban tree canopy and shade cover. Reduce heat island effects and support water infrastructure. Reduce fire risk via defensible space. AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban tree canopy 10% by 2035. Target increased in response to AB 2251 and Governor Newsom's direction on CO ₂ removal targets in his July 2022 letter.
Wetlands	Restore 60,000 acres of Delta wetlands.	Increase carbon sequestration and reduce short-lived climate pollutants. Helps to reverse land subsidence while improving flood protection and providing critical habitat.
Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.	Reduce the rate of land conversion to more GHG-intensive land uses.

Strategies for Carbon Removal and Sequestration

To achieve carbon neutrality, any remaining emissions must be compensated for using carbon removal and sequestration tools. The following discussion presents more detail

on the options available to capture and sequester carbon. Carbon removal and sequestration will be an essential tool to achieve carbon neutrality, and the modeling clearly shows there is no path to carbon neutrality without carbon removal and sequestration. Governor Newsom also recognized the importance of CO₂ removal strategies and directed CARB to establish CO₂ removal and carbon capture targets of 20 MMTCO₂ and 100 MMTCO₂ by 2030 and 2045, respectively, as well as signing 2022 legislation on carbon removal and sequestration, including: AB 1279, SB 905, SB 1137, and AB 1757. Carbon removal and sequestration can take different forms. Figure 2-2 illustrates the types of carbon removal and sequestration included in this Scoping Plan. There are numerous other carbon removal options undergoing research, development, and pilot deployment. As these options mature and new approaches emerge, they can be considered in future Scoping Plan updates.

Figure 2-2: Forms of carbon removal and sequestration considered in this Scoping Plan



The Role of Carbon Capture and Sequestration

Carbon capture and sequestration (CCS) will be a necessary tool to reduce GHG emissions and mitigate climate change while minimizing leakage and minimizing emissions where no technological alternatives may exist. CCS is a process by which large amounts of CO₂ are captured, compressed, transported, and sequestered. CCS projects are paired with a source of emissions, as the CCS project captures CO₂ as it leaves a facility's smokestack. CCS projects are often paired with large GHG-emitting facilities such as energy, manufacturing, or fuel production facilities. The sequestration component

of CCS includes CO₂ injection into geologic formations (such as depleted oil and gas reservoirs and saline formations), as well as use in industrial materials (e.g., concrete). CCS is distinct from biological sequestration, which is typically accomplished through NWL management and conservation practices that enhance the storage of carbon or reduce CO₂ emissions with nature-based approaches. CCS is also distinct from mechanical CO₂ removal technologies, where CO₂ is removed directly from the atmosphere using mechanical and/or chemical processes.

CARB adopted a CCS Protocol in 2018 as part of amendments to the Low Carbon Fuel Standard.¹³⁸ At this time, no CCS projects have been implemented or have generated any credits under that protocol. However, CCS projects have been implemented elsewhere since the 1970s, largely on coal-fired power plants, with over two dozen projects operational around the world. Over 100 are at the stages of advanced or early development and are expanding beyond coal-fired plants to fossil gas, fuel production, and electricity generation facilities.¹³⁹ CCS projects are in development for addressing emissions from fuel, gas, energy production, and chemical production. As of November 2019, more than half of global large-scale CCS facilities (representing approximately 22 MMTCO₂/yr in capacity¹⁴⁰) were in the U.S., mostly as a result of sustained governmental support for these technologies.¹⁴¹ This support includes the federal 45Q tax credit for CCS^{142, 143} and research and deployment grants from federal agencies.^{144, 145} California's deep sedimentary rock formations in the Central Valley represent world-class

¹³⁸ CARB. 2022. Carbon Capture & Sequestration. <https://ww2.arb.ca.gov/our-work/programs/carbon-capture-sequestration>.

¹³⁹ Global CCS Institute. 2021. *Global Status of CCS 2021*. <https://www.globalccsinstitute.com/wp-content/uploads/2021/11/Global-Status-of-CCS-2021-Global-CCS-Institute-1121.pdf>.

¹⁴⁰ IHS Markit. August 2021. Carbon Removal Potential: An Overview.

https://ww2.arb.ca.gov/sites/default/files/2021-08/ihsmarkit_presentation_sp_engineeredcarbonremoval_august2021.pdf.

¹⁴¹ Beck, Lee. 2019. *Carbon capture and storage in the USA: The role of US innovation leadership in climate-technology commercialization*. <https://academic.oup.com/ce/article/4/1/2/5686277>.

¹⁴² Congressional Research Service. 2021. Carbon Storage Requirements in the 45Q Tax Credit. IF11639. <https://crsreports.congress.gov/product/pdf/IF/IF11639>.

¹⁴³ The Inflation Reduction Act of August 2022 expands and enhances the 45 Q tax credit for CCS. Pub.L. No. 117-169 (August 16, 2022).

¹⁴⁴ U.S. Department of Energy. 2020. U.S. Department of Energy Announces \$131 Million for CCUS Technologies. <https://www.energy.gov/articles/us-department-energy-announces-131-million-ccus-technologies>.

¹⁴⁵ U.S. Department of Energy. 2021. Funding Opportunity Announcement 2515, Carbon Capture R&D for Natural Gas and Industrial Point Sources, and Front-End Engineering Design Studies for Carbon Capture Systems at Industrial Facilities and Natural Gas Plants. <https://www.energy.gov/fecm/articles/funding-opportunity-announcement-2515-carbon-capture-rd-natural-gas-and-industrial>.

CO₂ storage sites that would meet the highest standards, with storage capacities of at least 17 billion tons of CO₂.^{146,147}

In this Scoping Plan, CCS is included to address emissions from limited sectors, including electricity generation, cement production facilities, and refineries, to ensure anthropogenic emissions are reduced by at least 85 percent below 1990 levels in 2045, as directed in AB 1279. While the modeling outputs show CCS not being applied to the electricity sector until 2045, CCS could be implemented earlier on the electricity sector with a similar ramp up over time as that for refineries and cement plants. An earlier application of CCS in the electricity sector would yield additional reductions in years prior to 2045. In addition, CCS can support hydrogen production until such time as there is sufficient renewable power for electrolysis and an abundant water source.

Cement plants have emissions associated with combustion and process-related activities. Combustion emissions account for approximately 40 percent of the total emissions at cement plants. The remaining emissions are related to process-related activities. Due to the high heat content needed to produce cement, there is currently no technically feasible alternative to combustion. SB 596 calls for a 40 percent reduction in GHG intensity in cement emissions from 2019 levels by 2035, and then net zero emissions by 2045. To meet in-state demand, the state relies on cement both produced in state and imported. There are seven cement plants operating in California.¹⁴⁸ To minimize emissions leakage and address emissions from cement plants, the Scoping Plan Scenario includes CCS for cement plants. Additional reductions will need to be pursued and considered as part of implementation of SB 596, which calls for CARB to develop a comprehensive strategy by July 1, 2023, for the state's cement sector to achieve net-zero emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. This effort began in the summer of 2022 and included sector specific workshops.

Even with implementation of EO N-79-20, and despite all of the ambitious efforts in the Scoping Plan Scenario, there will remain some demand for petroleum fuels for legacy vehicles on road applications, and in aviation, rail, and marine applications. Petroleum refineries will need to implement technology to decarbonize their operations and reduce their emissions. This Scoping Plan also assumes CCS at petroleum refineries as one of those potential strategies. Currently, there are seventeen petroleum refineries operating

¹⁴⁶ For comparison purposes, California's emitted 418.2 million metric tons of CO₂e in 2019.

¹⁴⁷ Lawrence Livermore National Laboratory. 2020. *Getting to Neutral: Options for Negative Carbon Emissions in California*. Revision 1. https://www-gs.llnl.gov/content/assets/docs/energy/Getting_to_Neutral.pdf.

¹⁴⁸ CARB. Mandatory GHG Reporting – Reported Emissions. <https://ww2.arb.ca.gov/mrr-data>

in the state.¹⁴⁹ On the supply side, the modeling assumes all in-state demand is met through some very limited refining activities in California. Figure 2-3 shows the emissions from the refining sector with and without CCS. If CCS is not deployed, the emissions would be directly emitted into the atmosphere, and CO₂ removal by NWL or direct air capture would need to increase to compensate for the sector's emissions.

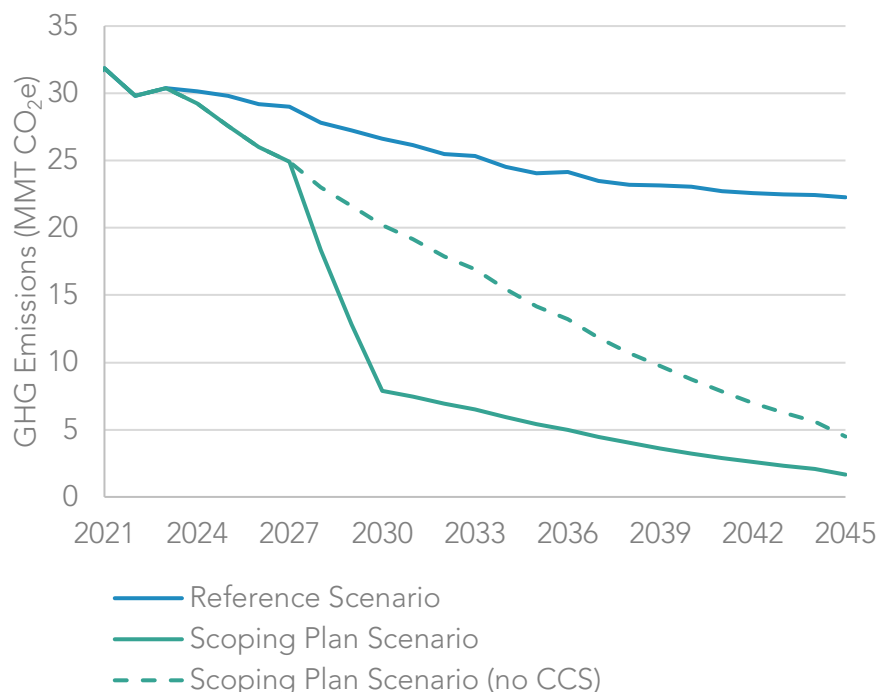
Refineries can have a variety of point sources that emit CO₂—such as steam methane reformers for producing hydrogen, combined heat and power units, and catalytic crackers—that are best suited for CCS. Each configuration of a refinery can be unique to its footprint, onsite operations, and the types of crude oils processed. There are newer technologies with smaller footprints¹⁵⁰ that can be deployed in modular configurations to capture CO₂ in space-constrained and multiple-point-source facilities such as refineries. CCS can provide a path to reducing GHG emissions from these facilities to meet petroleum demand while avoiding leakage and until such time as some refineries can be transitioned to produce clean energy to support the transition away from fossil fuels.

While the Scoping Plan modeled deployment of CCS on refineries and identifies significant emissions reductions that can be achieved, the refineries in California are large and complex. The actual deployment of CCS at these facilities as modeled in the Scoping Plan is uncertain. It will be important to closely monitor the evolution of CCS deployment in the refinery sector and, in the next Scoping Plan update, to evaluate the progress toward use in this sector to determine whether the projected reductions will be achieved.

¹⁴⁹ CARB. Mandatory GHG Reporting. <https://ww2.arb.ca.gov/mrr-data>.

¹⁵⁰ Carbon Clean. Modular Carbon Capture Systems for Industry. <https://www.carbonclean.com/modular-systems?hsLang=en>.

Figure 2-3: Petroleum refining emissions with and without carbon capture and sequestration



This Scoping Plan also calls for accelerating the transition from combustion of fossil fuels to hydrogen. Hydrogen can be produced through electrolysis with renewable electricity or through steam methane reformation of biomethane. There is a high degree of uncertainty around the availability of solar to support both electrification of existing sectors and the production of hydrogen through electrolysis. Producing hydrogen required under the Scoping Plan Scenario with electrolysis would require about 10 gigawatts (GW)¹⁵¹ of additional solar capacity. If steam methane reformation is paired with CCS, the hydrogen produced could potentially be low carbon. Additionally, the biomethane used to generate hydrogen could be sourced from gasification of forest or agricultural waste resulting from forest management and other NWL management practices, which could also lead to net negative carbon outcomes. Steam methane reformation paired with CCS can thus ensure a rapid transition to hydrogen and increase hydrogen availability until such time as

¹⁵¹ The Draft Scoping Plan included an estimate for solar capacity (40 GW) to support only electrolysis to produce all hydrogen in the Proposed Scenario. The Scoping Plan now includes steam methane reformation of biomethane and biomass gasification with CCS to produce hydrogen, along with electrolysis from off-grid solar. See Appendix H (AB 32 GHG Inventory Sector Modeling) for additional details.

electrolysis with renewables can meet the ongoing need, assuming there is also sufficient water supply. Additional background and next steps for CCS can be found in Chapter 4.

The EJ Advisory Committee has raised multiple concerns related to the inclusion of CCS and mechanical CDR in the Scoping Plan. Concerns range from potential negative health and air quality impacts in communities from operation of facilities utilizing CCS that continue to emit other emissions, to safety concerns related to potential leaks, to the viability of the current technology. Additionally, the EJ Advisory Committee has policy concerns about the strategy and wants to ensure that engineered carbon removal is not used as a substitute for strategies to achieve emissions reductions onsite and that it does not result in delays in phasing out fossil fuel use. Given these and other concerns and the importance of building public awareness, CARB recognizes the need for a multi-stakeholder process including other state, federal, and local agencies; tribes; independent experts; and community residents to further understand and address community concerns related to CCS. CARB hosted a CCS Symposium with U.S. EPA Region 9 and the Stanford Doerr School of Sustainability to discuss some of these critical issues with community members and other participants. As CARB begins the process of implementing SB 905 in 2023, that will provide an opportunity for further engagement.

In the context of CCS deployment, the Council of Environmental Quality (CEQ) also highlighted the need to further assess and quantify potential impacts on local criteria air pollutants and other emissions resulting from carbon capture retrofits at industrial facilities in response to concerns regarding potential cumulative emissions from single and/or multiple sources.¹⁵² An October 2020 Stanford report¹⁵³ discussed how the potential post-combustion capture for CO₂ could also reduce emissions of criteria air pollutant emissions from certain facilities. Exploring these potential outcomes will be important to ensure deployment of CCS does not exacerbate air pollution impacts in communities and maximizes any air pollution benefits. The need for these types of evaluations is also included in SB 905.

The Role of Natural and Working Lands Emissions and Sequestration

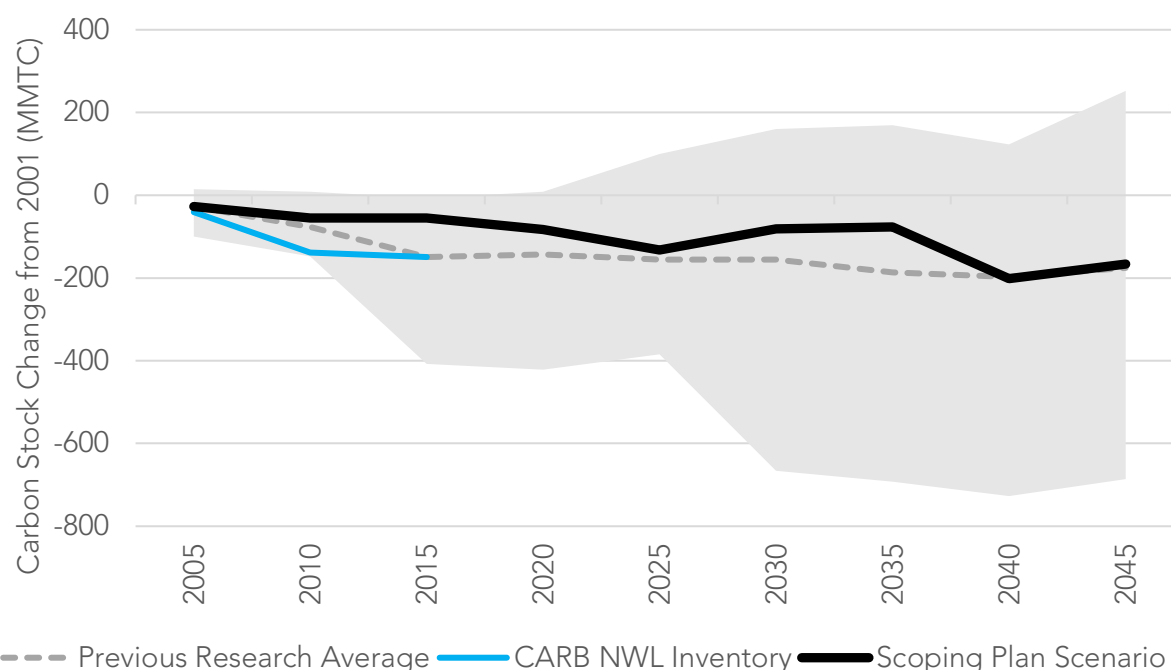
California's NWL assessments highlight the importance of increasing the pace and scale of NWL actions to ensure that our ecosystems are better equipped to withstand future climate change so they continue to provide the benefits that nature and society depend

¹⁵² Carbon Capture, Utilization, and Sequestration Guidance. 87 Fed. Reg. 8808 (Feb. 16, 2022), [2022-03205.pdf \(govinfo.gov\)](#).

¹⁵³ Stanford Center for Carbon Storage. 2020. *An Action Plan for Carbon Capture and Storage in California: Opportunities, Challenges, and Solutions*. October. <https://sccs.stanford.edu/ccs-in-ca/full-report-form?msclkid=6f9177f6c57811ecbebc473e75203b21>.

upon for survival. As climate change increases the likelihood of extreme wildfires, drought, heat, and other impacts, carbon stocks in California's NWL will face increased risks and impacts. We know from previous climate change and Scoping Plan work¹⁵⁴ that lands can be a net source of GHG emissions or a net sink, and that the magnitude of carbon stock changes and GHG emissions and sequestration from NWL are dependent on the effects of climate change and land management. The expanded modeling conducted for this Scoping Plan shows that NWL are projected to be a net source of emissions through 2045 and indicates a probable decrease of carbon stocks into the future. This projection is further corroborated by previous, independent research that has reached the same conclusion, showing a range of varying levels of carbon stock loss. Figure 2-4 shows the modeling results of the Scoping Plan Scenario overlaid with the NWL inventory and findings from independent research.

Figure 2-4: Comparison of the Scoping Plan Scenario (NWL) with existing research



The modeling indicates that immediate and aggressive climate action can reduce the environmental impacts that would occur in the absence of this action. The results of the modeling demonstrate that regular NWL management over the next two decades can

¹⁵⁴ CARB. 2019. January 2019. *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan*. <https://ww2.arb.ca.gov/sites/default/files/2020-10/draft-nwl-ip-040419.pdf>.

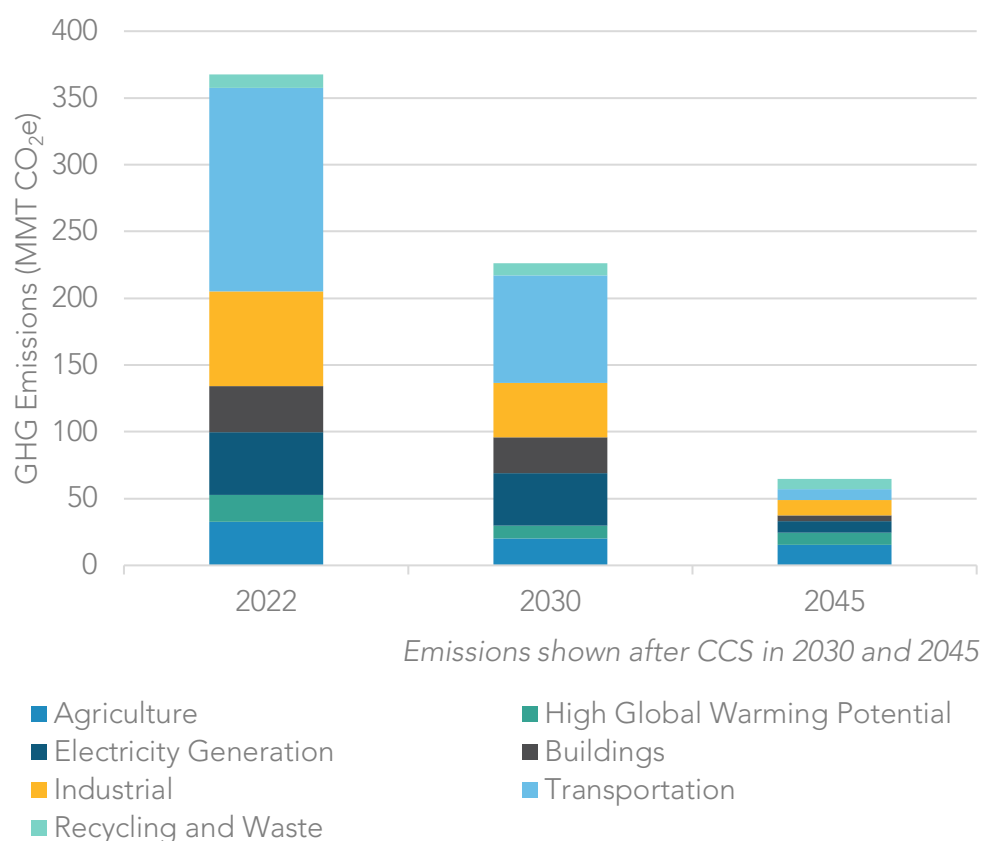
increase carbon stocks from the Reference Scenario trajectory, reduce GHG emissions from lands, and improve ecosystem and public health. This effort is the most comprehensive scientific effort taken by any government to include NWL within its overall climate strategy. Even so, we know that uncertainty exists about future climate and economic forces and the impacts they may have on our ecosystems, so it is important that the state take decisive and aggressive action to improve and diversify ecosystem structures and management.

The effects of climate change, including increased drought, wildfire, and extreme heat, play a significant role in determining the future of California's carbon stocks. And while management actions will help to reduce the impact that climate change will have on California, it is clear from the analysis that NWL sinks and sources are highly variable from year to year, and short time frames do not adequately demonstrate the impact that climate and management are having on ecosystems. For the purposes of climate planning, therefore, it is best to focus on carbon stock changes over longer periods rather than focusing on sequestration or emissions on shorter time frames. The Scoping Plan Scenario is estimated to result in additional NWL emissions of 7 million metric tons of carbon dioxide equivalent (MMTCO_{2e}) annually from 2025–2045. The Reference Scenario is estimated to result in annual emissions of 9 MMTCO_{2e} over the same time period, and so the Scoping Plan Scenario slows the rate of emissions and provides an approximate 2 MMTCO_{2e} in additional annual sequestration relative to the Reference Scenario. Because NWL are projected to be a net emissions source, the annual NWL emissions of approximately 7 MMTCO_{2e} from the Scoping Plan Scenario will need to be compensated by additional CO₂ removal approaches to ensure California can achieve carbon neutrality by 2045.

The Role for Carbon Dioxide Removal (Direct Air Capture)

Even if anthropogenic emissions are reduced to at least 85 percent below 1990 levels by 2045 as called for by AB 1279, there will still be residual emissions in the AB 32 GHG Inventory sectors in 2045 that must be addressed in order to achieve the California's carbon neutrality target. Figure 2-5 includes the emissions by sector for the AB 32 GHG Inventory Sectors in 2022, 2030, and 2045 for the Scoping Plan Scenario.

Figure 2-5: Residual emissions in 2022, 2030, and 2045 for the Scoping Plan Scenario¹⁵⁵



To achieve carbon neutrality, mechanical CDR will therefore need to be deployed. Because NWL management is not estimated to be a significant carbon removal path in the near term, additional CDR options will be needed. *Mechanical CDR* refers to a range of technologies that capture and concentrate ambient CO₂. Direct air capture (DAC) is one available option that is under development today and could be widely deployed. Note that, unlike CCS, DAC technologies are not designed to be attached to a specific source or smokestack. These technologies include chemical scrubbing processes that capture CO₂ through absorption or adsorption separation processes. Another carbon removal

¹⁵⁵ The High GWP sector includes high global warming potential gas emissions from releases of ozone depleting substance (ODS) substitutes, SF₆ emissions from the electricity transmission and distribution system, and gases that are emitted in the semiconductor manufacturing process. ODS substitutes, which are primarily hydrofluorocarbons (HFCs), are used in refrigeration and air conditioning equipment, solvent cleaning, foam production, fire retardants, and aerosols.

option that involves rapid mineralization of CO₂ at the Earth's surface is called *mineral carbonation*.¹⁵⁶ As is the case with CCS, mechanical CDR technologies will need governmental or other incentive support to overcome technology and market barriers. In the United States, the U.S. Department of Energy announced financing specifically for DAC in March 2020¹⁵⁷ and March 2021.¹⁵⁸ Additionally, almost \$9 billion in CCS support was included in the \$ 1 trillion Infrastructure Investment and Jobs Act of 2021.¹⁵⁹ This includes funding to establish four DAC hubs. The Inflation Reduction Act of 2022¹⁶⁰ increases the value of the 45Q tax credit to USD 85 per metric ton of CO₂ captured and stored in geologic formations from some industrial applications and USD 180 per metric ton for DAC with storage in geologic formations. In 2021, there were approximately 19 DAC facilities globally.¹⁶¹

Ultimately, the role for mechanical CDR will depend on the success of reducing emissions directly at the source in the AB 32 GHG Inventory sectors and the ability of the NWL to sequester carbon. However, mechanical CDR also provides an opportunity to not just achieve carbon neutrality, but also remove legacy GHG emissions from the atmosphere. As such, increased deployment of DAC can help achieve net negative emissions. This would further help avoid the most damaging impacts of climate change. While the federal incentives for DAC provide some support for this technology, the only California program that recognizes this technology is the LCFS program. Permitting must also happen across different levels of government and across multiple state agencies. Energy availability must also be addressed if DAC is to be implemented in remote areas. Additional information and next steps on DAC can be found in Chapter 4.

¹⁵⁶ The National Academies Press. 2018. Direct Air Capture and Mineral Carbonation Approaches for Carbon Dioxide Removal and Reliable Sequestration: Proceedings of a Workshop—in Brief. <https://nap.nationalacademies.org/catalog/25132/direct-air-capture-and-mineral-carbonation-approaches-for-carbon-dioxide-removal-and-reliable-sequestration#:~:text=National%20Academies%20of%20Sciences%2C%20Engineering%2C%20and%20Medicine%3B%20Division,concentrate%20carbon%20dioxide%20%28CO%20%29%20from%20ambient%20air.>

¹⁵⁷ U.S. Department of Energy. 2020. Department of Energy to Provide \$22 Million for Research on Capturing Carbon Dioxide from Air. <https://www.energy.gov/articles/department-energy-provide-22-million-research-capturing-carbon-dioxide-air>.

¹⁵⁸ U.S. Department of Energy. 2021. DOE Invests \$24 Million to Advance Transformational Air Pollution Capture. <https://www.energy.gov/articles/doe-invests-24-million-advance-transformational-air-pollution-capture>.

¹⁵⁹ Pub.L. No. 117-58 (November 15, 2021). <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>.

¹⁶⁰ Pub.L. No. 117-169 (August 16, 2022). <https://www.congress.gov/bill/117th-congress/house-bill/5376/text>.

¹⁶¹ International Energy Agency (IEA). 2022. Direct Air Capture – Analysis. <https://www.iea.org/reports/direct-air-capture>.

Carbon Dioxide Removal and Capture Targets for 2030 and 2045

Recognizing the importance of CO₂ removal, Governor Newsom and the Legislature identified the need for targets to send policy and regulatory signals to pilot, deploy, and scale action for those efforts. Governor Newsom requested that CARB set a CO₂ removal and capture target of 20 MMT for 2030 and 100 MMT for 2045, first prioritizing sequestration in NWL. And while this Scoping Plan prioritizes and recommends significant increased climate-smart action on all NWL to support carbon neutrality and healthy and resilient lands, the modeling indicates that, across all NWL, lands will be a net source of emissions when accounting for both carbon sequestration and GHG (CO₂, CH₄, and N₂O) emissions from lands.

Some landscapes, however, are projected to have a net increase in carbon stocks under the Scoping Plan Scenario between 2025 and 2045 relative to the reference case, indicating that NWL actions can help California achieve Governor Newsom's CO₂ removal targets. Carbon stocks in urban forests and grasslands are projected to increase relative to historical levels from implementation of the 2022 Scoping Plan. To support the governor's CO₂ removal targets, CARB estimates that lands would contribute an average of 1.5 MMT of CO₂ removals each year between 2025 and 2045. Any carbon sequestration contributions from lands need to reflect both long-term storage and an overall net increase in carbon stocks over time to ensure these NWL actions are contributing toward California's achievement and maintenance of carbon neutrality over time.

CARB will work to update and revise these estimates as part of implementation of AB 1757, which was signed by the governor in September 2022 and requires that CARB and the California Natural Resources Agency (CNRA) work with an expert advisory committee to determine an ambitious range of carbon sequestration targets by January 1, 2024, for the years 2030, 2038, and 2045.

For the AB 32 GHG Inventory sectors, the Scoping Plan Scenario modeling indicates that the scenario would meet or exceed the 2030 SB 32 target through GHG reduction policies without the need for CDR. CDR will, however, be necessary to increase ambition for an accelerated 2030 target and in increasing amounts over the following decades to achieve carbon neutrality by 2045.¹⁶² Given the likelihood of NWL to be a net source of emissions, and the need for CDR to compensate for residual emissions to achieve carbon neutrality

¹⁶² The modeled scenarios assume that residual emissions will be compensated using DAC technologies by including the direct cost in terms of dollars per ton CO₂ removed. The energy source for DAC is not modeled, but renewable electricity and/or hydrogen produced from electrolysis are zero carbon options consistent with the carbon neutrality targets in this Scoping Plan.

by 2045, California will need increasing deployment of mechanical CDR over the coming decades. In the immediate future, scaling nature-based CDR approaches also can help to provide some CO₂ removal quickly while mechanical CDR is scaled up between now and 2045. Table 2-3 provides estimates of CO₂ removal and capture needed in 2030¹⁶³ and 2045.

¹⁶³ As identified in Chapter 1, SB 27 (Skinner, Chapter 237, Statutes of 2021) directed CARB to “establish carbon dioxide removal targets for 2030 and beyond” as part of this Scoping Plan. CARB is establishing these targets to satisfy both the requirements of SB 27 and the directive from Governor Newsom to establish CO₂ removal targets for 2030 and 2045.

Table 2-3: GHG emissions and removals needed to achieve carbon neutrality and meet the 20 MMTCO₂ removal and capture target in 2030 and the 100 MMTCO₂ removal and capture target in 2045.¹⁶⁴

	2030 (MMTCO ₂ e)	2045 (MMTCO ₂ e)
GHG Emissions	233	72
AB 32 GHG Inventory Sector Emissions	226	65
Net NWL GHG Emissions Across All Landscapes (annual average from 2025–2045)	7	7
Carbon Capture and Sequestration (CCS): Avoided GHG Emissions from Industry and Electric Sectors	(13)	(25)
Carbon Dioxide Removal (CDR) including natural and working lands carbon sequestration, ¹⁶⁵ Direct Air Capture, and Bioenergy with CCS (BECCS).	(7)	(75)
Net Emissions (GHG Emissions + CDR)	226	(3)

In 2030, the CO₂ removal and capture target is 20 MMT, but because the SB 32 target only encompasses the AB 32 GHG Inventory sectors, only CCS that reduces GHG emissions on AB 32 sources count toward achieving more ambitious GHG emission reductions in 2030. In 2045, the CO₂ removal and capture must compensate for any residual emissions from the AB 32 Inventory sectors and NWL emissions to support achieving carbon neutrality while also totaling at least 100 MMT. It is important to note that NWL, particularly forests, need a natural wildfire cycle to remain healthy. While the modeling projected wildfires, and implementing the Scoping Plan will result in a reduction in future wildfire emissions, getting to zero wildfires in the sector is not the goal, nor the

¹⁶⁴ Modeled estimates from the Scoping Plan Scenario indicate the relative quantity of emissions and removals to achieve carbon neutrality and meet carbon removal and capture targets. These estimates are not intended to imply precision, as the required policies are yet to be implemented and all models have some uncertainty in their forecasts.

¹⁶⁵ For the purposes of quantifying how to achieve the governor's 20 MMT and 100 MMT CO₂ removal and capture target, CARB included 1.5 MMTCO₂e sequestration from NWL, which is the sequestration from urban forests. This is included as CO₂ removal because it is this sequestration that CARB can consider as having some permanence. Permanence is necessary for incorporating NWL into carbon neutrality. The net NWL emissions of 7 MMTCO₂e, identified in the second row of Table 2-3, includes *all* emissions and sinks from all NWL landscapes, which is inclusive of the 1.5 MMTCO₂e sequestration. CARB will develop an accounting framework to accommodate NWL carbon stocks.

right approach to a sustainable forestry sector. In contrast in 2045, the reductions from programs and policies are estimated to reduce emissions by 169 MMTCO₂e from business as usual.

The 2030 target for engineered CDR also provides a near term milestone for California and can serve as an important marker for progress in deploying CDR to support California's carbon neutrality goal. Preliminary estimates indicate that, globally, capacity from already announced projects will range from about 2 million metric tons per year (MMTCO₂/y) to 8 MMTCO₂/y from bioenergy paired with CCS, and from about 2,000 metric tons per year (MTCO₂/y) to 1 MMTCO₂/y from DACs by 2027,¹⁶⁶ which indicates that California's 2030 target is an ambitious, but achievable, goal.

Scenario Uncertainty

Greenhouse Gas Emissions Modeling

Several types of uncertainty are important to understand in both forecasting future emissions and estimating the benefits of emission reduction actions. In developing this Scoping Plan we forecasted a reference scenario and estimated the GHG emissions outcome of the AB 32 GHG Inventory sectors using the PATHWAYS¹⁶⁷ model. Inherent in the reference scenario modeling is the expectation that many of the existing programs will continue in their current form, and that the expected drivers for GHG emissions, such as energy demand, population growth, and economic growth, will match our current projections.

However, there is also the expectation that each of the policies included and implemented to achieve the 2030 target in the 2017 Scoping Plan will deliver their exact outcomes. It is unlikely the future will precisely match our projections, and this will lead to uncertainty in the forecast. For example, we never could have foreseen and forecasted economic and emissions impacts related to the extended disruptions from the COVID-19 pandemic. Thus, the single "reference" or "forecast" line should be understood to represent one possible future in a range of possible predictions. For this Scoping Plan, PATHWAYS utilized inputs that reflect technically feasible levels of deployment or adoption of low- or zero-carbon fuels and technologies. Each of the input assumptions provided to PATHWAYS has some uncertainty, which also contributes to uncertainty in the resulting reference scenario.

¹⁶⁶ IHS Markit. August 2021. Carbon Removal Potential. https://ww2.arb.ca.gov/sites/default/files/2021-08/ihsmarkit_presentation_sp_engineeredcarbonremoval_august2021.pdf.

¹⁶⁷ See Appendix H (AB 32 GHG Inventory Sector Modeling).

Similarly, for the NWL modeling, CARB used a mix of individual modeling tools¹⁶⁸ to estimate the carbon and other ecological, public health, and economic outcomes. The Reference scenario assumes that the level of land management actions that occurred between 2001 and 2014 for forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands continues into the future. Alternative scenarios assessed the effect of increasing levels of management actions from the reference scenario beginning in 2025. There is a great deal of uncertainty about exactly how lands are currently managed, and a larger uncertainty about how they may be managed in the future. For NWL, it is unlikely that the future will precisely match the carbon stock outcomes CARB has projected, particularly given the uncertainties around current and future land management and the effects climate change will have on our lands. For any modeling exercise these uncertainties exist; however, this modeling effort brings together the best available science, data, and models to quantify the impact our actions may have on the landscape under an unknown future.

Implementation

As this Scoping Plan is designed to chart a path to achieving carbon neutrality, additional work will be required to fully design and implement any policies and actions identified in this plan. During the subsequent development of policies, the Legislature, CARB, and other state agencies will learn more about the technologies and their costs, as well as how each industry works, as a more comprehensive evaluation is conducted in coordination with stakeholders, including community engagement. Significant areas of uncertainty include permitting wait times¹⁶⁹ and local ordinances that might limit or slow the build-out of utility scale renewables.^{170, 171} In another example, times to reach commercial operations for solar projects after securing an interconnection agreement also have increased in recent years, to 3.5 to 5.5 years.¹⁷²

The level of natural and working lands climate action identified in this Scoping Plan is ambitious. Achieving the level of action needed to result in the quantified carbon,

¹⁶⁸ See Appendix I (Natural and Working Lands Technical Support Document).

¹⁶⁹ CEC. 2021. *SB 100 Joint Agency Report*. https://www.energy.ca.gov/sb100#anchor_report.

¹⁷⁰ Roth, Sammy. 2019. "California's San Bernardino County slams the brakes on big solar projects." *Los Angeles Times*. <https://www.latimes.com/business/la-fi-san-bernardino-solar-renewable-energy-20190228-story.html?fbclid=IwAR2qHGq3bahHme6SFErLsnyFi9UPlfBHIhvnOh3dU3OM7kUTMcEqYfN3pQA>.

¹⁷¹ Chediak, Mark. 2021. "California NIMBYs Threaten Biden's Clean Energy Goals." *BNN Bloomberg*. <https://www.bnnbloomberg.ca/california-nimbys-threaten-biden-s-clean-energy-goals-1.1634351?msclkid=668c9ae9c11311ec92e34035ea157ad4>.

¹⁷² Rand, Joseph, et al. 2022. *Queued Up: Characteristics of Power Plants Seeking Transmission Interconnection as of the End of 2021*. Power Point Presentation. Lawrence Berkeley National Laboratory. https://emp.lbl.gov/sites/default/files/queued_up_2021_04-13-2022.pdf.

emissions, health, and economic outcomes within this Scoping Plan requires coordination, investment, and partnerships across all levels of government and sectors of the economy. It is possible that not all of the actions at the identified level will begin in 2025. This uncertainty will result in diminished levels of beneficial outcomes quantified in the Scoping Plan Scenario. The levels of NWL action identified in this Scoping Plan represent CARB's assessment of the pace and scale of action needed to achieve the carbon stock targets and CO₂ removal targets identified in this Scoping Plan.

The Scoping Plan Scenario identifies that 2.3 million acres of forests, shrubland, and grassland management annually would achieve substantial levels of fire emissions reductions and the concomitant health and economics benefits. Currently, 1 million acres of forest treatment annually is the joint federal and state government goal (500,000 acres each). This target of one million acres annually by 2025 is for the purposes of increasing forest health and wildfire resilience in the near term, whereas the 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045. By identifying 2.3 million acres of climate action annually in forests, shrublands, and grasslands, this Scoping Plan emphasizes the importance of that 1 million acre annual goal as a milestone on the way to even more action and improved fire and air quality outcomes. The modeling indicates that substantial improvements to statewide fire emissions will occur at levels of action greater than 1 million acres per year. If these levels of action do not occur starting in 2025, the Scoping Plan has quantified climate benefits that will still occur, but to a lesser extent. In terms of fire emissions, compared to the Reference Scenario, 2.3 million acres of forest, shrubland and grassland management will result in a 10% reduction in wildfire emissions. At 1 million acres per year, this decreases to a 2.5% reduction. If 1 million acres per year is also not accomplished, then the emissions and health benefits are even lower.

Climate action in other NWL sectors also generates many co-benefits. Climate action identified in this Scoping Plan is aimed at not only fighting climate change but also improving air quality and public health. The climate action identified in the agricultural sector, for example, should result in decreased pesticide and synthetic fertilizer use. This decrease of synthetic chemical use in agriculture across California also should result in improved public health, especially for communities that work and live in and around agricultural lands. However, as with the forestry sector, the benefits of climate action in agricultural lands and in any other land are dependent on how much implementation takes place. Ramping up increased healthy soils practices and increasing organic agriculture in California will require continued and sustained implementation by private industry and public agencies. For example, achieving the carbon stock outcomes for the annual crops called for in this Scoping Plan would require deployment and maintenance of healthy soils practices on 80,000 additional acres of croplands in California every year between 2025 and 2045. For context, CDFA's Healthy Soils Program, which is an incentive program

supporting healthy soils practices, took almost four years of sustained funding to achieve approximately 50,000 acres total under healthy soils practices.¹⁷³

Given the uncertainty around the modeling assumptions, and performance uncertainty as specific policies are fully designed and implemented, estimates associated with the Scoping Plan Scenario are certain to be different than what is ultimately implemented. One way to mitigate for this is to develop policies that can adapt and increase certainty in GHG emissions reductions. Periodic reviews of progress toward achieving the 2030 target and longer term deeper decarbonization, as well as performance of specific policies, also provide opportunities for the state to consider any changes to ensure we remain on course to achieve the 2030 target and carbon neutrality. The need for this periodic review process was anticipated in AB 32, as it calls for updates to the Scoping Plan at least once every five years. For this Scoping Plan, the metrics provided on the rate of deployment of clean fuels and technologies, along with the annual AB 32 GHG Inventory, provide additional information that can be used to assess progress on sectors and aggregate emissions. This is also true of CARB's NWL carbon inventory. An uncertainty analysis for achieving an accelerated 2030 target is provided toward the end of this chapter.

Targeted Evaluations for the Scoping Plan: Oil and Gas Extraction and Refining

To achieve California's air quality and climate goals, we must end our dependence on petroleum. This will not happen overnight. There are about 28 million combustion engine heavy- and light-duty trucks and passenger vehicles in California, and these are almost always replaced at their end of life. The ZEV Executive Order (EO N-79-20) calls for 100 percent new ZEV car sales beginning in 2035 and a 100 percent ZEV medium- and heavy-duty fleet sales by 2045 where feasible. The result is an ongoing, albeit shrinking, pool of vehicles that will continue to require petroleum fuels. To avoid leakage, as called for in AB 32, and to meet that remaining demand for petroleum fuel, a complete phaseout of oil and gas extraction and refining is not possible by 2045. This Scoping Plan assumes a phasedown in both oil and gas extraction as well as petroleum refining in line with the reduction in demand for in-state on-road petroleum fuel demand. Since the transportation sector is the largest source of GHG emissions and harmful local air pollution, we must continue to research and invest in efforts to deploy zero emissions technologies and clean fuels, and to reduce VMT. An assessment of ongoing progress and efforts to reduce

¹⁷³ California Department of Food and Agriculture. 2021. *Incentives Program 2017–2020 Summary by the Numbers*.

https://www.cdfa.ca.gov/oefi/healthysoils/docs/HSP_Incentives_program_level_data_funded_projects.pdf.

demand for petroleum fuels and of opportunities to phase down oil and gas extraction and refining will be included in the next Scoping Plan update.

In addition to supplying in-state demand, California is a net exporter of gasoline, diesel, and jet fuel. California pipelines supply the Nevada and Arizona regions¹⁷⁴ with approximately 87 million barrels gasoline equivalent of refined products annually.¹⁷⁵ California pipelines deliver approximately 85% of Nevada's and 40% of Arizona's refined product. Most finished fuels flowing from California to Nevada and Arizona are currently produced by California refineries. To manage the phasedown of oil and gas extraction and petroleum refining in California, exports of finished fuels must be considered and factored into that process, in addition to the declining in-state demand. The authorities and considerations related to supply and demand of petroleum fuels span federal, state, and local agencies. If supply of fossil fuels is to decline along with demand, a multi-agency discussion is needed to systematically evaluate and plan for the transition to ensure that it is equitable.

This inter-agency work should also consider related topics, such as the following:

- Direct and indirect job and economic impacts
- Demand for other liquid fuel types such as renewable fuels, and expected volumes
- Legal considerations
- Public health benefits
- Demand and supply strategies for petroleum fuels, including how to avoid short term supply constraints that may impact low-income consumers

Some of these topics were also discussed as part of two studies¹⁷⁶ supported by the California Environmental Protection Agency, which can serve as a starting point for a working group to analyze these questions and develop policy recommendations.

Oil and Gas Extraction

On April 23, 2021,¹⁷⁷ Governor Newsom directed CARB to evaluate the phaseout of oil and gas extraction no later than 2045 as part of this Scoping Plan. As noted above, this Scoping Plan still has some California demand for finished fossil fuels (gasoline, diesel,

¹⁷⁴ CEC. August 2021. A Primer on California's Pipeline Infrastructure. *Petroleum Watch*.

https://www.energy.ca.gov/sites/default/files/2021-08/August_Petroleum_Watch_ADA.pdf.

¹⁷⁵ CEC. March 2020. *Petroleum Watch*. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.

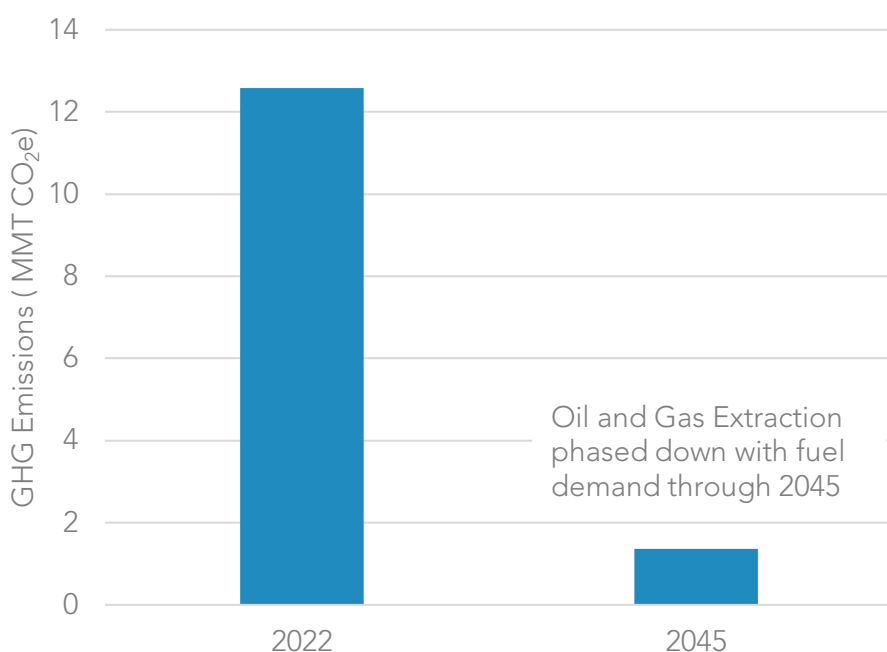
¹⁷⁶ CalEPA. 2021. Carbon Neutrality Studies: <https://calepa.ca.gov/climate/carbon-neutrality-studies/>.

¹⁷⁷ Governor Newsom. April 23, 2021. Governor Newsom Takes Action to Phase Out Oil Extraction in California. Press Release. <https://www.gov.ca.gov/2021/04/23/governor-newsom-takes-action-to-phase-out-oil-extraction-in-california/>.

and jet fuel) in 2045. This demand is primarily for transportation, including for sectors that are directly regulated by the state and some that are subject to federal jurisdiction, such as interstate locomotives, marine, and aviation. As discussed more fully below, while significant GHG reductions from oil and gas extraction could be achieved as demand for fossil fuels is reduced due to strategies in this Scoping Plan, it is not feasible to phase out oil and gas production fully by 2045 given this remaining demand.

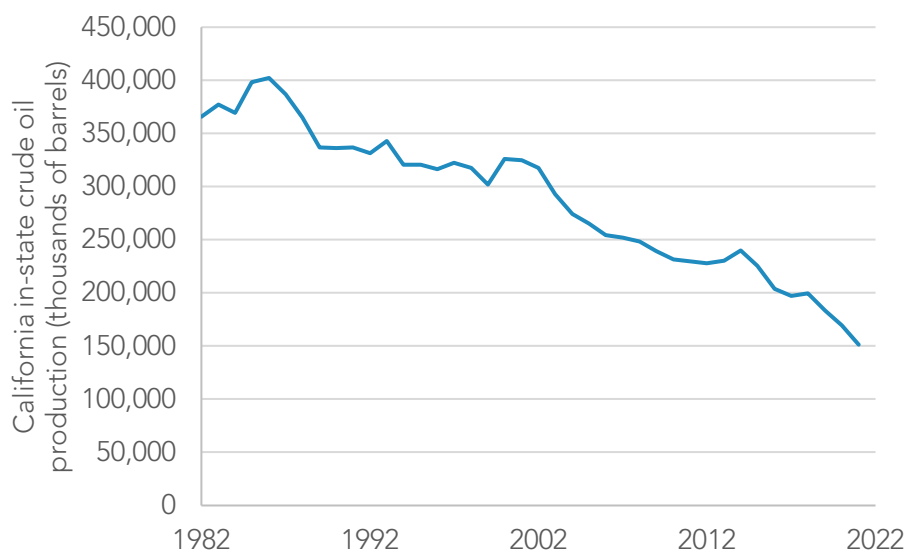
In the Scoping Plan Scenario, with successful deployment of zero carbon fuels and non-combustion technology to phase down petroleum demand, GHG emissions from oil and gas extraction could be reduced by approximately 89 percent in 2045 from 2022 levels if extraction decreases in line with in-state finished fuel demand. If in-state extraction were to be phased out fully, the future petroleum demand by in-state refineries would be met through increased crude imports to the state relative to the Scoping Plan Scenario. AB 32 defines leakage as, “a reduction in emissions in greenhouse gases within the state that is offset by an increase in emissions of greenhouse gases outside the state.” AB 32 also requires any actions undertaken to reduce GHGs to “minimize leakage.” Increases in imported crude could result in increased activity outside California to extract and transport crude into California. Therefore, our analysis indicates that a full phaseout of in-state extraction could result in GHG emissions leakage and in-state impacts to crude oil imported into the state. Figure 2-6 compares the 2022 emissions from this sector with the modeled results when the sector is phased down with in-state petroleum demand.

Figure 2-6: Oil and gas extraction sector GHG emissions in 2022 and 2045 when activity is phased down with in-state fuel demand



According to California Energy Commission (CEC) data used in Figure 2-7, the total oil extracted in California peaked at 402 million barrels in 1986. Since then, California crude oil production has decreased by an average of 6 million barrels per year, to about 200 million barrels in 2020. This steadily decreasing production of crude in California is expected to continue as the state's oil fields deplete.

Figure 2-7: California in-state crude oil production¹⁷⁸



A UC Santa Barbara report estimated that, under business-as-usual conditions, California oil field production would decrease to 97 million barrels in 2045.¹⁷⁹ The business-as-usual model assumed no additional regulations limiting oil extraction in California.

Any crude oil demand by California refineries not met by California crude oil will be met by marine imports of Alaskan and foreign crude.¹⁸⁰ As shown in Figure 2-8, approximately 99 percent of crude imports into California are delivered by marine transportation. The

¹⁷⁸ CEC. No date. Oil Supply Sources to California Refineries. Accessed April 21, 2022.

<https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries>.

¹⁷⁹ University of California, Santa Barbara. 2021. Enhancing Equity While Eliminating Emissions in California's Supply of Transportation Fuels.

¹⁸⁰ CEC. 2020. *Petroleum Watch: How Petroleum Products Move*. March.

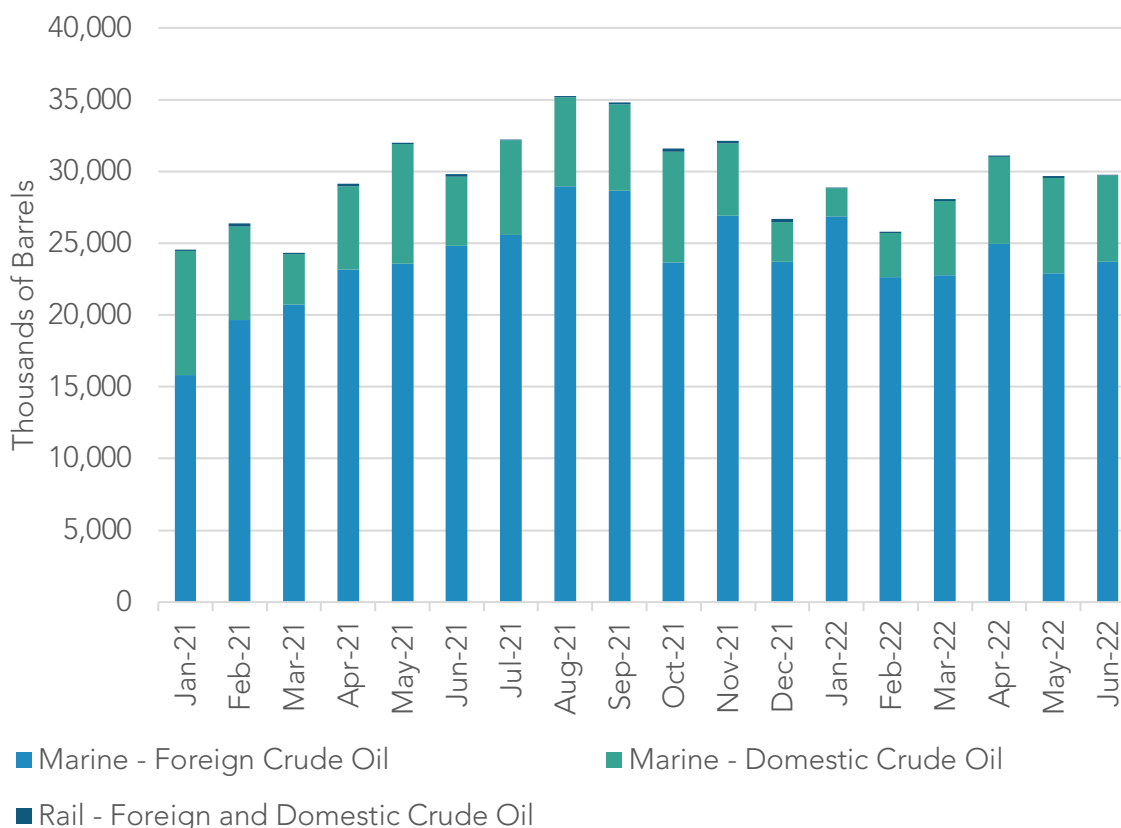
https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf, and CEC.

2020. *Petroleum Watch: What Types of Crude Oil Do California Refineries Process?* February.

https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf.

remaining imports occur by rail.¹⁸¹ There are no pipelines that bring crude oil into California from out of state.¹⁸²

Figure 2-8: Crude oil imports by transportation type¹⁸³



Crude oil delivered by marine tankers is delivered to onshore storage tanks and subsequently to refineries via pipeline. Most crude oil produced in California is delivered to California refineries by pipeline. Using historical trends, any increases in imported crude above historic levels would result in increased deliveries through the marine ports. This increased activity could require more infrastructure to store and move larger volumes of crude to the refineries in state.

¹⁸¹ CEC. June 2021. Crude Oil Imports by Transportation Type. Accessed March 16, 2022. <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/crude-oil-imports-source>.
¹⁸² CEC. 2020. *Petroleum Watch: How Petroleum Products Move*. March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.
¹⁸³ CEC. June 2021. Crude Oil Imports. <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/crude-oil-imports-source>.

California refineries import a variety of crude oils to meet refinery needs. California petroleum refineries are generally designed to process relatively heavy crude relative to other U.S. refineries. In 2018, crude inputs to California refineries had an average American Petroleum Institute (API) gravity of 26.18 and an average sulfur content of 1.64 percent. Processing significantly lighter or heavier crude blends would require significant changes to a refinery.¹⁸⁴ Most crude imported from Alaska and the Middle East is relatively light (API gravity > 30) compared to California crude (API gravity < 20).¹⁸⁵ If California crude production is insufficient to meet the demand at California refineries, then California refineries will need access to a similarly heavy source of crude so that the average API gravity of crude remains within their established operating window. South American crude oil imports into California are the heaviest relative to other regions, and therefore they may be the most likely to replace decreased California crude oil supply.¹⁸⁶

In summary, the modeling indicates that demand for petroleum will persist due to legacy fleets that will not be replaced until end of life. The modeling also shows what the GHG emissions reductions would be if oil and gas extraction activities were phased down in line with the reduction of in-state petroleum demand. Trend data shows that oil and gas extraction already has been on the decline and will continue to decline. It is possible to anticipate the likely regions and types of crude that would be imported to meet in-state petroleum demand if in-state extraction was fully phased out by 2045. Importantly, activity at the ports would increase, and new infrastructure would be needed to store and deliver crude to in-state refineries. And while GHG emissions from this sector would go to zero in our AB 32 GHG Inventory with a full phaseout, emissions related to the production and transport of crude to California might increase elsewhere, resulting in emissions leakage.

As the state continues to reduce demand for petroleum, efforts to protect public health for communities located near oil and gas extraction sites must also continue. In October 2021, Governor Newsom directed action to prevent new oil drilling near communities and

¹⁸⁴ CEC. 2020. *Petroleum Watch: What Types of Crude?* February.
https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf.

¹⁸⁵ CEC. 2020. *Petroleum Watch: What Types of Crude?* February.
https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf.

¹⁸⁶ CEC. 2020. *Petroleum Watch: What Types of Crude?* February.
https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf.

expand health protections.^{187, 188} In 2022, the Legislature passed, and the governor signed, SB 1137 to protect communities from existing and any new oil and gas extraction activities through 3,200 foot setbacks.

Petroleum Refining

In the Scoping Plan Scenario CARB modeled a phasedown of refining activity in line with petroleum demand. Meeting petroleum demand means sufficient availability of finished fuel (gasoline, diesel, and jet fuel). Crude is processed at in-state refineries to produce finished fuel. In response to stakeholder requests,¹⁸⁹ this evaluation focuses on the Scoping Plan Scenario, but with an evaluation of a complete phasedown of refinery operations in state.

The Scoping Plan Scenario results in California petroleum refining emissions of 4.5 MMTCO₂e in 2045; a reduction of approximately 85 percent relative to 2022 levels, which is in line with the decline in in-state finished fuel demand.¹⁹⁰ Emissions from refining can be reduced further through the application of CCS technology, as shown in Figure 2-9. If in-state refining is phased down to zero and the demand for the finished fuels produced by that refining persists, imported finished fuels may be needed to meet the remaining in-state demand.¹⁹¹ The current data shows unmet demand for liquid petroleum transportation fuels would most likely be met by marine imports. A CEC report notes, “The only way for California to receive large amounts of crude and refined products is by marine.”¹⁹²

¹⁸⁷ Office of Governor Gavin Newsom. 2021. California Moves to Prevent New Oil Drilling Near Communities, Expand Health Protections. <https://www.gov.ca.gov/2021/10/21/california-moves-to-prevent-new-oil-drilling-near-communities-expand-health-protections-2/?msclkid=6c0da86bc58e11ecb81cf596d4d8a735>.

¹⁸⁸ California Department of Conservation Geologic Energy Management Division. October 2021. Draft Rule for Protection of Communities and Workers from Health and Safety Impacts from Oil and Gas Production Operations. <https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx?msclkid=45660232cf2511ecb1c56119097e3b0c>.

¹⁸⁹ California Environmental Justice Alliance. October 22, 2021. Comment on 2022 Scoping Plan Update - Scenario Inputs Technical Workshop. <https://www.arb.ca.gov/lists/com-attach/68-sp22-inputs-ws-WzhdPII5AjACW1Qx.pdf>.

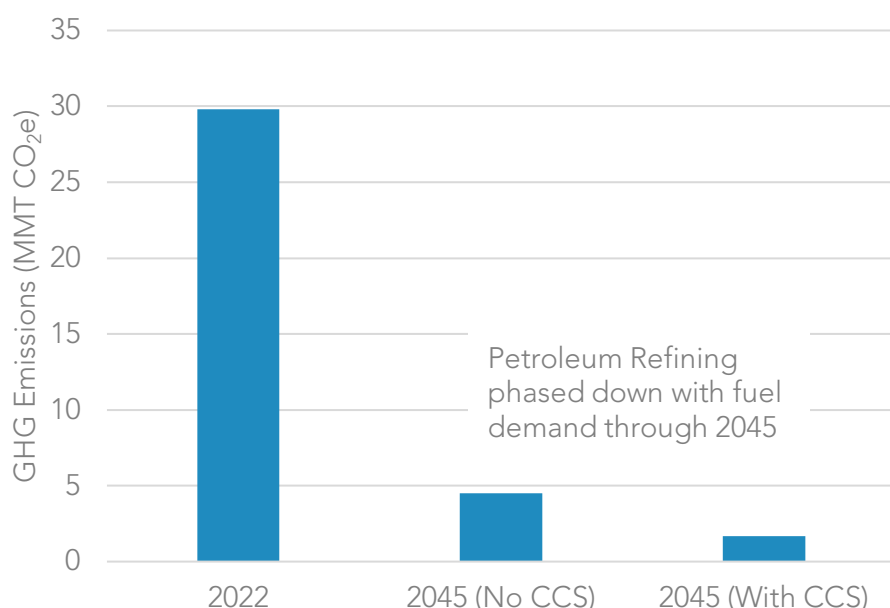
¹⁹⁰ This reduction in demand does not assume any need for ongoing operations to support exports to neighboring states.

¹⁹¹ If demand assumes an ongoing need to support exports to neighboring states, the residual demand would require a five-fold increase in finished fuel imports.

¹⁹² CEC. 2020. *Petroleum Watch: How Petroleum Products Move*. March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.

There are currently no pipelines capable of bringing refined products to the state, and rail imports of refined products have historically made up less than 1 percent of all imports.¹⁹³ Significant increases in marine imports would likely require significant reconfiguring, retrofitting, or replacement of crude pipelines and storage tanks at current marine terminals, and possible reconfiguring of existing finished fuel infrastructure to account for changes in volumes and locations of supply points.

Figure 2-9: Petroleum refining sector GHG emissions in 2022 and 2045 (with and without CCS) when activity is phased down with fuel demand



If California's finished fuel demand is not met by continued refining activity in California, the state would need to import finished fuels to meet the ongoing demand. This would likely result in a two- to five-fold increase in the number of finished fuel ship deliveries to marine terminals. Marine tankers delivering refined products are often much smaller than crude oil tankers, so changes in fuel use and emissions cannot be easily estimated from the change in both the type and the number of ship deliveries.¹⁹⁴

¹⁹³ CEC. 2020. *Petroleum Watch: How Petroleum Products Move*. March.

https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.

¹⁹⁴ Personal communication with CEC staff, March 2022; U.S. EIA. 2017. *World Oil Transit Chokepoints*. 3. <https://www.eia.gov/beta/international/regions-topics.php?RegionTopicID=WOTC>.

If refining ceased in California, the rail and marine deliveries currently needed to support both refining processes and the export of waste products, such as petroleum coke, would cease.

In summary, the modeling indicates that demand for petroleum will persist through 2045. The modeling also shows what the GHG emissions reductions would be if refining activities were phased down in line with the reduction in in-state petroleum demand. CCS can further reduce emissions for this sector. Importantly, activity at the ports would increase, and new infrastructure would be needed to store and deliver finished fuel across the state, if in-state refining were fully phased down by 2045. And while GHG emissions from this sector would go to zero in our AB 32 GHG Inventory with a full phaseout, emissions related to the refining and transport of finished fuel to California might increase elsewhere, resulting in emissions leakage.

Progress Toward Achieving the Accelerated 2030 Target

The 2017 Scoping Plan laid out a path to achieving the SB 32 target of at least a 40 percent reduction of GHG emissions below 1990 levels by 2030 that focused on reducing emissions in the state and was technologically feasible and cost-effective, reflecting statutory direction. Many of the programs to achieve the 2030 target increased in stringency beginning January 1, 2021. However, the 2030 target must be increased to help achieve the deeper reductions needed to meet the state's statutory carbon neutrality target specified in AB 1279 and Executive Order B-55-18.

Starting in 2020 and extending into 2022, the COVID-19 pandemic impacts reverberated across the globe in a multitude of ways, including the devastating loss of millions of lives. The pandemic also had a significant impact on GHG emissions by virtue of its impact on global economies and lifestyle changes for Californians, with extended work and school disruptions. Thus, assessing our progress toward meeting our SB 32 target is confounded by the unprecedented nature of the pandemic. Nevertheless, an assessment of progress toward the 2030 target is critical, in particular the accelerated 2030 target called for in this Scoping Plan, since achieving the accelerated 2030 target would make the state well positioned to achieve its carbon neutrality goals and bring critical near-term air quality benefits to address historical and ongoing disparities in access to healthy air. Because there is only one year of data available for this decade, the analysis takes a prospective look using projected emissions over the remainder of this decade.

Estimating GHG emissions in 2030 requires projecting the effect of policies or measures that are currently deployed and undergoing implementation. Table 2-4 shows three distinct estimates of GHG emissions in 2030 that were created at different times and used different modeling approaches.

Table 2-4: Estimates of 2030 GHG emissions

Scenario Description	2030 GHG Emissions (MMTCO ₂ e)
2017 Scoping Plan: the projected outcome from implementing policies identified in the 2017 Scoping Plan that was approved by the CARB Board in December 2017.	320
Reference Scenario: the assessment of current trends and expected performance of policies identified in the 2017 Scoping Plan, as of February 2022, using the PATHWAYS model (E3).	305
Reference Scenario (Rhodium): the analysis of projected emissions from 2021 to 2030 from state and federal policies implemented as of July 2022, including the estimated impact of the Inflation Reduction Act and Advanced Clean Cars II using RHG-NEMS and other Rhodium Taking Stock 2022 methods (https://rhg.com/wp-content/uploads/2022/07/Taking-Stock-2022-US-Emissions-Outlook.pdf).	324

These three estimates of 2030 GHG emissions differ, which is expected. The estimates reflect different outcomes of the current and future impact of policies and measures. They also vary due to fundamental differences in the way these models work. For example, PATHWAYS is an economy-wide, scenario-based GHG accounting tool that tracks energy demands and supplies in line with scenario assumptions and is benchmarked to historical values. RHG-NEMS optimizes both the supply and demand sides of the energy system while factoring in consumer constraints and dynamic economic and energy systemwide feedback. Importantly, while these point estimates give the appearance of certainty and accuracy, there is significant uncertainty in future emissions projections that is documented thoroughly in each of the three emissions scenarios described above. No model can predict the future given unforeseen factors such as notable economic swings and implementation delays for programs. However, the range of emissions estimates provides a useful indication of possible outcomes from successful implementation of policies and measures.

An important source of uncertainty is the impact of delayed implementation of policy measures and market actions. The successful rate of deployment of clean technology and fuels—including consumer adoption patterns, economic recovery from the pandemic, and the permitting and build-out of necessary new assets and reuse of existing assets to produce and deliver clean energy—is essential to reach GHG emission reduction targets. Any delays will only increase GHG emissions in 2030.

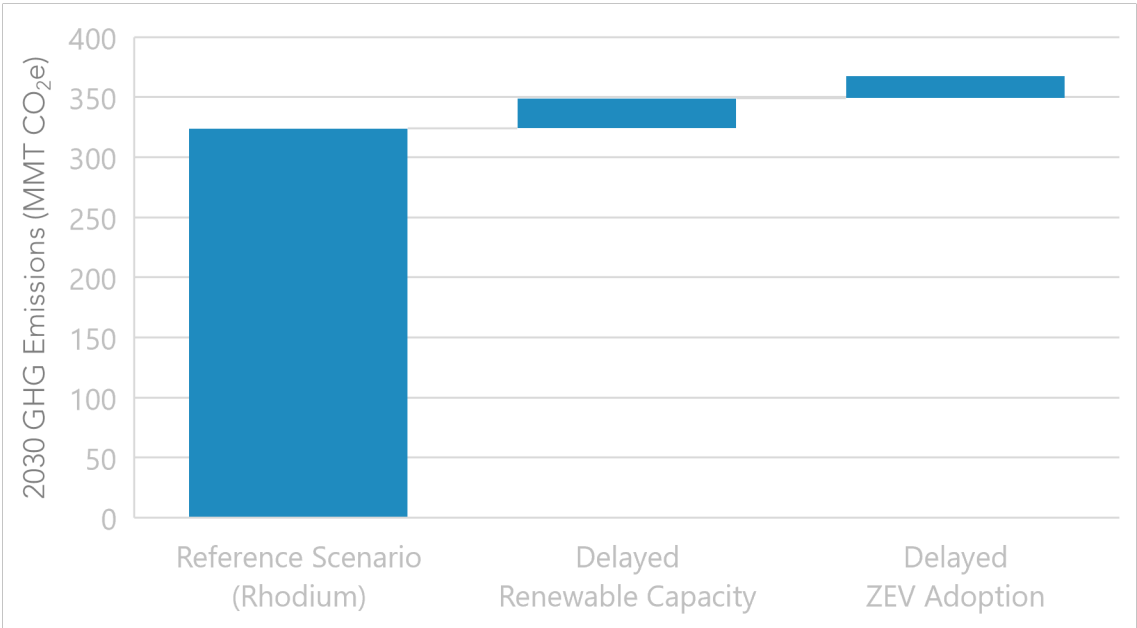
It is important to note that incentives, carbon pricing, and regulations all can result in similar types of responses including, but not limited to:

- Build-out of clean energy and infrastructure
- Deployment of clean technology
- Reduced demand for fossil energy
- Efficiency improvements

As such, the uncertainty analysis discussion focuses on implementation (technology and infrastructure deployment), and not any specific programs or policies. It is successful implementation that must ultimately happen for emissions reductions to be realized.

The uncertainty analysis described in Appendix J (Uncertainty Analysis) quantifies the impact of delayed permitting and building of renewable generation and transmission in the power sector and delayed adoption of ZEVs across all vehicle fleets in the transportation sector. The Reference Scenario (Rhodium) estimates emissions in 2030 to be 324 MMTCO₂e. A five-year delay in renewable capacity would increase emissions by 8 percent in 2030 (25 MMTCO₂e) relative to the Reference Scenario. If similar delays in clean energy production and deployment occur in other sectors, a larger increase in emissions relative to the reference scenario would be expected, jeopardizing the state's ability to achieve the 2030 target. Similarly, a delay in consumer adoption of zero emission vehicles (LDV, MDV, HDV) would increase emissions by 6 percent in 2030 (19 MMTCO₂e) relative to the Reference Scenario. Delays in transitioning to electric equipment and appliances in homes and businesses would also lead to increased emissions in 2030. Figure 2-10 illustrates the impact on projected emissions in 2030 associated with delayed renewable capacity and delayed transportation vehicle electrification.

Figure 2-10: Impact of delayed implementation on 2030 GHG emissions¹⁹⁵



Appendix J (Uncertainty Analysis) includes additional details on the assumptions and model used for the uncertainty analysis and the risks to achieve the emissions reductions from 2022 to 2030 that are anticipated in the Scoping Plan Reference Scenario. While the analysis focuses on renewable capacity and transportation, the analysis identifies a common set of themes that can impact emissions reductions across economic sectors, including permitting, technology availability, and consumer adoption. The impact of delayed emissions reductions will vary by sector and by the specific policy at risk of delay.

We give these quantitative examples of the impact implementation delays can have on GHG reductions, but almost every economic sector will have the need for permitting to enable at least a 40 percent reduction below 1990 levels. If we consider the increased ambition of the Scoping Plan Scenario, which identifies an accelerated 2030 target, the same types of uncertainty manifest themselves in successful implementation of the Scoping Plan Scenario, with the added need for CCS and CDR and a need to grow other energy sectors such as hydrogen.

¹⁹⁵ The implementation delay scenarios were modeled separately and do not necessarily reflect the combined impact of delayed renewable capacity and transportation vehicle electrification.

Cap-and-Trade Program Update

Since the adoption of the first Scoping Plan in 2008, carbon pricing in the form of a Cap-and-Trade Program has been part of the portfolio to achieve the state's GHG reduction targets, and it will remain critical as we work toward carbon neutrality. This section provides an update on the program and its role in achieving the 2030 target.

The Cap-and-Trade Program first came into effect in 2012, under AB 32, and included declining allowance caps through 2020. In 2017, AB 398¹⁹⁶ was passed by a supermajority in the Legislature and included prescriptive direction on the design of the program from 2021 through 2030. The AB 398 Cap-and-Trade Program came into effect on January 1, 2021, and it included the following changes:

- Doubling of stringency with an annual cap decline of 4 percent per year from 2021–2030
- AB 398 price ceiling
- AB 398 redesigned allowance price containment reserve with two tiers
- AB 398 100 percent leakage assistance factor for industry
- AB 398 lower offset limits: Usage limit cut from 8 percent to 4 percent, and half of offsets must provide direct benefits to California

The reduction in the role of offsets in the program was in recognition of ongoing concerns raised by environmental justice advocates regarding the ability of companies to use offsets for compliance instead of investing in actions on site to reduce GHG emissions that could also potentially reduce criteria or toxic emissions.^{197,198} Note that data show the relationship between facility emissions of GHGs and co-pollutants is highly variable by sector and pollutant.¹⁹⁹ Changes to the allowance price containment reserve and the addition of the price ceiling were included to ensure protections against price spikes in the program, while the changes to the leakage assistance factors were to ensure the maximum protection against leakage in the program. The original design of the program included an auction floor price that increases by 5 percent plus inflation each year, and

¹⁹⁶ Assembly Bill 398 (Garcia, Chapter 135, Stats. of 2017). California Global Warming Solutions Act of 2006: market-based compliance mechanisms: fire prevention fees: sales and use tax manufacturing exemption. https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398.

¹⁹⁷ OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities*. <https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf>.

¹⁹⁸ The OEHHA report also found that companies that use the most offsets often own the facilities that contribute to local PM_{2.5} exposure. However, there was no causal relationship found to indicate that implementation of the Cap-and-Trade Program was contributing to increases in local air pollution. Also see: CARB. FAQ Cap-and-Trade Program. <https://ww2.arb.ca.gov/resources/documents/faq-cap-and-trade-program>.

¹⁹⁹ OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities*. <https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf>.

that escalation factor is retained in the post-2020 program and is also applied to the allowance price containment reserve and price ceiling. These features, combined with the self-ratcheting mechanism for unsold allowances at auctions,²⁰⁰ help to ensure the program is able to handle periods of high and low demand for allowances while continuing to ensure a steadily increasing price signal for regulated entities to invest in GHG reduction technologies.

As a result of achieving the 2020 target several years earlier than mandated by law, there are unused allowances in circulation. CARB estimated the amount to be approximately 310 million allowances after the conclusion of the third compliance period (2018–2020).²⁰¹ AB 398 had also called for a similar analysis, which was completed in 2018.²⁰² This bank represents approximately 5 percent of the total number of vintage 2013–2030 allowances issued within the joint market. This bank of allowances can only remain banked if year-over-year the covered emissions are declining by 14 MMT. If the annual decline in actual emissions is less than 14 MMT, regulated entities will need to use the banked allowances to cover their compliance obligations. It is likely that the existing bank of 310 million allowances will be needed over the early part of this decade and will be exhausted by the end of the decade. During the same period, prices for allowances will continue to increase at least 5 percent plus inflation year-over-year, sending a steadily increasing price signal to spur investment in onsite reductions for covered entities.

With the passage of AB 1279, the state has a statutory target to achieve carbon neutrality no later than 2045. This Scoping Plan demonstrates that planning on a longer time frame for the new carbon neutrality target means we must accelerate our near-term ambition for 2030 in order to be on track to achieve our longer-term target. CARB will use the modeling for this Scoping Plan to assess what changes may be warranted to the Cap-and-Trade or other programs to ensure we are on track to achieve an accelerated 2030 target. Since the original adoption of the Cap-and-Trade regulation, the program has been amended eight times through a robust public process. Moreover, then-California Environmental Protection Agency Secretary Jared Blumenfeld testified at a Senate hearing in 2022 that CARB will report back to the Legislature by the end of 2023 on the status of the allowance supply with any suggestions on legislative changes to ensure the number of allowances

²⁰⁰ The self-ratcheting mechanism temporarily removes unsold allowances from the market until either sufficient demand manifests for two consecutive auctions and they are incrementally reintroduced at future auctions, or they are permanently removed from general circulation if demand remains low.

²⁰¹ CARB. 2022. BR 18-51 Cap-and-Trade Allowance Report. Attachment A.

https://www2.arb.ca.gov/sites/default/files/cap-and-trade/Allowance%20Report_Reso18_51.pdf.

²⁰² CARB. 2018. Staff Report: Initial Statement of Reasons: Proposed Amendments to the Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. September 4. https://www.arb.ca.gov/regact/2018/capandtrade18/ct18398.pdf?_ga=2.134288305.1735610122.1664813952-1100516233.1657841496.

is appropriate to help the state achieve its 2030 target of at least 40% below 1990 levels. As part of that status update, CARB will also provide information on any potential program changes that may be needed to allowance supply to help achieve an accelerated target for 2030 identified in this Scoping Plan as necessary to achieve carbon neutrality no later than 2045. Engaging in this process in 2023 will allow for the consideration of this Scoping Plan, inclusion of additional data points for the second year of operation of the AB 398-designed program (which only came into force in January 2021), and an opportunity to hold public workshops.

It is also worth noting that the COVID-19 pandemic had significant impacts on economic activity in California and elsewhere.²⁰³ Emissions were significantly lower in 2020 due to the impacts of the global pandemic. There is an expectation that emissions will increase as the economy recovers and behaviors continue to shift from the impacts of the ongoing pandemic. As a result, 2020 should be regarded as an outlier in the emissions trends. This scenario of increasing emissions is similar to what happened in the first compliance period for Cap-and-Trade, where the state economy was recovering from the Great Recession and does not correlate to a problem with the structure of this program or other programs that cover emissions related to the manufacturing or transportation sectors. In any assessment of this and other programs, it is essential to consider external factors such as economic activity and availability of zero carbon energy such as hydropower, among others.

To better understand the role of the Cap-and-Trade Program in achieving the 2030 target, Table 2-5 compares the 2030 GHG emissions estimates from the three reference scenarios described in Table 2-4. The 2017 Scoping Plan projection is from the PATHWAYS model for the Scoping Plan Scenario approved by the Board in late 2017. It excludes the contribution of the Cap-and-Trade Program, without any consideration of uncertainty factors (i.e., a characterization of the uncertainty that a given GHG reduction measure included in the 2017 Scoping Plan will actually achieve the GHG reductions it is projected to deliver). The Reference Scenario represents what GHG emissions would look like if we did nothing beyond the existing policies that are required and already in place to achieve the 2030 target; this scenario is based on the recent PATHWAYS modeling, excluding the contribution of the Cap-and-Trade Program, and without any consideration of uncertainty factors. It indicates that GHG emissions will be lower over this decade than originally projected when the 2017 Scoping Plan was approved. The

²⁰³ CARB. November 4, 2021. Mandatory Greenhouse Gas Reporting - 2020 Emissions Year Frequently Asked Questions. https://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/2020mrrfaqs.pdf?_ga=2.264251343.1760432228.1650736660-1644197524.1577749754.

Reference Scenario (Rhodium) which also does not include uncertainty bounds, is the modeling used for the uncertainty analysis above.

Importantly, PATHWAYS is not able to explicitly model a carbon pricing policy, and therefore the Cap-and-Trade Program is not represented in the 2017 Scoping Plan or the Reference Scenario. Carbon pricing is included in RHG-NEMS, which reflects state and federal policies included in the U.S. Energy Information Administration (EIA) Annual Energy Outlook 2022 and the National Energy Systems Model (NEMS), which is the basis for RHG-NEMS.²⁰⁴

As detailed in EIA's documentation, California's Cap-and-Trade Program is represented through increased energy prices, which flow across economic sectors.²⁰⁵ However, many of the emissions covered by the California Cap-and-Trade Program are not energy- and fuel-related emissions. Given that, the energy systems model RHG-NEMS was used to model the impact of California Cap-and-Trade on the energy system. However, RHG-NEMS does not explicitly model the entire program, which includes non-energy related emissions from the industrial, agricultural, waste, and transportation sectors.

²⁰⁴ U.S. EIA. 2022. *Summary of Legislation and Regulations Included in the Annual Energy Outlook 2022*. March. <https://www.eia.gov/outlooks/aeo/assumptions/pdf/summary.pdf>.

²⁰⁵ U.S. EIA. 2022. Electricity Market Module. <https://www.eia.gov/outlooks/aeo/assumptions/pdf/electricity.pdf>.

Table 2-5: Comparison of 2017 Scoping Plan and two Reference Scenarios

	2030 GHG Emissions (MMTCO ₂ e) (2017 Scoping Plan)	2030 GHG Emissions (MMTCO ₂ e) (Reference Scenario)	2030 GHG Emissions (MMTCO ₂ e) (Reference Scenario-Rhodium)
Reference Scenarios	320	305	324
Gap to Accelerated 2030 Target under the Scoping Plan Scenario (226)²⁰⁶	94	79	98

Under the Scoping Plan Scenario, in 2030 California emissions are anticipated to be 48% below 1990 levels. This represents an acceleration of the current SB 32 target of a 40% reduction below 1990 levels. Table 2-5 includes the gap between the different reference scenarios and the accelerated 2030 target achieved under the Scoping Plan Scenario. It also shows that depending on the modeling, there are a range of potential emissions levels in 2030 prior to accounting for the full impact of the Cap-and-Trade Program on emissions. That range is from 305 to 324 MMTCO₂e in 2030. That represents a 19 MMTCO₂e spread, or about 8.4 percent of the accelerated 2030 target of 226 MMTCO₂e. Importantly, none of these scenarios includes all of the actions identified in the Scoping Plan Scenario for this Scoping Plan; many of those actions, such as SB 596, CCS, and a more stringent LCFS program, will only begin to happen in this decade, and their contributions toward meeting the accelerated 2030 target are therefore not included in the reference scenarios. The actual emissions for the remainder of this decade will therefore likely be lower than in each of the scenarios in Table 2-5 once policies and regulations are in place to support an accelerated 2030 target. However, the degree of this difference between actual and projected emissions will differ across the modeled reference scenarios.

²⁰⁶ Table 3 from the 2017 Scoping Plan included a range of 34 to 79 MMTCO₂e for reductions needed from the Cap-and-Trade Program to achieve a 2030 target of 40 percent below 1990 levels.

Regardless of the uncertainty and differences in the models, it is clear additional GHG reductions must happen over this decade to achieve an accelerated 2030 target. This will require an evaluation of all major programs to assess the need to increase their stringency between now and 2030. As the actual reductions from non-Cap-and-Trade Program measures increase, California will be less reliant on the Cap-and-Trade Program to “fill the gap” to meet an accelerated 2030 reduction target. For example, CARB is developing a proposal to increase the stringency of the LCFS program for 2030, the recently adopted Advanced Clean Cars II regulation is more stringent than modeled for the 2030 40 percent target in the 2017 Scoping Plan, and SB 596 requires specific reductions in the cement sector over this decade and beyond. However, we also know we are not on track to achieve the VMT reduction called for in the 2017 Scoping Plan and will need to double down to achieve the even more ambitious target called for in the Scoping Plan Scenario. Also, we will need additional actions over the coming years to reduce short-lived climate pollutants to meet the emission reductions called for in SB 1383.

Collectively, any additional legislation or prescriptive policies for sectors, delays in successful implementation of non-Cap-and-Trade programs and policies, increases in incentive program funding, and delays in economic recovery from the pandemic will continue to affect the role the Cap-and-Trade Program will need to play over this decade to meet the state’s GHG reduction obligations. In summary, the Cap-and-Trade Program must continue to be able to scale across a range of possibilities. With passage of AB 1279 and the need to accelerate the 2030 target, CARB will initiate a public process to utilize the modeling results from this Scoping Plan, specifically the Scoping Plan Scenario, to evaluate and potentially propose changes to the design of the Program, including the annual caps. This process will ensure that the Program supports an increased ambition for 2030 while retaining the ability to scale as other factors, such as changing economic conditions and implementation of non Cap-and-Trade programs, impact the actual emissions at the sources covered by the Program. Any changes to the Program must continue to support a well-designed system that continues to send a steadily increasing price signal, minimizes for leakage, reduces emissions in the covered sectors toward the state’s targets, is cost-effective and technologically feasible, and avoids energy rate spikes. Importantly, the Program should support air quality benefits, especially in overly burdened communities, and not exacerbate existing air quality disparities.

Chapter 3: Economic and Health Evaluations

This chapter provides two approaches for quantifying the economic and health outcomes of the Scoping Plan Scenario. One approach is to consider the combined impact of all measures²⁰⁷ in a scenario. The other approach is required by AB 197, where each measure within a scenario is evaluated independently. In addition to these two evaluation approaches, this chapter also includes a discussion of the Public Health implications for the Scoping Plan Scenario, an overview of the Climate Vulnerability Metric, and the Environmental Analysis conducted in accord with the California Environmental Quality Act (CEQA).

It is important to note that all of the analyses in this chapter use a variety of data sources, but because the modeling is economy-wide at the state level, none of them produce community specific detail outputs. The AB 32 GHG Inventory Sector analysis relies on PATHWAYS data at the state level that is proportionally applied across all regions of the state to translate changes in state level fuel combustion to local level changes. The NWL analysis similarly utilizes a variety of data sources and a suite of models that produce data that are scaled up to the statewide level. All of the models, except the Wildland Urban Interface (WUI) defensible space model, which is conducted at the county level, create aspatial projections that are not applicable at the community level.

Economic Analysis

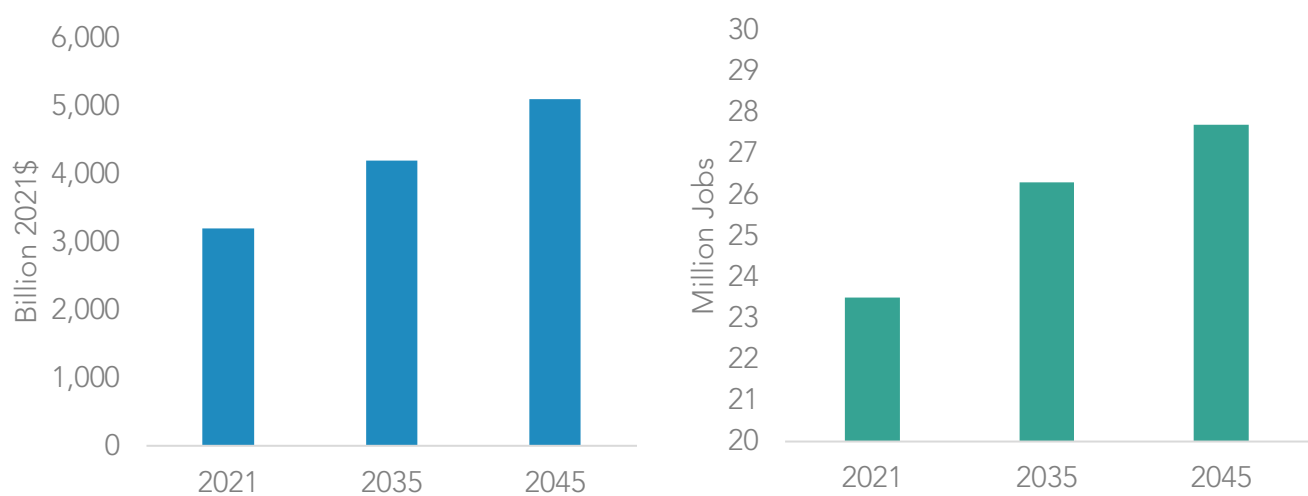
As part of the process to develop this Scoping Plan, alternative scenarios that transition energy needs away from fossil fuels and achieve carbon neutrality no later than 2045 were developed. Alternative scenarios that assess the impact of different land management strategies on carbon stocks in NWL were also developed. These alternatives are described in Appendix C (AB 197 Measure Analysis). The following sections describe the Scoping Plan Scenario in terms of direct cost, the economy, employment, and health outcomes.²⁰⁸

²⁰⁷ AB 197 calls for the evaluation of “measures.” This Scoping Plan treats each action and its variants on stringency as measures for the purposes of this chapter. Appendix C (AB 197 Measure Analysis) lists the measures and corresponding modeling assumptions for each alternative and the Scoping Plan Scenario. The modeling assumptions for the Scoping Plan Scenario are summarized in Table 2-1.

²⁰⁸ For the Draft 2022 Scoping Plan Update, achieving carbon neutrality in 2035 and 2045 was evaluated. The AB 32 GHG Inventory sector direct cost, the economy, employment, and health outcomes were assessed in those years. Similarly, the Scoping Plan Scenario assessments that are presented in this chapter were made for years 2035 and 2045.

The California economy is growing, and it is projected to continue to grow about 2 percent each year, from \$3.2 trillion in 2021 to \$5.1 trillion in 2045, as shown in Figure 3-1. Similarly, employment in California is anticipated to grow 0.7 percent per year, from 23.5 million jobs in 2021 to 27.7 million jobs in 2045. It is in this context, termed the *Reference Scenario*, that CARB evaluates the Scoping Plan Scenario in terms of its impact on economic growth and employment. The projections shown in Figure 3-1 were produced by CARB to evaluate the incremental impact of regulations.

Figure 3-1: Projected California gross state product (left) and employment growth (right) from 2021 to 2035 and 2045



Source: California Air Resources Board

Transitioning away from fossil fuels to alternatives and increasing action on NWL will affect employment opportunities, household spending, businesses, and other economic aspects of our lives. Sectors expected to see growth include renewable electricity and hydrogen production, while other sectors may shrink. The deployment of clean technology may require higher upfront costs for things like heat pumps and induction stoves, but those could be offset by energy efficiency savings. Employment and economic development in NWL-related industries and sectors are expected to increase as land management actions increase, especially for the Forestry sector (in which a significant increase is called for under the Scoping Plan Scenario). The net impact of these actions on employment and jobs is presented in this chapter.

Estimated Direct Costs

One key metric is the direct cost, or net investment, reflecting any savings that result from actions. Similar approaches were used to estimate direct costs for the AB 32 GHG Inventory sectors and for the NWL, as described in this section.

AB 32 GHG Inventory Sectors

Transitioning away from fossil fuels requires investment in new equipment and infrastructure throughout the economy. It involves developing the capacity to produce fuels and electricity from renewable sources rather than producing fossil energy. This transition also takes time. One approach is to eliminate combustion of fossil fuels by replacing all equipment in a specified year. Another approach is to establish a future point at which all sales of new equipment rely on alternative energy sources and allow the transition to occur over time as equipment is replaced upon its end of life.

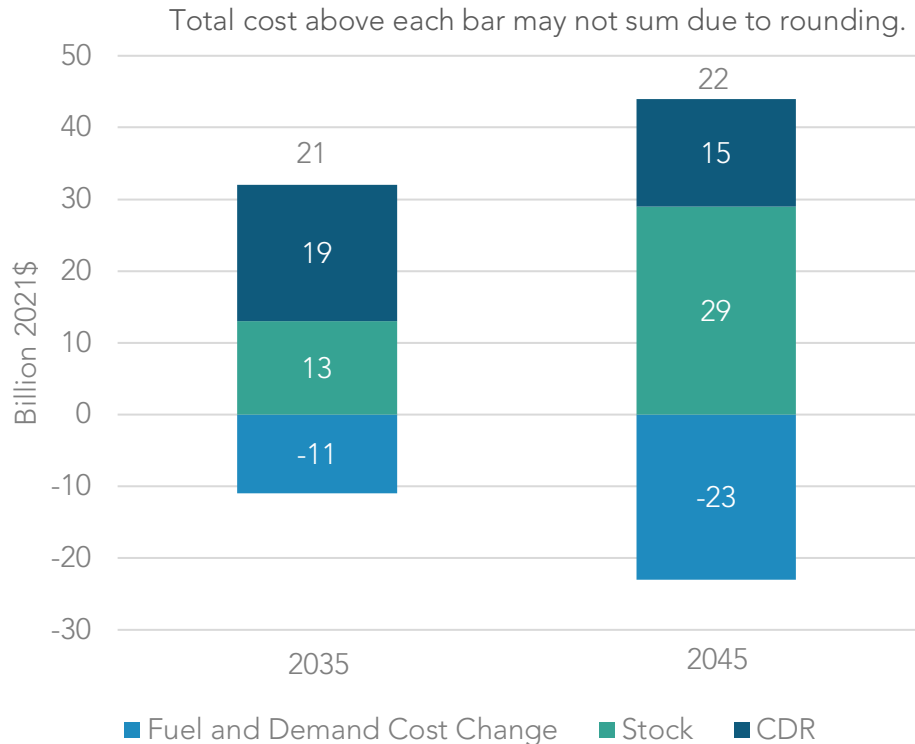
To evaluate the investment required through 2045, the PATHWAYS model was used to represent equipment stock and its turnover to non-fossil fuel alternatives over time. The annualized, incremental cost of infrastructure in excess of the annualized cost of the Reference Scenario²⁰⁹ was computed for each year from 2022 through 2045. These costs were computed by first taking the absolute cost in each year—which includes both new equipment investment and also expenditures on energy, operations, and maintenance in each year—and then levelizing the costs (in the same way car or house payments are annualized or spread out over time) to arrive at an annualized cost. Fuel savings, and resulting cost savings, associated with changing energy demand—from gasoline to electricity for vehicles, for example—are included as a result of this methodology. Carbon dioxide removal includes DAC technology powered primarily by off-grid solar, BECCS to produce hydrogen or other fuels, and NWL sequestration, as discussed in Chapter 2.²¹⁰

Figure 3-2 shows the stock investment cost, fuel/efficiency savings, and CDR cost. The Scoping Plan Scenario allows end-of-life transition of equipment. The cost of investing in new equipment is partially offset by savings associated with efficiency gains and reduced demand for fuels like gasoline. This is particularly relevant in the transportation sector, which leads to the majority of savings in 2045 in the Scoping Plan Scenario, which models near complete electrification of transport relying only on end-of-life replacement of vehicles. Appendix H (AB 32 GHG Inventory Sector Modeling) includes additional detail on direct costs in each sector and how costs change over time.

²⁰⁹ The Reference Scenario described in Chapter 2 and in Appendix H (AB 32 GHG Inventory Sector Modeling) was the basis for the direct cost comparison.

²¹⁰ The energy source for DAC is not modeled, but renewable electricity and/or hydrogen produced from electrolysis are zero-carbon options consistent with the carbon neutrality targets in this Scoping Plan. The economic analysis associated the investment in DAC with the solar industry for consistency with the carbon neutrality targets.

Figure 3-2: Cost and savings relative to the growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors)



Natural and Working Lands

For NWL, the direct costs of each management strategy were estimated using available academic literature, monitoring and reporting data, survey data, and cost data from existing subsidy programs on the per acre cost of implementing the management strategy. These cost data, in combination with the acreage of each management strategy under the scenarios, provided estimates of the overall direct cost to either the government or the private sector. The direct costs are independent of the policy lever used to implement the action and do not include many important benefits and externalities of the actions. They are assumed to be constant for each scenario and into the future. Avoided or secondary costs, such as those from reductions in wildfire suppression expenses, are not included. Appendix I (NWL Technical Support Document) includes additional direct cost details.

Table 3-1 includes the direct cost estimates for the Scoping Plan Scenario compared to the Reference Scenario.²¹¹ Direct costs for the NWL sector are expected to be significant due to the ambitious level of action for each land type.

Table 3-1: Cost and savings relative to a growing California economy for the Scoping Plan Scenario (NWL)

Measure	Scoping Plan Scenario: Average Direct Annual Cost, 2025–2045 (millions \$/year)
Forests / Shrublands / Grasslands	1,780
Annual Croplands	284
Perennial Croplands	4
Urban Forest	4,230
Wildland Urban Interface (WUI)	114
Wetlands	28
Sparsely Vegetated Lands	4
Totals	6,460
Note: Table values may not add to total due to rounding.	

CARB estimates that all jurisdictions, including private landowners, currently spend approximately \$4 billion dollars annually on planting, maintenance, sidewalk repair, tree removal, and other expenses related to urban forests, and that reaching the theoretical maximum tree cover would require increasing that spending by a factor of 20. The cost of the Scoping Plan Scenario is predominantly a mix of urban forests and forests, shrubland, and grasslands spending.

²¹¹ The Reference Scenario described in Chapter 2 and in Appendix I (NWL Technical Support Document) was the basis for the direct cost comparison.

Economy and Employment

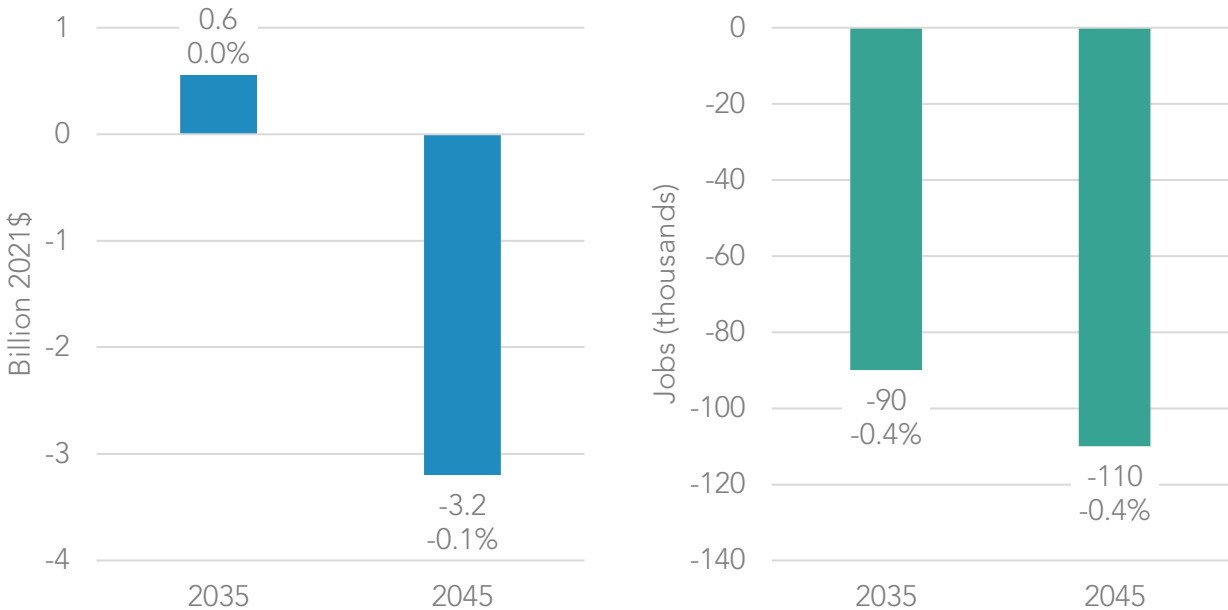
Two different models were used to estimate the overall impact that investing in a transition away from fossil fuels and in our NWL may have on the growing California economy. The transition away from fossil fuels was evaluated using the IMPLAN economic analysis model. The NWL investments were evaluated using the REMI PI+ economic model. These models provide similar outputs relative to the same economic and employment forecasts used to develop a Reference Scenario for use in each model.

AB 32 GHG Inventory Sectors

To estimate the overall impact that investing in a transition away from fossil fuels may have on the California economy, CARB used the IMPLAN model. Additional detail regarding the model, assumptions, and methodology are included in Appendix H (AB 32 GHG Inventory Sector Modeling). The IMPLAN model is a multisector representation of private industries in the U.S. economy that maps economic relationships across industries, households, and governments. This model translates direct costs and savings associated with transitioning away from fossil fuels with indirect effects such as wages, purchases of goods and services, business tax impacts, and supply chain effects. In addition, the induced effects of household purchases, local and import purchases, wages paid, and household tax impacts are estimated. This comprehensive assessment of the interactions between capital investment in fossil fuel alternatives and household purchases provides an indication of the response of the California economy to the Scoping Plan Scenario.

The Scoping Plan Scenario results in a small impact on the Gross State Product (GSP) and employment relative to the Reference Scenario, as shown in Figure 3-3. Economic growth is largely unaffected by the Scoping Plan Scenario in 2035 and slowed by 0.1 percent in 2045. Employment growth is also slowed a small amount, 0.4 percent in 2035 and in 2045, and employment still grows. Assuming annual growth rates of 0.7 percent means there would be more than 193,000 additional jobs in 2045.

Figure 3-3: Gross state product (left) and employment (right) relative to a growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors)



California households will see increased costs from the purchase of new capital stock and savings from reduced spending on fuel, as shown in Figure 3-2. Households also will face increased costs associated with CDR, costs associated with energy efficiency measures, and commercial stock purchases—all of which are assumed to be passed directly to consumers. The impact to California households, however, is not limited to these direct costs, as changes in relative prices, employment, and wages can affect household well-being. Personal income, which captures the direct, indirect, and induced impacts, is a metric commonly used to evaluate the impact of policies on households.

Personal income in California is projected to grow from \$2.7 trillion in 2021 to \$3.6 trillion in 2035 and \$4.4 trillion in 2045. Household projections are based on California Department of Finance population projections, which estimate the state’s population to grow an average of 0.3 percent each year from 2021 to 2045.²¹² California households are projected to increase from 13.3 million in 2020 to 14.6 million in 2035 and 15.0 million in 2045.

²¹² California Department of Finance. Population Projections (Baseline 2019). <https://dof.ca.gov/forecasting/demographics/projections/>.

While the transition away from combustion of fossil fuels will improve air quality for all Californians (and even, more so in overly burdened communities), the economic impacts of the Scoping Plan Scenario are unlikely to be equal among Californians. Table 3-2 presents the change in income by household income group relative to the Reference Scenario in 2035 and 2045. While in 2035 there is a net decrease in personal income of \$600 million, total income for households that make less than \$100,000 per year is estimated to decline by \$4.1 billion dollars, and the total income for households that make more than \$100,000 per year will increase by \$3.5 billion under the Scoping Plan Scenario. In 2045, although there is no net change in personal income across all California households, results vary by income level. Total income for households that make less than \$100,000 per year are estimated to decline by \$5.3 billion dollars, while the total income for households that make more than \$100,000 per year will increase by \$5.3 billion under the Scoping Plan Scenario.

Table 3-2: Income Impacts by California household income group in 2035 and 2045 for the Scoping Plan Scenario (AB 32 GHG Inventory Sectors)

Household Income Group (\$2021)	Percentage of 2021 California Households ²¹³	Change in Income (Billion \$2021)	
		2035	2045
Less than \$50,000	30	-2.9	-3.9
\$50,000 to \$100,000	27	-1.2	-1.4
\$100,000 to \$200,000	28	2.5	4.0
More than \$200,000	15	1.0	1.3
Total	100	-0.6	0.0

²¹³ U.S. Census Bureau. 2021. Household Income. California.
<https://data.census.gov/cedsci/table?q=california%20income>.

In addition to income level, there is likely to be an impact to California personal income that varies based on race/ethnicity.²¹⁴ Table 3-3 shows the percentage of households within each income group based on eight race/ethnicity categories identified in the American Community Survey 2021. As shown in Table 3-2, households in lower income groups are anticipated to see negative impacts, while households in higher income groups are anticipated to see positive impacts from the Scoping Plan Scenario in both 2035 and 2045. Because more than 60% of households in the race/ethnicity categories of Hispanic, Black alone, Native Hawaiian (HI) or Pacific Islander, American Indian or Alaskan Native, Other, and Two or More make less than \$100,000 per year, these populations generally are likely to experience reduced income. White and Asian households will generally experience both increased and decreased income because these households are distributed more evenly across all four income groups.

The state recognizes the need to ensure that accessibility to clean technology and energy do not further exacerbate health and opportunity gaps for low-income households and communities of color. The Climate Change Investments program exceeds the statutory minimums to invest in projects to benefit disadvantaged communities.²¹⁵ Utilities implement programs for reduced energy bills for qualifying low-income customers.²¹⁶ There are also resources for waste and water bills that leverage federal funds.²¹⁷ CARB also coordinated with the CPUC to ensure that the Climate Credit²¹⁸ funded from the sale of Cap-and-Trade allowances provided to utilities on behalf of ratepayers is credited equally to households and not based on how much energy is used. These are just a few examples of how the state is designing and implementing programs to avoid increasing existing disparities. The state must continue to find ways to relieve economic burdens on low-income households.

²¹⁴ The number of households in each bracket and the race/ethnicity categories are from American Community Survey 2021 results. Population changes through 2035 and 2045 are not forecast. U.S. Census Bureau. 2021. Household Income. California. <https://data.census.gov/cedsci/table?q=california%20income>.

²¹⁵ CARB. Priority Populations — California Climate Investments. <https://www.caclimateinvestments.ca.gov/priority-populations>.

²¹⁶ CPUC. CARE/FERA Program. <https://www.cpuc.ca.gov/lowincomerates/>.

²¹⁷ California Department of Community Services and Development. Low Income Household Water Assistance Program. <https://www.csd.ca.gov/lihwap>.

²¹⁸ CPUC. California Climate Credit - FAQ. <https://www.cpuc.ca.gov/industries-and-topics/natural-gas/greenhouse-gas-cap-and-trade-program/california-climate-credit/california-climate-credit---faq>.

Table 3-3: Percentage of households in each race/ethnicity category by household income group

Household Income Group (\$2021)	Households in Income Group (%)							
	White Not Hispanic	Hispanic	Black Alone	Asian Alone	Native HI or Pacific Islander	American Indian or Alaskan Native	Other	Two or More
Less than \$50,000	26	35	45	25	30	35	37	32
\$50,000 to \$100,000	25	32	27	21	31	33	33	30
\$100,000 to \$200,000	29	25	21	30	30	26	24	27
More than \$200,000	19	7	7	24	9	7	5	11

Natural and Working Lands

The macroeconomic impact of the NWL scenario was evaluated separately in the REMI PI+ model. For the Scoping Plan Scenario, the macroeconomic impact was modeled by assuming that economic activity in the relevant industries grows in proportion to the proposed implementation spending in that industry. All funds for implementing the actions were assumed to be sourced from within the state. For urban forests, the funds were modeled as being sourced from a combination of state government and private property owners in proportion to the current estimated private/public spending ratio. For all other actions, funds were assumed to be sourced from the state government. In each modeled scenario, government spending and income to property owners were reduced relative to the Reference Scenario in proportion to the annual costs of implementation. None of the proposed spending was modeled as being sourced from increased taxes. Additional details on the methodology for evaluating macroeconomic impacts are in Appendix I (NWL Technical Support Document).

While the macroeconomic model does count the increased economic activity in the affected industries as part of GSP, it does not quantify many of the important economic, health, and environmental benefits that would occur if these actions were implemented. While these benefits—like the reduced use of pesticides, value of urban trees, and increased recreational opportunities—would be very significant, they are outside the scope of the macroeconomic model.

The macroeconomic model also makes projections about the total level of employment in the state. The model forecasts that the Scoping Plan Scenario, which greatly increases the level of NWL management actions, channels economic activity toward related industries and would lead to a slight increase in total employment. (Table 3-4). While the model does aim to accurately represent many labor market dynamics, including adjustments of wages and migration rates, it does not account for many costs that might be associated with dramatically scaling up employment in a particular industry, such as the cost of job training.

Table 3-4: Gross state product and employment relative to a growing California economy for the Scoping Plan Scenario in 2035 / 2045 (NWL)

	Scoping Plan Scenario (%)
Gross State Product	0.00 / 0.01
Employment	0.12 / 0.10
Personal Income	-0.04 / -0.04
Personal Income per Capita	-0.04 / -0.14

Health Analysis

Air quality is affected by pollutant emissions from various processes associated with energy systems, including the combustion of fossil fuels, as well as the combustion of vegetation biomass from NWL during wildfires. Pollutants that are important contributors to degraded air quality in California include nitrogen oxides (NO_x), particulate matter (PM), reactive organic gases (ROG), and others. Further, in the atmosphere these pollutants are transported away from the locations of the emissions by wind and other phenomena, and undergo chemical reactions that result in the formation of new pollutants such as ground-level ozone and fine particulate matter (PM_{2.5}). Both primary (emitted) and secondary (formed) pollutants are important from a public health standpoint and contribute to the incidence of air pollution-related mortality and disease within California populations. Measures focused on GHGs do not incorporate specific targets to reduce emissions of PM_{2.5} or air toxics like benzene. These co-pollutants, which are emitted from many of the same pollution sources as GHGs, affect local air quality and pose known risks to public health, such as the risk of asthma and cardiovascular disease. Generally, for stationary sources, certain harmful pollutants are regulated via local rules and regulations that are reflected in permits for stationary sources and are enforced by local air districts, with CARB also regulating air toxics contaminants from stationary sources with the air districts.

AB 32 GHG Inventory Sectors

To assess health impacts for the AB 32 GHG Inventory sectors, an integrated modeling approach was used to quantify and value the air pollution-related public health benefits of the Scoping Plan Scenario relative to the Reference Scenario. Additional details about the models, assumptions, and methodology are included in Appendix H (AB 32 GHG Inventory Sector Modeling). Using output from the PATHWAYS model, projections of pollutant emissions to 2045 were developed for stationary, area, and mobile source emissions using a detailed base year CARB pollutant emissions inventory. Further, the emissions are processed, including for where and when they occur in California, using the Sparse Matrix Operator Kernels Emissions (SMOKE) model. For example, on-road vehicle emissions were allocated along existing roadways, and refining emissions were assigned to the locations of existing refineries. It should be noted that the emissions projections represent statewide average reductions associated with high-level assumptions about alternative fuels and technologies. For example, emissions occurring from refineries to produce liquid fuels are reduced in line with petroleum demand. This reduction is applied equally to all refineries in the Scoping Plan Scenario and does not specify individual facility responses to changing demand. Similarly, the Scoping Plan Scenario does not specify which refineries transition to biofuel production or where new electricity generation facilities are built.

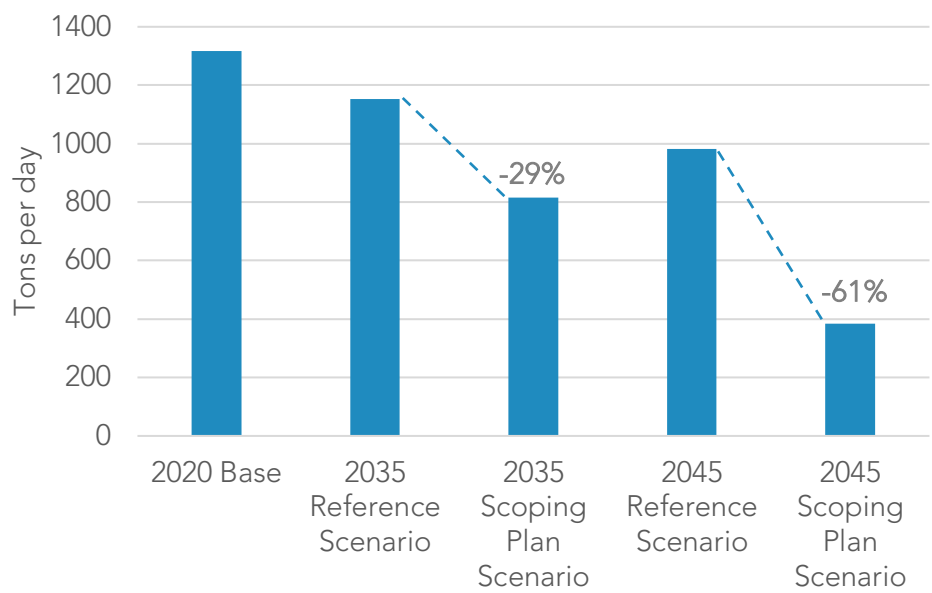
Next, emission changes were translated into impacts on atmospheric pollution levels, including ground-level ozone and PM_{2.5}, via an advanced photochemical air quality model called the Community Multiscale Air Quality (CMAQ) model, which accounts for atmospheric chemistry and transport. A comprehensive assessment of how pollutant concentrations are impacted throughout the year was achieved by simulating all months in 2035 and 2045 for the Scoping Plan Scenario.²¹⁹ Health benefits were estimated using the U.S. EPA's environmental Benefits Mapping and Analysis Program (BenMAP) model to translate pollutant changes into avoided incidence of mortality, hospital admissions, emergency room visits, and other outcomes as a result of reduced exposure to ozone and PM_{2.5}. These outcomes are associated with an economic value in order to aggregate health impacts.

The Scoping Plan Scenario shows a substantial reduction in pollutant emissions relative to the Reference Scenario, including NO_x, PM_{2.5}, and ROG. Reductions in NO_x are shown in Figure 3-4. Even under a business-as-usual trajectory, emissions are reduced from present levels by 26 percent in 2045 in the Reference Scenario, demonstrating the impact of current regulations and trends in energy sectors. The Scoping Plan Scenario further reduces NO_x

²¹⁹ This annual approach differs from the episodic modeling approach applied to the Proposed Scenario and Alternatives in the Draft 2022 Scoping Plan Update. Appendix H (AB 32 GHG Inventory Sector Modeling) describes both approaches.

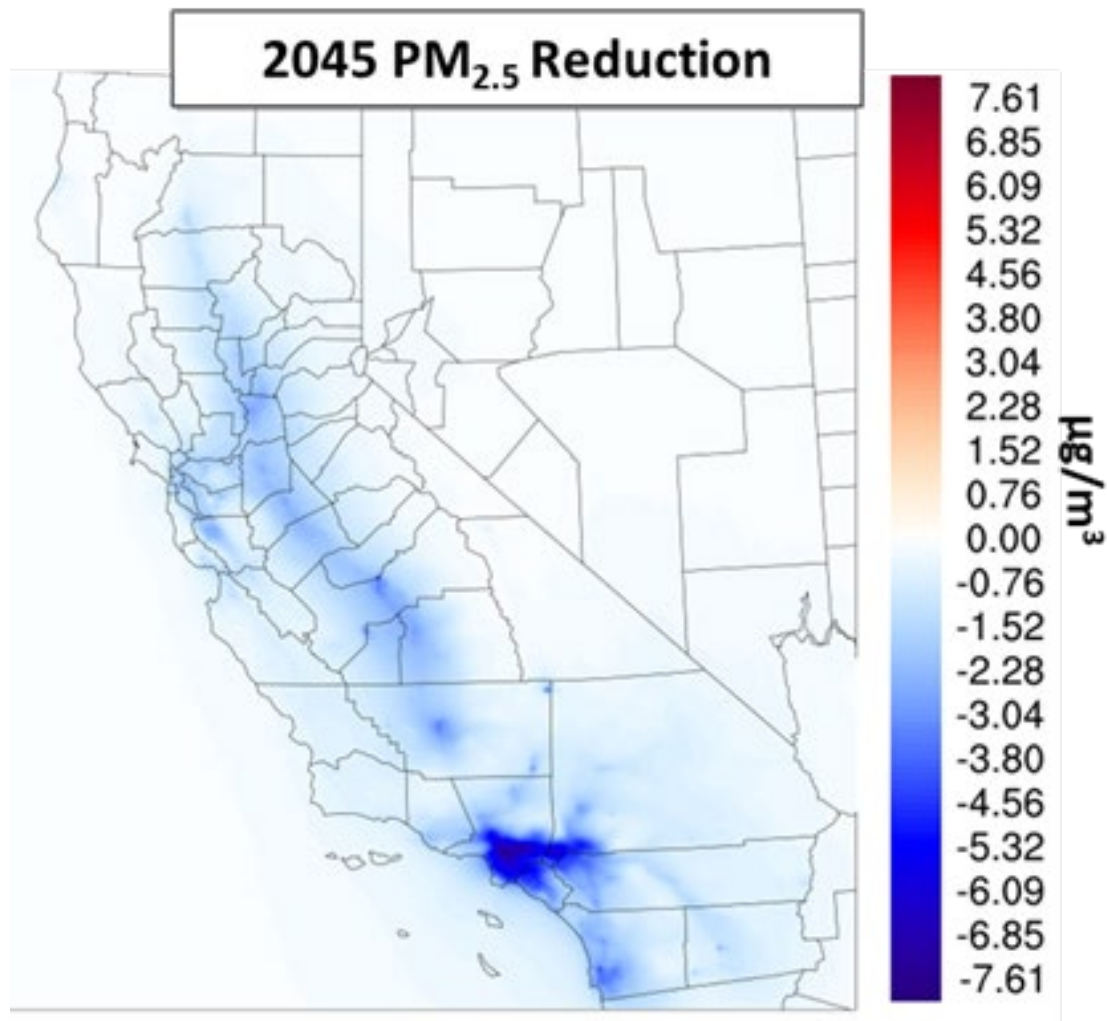
emissions from the Reference Scenario by 29% in 2035 and 61% in 2045. Emission reductions occur throughout the state with particular prominence in urban areas, including the South Coast Air Basin, due to the large presence and activity of emission sources. Appendix H (AB 32 GHG Inventory Sector Modeling) contains additional information about the pollutant emissions modeling and results.

Figure 3-4: Illustration of NO_x emission reductions from current levels for the Reference Scenario and the Scoping Plan Scenario (AB 32 GHG Inventory sectors)



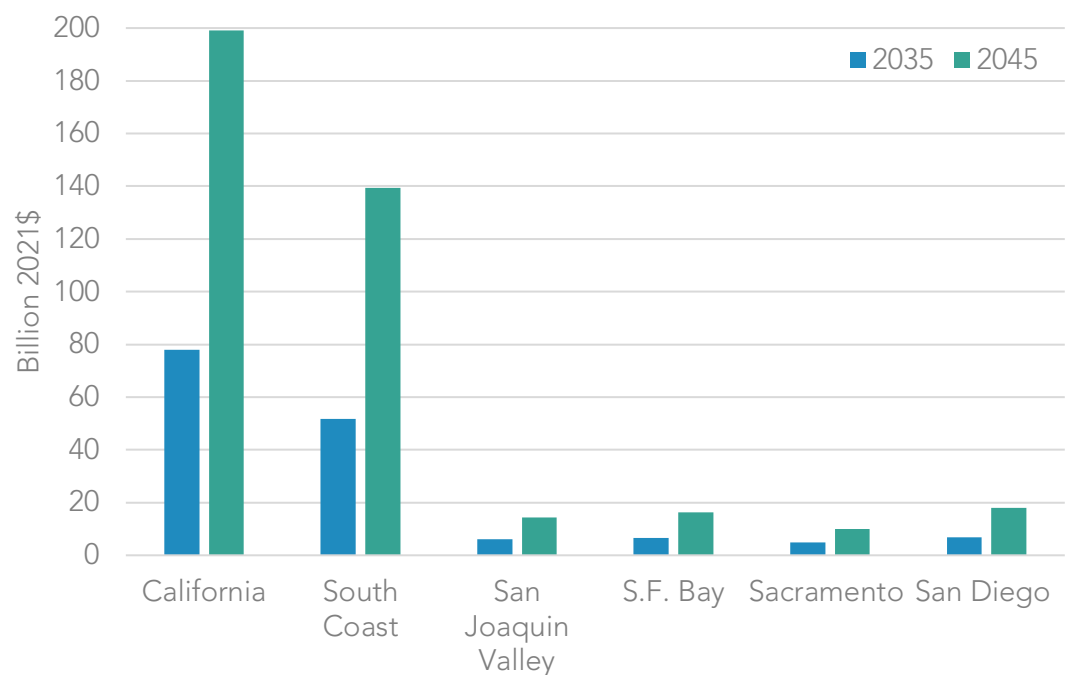
The emission reductions achieve important improvements in air quality throughout California, including reductions in the levels of ozone and PM_{2.5}. Reductions in annual PM_{2.5} levels are shown in Figure 3-5. The greatest reductions are evident in Southern California, the San Joaquin Valley, the San Francisco Bay area, and the Greater Sacramento area due to the large presence and activity of emission sources, meteorology, topography, and others. To highlight the extent of the air quality improvements: reductions reach nearly 8 micrograms per cubic meter (µg/m³) in 2045 and lead to 76% fewer exceedances of the health-based National Ambient Air Quality PM_{2.5} standard of 12 µg/m³. Similarly, ozone improvements reach 19 parts per billion (ppb) and yield 62% fewer exceedance events. Furthermore, the locations of improvements carry important implications for human health as these areas support large urban populations and generally experience the most degraded ozone and PM_{2.5} pollution. Appendix H (AB 32 GHG Inventory Sector Modeling) provides details regarding the atmospheric modeling and results, including differences in ozone and PM_{2.5}.

Figure 3-5: Difference in annual average PM_{2.5} (µg/m³) in the Scoping Plan scenario relative to the Reference scenario in 2045 (AB 32 GHG Inventory sectors)



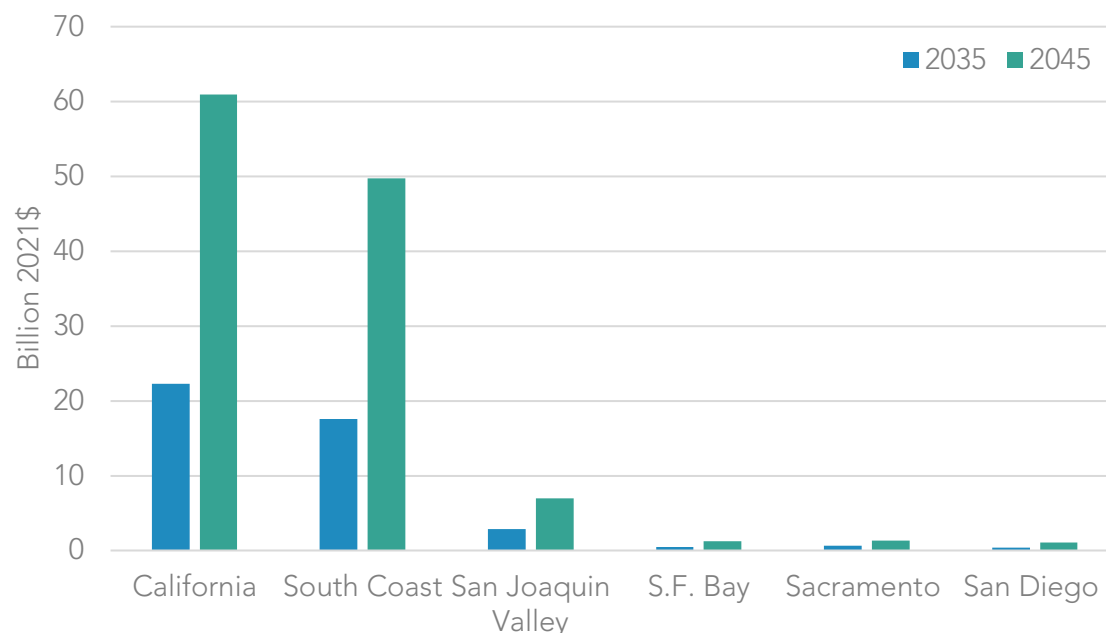
Notable health benefits representing the economic value of the avoided incidence of health effects are associated with the Scoping Plan Scenario. In total, the benefits reach \$78 billion in 2035 and \$199 billion in 2045, as shown in Figure 3-6. Populations in Southern California benefit the most due to preexisting air quality challenges, significant emission sources and activity, and the presence of a large, dense urban population. Additional details regarding the health impact assessment are provided in Appendix H (AB 32 GHG Inventory Sector Modeling).

Figure 3-6: Total health benefits estimated from air quality improvements in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)



Furthermore, these benefits accrue within socially and economically disadvantaged communities identified by CalEnviroScreen, where they are most needed. Total health benefits within census tracts identified as disadvantaged communities using CalEnviroScreen 4.0 reach \$22 billion in 2035 and \$61 billion in 2045, as shown in Figure 3-7. Similarly to the statewide health benefits, the largest share of benefits occurs within disadvantaged communities in Southern California. Additional information on the health benefits within disadvantaged communities can be found in Appendix H (AB 32 GHG Inventory Sector Modeling).

Figure 3-7: Disadvantaged community health benefits relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

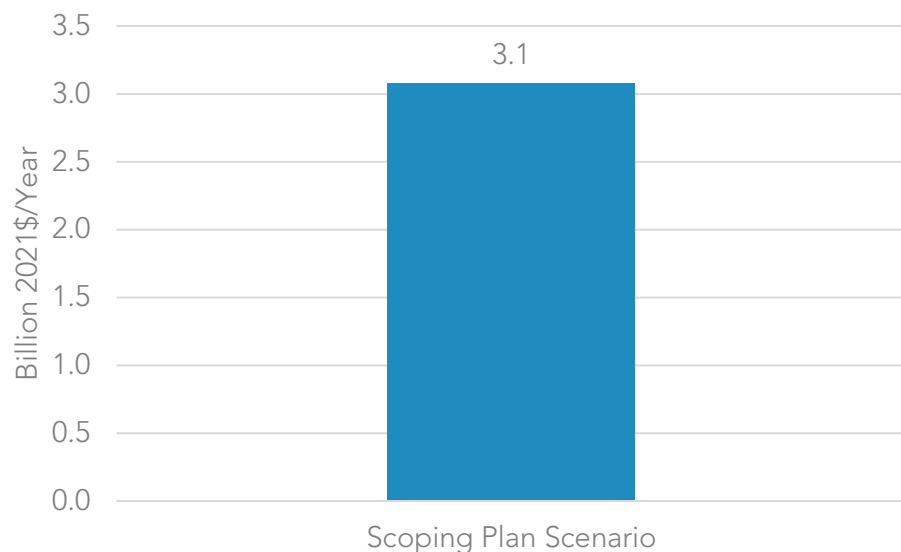


Natural and Working Lands

For NWL, health benefits were evaluated based on projected PM_{2.5} wildfire emissions on forests, shrublands, and grasslands, discussed in the AB 197 Measure Analysis section of the chapter that follows.²²⁰ The health endpoints for the Scoping Plan Scenario and in Appendix I (NWL Technical Support Document) for the alternative scenarios were the basis for the estimated health benefits shown in Figure 3-8. Health benefits were derived from the preliminary University of California, Los Angeles (UCLA) study that estimated annual health impacts and associated costs from California's wildfires from 2008–2018. Additional details are included in Appendix I (NWL Technical Support Document). These costs were applied to the health endpoints discussed in the AB 197 Measure Analysis section of the chapter.

²²⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11, N14. [finalejacrecs.pdf](#) ([arb.ca.gov](#)).

Figure 3-8: Total average annual health benefits relative to the Reference Scenario for the Scoping Plan Scenario (NWL)



As health impacts analyzed here are driven by wildfire emissions, the health benefits for the Scoping Plan Scenario are directly related to the amount of forest, shrubland, and grassland management action. These management actions reduce vegetation fuels and, as a result, wildfire activity. The Scoping Plan Scenario increases the amount of these management actions, reducing wildfire emissions and avoiding incidence of emission-related health effects. The health benefits, or economic value of the avoided incidence of health effects, correspondingly increase with an increasing management implementation rate. Additional details are included in Appendix I (NWL Technical Support Document).

Estimated health benefits do not include the direct impact of wildfires on injuries, deaths, or mental health, nor the indirect costs of lost ecosystem benefits to wildfire. Additional direct health costs may result from wildfire that would likely increase the health benefits from increased forest, shrubland, and grassland management to reduce wildfire activity. Nonetheless, the conservative health benefits under the Scoping Plan Scenario are estimated to be \$3.1 billion per year relative to the Reference Scenario for all NWL actions identified in the Scoping Plan Scenario.

AB 197 Measure Analysis

This section provides estimates for information associated with GHG emissions reduction measures evaluated in this Scoping Plan.²²¹ These estimates, which were developed as part of the process for meeting the requirements of AB 197 (E. Garcia, Chapter 250, Statutes of 2016), provide information on the relative impacts of the evaluated measures when compared to each other. To support the design of a suite of policies that result in GHG reductions, air quality co-benefits, and cost-effective measures, it is important to understand if a measure will increase or reduce criteria pollutants or toxic air contaminant emissions, or if increasing stringency at additional costs yields few additional GHG reductions. To this end, AB 197 requires the following for each potential emissions reduction measure evaluated in any Scoping Plan update:

- The range of projected GHG emissions reductions that result from the measure;
- The range of projected criteria pollutant emission reductions that result from the measure; and
- The cost-effectiveness, including avoided social costs, of the measure.

The following sections describe the evaluation of measures for the AB 32 GHG Inventory sectors and NWL. For the purposes of this Scoping Plan, the identified emissions reduction measures for the analysis required by AB 197 are actions grouped by sectors where several policies and programs are expected to overlap. This approach reflects the most granular feasible analysis given the modeling tools available,²²² the overlap and interaction effects among policies and incentive programs, the longer planning horizon used for this Scoping Plan compared to previous efforts, and the scale of transition needed to achieve carbon neutrality. To implement this Scoping Plan, dozens of individual regulations, policies, and incentive programs are anticipated that work together to drive down emissions across all economic sectors and support actions. Every specific policy or incentive program that could contribute to the deployment of clean technology and energy called for in this plan may overlap in ways that make it infeasible to tease out those policies and programs' individual effects with any reasonable degree of certainty. For example, in the transportation sector, deploying ZEVs and reducing driving demand may be achieved through a combination of the implementation of new or existing regulations, fuels programs, incentive programs, and VMT reduction initiatives that can each contribute to reductions in emissions for the sector. It is not feasible to isolate each sub action from each other at this time in terms of the share of contribution to total reductions. The estimated emission

²²¹ AB 197 calls for the evaluation of "emission reduction measures." This Scoping Plan treats each action and its variants on stringency as emission reduction measures for the purposes of this chapter. Appendix C (AB 197 Measure Analysis) lists the measures and corresponding modeling assumptions for each alternative.

²²² See Appendix H (AB 32 GHG Inventory Sector Modeling and Appendix I (NWL Technical Support Document).

reductions, health endpoints, and costs by measure for the Scoping Plan Scenario are presented in this chapter, and the corresponding estimates for the Proposed Scenario and Alternatives 1, 2, and 4 are included in Appendix C (AB 197 Measure Analysis).

Because many of the measures and underlying assumptions interact with each other, isolating the GHG emission reductions, corresponding changes to fuel combustion, and associated cost of an individual measure is analytically challenging. Each measure is evaluated by examining the change in fuel combustion, cost, and emissions associated with just that measure using the PATHWAYS model. The difference between the Scoping Plan Scenario and the Reference Scenario is estimated for each measure. Starting from the Scoping Plan Scenario, the modeling assumptions for an individual measure are reverted to the Reference Scenario values, resulting in GHG reductions, changes to fuel combustion, and costs (or savings). This approach does not reflect interactions between sectors in PATHWAYS that influence the results for each complete alternative, presented earlier. As such, the values associated with each measure should not be added to obtain an overall scenario estimate.

To arrive at the 2045 target for NWL, CARB modeled the ecological impact that climate smart land-based management strategies (suites of on-the-ground actions, or *treatments*, that are used across the landscape to manipulate an ecosystem) will have on ecosystem carbon; and whenever possible, additional co-benefits from those actions. The Scoping Plan Scenario incorporates a set of land management actions at varying scales of implementation for each land type to achieve the GHG emission reductions. Each land type, and its associated management actions, was considered a measure for this analysis. For modeling individual landscapes and management actions, CARB used a suite of models. The complexity of these models varies by land type, depending on the existing science, data, and availability of existing models to use. Appendix I (NWL Technical Support Document) provides detailed modeling assumptions for each NWL type. The estimated emission reductions, health endpoints, and costs by measure under the Scoping Plan Scenario for each NWL type are presented in this chapter, and the corresponding estimates for the Proposed Scenario and NWL Alternatives 1, 2, and 4 are included in Appendix C (AB 197 Measure Analysis).

Estimated Emissions Reductions

Both GHG emissions reductions and emissions of criteria air pollutants were evaluated for the AB 32 GHG Inventory sectors and for NWL. The methods and results are described in this section.

AB 32 GHG Inventory Sectors

In the absence of having direct modeling results for criteria pollutant estimates from PATHWAYS, CARB estimated criteria pollutant emissions impacts by using changes in fuel combustion in units of exajoules from PATHWAYS and emission factors in units of tons per exajoule to estimate the change in emissions in tons per year. Emission factors from a variety

of sources for each sector were utilized, including but not limited to CARB's mobile source emissions models,²²³ U.S. EPA's AP 42 Emissions Factors,²²⁴ and the South Coast Air Quality Management District's (AQMD's) District Rules.²²⁵ These emission factors were applied to fuel burn change by fuel type, sector, equipment type, and process, where applicable. Statewide annual average emissions were estimated for three criteria pollutants: NO_x, PM_{2.5}, and ROG.

Table 3-5 provides the estimated GHG and criteria pollutant emission reductions for the measures in the Scoping Plan Scenario in 2035 and 2045. The other alternatives are presented in Appendix C (AB 197 Measure Analysis). Based on the estimates below, these measures are expected to provide air quality benefits. The estimates provided in this chapter and Appendix C (AB 197 Measure Analysis) are appropriate for comparing across alternatives considered for the development of this Scoping Plan, but they are not precise estimates.

²²³ CARB. MSEI - Modeling Tools. <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>.

²²⁴ U.S EPA. AP-42: Compilation of Air Emissions Factors. <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors>.

²²⁵ South Coast AQMD. South Coast AQMD Rule Book. <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

Table 3-5: Estimated GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario in 2035/2045 (AB 32 GHG Inventory sectors)

Measure	GHG Reductions (MMTCO ₂)	NOx Reductions (Short Tons/Year)	PM _{2.5} Reductions (Short Tons/Year)	ROG Reductions (Short Tons/Year)
Deploy ZEVs and reduce driving demand	-46 / -84	-51,620 / -122,806	-2,008 / -6,506	-18,967 / -30,410
Coordinate supply of liquid fossil fuels with declining California fuel demand	-25 / -30	-1,601 / -2,707	-978 / -1,705	-747 / -1,323
Generate clean electricity	-8 / -31	-92 / -1,555	-177 / -1,382	-41 / -425
Measure	GHG Reductions (MMTCO ₂)	NOx Reductions (Short Tons/Year)	PM _{2.5} Reductions (Short Tons/Year)	ROG Reductions (Short Tons/Year)
Decarbonize industrial energy supply	-9 / -22	-21,172 / -34,876	-1,188 / -2,527	-3,710 / -6,298
Decarbonize buildings	-14 / -35	-8,105 / -94,455	-826 / -6,877	-1,093 / -8,109
Reduce non-combustion emissions^a	-0.41 / -0.52 (MMTCH ₄)	N/A	N/A	N/A
Compensate for remaining emissions	-25 / -64	N/A	N/A	N/A
^a Methane emissions reductions are reported for this measure.				

The measures related to reducing non-combustion emissions and compensating for the remaining emissions do not include changes to fuel combustion, and therefore are not

associated with changes to air pollutants. Biomethane combustion is captured in measures that reduce combustion of fossil gas, such as decarbonizing industrial energy supply and buildings.

Natural and Working Lands

NWL ecosystems naturally vary between being a source and a sink for carbon over time. The NWL ecosystem carbon stock changes projected through mid-century by the suite of models were used to estimate net emissions or emissions reductions relative to the Reference Scenario. These changes in carbon stocks were affected by projected climate change, the implementation of management actions under the various scenarios, land conversion, and (for forests, shrublands, grasslands) wildfire. Each NWL type was evaluated, and an overview of all NWL is presented in Table 3-6. More detailed results for each NWL type can be found in Appendix C (AB 197 Measure Analysis).

Table 3-6: Estimated average annual GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario from 2025–2045 (NWL)

Measure	GHG Reductions (MMTCO ₂ e/year)	PM _{2.5} Reductions (MT/Year)
Forests/Shrublands/Grasslands	-0.12	-17,500
Annual Croplands	-0.25	N/A
Perennial Croplands	-0.01	N/A
Urban Forest	-1.29	N/A
Wildland Urban Interface (WUI)	0.75	N/A
Wetlands	-0.43	N/A
Sparsely Vegetated Lands	<-0.01	N/A

Fine particulate wildfire emissions were evaluated for forests, shrublands, and grasslands only. Wildfire emissions decreased under the Scoping Plan Scenario compared to the Reference Scenario. The Scoping Plan Scenario's higher level of management actions that reduce tree or shrub densities, protect large trees, reintroduce fire to the landscape, and diversify species and structures result in greater reductions in wildfire emissions.

Estimated Health Endpoints

Climate change mitigation will result in both environmental and health benefits. This section provides information about the potential health benefits of the Scoping Plan Scenario. Health benefits are primarily the result of reduced PM_{2.5} pollution, both from stationary and mobile sources, as well as wildfire in forests, shrublands, and chaparral.

AB 32 GHG Inventory Sectors

CARB used the criteria pollutant emissions in Table 3-5 to understand potential health impacts. Similar to the air quality estimates, this information should be used to understand the relative health benefits of the various measures and should not be taken as absolute estimates of health outcomes. CARB used the incidence-per-ton (IPT) methodology to quantify the health benefits of emission reductions. The IPT methodology is based on a methodology developed by the U.S.

EPA.^{226,227,228,229} Under the IPT methodology, changes in emissions are approximately proportional to the resulting changes in health outcomes. IPT factors are derived by calculating the number of health outcomes associated with exposure to PM_{2.5} for a baseline scenario using measured ambient concentrations and dividing that number by the emissions of PM_{2.5} or a precursor. To estimate the reduction in health outcomes, the emission reductions are multiplied by the IPT factor. For future years, the number of outcomes is adjusted to account for population growth. IPT factors were computed for the two types of PM_{2.5}: primary PM_{2.5} and secondary PM_{2.5} of ammonium nitrate aerosol formed from precursors.

For this AB 197 analysis, CARB calculated the health benefits associated with the five key measures that are represented by changes to fuel combustion. The health benefits associated with emission reductions for the Scoping Plan Scenario were estimated for each air basin and then aggregated for the entire state of California. CARB assumed that the statewide emission reductions distribution among the air basins is proportional to the baseline emissions in that air basin.

Calculated health endpoints include premature mortality, cardiovascular emergency department (ED) visits, acute myocardial infarction, respiratory ED visits, lung cancer incidence, asthma onset, asthma symptoms, work loss days, hospitalizations due to cardiopulmonary illnesses, hospitalizations due to respiratory illnesses, hospital admissions for Alzheimer's disease, and hospital admissions for Parkinson's disease.^{230,231,232} These health endpoints were calculated using the IPT method for estimated emission reductions. Table 3-7 compares the health benefits of emission reductions associated with each measure for the Scoping Plan Scenario in the year

²²⁶ CARB. CARB's Methodology for Estimating the Health Effects of Air Pollution. Retrieved February 9, 2021. <https://ww2.arb.ca.gov/resources/documents/carbs-methodology-estimating-health-effects-air-pollution>.

²²⁷ Fann, N., C. M. Fulcher, and B. J. Hubbell. 2019. "The influence of location, source, and emission type in estimates of the human health benefits of reducing a ton of air pollution." *Air Quality, Atmosphere & Health* 2:169–176. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2770129/>.

²²⁸ Fann, N., K. R. Baker, and C. M. Fulcher. 2012. "Characterizing the PM_{2.5}-related health benefits of emission reductions for 17 industrial, area and mobile emission sectors across the U.S." *Environ Int.* 49:141–51. November 15. <https://www.sciencedirect.com/science/article/pii/S0160412012001985>.

²²⁹ Fann, N., K. Baker, E. Chan, A. Eyth, A. Macpherson, E. Miller, and J. Snyder. 2018. "Assessing Human Health PM_{2.5} and Ozone Impacts from U.S. Oil and Natural Gas Sector Emissions in 2025." *Environ. Sci. Technol.* 52 (15), 8095–8103. <https://pubs.acs.org/doi/abs/10.1021/acs.est.8b02050>.

²³⁰ CARB. CARB's Methodology. <https://ww2.arb.ca.gov/resources/documents/carbs-methodology-estimating-health-effects-air-pollution>.

²³¹ CARB. 2022. Updated Health Endpoints in CARB's Health Benefits Methodology. [*Evaluating New Health Endpoints for Use in CARB's Health Analyses*](#).

²³² Cardio-pulmonary mortality, hospitalizations due to cardiopulmonary illnesses, and hospital admissions due to respiratory illnesses endpoints utilize studies documented in CARB's methodology document. For future assessments, CARB will use more recent studies to estimate cardiovascular hospital admissions and respiratory hospital admissions, as documented in CARB's updated health endpoints memo.

specified (2035 or 2045). The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-7: Estimated avoided incidence of mortality, cardiovascular and respiratory disease onset, work loss days and hospital admissions relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Deploy ZEVs and reduce driving demand in 2035	635	170	70	400	45	1,475	128,930	92,510	95	115	245	40
Deploy ZEVs and reduce driving demand in 2045	1,820	475	200	1,115	135	3,995	343,095	255,800	295	350	745	125
Coordinate supply of liquid fossil fuels with declining CA fuel demand in 2035	115	30	15	70	10	275	23,530	16,880	20	20	50	10

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Coordinate supply of liquid fossil fuels with declining CA fuel demand in 2045	215	55	25	130	15	490	40,860	30,445	35	40	95	15
Generate clean electricity in 2035	20	5	0	10	0	45	3,930	2,820	5	5	10	0
Generate clean electricity in 2045	170	45	20	105	15	385	32,065	23,890	25	30	75	10
Decarbonize industrial energy supply in 2035	300	80	35	190	20	695	60,660	43,520	45	55	115	20
Decarbonize industrial energy supply in 2045	595	155	65	365	45	1,310	111,925	83,435	95	115	245	40

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Decarbonize buildings in 2035	155	40	15	95	10	360	31,130	22,335	25	30	60	10
Decarbonize buildings in 2045	1,610	420	175	985	120	3,550	303,830	226,500	260	310	665	115
Note: All values are rounded to the nearest 0 or 5.												

The measures related to reducing non-combustion emissions and compensating for remaining emissions do not include changes to fuel combustion and therefore are not associated with changes to air pollutants or health endpoints. Biomethane combustion is captured in measures that reduce combustion of fossil gas, such as decarbonizing industrial energy supply and buildings.

Although the estimated health outcomes presented are based on a well-established methodology, they are subject to uncertainty. For instance, future population estimates are subject to increasing uncertainty as they are projected further into the future, and baseline incidence rates can experience year-to-year variation. Also, the relationship between changes in pollutant concentrations and changes in pollutant or precursor emissions is assumed to be approximately proportional.

In addition, emissions are reported at an air basin level and do not capture local variations. These estimates also do not account for impacts from global climate change, such as temperature rise, and are only based on the scenarios in this Scoping Plan.

The fuel changes for each AB 197 measure are estimated based on the impact of each measure compared to the Reference Scenario for the years 2035 and 2045. Therefore, aggregating the effect of each measure would overestimate the impacts of the Scoping Plan Scenario because the implementation of each measure would affect the level of benefits of the other measures. This measure-by-measure analysis uses a different methodology for calculating health endpoints than does the health analysis for the complete Scoping Plan Scenario provided earlier.

Natural and Working Lands

Implementation of NWL management strategies to mitigate and adapt to climate change will result in both environmental and health benefits. This section provides information about the potential health benefits of measures evaluated for the Scoping Plan Scenario. For this analysis, health benefit estimates were focused on increases or decreases to PM_{2.5} resulting from wildfire emissions on forests, shrublands, and grasslands.²³³ Other health benefits resulting from NWL management actions in the Scoping Plan Scenario are not quantified here but are important for all Californians. This includes, but is not limited to, reductions in exposure to synthetic pesticides when switching to organic agricultural systems, improvements in shade availability and mental health with increasing urban forest cover, improved mental health from opportunities for recreation in resilient and healthy environments, and protection from floods and rising sea levels.

²³³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11, N14. [finalejacrecs.pdf \(arb.ca.gov\)](#).

These examples are by no means exhaustive, as our natural and working lands provide immense health benefits to everyone.

For this analysis, CARB used the PM_{2.5} emissions in Table 3-6 to understand potential health impacts. This information should be used to understand the relative health endpoints of the various measures and should not be taken as absolute estimates of health outcomes of this Scoping Plan statewide or within a specific community. The IPT methodology was used to calculate health endpoints, similar to the AB 32 GHG Inventory Sector analysis. CARB calculated the annual health endpoints associated with the wildfire emissions changes resulting from the implementation of management strategies on forests, shrublands, and grasslands under each alternative. The annual health endpoints associated with emission reductions for the Scoping Plan Scenario were estimated for the entire state. Calculated health endpoints include emissions-caused mortality, hospital admittance, and emergency room visits from asthma; hospital admittance from chronic obstructive pulmonary disease; and emergency room visits from respiratory and cardiovascular outcomes. Table 3-8 compares the average annual health endpoints of wildfire emission reductions associated with the Scoping Plan Scenario over the period 2025–2045. The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-8: Estimated average annual avoided incidence of hospital admissions, emergency room visits, and mortality relative to the Reference Scenario for the Scoping Plan Scenario resulting from forest, shrubland, and grassland wildfire emissions (NWL)

Health Endpoints from Forest, Shrubland, and Grassland Wildfire Emissions	Average Annual Avoided Incidence
Hospital admissions from asthma	22
Hospital admissions from chronic obstructive pulmonary disease without asthma	19
Hospital admissions from all respiratory outcomes	63
Emergency room visits from asthma	155
Emergency room visits from all respiratory outcomes	419
Emergency room visits from all cardiovascular outcomes	156
All causes of mortality	394

Estimated Social Cost

Social costs are generally defined as the cost of an action on people, the environment, or society and are widely used to understand the impact of regulatory actions. One tool, the social cost of greenhouse gases (SC-GHG), is an estimate of the present value of the costs associated with the emission of GHGs in future years. It combines climate science and economics to help understand the benefits of reducing GHG emissions. The estimates of the social cost of carbon (SC-CO₂) and social cost of methane (SC-CH₄), two types of SC-GHGs presented here, estimate the value of the net harm to society associated with adding GHGs to the atmosphere in a given year; they do not represent the cost of actions taken to reduce GHG emissions (known as the *cost of abatement*) nor the cost of GHG emissions reductions. In principle, the SC-GHG includes the value of climate change impacts, including but not limited to, changes in net agricultural productivity, human health effects, property damage from increased flood risk and other natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. It reflects the societal value of reducing emissions

of the gas in question by one metric ton.²³⁴ Many of these damages from GHG emissions today will affect economic outcomes throughout the next several centuries.

In 2008, federal agencies began incorporating SC-CO₂ estimates into the analysis of their regulatory actions. U.S. EPA has used various models and discount rates to determine the value of future impacts. Generally, these models begin with assumptions to predict economic activity over time, along with projected GHG emissions. The modeled emissions are input into a model of the global climate system, which then translates into estimates of surface temperature, sea level rise, and other impacts. These outputs are used to estimate economic damages per ton of GHG emitted in a given year in the future. Since the models are calculating the present value of future damages, a discount rate is applied. For example, the SC-CO₂ for the year 2045 represents the value of climate change damages from a release of CO₂ in 2045 discounted back to today. The present value is significantly affected by the discount rate used; a higher discount rate results in a lower present value. For example, in 2021 dollars the SC-CO₂ in 2045 is \$31 using a 5 percent discount rate, \$88 using a 3 percent discount rate, and \$122 using a 2.5 percent discount rate. Additional detail is included in Appendix C (AB 197 Measure Analysis).

The 2017 Scoping Plan utilized SC-CO₂ and SC-CH₄ Obama Administration-era values developed by the Council of Economic Advisors and the Office of Management and Budget-convened Interagency Working Group on the Social Cost of Greenhouse Gases (IWG)²³⁵ to consider the social costs of actions to reduce GHG emissions. The Biden Administration reinstated these values in February 2021,²³⁶ after they had been rescinded and significantly revised by the Trump Administration. The reinstatement was considered an interim step, and the Biden Administration also reconvened the IWG to continue its work to evaluate and incorporate the latest climate science and economic research and

²³⁴ U.S. Government. Interagency Working Group on Social Cost of Greenhouse Gases. February 2021. Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide – Interim Estimates under Executive Order 13990. https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

²³⁵ Originally titled the “Interagency Working Group on the Social Cost of Carbon,” the IWG was renamed in 2016. 82 Fed. Reg. 16093, 16095-96 (Mar. 28, 2017). <https://www.govinfo.gov/content/pkg/FR-2017-03-31/pdf/2017-06576.pdf>.

²³⁶ Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, Executive Order 13990 (Jan. 20, 2021), 86 Fed. Reg. 7037 (Jan. 25, 2021). <https://www.energy.gov/sites/default/files/2021/02/f83/eo-13990-protecting-public-health-environment-restoring.pdf>. IWG, Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates Under Executive Order 13990 (February 2021), https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf See also, The White House. 2021. A Return to Science: Evidence-Based Estimates of the Benefits of Reducing Climate Pollution. <https://www.whitehouse.gov/cea/written-materials/2021/02/26/a-return-to-science-evidence-based-estimates-of-the-benefits-of-reducing-climate-pollution/>.

respond to the National Academies' recommendations from 2017 as it develops a more complete revision of the estimates.

It is important to note that the models used to produce SC-GHG estimates do not include all of the important physical, ecological, and economic impacts of climate change recognized in the climate literature. There are additional costs to society, including the costs associated with changes in co-pollutants and costs that cannot be included due to modeling and data limitations. The IWG has stated that the range of the interim SC-GHG estimates likely underestimates societal damages from GHG emissions.²³⁷ The revised estimates were originally slated to be released in early 2022 but were stalled.²³⁸ CARB staff is applying the interim values presented in the IWG February 2021 Technical Support Document (TSD), which reflect the best available science in the estimation of the socioeconomic impacts of GHGs.²³⁹ This Scoping Plan utilizes the TSD standardized range of discount rates, from 2.5 to 5 percent, to represent varying valuation of future damages.

AB 32 GHG Inventory Sectors

Table 3-9 presents the estimated social cost, in terms of avoided economic damages, for each measure of the Scoping Plan Scenario. For each measure, Table 3-9 includes the range of the SC-CO₂ and SC-CH₄ that results from the GHG emissions reductions in 2035 and 2045 at 2.5 and 5 percent discount rates. Additional background on the SC-GHG and methodology for calculating the SC-CO₂ and SC-CH₄ estimates in this Scoping Plan, as well as estimates for the alternatives, are provided in Appendix C (AB 197 Measure Analysis).

²³⁷ Interagency Working Group on Social Cost of Greenhouse Gases. 2021. Technical Support Document. https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

²³⁸ See *Louisiana v. Biden* (W.D. La. 2022) 585 F.Supp.3d 840, stayed pending review (5th Cir. Mar. 16, 2022) 2022 WL 866282. A federal district court ruling issued in early February 2022 had granted a preliminary injunction blocking the Biden Administration from using the interim IWG SC-GHG estimates. However, a federal appeals court overturned the lower court's preliminary injunction in March 2022, which allows the Biden Administration to continue using the policy as legal proceedings continue. CARB will continue to monitor the litigation. However, the federal action does not prohibit CARB from using social cost of carbon and CARB will use the best available science regardless of politics. A separate federal appeals court upheld the Biden administration's use of the IWG SC-GHG estimates in October 2022. *Missouri v. Biden* (8th Cir. 2022) ____ F.4th ____.

²³⁹ Interagency Working Group on Social Cost of Greenhouse Gases. 2021. Technical Support Document. https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

Table 3-9: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Social Cost of Carbon in 2035, 5%–2.5% Discount Rate	Social Cost of Carbon in 2045, 5%–2.5% Discount Rate
	Billion USD (2021 dollars)	Billion USD (2021 dollars)
Deploy ZEVs and reduce driving demand	1.12–4.87	2.64–10.23
Coordinate supply of liquid fossil fuels with declining California fuel demand	0.61–2.63	0.95–3.67
Generate clean electricity	0.20–0.88	0.97–3.75
Decarbonize industrial energy supply	0.23–1.01	0.69–2.67
Decarbonize buildings	0.35–1.52	1.11–4.32
Reduce non-combustion emissions	0.51–1.29 (SC-CH ₄)	0.86–2.01 (SC-CH ₄)
Compensate for remaining emissions	0.61–2.66	2.03–7.84
Scoping Plan Scenario SC-CO₂	2.4–10.4	5.6–21.9
Scoping Plan Scenario SC-CH₄	0.51–1.3	0.86–2.0
Scoping Plan Scenario (Total)^a	2.9–11.7	6.5–23.9

^a CARB staff could not precisely separate some CO₂ and CH₄ from other GHGs from PATHWAYS outputs, but the contribution is believed to be small for purposes of calculating the social cost of carbon. The approach used to estimate GHG emissions reductions for individual measures in PATHWAYS does not reflect cross-sector interactions. Therefore, the GHG values for each measure do not sum to the overall scenario total. The total GHG emissions reduction used in this calculation is 97 MMTCO₂e in 2035 and 180 MMTCO₂e in 2045.

Natural and Working Lands

The SC-CO₂ estimates for the NWL measures shown in Table 3-10, in terms of avoided economic damages, reflect 2021 IWG interim values, updated for inflation, similar to the AB 32 GHG Inventory Sector analysis. This analysis utilizes the 2.5 percent and 5 percent

discount rate and the average annual emissions reductions from each NWL type from 2025–2045. Estimates for all alternatives are included in Appendix C (AB 197 Measure Analysis).

Table 3-10: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (NWL)

Measure	Social Cost of Carbon in 2035, 5%–2.5% Discount Rate	Social Cost of Carbon in 2045, 5%–2.5% Discount Rate
	Billion USD (2021 dollars)	Billion USD (2021 dollars)
Forests/Shrublands/Grasslands	0.003–0.012	0.004–0.014
Annual Croplands	0.006–0.027	0.008–0.031
Perennial Croplands	<0.001–0.001	0.000–0.001
Urban Forest	0.032–0.138	0.041–0.157
Wildland Urban Interface (WUI)	(0.018) – (0.080) ^a	(0.023) – (0.090)
Wetlands	0.011–0.046	0.014–0.053
Sparsely Vegetated Lands	<0.001	<0.001
^a Parentheses indicate an increase in estimated social cost, i.e., an increase in economic damages. This is only the case for WUI measures where emissions are increased, shown in Table 3-6. The estimated social cost does not account for the decrease in wildfire risk or decrease in wildfire damages resulting from the WUI measures.		

Social Costs of GHGs in Relation to Cost-Effectiveness

AB 32 includes a requirement that rules and regulations “achieve the maximum technologically feasible and cost-effective” greenhouse gas emissions reductions.²⁴⁰ Under AB 32, *cost-effectiveness* means the relative cost per metric ton of various GHG reduction strategies,²⁴¹ which is the traditional cost metric associated with emission control. In contrast, the SC-CO₂, SC-CH₄, and social cost of nitrous oxide (SC-N₂O), because they are estimates of the cost to society of additional GHG emissions, can be used to estimate of the economic benefits of reducing emissions, but do not take into account the cost of the actions that must be taken to achieve those GHG emissions reductions.

There may be technologies or policies that do not appear to be cost-effective when compared to the SC-CO₂, SC-CH₄, and SC-N₂O associated with GHG reductions. However, these technologies or policies may result in other benefits that are not reflected in the IWG social costs. Examples include the evaluation of social diversification of the portfolio of transportation fuels (a goal outlined in the Low Carbon Fuel Standard) and reductions in criteria pollutant emissions from power plants (as in the Renewables Portfolio Standard). Additionally, costs for new technology may be higher early on in a technology’s development cycle and may drop over time as use of the technology is scaled up.

Estimated Cost per Metric Ton

AB 197 requires an estimation of the cost-effectiveness of the measures evaluated for this Scoping Plan. The cost (or savings)²⁴² per metric ton of CO₂e reduced for each measure is one metric for comparing the performance of the measures. Additional factors beyond the cost per metric ton that could be considered include continuity with existing laws and policies, implementation feasibility, contribution to fuel diversity and technology transformation goals, and health and other benefits to California. These considerations are not reflected in the cost per metric ton estimates presented below. It is important to understand the relative cost-effectiveness of individual measures as presented in this section. However, the economic analysis presented earlier in this chapter, in Appendix H

²⁴⁰ AB 32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. (AB 32, Núñez, Chapter 488, Statutes of 2006).

https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32.

²⁴¹ Health & Saf. Code § 38505(d).

²⁴² Similarly, to the direct costs reported earlier, the cost per metric ton of a measure reflects the stock costs and any fuel or efficiency savings associated with a measure divided by the GHG emission reduction achieved by the measure. Costs are reported as positive values, and savings are reported as negative values.

(AB 32 GHG Inventory Sector Modeling), and in Appendix I (NWL Technical Support Document) provides a more comprehensive analysis of how the Scoping Plan Scenario and alternative scenarios affect the state's economy and jobs.

AB 32 GHG Inventory Sectors

The cost per metric ton for the AB 32 GHG Inventory sectors was computed for each measure independently relative to the Reference Scenario using the sensitivity calculations based on PATHWAYS and RESOLVE outputs. The difference in the annualized cost between the Scoping Plan Scenario and the Reference Scenario was computed for each measure in 2035 and in 2045. The incremental cost was divided by the incremental GHG emissions impact to calculate the cost per metric ton in each year. To capture the fuel and GHG impacts of investments made from 2022 through 2035, or from 2022 through 2045, CARB computed an average annual cost per metric ton. The incremental cost in each year was averaged over the period. This value is divided by the corresponding annual, incremental GHG impact averaged over the same period.

The cost metric includes the annualized incremental cost of energy infrastructure, such as zero-emission vehicles, electric appliances, and required revenue to support all electric assets. A residual value for equipment such as vehicles or appliances that are retired early is included. The annual fuel cost or avoided fuel cost that results from efficiency improvements or changes to demand for fuels associated with transitioning to alternative fuels is included. Not included in this cost metric are costs that represent transfers within the state, such as incentive payments for early retirement of equipment.

It is important to note that this cost per metric ton does not represent an expected market price value for carbon mitigation associated with these measures. In addition, the values do not capture fuel savings or GHG reductions associated with the full economic lifetime of measures that have been implemented by the target date of 2035 or 2045 but whose impacts extend beyond the target date.

Table 3-11 includes the cost per metric ton and annual average cost per metric ton estimates for the Scoping Plan Scenario. The other alternatives are presented in Appendix C (AB 197 Measure Analysis). Measures that are relatively less costly in 2035 or 2045 are also less costly over the extended period. As noted earlier, incremental costs of new vehicles are generally offset by gains in efficiency and avoided fuel consumption resulting in negative cost per metric ton.

Table 3-11: Estimated cost per metric ton of reduced CO₂e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Annual Cost, 2035 (\$/ton)	Average Annual Cost, 2022–2035 (\$/ton)	Annual Cost, 2045 (\$/ton)	Average Annual Cost, 2022–2045 (\$/ton)
Deploy ZEVs and reduce driving demand	-171	-99	-103	-122
Coordinate supply of liquid fossil fuels with declining CA fuel demand	60	109	-50	39
Generate clean electricity ^a	101	156	145	161
Decarbonize industrial energy supply	290	217	257	274
Decarbonize buildings	235	230	112	213
Reduce non-combustion emissions	93	94	106	99
Compensate for remaining emissions	745	823	236	485
^a Note: The denominator of this calculation (2045) does not include GHG reductions occurring outside of California resulting from SB 100. If these reductions were included, this number would be lower.				

Natural and Working Lands

The cost per metric ton for NWL measures were computed for the Scoping Plan Scenario relative to the Reference Scenario using the projected carbon stock/sequestration data from the NWL modeling and the direct cost estimates for each management action, described earlier. Direct costs represent the cost of implementing a certain management action. The projected emissions reductions take into account the loss of carbon that results from the management action, such as fuels reduction treatments in forests, as well as climate change effects on growth. The direct cost for each NWL measure was divided by the average annual emission reductions presented in Table 3-6 to produce the cost

per metric ton. The increasing effect of climate change on diminished future growth reduces the ability of the land to sequester or store carbon, driving up the cost per ton.

It is important to note that this cost per metric ton does not represent an expected market price value for carbon mitigation associated with these measures. In addition, emissions benefits of NWL management actions often take longer time periods to accrue, and these values only capture GHG reductions up to 2045.

Table 3-12 includes the average cost per metric ton estimates for the average annual CO₂e reductions from 2025 through 2045 for the Scoping Plan Scenario. The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-12: Estimated average cost per metric ton of reduced CO₂e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (NWL)

Measure	Average Cost per Reduced Ton CO₂e (\$/Ton)
Forests/Shrublands/Grasslands	15,500
Annual Croplands	1,100
Perennial Croplands	412
Urban Forest	3,270
Wildland Urban Interface (WUI)	N/A
Wetlands	64
Sparsely Vegetated Lands	451,000

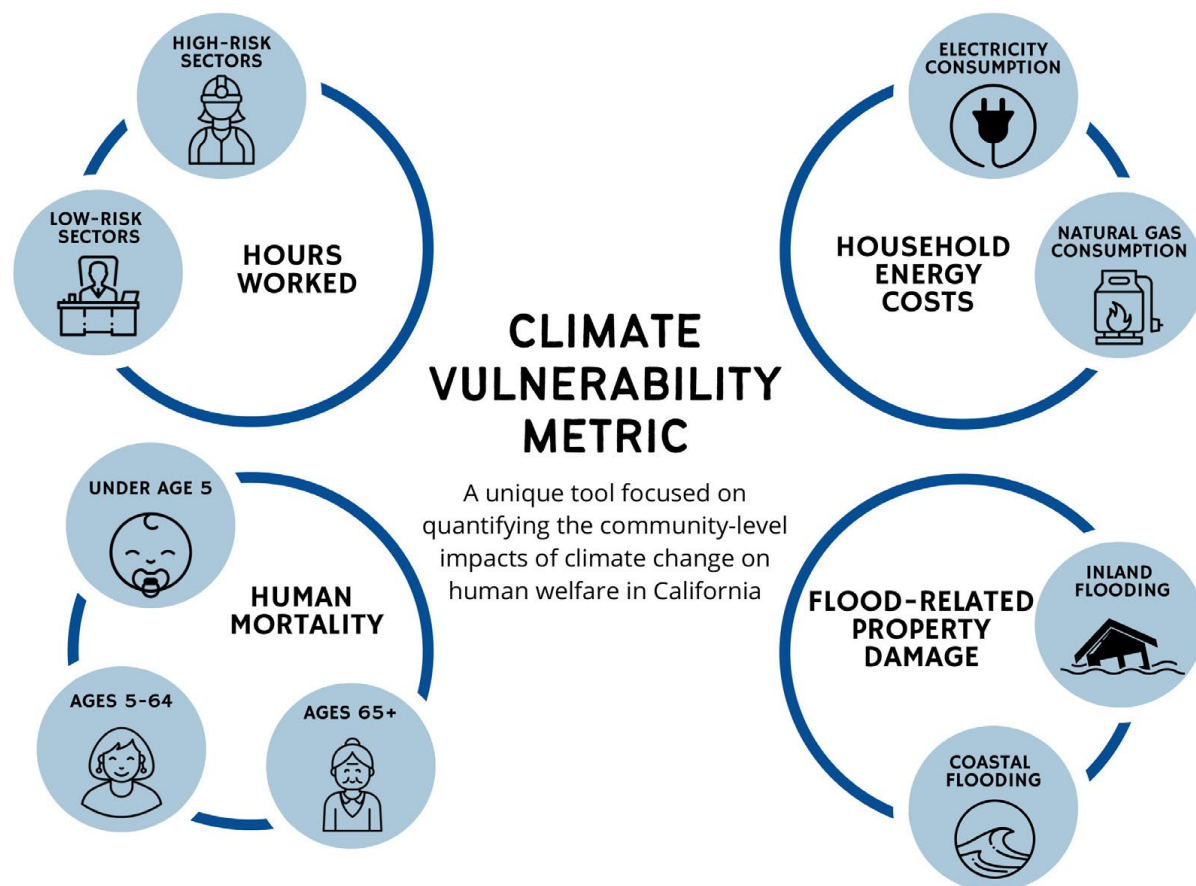
Climate Vulnerability Metric

As California invests in climate mitigation and adaptation, it is essential to understand that the relative impact of climate change will vary across the state's communities. Due to persisting health and opportunity gaps, not all communities are equally resilient in the face of climate impacts. A global metric such as the Social Cost of Carbon cannot adequately capture the incremental additional economic impact faced by overly burdened communities. The Climate Vulnerability Metric (CVM) is specifically focused on quantifying the community-level impacts of a warming climate on human welfare and the additional costs. Additional details and results are included in Appendix K (Climate Vulnerability Metric).

The CVM aggregates the impacts of climate change that can be quantified at the census tract level using robust and currently available research. The CVM includes the projected impacts of climate change on human welfare across four categories (hours worked, household energy costs, human mortality, and flood-related property damage) through midcentury. The CVM identifies nine components of the four climate impacts as shown in Figure 3-9 and aggregates the data to generate a total CVM result for each census tract. To ensure that the CVM represents the diversity of California communities, it is reported as the aggregate monetized impact of climate change as a percentage of census tract-specific incomes.²⁴³ For example, a CVM value of 3 implies that by 2050, a census tract is projected to experience human welfare impacts of climate change that amount to 3% of annual income in that tract.

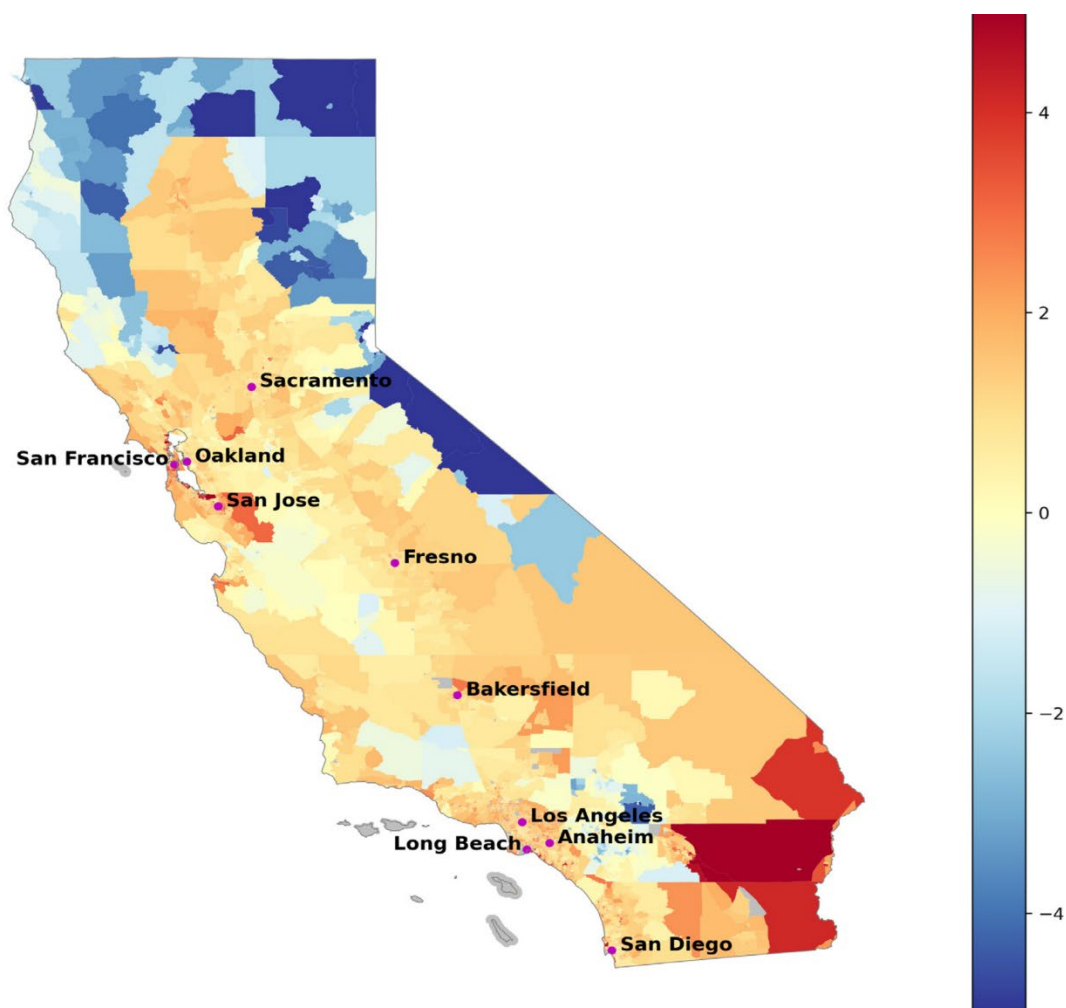
²⁴³ Per capita income in 2019 for census tracts across California ranges from \$633 to \$176,388, with a median of \$32,181 (\$2019). Source: American Community Survey.

Figure 3-9: Categories of climate change impacts on human welfare included in the Climate Vulnerability Metric.



The CVM shows that climate change will have highly unequal impacts across California. While some southeastern regions of California are estimated to suffer damages that exceed 5% of annual income, other high-elevation northeastern regions of California are estimated to see benefits of up to 10%. Some low-lying urban areas, such as the San Francisco Bay Area, are estimated to be particularly vulnerable, while much of the Central Valley is estimated to suffer at least moderate economic damages relative to the rest of the state. It is important to note that the CVM does not set a threshold for vulnerability. Instead, it shows relative impacts across census tracts. The CVM is limited to the impacts that can currently be quantified at the census tract level.

Figure 3-10: Combined impacts of climate change in 2050 under a moderate emissions scenario; damages as share of 2019 tract income (%)



The map shows combined impacts of climate change in 2050 under a moderate emissions scenario (RCP 4.5), reported as a share of 2019 census tract income. For example, a CVM value of 3 implies that by 2050, a census tract is projected to experience human welfare impacts of climate change that amount to 3% of annual income. Impacts are combined across the categories shown in Figure 3-9. The higher the CVM for a given census tract, the more damaging the projected impacts of climate change on human welfare. Census tracts with high CVMs are represented by positive percentages in orange and red. A lower CVM is associated with lower projected impacts of climate change, shown in yellow, while a negative CVM value represents a projected beneficial impact of climate change (e.g., through reductions in deaths caused by extremely cold winter weather). Negative CVMs are represented by negative percentages in blue.

By providing information about how climate vulnerability varies across California (Figure 3-10), the CVM results can be used to direct resources to enhance resiliency in the state's

most vulnerable communities based on the specific impacts, such as heat or flooding, they are experiencing. The CVM may be used in combination with existing screening tools, such as CalEnviroScreen 4.0, to identify communities that face environmental and health hazards that contribute to disproportionate economic impacts in addition to climate vulnerability. The CVM can become an essential source of information to implement this Scoping Plan and build a more resilient, just, and equitable future for all communities.

Public Health

Health Analysis Overview

This section focuses on a broader evaluation of public health and climate change. Science demonstrates that taking action to address climate change presents one of the most significant opportunities to improve public health outcomes.²⁴⁴ Transitioning to clean energy and technology and improving land and ecosystem management will lead to a much healthier future. Many actions to reduce GHG emissions also have health co-benefits that can improve the health and well-being of populations across the state, as well as address climate change. This section and the accompanying Appendix G (Public Health) provide a qualitative analysis of health benefits to accompany the quantitative health analysis included in this chapter, in Appendix C (AB 197 Measure Analysis), and in Appendix H (AB 32 GHG Inventory Sector Modeling). Together the qualitative and quantitative analyses of benefits are demonstrating the many ways that climate action and health improvements go hand in hand.

Climate change can lead to a wide range of direct health impacts such as increased heat-related illnesses (i.e., heat exhaustion and heat stroke), and injuries and deaths from extreme weather events or disasters (e.g., severe storms, flooding, wildfires). Indirect impacts include:

- more air pollution-related exacerbations of cardiovascular and respiratory diseases (e.g., due to increased smog, wildfire smoke)
- increased vector-borne and fungal diseases due to changes in the distribution and geographic range of disease-carrying species (e.g., mosquitoes, ticks, fungi in dust)
- negative nutritional consequences related to decreases in agricultural food yields
- stress and mental trauma due to extreme weather-related catastrophes
- anxiety, depression, and other mental health impacts associated with gradual changes in the climate (e.g., prolonged drought or temperature shifts affecting jobs and industries) that result in unemployment and income loss

²⁴⁴ Watts, N., W. N. Adger, P. Agnolucci, et al. 2015. "Health and climate change: Policy responses to protect public health." *Lancet* 386, 1861–1914.

- residential displacement and home loss (e.g., sea level rise impacting coastal communities)

Wildfires and wildfire smoke are one area where we have already seen and expect to see even further drastic impacts on the health of Californians. According to CalFire, since 1932 the top eight largest wildfires in California have occurred in the past five years (2017–2022), with 151 deaths due directly to fires during that period.²⁴⁵ Researchers estimate that wildfire smoke during fall 2020 may have led to as many as 3,000 excess deaths, with at least 95% of Californians suffering unhealthy levels of particle pollution due to wildfires in 2020.²⁴⁶ Continued climate change is projected to further increase smoke exposure from wildfires through the end of the century.²⁴⁷ Wildfires also create a high-risk environment for outdoor workers, including agricultural workers. While the direct medical and physical health impacts are often most noticeable, the psychological impacts can develop and persist well after the event. Estimates indicate that 20%–65% of survivors of extreme weather events have mental health issues following the event.²⁴⁸

Extreme heat, drought, and associated worsened air quality impacts are among the most serious climate-related exposures affecting the health of Californians. Numerous studies find a wide range of adverse health effects accompanying extreme heat, including heat stroke and adverse birth outcomes, and find that extreme heat can harm most body systems. Climate change exacerbates air pollution problems that cause difficulty breathing and can lead to serious illness and death in many parts of California. Increasing temperatures cause increases in ozone and other pollution concentrations, including for California’s most polluted regions, and heighten health risks for the vulnerable and marginalized populations living in these areas.²⁴⁹ In 2020, there were 157 ozone polluted days across Los Angeles, Orange, Riverside, and San Bernardino Counties—the most days since 1997. In addition, particulate matter exposure is a heightened problem during

²⁴⁵ California Department of Forestry and Fire Protection (CAL FIRE). “Stats and Events.” *Cal Fire Department of Forestry and Fire Protection*, <https://www.fire.ca.gov/stats-events/>.

²⁴⁶ G-FEED. 2020. Indirect mortality from recent wildfires in CA. <http://www.g-feed.com/2020/09/indirect-mortality-from-recent.html>.

²⁴⁷ M. D. Hurteau, A. L. Westerling, C. Wiedinmyer, and B. P. Bryant. 2014. “Projected effects of climate and development on California wildfire emissions through 2100.” *Environ. Sci. Technol.* 48, 2298–2304.

²⁴⁸ American Public Health Association. 2019. Addressing the Impacts of Climate Change on Mental Health and Well-Being. Policy No: 20196. <https://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2020/01/13/addressing-the-impacts-of-climate-change-on-mental-health-and-well-being>.

²⁴⁹ American Lung Association. State of the Air 2021. <https://www.lung.org/research/sota>.

droughts, which are expected to increase over this century.^{250,251} Worse air quality leads to illnesses, emergency room visits, and hospitalizations for chronic health conditions, including chronic obstructive pulmonary disease (COPD), asthma, chronic bronchitis, and other respiratory and cardiovascular conditions, as well as increased risk for respiratory infections, which all result in greater health costs to the state.^{252,253,254} These and other climate-related health impacts are discussed in more detail in Appendix G (Public Health).

Health Analysis Components

This Scoping Plan health analysis focuses on the contrast between a California that is still dependent on a fossil fuel-based economy and a California that is transitioned to a carbon-neutral, clean energy future. This qualitative analysis evaluates and demonstrates the broad range of benefits of a dramatic reduction in fossil fuels by 2045 combined with healthier ecosystem management, comparing health outcomes for a “no-action” scenario (Reference) to a “take-action” decarbonization scenario. As this is a qualitative analysis, it looks more broadly at the public health benefits of a drastic reduction in fossil fuel combustion. While this analysis provides scientific evidence for Scoping Plan benefits based on achieving carbon neutrality by 2045, it does not analyze a specific scenario.

The key areas of focus for the analysis are: heat impacts, children’s health and development, economic security, food security, mobility and physical activity, urban greening, wildfires and smoke impacts, and housing affordability. For each area of focus, the analysis covers the scientific evidence and compares expected health effects between the Reference and decarbonization scenarios. This analysis looks at the major health outcomes, provides directional effects for each health outcome, and where possible provides information on the strength and scale of health impacts. Some areas include quantitative information where tools are available to measure health outcomes. While the analysis is focused on health outcomes statewide, it also includes discussion

²⁵⁰ Cvijanovic, I., B. D. Santer, C. Bonfils, et al. 2017. “Future Loss of Arctic Sea-ice Cover Could Drive a Substantial Decrease in California’s Rainfall.” 8 *Nat. Commun.* 1947. <https://doi.org/10.1038/s41467-017-01907-4>.

²⁵¹ Williams, A. P., R. Seager, J. T. Abatzoglou, B. I. Cook, J. E. Smerdon, and E. R. Cook. 2015. “Contribution of anthropogenic warming to California drought during 2012–2014.” *Geophysical Research Letters* 42(16), 6819–6828.

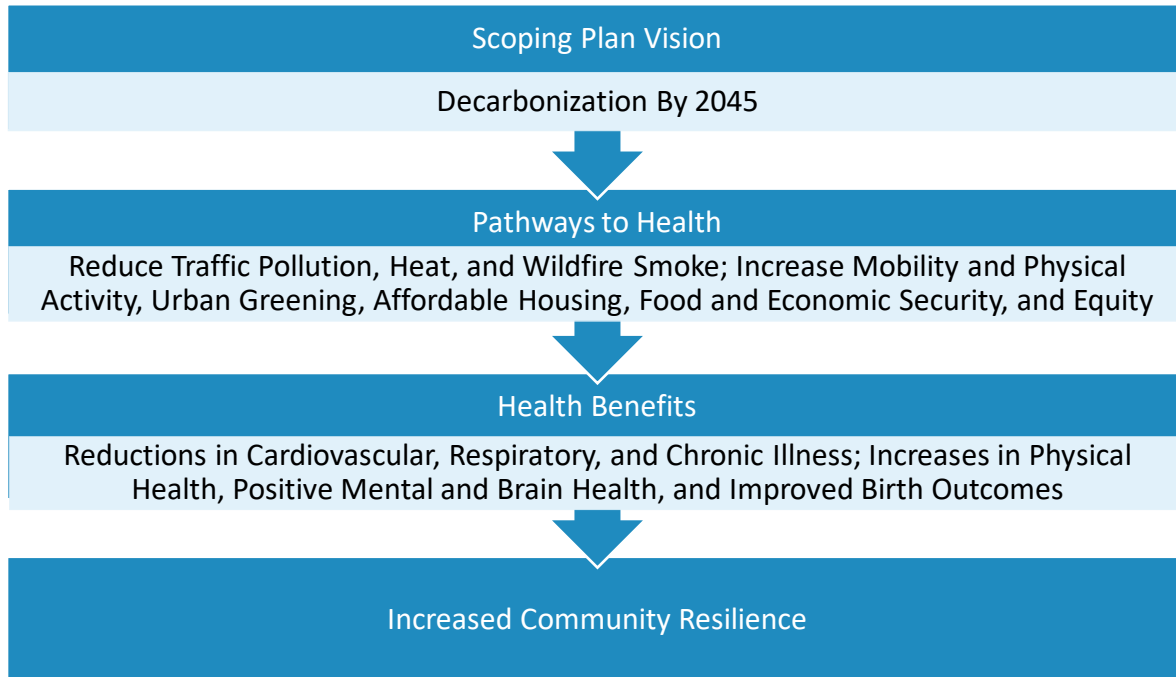
²⁵² Romley, J. A., A. Hackbarth, and D. P. Goldman. 2010. Cost and Health Consequences of Air Pollution in California. Santa Monica, California. RAND Corp. https://www.rand.org/pubs/research_briefs/RB9501.html.

²⁵³ Wang, M., C. P. Aaron, J. Madrigano, E. A. Hoffman, E. Angelini, J. Yang, A. Laine, et al. 2019. “Association between long-term exposure to ambient air pollution and change in quantitatively assessed emphysema and lung function.” *JAMA* 322(6), 546–556.

²⁵⁴ Inzerro, A. 2018. “Air Pollution Linked to Lung Infections, Especially in Young Children.” *Am. J. Managed Care* (May 6). <https://www.ajmc.com/view/air-pollution-linked-to-lung-infections-especially-in-young-children>.

of benefits to community health and climate resilience, as well as potential inequities experienced at a community level. Figure 3-11 shows the co-benefit areas covered in this Scoping Plan and the path to health improvements and increased community resilience.

Figure 3-11: Scoping Plan outcome and the path to health improvements



Social and Environmental Determinants of Health Inequities

Communities across the state do not experience exposure to pollution sources and the resulting effects equally. Low-income communities and communities of color (including Black, Latino and Indigenous communities) consistently experience significantly higher rates of pollution and adverse health conditions than others due to factors including historic marginalization rooted in systemic racism. As shown in Figure 3-12, the most impacted neighborhoods according to CalEnviroScreen (CES) are home to very high percentages of people of color while the least impacted neighborhoods are predominantly white. Recent findings show that Black Californians have 19% higher PM_{2.5} exposure from vehicle emissions than the state average, and the census tracts with the highest PM_{2.5} pollution burden from vehicle emissions have a high proportion of people of color.²⁵⁵ Air pollutant emissions from mobile sources have disproportionate impacts on low-income communities and communities of color due to their proximity.²⁵⁶ Diesel-fueled vehicles traveling on California's freeways and major roads expose nearby residents to pollution that is linked to lung cancer, hospitalizations and emergency department visits for chronic heart and lung disease, and premature death.^{257,258} A combination of historical and social inequities are evident in communities of color disproportionately living close to freeways and other major sources of vehicle pollution. Environmental exposures and contaminants are one component of a broader set of social, economic, and environmental factors that can amplify health conditions, and the combination of all these factors can compound the health effects of individual exposures. This broader set of community factors can be referred to as "cumulative impacts." In addition, specific populations are more sensitive to pollution and face greater susceptibility. This includes young children, older adults, and individuals with existing health conditions.

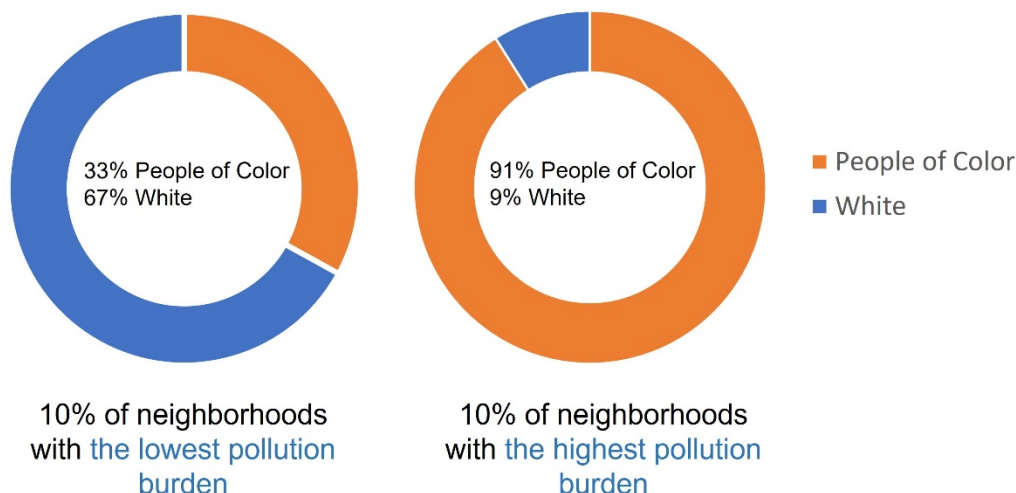
²⁵⁵ Reichmuth, D. 2019. *Inequitable exposure to air pollution from vehicles in California*. <https://www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019>.

²⁵⁶ CARB. 2017. *California's 2017 climate change scoping plan*. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

²⁵⁷ CARB. 2020. Overview: Diesel exhaust & health. <https://www2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

²⁵⁸ Kagawa, J. 2002. "Health effects of diesel exhaust emissions—a mixture of air pollutants of worldwide concern." *Toxicology* 181–182:349–353.

Figure 3-12: Least and most impacted neighborhoods from CalEnviroScreen²⁵⁹



Social Determinants of Health Inequities

The physical and mental health of individuals and communities is shaped, to a great extent, by the social, economic, and environmental circumstances in which people live, work, play, and learn. According to the World Health Organization, these same circumstances—or social determinants of health—are “mostly responsible for health inequities: the unfair and avoidable differences in health status seen within and between countries.” In fact, a strong body of research demonstrates that more than 50 percent of long-term health outcomes are the result of social determinants affecting an individual.²⁶⁰ Race/ethnicity and socioeconomic status, for example, have been found to amplify impacts from long- and short-term environmental exposures for several health outcomes,

²⁵⁹ The figure represents the top and bottom decile scoring of CalEnviroScreen census tracts for pollution burden. This chart is modified from Figure 2. Race in the Least and Most Impacted Census Tracts of CalEnviroScreen 4.0 in the Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. Analysis of Race/Ethnicity and CalEnviroScreen 4.0 Scores. 2021. <https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40raceanalysisf2021.pdf>.

²⁶⁰ California Department of Public Health (CDPH). 2015. *The Portrait of Promise: The California Statewide Plan to Promote Health and Mental Health Equity*. A Report to the Legislature and the People of California by the Office of Health Equity. Sacramento, California. California Department of Public Health, Office of Health Equity.

such as mortality and birth outcomes.^{261,262,263,264} Social factors combine in low-income communities and communities of color to create levels of toxic chronic stress and limit opportunities for healthy food and healthy lifestyles. Social factors also can cause health disparities through psychosocial pathways such as discrimination and social exclusion.²⁶⁵ While the importance of social determinants is well known, measuring the specific and cumulative impacts of social determinants is challenging.

There are several important tools to evaluate and map cumulative impacts and factors contributing to the results of historical practices such as redlining, and these tools have been used for air quality and climate planning, community protection, and investments. CalEnviroScreen is a tool that maps cumulative pollution burdens and vulnerabilities on a statewide basis and ranks census tracts based on environmental, exposure, population, and socioeconomic indicators. An analysis using CES shows a direct, persistent relationship between exposure to environmental burdens and socioeconomic and health vulnerabilities affecting communities of color and historical redlining practices. OEHHA has evaluated health impacts of certain climate change policies on disadvantaged communities and communities of color utilizing CES rankings.²⁶⁶ The Healthy Places Index (HPI) maps indicators that affect life expectancy on a statewide basis. In the future, these and other tools can be helpful to prioritizing investments and informing implementation efforts for GHG emission reductions policies.

Environmental Determinants of Health Inequities

Communities with large percentages of Black and other socially vulnerable and marginalized groups are disproportionately located near pollution sources, such as traffic

²⁶¹ O'Neill, M. S., M. Jerrett, I. Kawachi, J. I. Levy, A. J. Cohen, N. Gouveia, et al. 2003. "Health, wealth, and air pollution: Advancing theory and methods." *Environ Health Perspect.* 111 (16): 1861–70.

²⁶² Ponce, N. A., K. J. Hoggatt, M. Wilhelm, and B. Ritz. 2005. "Preterm birth: The interaction of traffic-related air pollution with economic hardship in Los Angeles neighborhoods." *Am J Epidemiol.* 162 (2): 140–8.

²⁶³ Morello-Frosch, R., B. Jesdale, J. Sadd, and M. Pastor. 2010. "Ambient air pollution exposure and full-term birth weight in California." *Environ Health.* 9: 44.

²⁶⁴ Finkelstein, M. M., M. Jerrett, P. DeLuca, N. Finkelstein, D. K. Verma, K. Chapman, et al. 2003. "Relation between income, air pollution, and mortality: A cohort study." *CMAJ.* 169 (5): 397–402.

²⁶⁵ Clougherty, J., and L. Kubzansky. 2009. "A framework for examining social stress and susceptibility in air pollution and respiratory health." *Environ Health Perspect.* 117 (9): 1351–8.

²⁶⁶ OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities.* <https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf>.

and freight facilities, industrial facilities, and hazardous waste sites.^{267,268,269,270} Research shows large disparities in exposure to pollution between white and non-white populations in California, and between low-income and communities of color (Figure 3-13). The research also shows Black and Latino populations experience significantly greater air pollution impacts than white populations in California.²⁷¹ Additionally, Native Americans are disproportionately impacted by air pollution with high rates of exposure to industrial, diesel, and residential pollution sources and higher rates of diseases linked to air pollution.^{272, 273}

²⁶⁷ Mohai, P., P. M. Lanz, J. Morenoff, J. S. House, and R. P. Mero. 2009. "Racial and socioeconomic disparities in residential proximity to polluting industrial facilities: Evidence from the Americans' Changing Lives Study." *Am J Public Health*. 99 (Suppl 3): S649–56.

²⁶⁸ Mohai, P., and R. Saha. 2007. "Racial inequality in the distribution of hazardous waste: A national-level reassessment." *Soc Probl*. 54 (3): 343–70.

²⁶⁹ Morello-Frosch, R., M. Pastor, C. Porras, and J. Sadd. 2002. "Environmental justice and regional inequality in southern California: Implications for future research." *Environ Health Perspect*. 110 (Suppl 2): 149–54.

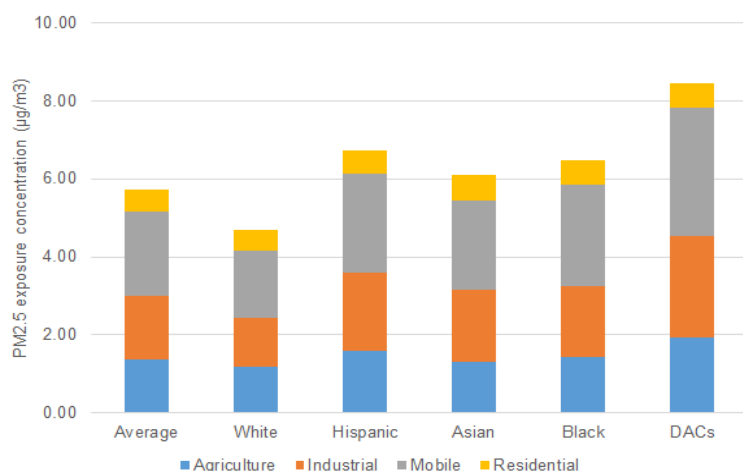
²⁷⁰ Gunier, R. B., A. Hertz, J. von Behren, and P. Reynolds. 2003. "Traffic density in California: Socioeconomic and ethnic differences among potentially exposed children." *J Expo Anal Environ Epidemiol*. 13 (3): 240–6.

²⁷¹ Apte, J. S., S. E. Chambliss, C. W. Tessum, and J. D. Marshall. 2019. *A Method to Prioritize Sources for Reducing High PM_{2.5} Exposures in Environmental Justice Communities in California*. CARB Research Contract Number 17RD006.

²⁷² Indigenous People and Air Pollution in the United States. A Report from the National Tribal Air Association and Moms Clean Air Force. 2021. https://7vv611.a2cdn1.secureserver.net/wp-content/uploads/2021/04/indigenoussairpollution_041421.pdf

²⁷³ National Tribal Air Association. 2022. Status of Tribal Air Report. Pg. 66. <https://7vv611.a2cdn1.secureserver.net/wp-content/uploads/2022/10/2022-NTAA-Status-of-Tribal-Air-Report.pdf>.

Figure 3-13: Top sources of PM_{2.5} and their contribution to PM_{2.5} exposures by race and in disadvantaged communities



These disparities in exposure to pollution sources generate health inequities. Communities located near major roadways are at increased risk of asthma attacks and other respiratory and cardiac effects. Studies consistently show that mobile source pollution exposure near major roadways or freight sources contributes to and exacerbates asthma, impairs lung function, and increases cardiovascular mortality.²⁷⁴ The exposure to mixtures of gaseous and particulate pollutants in mobile sources (including PM, NO_x, and benzene) is associated with higher rates of heart attacks, strokes, lung cancer, autism, and dementia.²⁷⁵

Environmental hazards found in communities also can include exposures to toxic substances and emissions, as well as occupational exposures. Due to historical inequities, under-resourced communities and communities of color are often located close to sources of toxic pollution, including chrome platers; metal recycling facilities; oil and gas operations; agricultural burning; railyards; facilities transporting, managing, or disposing of hazardous waste; and areas impacted by pesticides, among others. Some populations may be at increased risk of exposure to pollutants, both at work and home.

Children are more susceptible to environmental pollutants for many reasons, including the ongoing development of their nervous, immune, digestive, and other bodily systems. Moreover, children eat more food, drink more fluids, and breathe more air relative to their

²⁷⁴ U.S. Environmental Protection Agency website. How Mobile Source Pollution Effects Your Health. <https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health>.

²⁷⁵ USC Environmental Health Centers. 2018. Living Near Busy Roads or Traffic Pollution. https://envhealthcenters.usc.edu/wp-content/uploads/2016/10/living-near-bus_19696172.pdf.

For older adults, increased vulnerability is linked to respiratory, cardiovascular, and immune systems weakened by aging.²⁸⁰ Preexisting health conditions interact with environmental pollutants to enhance risks of adverse health outcomes.^{281,282} The recent COVID-19 pandemic has highlighted the heightened vulnerability of older adults as well as communities of color to respiratory disease, as hospital admissions and mortality data linked to COVID-19 cases for these groups have been higher than other groups. Research has also underscored the important link between COVID-19 mortality and morbidity and air pollution, demonstrating significantly higher mortality and morbidity for COVID-19 in areas of elevated PM_{2.5} pollution.

Climate change is expected to exacerbate the existing disparities of health conditions and worsen climate vulnerability, which is the degree to which natural systems and people or

²⁸² Zanobetti, A., J. Schwartz, and D. Gold. 2000. "Are there sensitive subgroups for the effects of airborne particles?" *Environ Health Perspect.* 108 (9): 841–5.

communities are at risk of experiencing the negative impacts of climate change.²⁸³ A report from the California Climate Change Center warned that the impacts of climate change will likely create especially heavy burdens on low-income and other vulnerable populations: *“Without proactive policies to address these equity concerns, climate change will likely reinforce and amplify current as well as future socioeconomic disparities, leaving low-income, minority, and politically marginalized groups with fewer economic opportunities and more environmental and health burdens.”*²⁸⁴

In the U.S. Environmental Protection Agency’s “Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts,”²⁸⁵ investigators analyzed risks of six primary climate change impacts disproportionately affecting communities across income, educational attainment, race/ethnicity, and age groups. Four socially vulnerable populations—low income, communities of color, no high school diploma, and age 65 and older—were identified as having a higher likelihood of experiencing the greatest impacts of a changing climate (according to the projected 2°C of global warming or 50 centimeters of global sea level rise). Disproportionate impacts were projected for climate events, including air quality, extreme temperature, coastal flooding, and other impacts, leading to increased risk of health and other adverse outcomes. The study projected significant health impacts for low-income communities, certain racial and ethnic subgroups, and those with lower educational attainment.

Several climate vulnerability tools have been developed or are under development to better understand and map areas at higher risk of climate impacts. The Climate Change and Health Vulnerability Indicators (CCHVIs) for California helps state and local health officials prepare for and reduce adverse health impacts due to a changing climate.²⁸⁶ For example, Los Angeles County shows higher than state average climate vulnerability overall, particularly for those who are linguistically isolated (more than twice the state average).

In summary, there are many environmental, social, individual, and economic factors affecting health and equity in California and contributing to worsening health outcomes from climate change impacts. This section and Appendix G (Public Health) reference a substantial and growing body of research documenting the different social and

²⁸³ OPR. 2018. Defining Vulnerable Communities in the Context of Climate Adaptation. https://opr.ca.gov/docs/20180723-Vulnerable_Communities.pdf.

²⁸⁴ Shonkoff, S., R. Morello-Frosch, M. Pastor, and J. Sadd. 2011. “The climate gap: environmental health and equity implications of climate change and mitigation policies in California—A review of the literature.” *Climatic Change* 109 (Suppl 1): S485–S503.

²⁸⁵ U.S. EPA. 2021. Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts. U.S. Environmental Protection Agency. EPA 430-R-21-003.

²⁸⁶ CDPH. 2022. Climate Change and Health Vulnerability Indicators for California. California Department of Public Health. <https://www.cdph.ca.gov/Programs/OHE/Pages/CC-Health-Vulnerability-Indicators.aspx>.

environmental factors affecting health outcomes and the many groups that are vulnerable to increased effects or that experience health inequities in California (see Table 3-13).

Table 3-13: Examples of vulnerable groups due to socioeconomic, environmental, developmental, and climate change factors

Examples of Vulnerable Groups Due to Socioeconomic, Environmental, Developmental, and Climate Change Factors		
Older People	People with Existing Chronic Illness	People Impacted Due to Working Conditions
Tribal Groups	Infants and Children	Low-Income People
People with Disabilities	People Experiencing Homelessness	Pregnant People
Communities of Color	Marginalized People	Immigrants/Refugees
People with Less Educational Options	Linguistically Isolated Households	People Impacted Due to Poor Housing Conditions

Summary of the Qualitative Health Analysis

CARB has developed a detailed health analysis that covers eight social and environmental co-benefit areas that impact public health (listed below). These co-benefit areas were selected due to ongoing research in these areas as well as discussion in a public workshop on climate change and health impacts held in summer 2018. For each social and environmental area, the analysis includes:

- a discussion of health impacts and disparities,
- key health metrics or epidemiological research on this topic,
- a discussion of how these areas would be affected by “no-action” (i.e., Reference) scenario compared to a “take-action” (i.e., Scoping Plan) scenario
- a discussion of where there are actions to consider for further success, and
- the types of mitigation actions that can help reduce or eliminate disparities and promote greater health equity and resilience.

All co-benefit areas are interconnected, and pursuing benefits in all areas has the potential to multiply positive results and further support building community resilience. *Community resilience* is the ability of a community to reduce harm and maintain an acceptable quality of life in the face of climate-induced stresses, which vary depending on that community’s circumstances and location. Below is a brief description of the areas evaluated for public health co-benefits. The specific health outcomes impacted by each

area, as well as the directional health benefits, are included in the Summary of Health Benefits section of the chapter and covered in more detail in Appendix G (Public Health).

Heat Impacts

Globally, increased GHG concentrations in the atmosphere are causing a continuing increase of the planet's average temperature. California temperatures have risen since records began in 1895, and the rate of increase is accelerating. Recent heat waves have broken heat records and caused serious illness across the state, and these events are becoming more frequent. Heat waves have a particularly high impact in Southern California, where they have become more intense and longer lasting. In the past two years, Los Angeles recorded 121°F, and the Coachella Valley had its hottest year ever, with temperatures reaching 123°F. Heat island effects in urbanized areas can elevate heat effects and disproportionately affect low-income communities and communities of color. Heat events exacerbate respiratory and cardiac illness and cause emergency room visits to soar. Strategies that reduce the impacts of heat exposure promote improved health outcomes.

Wildfires and Smoke

California's NWL cover more than 90 percent of California and include rangeland, forests, woodlands, grasslands, and urban green space. They provide biodiversity and ecosystem benefits, including their ability to sequester carbon from the atmosphere. Protecting and managing California's forests and other natural lands and maintaining their ecosystem health are key practices for maximizing GHG benefits and minimizing negative climate change impacts. Vegetation plays an important role in storing carbon; however, it can also release CO₂ back into the atmosphere when it dies or is burned by fires. California's wildfires are getting worse with increased fire risks, higher frequency of occurrence, larger burn areas, more costly damage, and a longer fire season due to climate change. Strategies that promote healthy ecosystem management of natural and working lands and increased urban greening promote improved health outcomes. Healthy ecosystems provide many health and environmental benefits and can maximize carbon sequestration.

Children's Health and Development

There are a wide range of interconnected environmental, social, biological, and community factors associated with climate change that are adversely affecting children's health. This section focuses on air pollution and near-roadway or traffic pollution as environmental impacts that have a profound effect on children's health. Children's bodies and lungs are still developing, and they take in more air per body weight than adults do. Many low-income communities and communities of color in California experience disproportionately high levels of air pollution, as well as high levels of traffic and freight that impact children. This excess exposure harms children's development and

predisposes them to increased risk of illness throughout their lives. Strategies that reduce air pollution and traffic emissions promote improved health outcomes for children.

Economic Security

Climate change is expected to result in serious adverse socioeconomic effects across many sectors. Economic factors, such as income inequality (among geographic regions), poverty, wealth, debt, unemployment rate, and job security are among the strongest determinants of health. Along the entire income spectrum, higher income is associated with increased life expectancy and improved health outcomes in the United States. Additionally, economic insecurity and negative health impacts are more pronounced in low-income communities and communities of color. Economic strategies, such as the promotion of clean energy and other green jobs and investments in low-income communities and communities of color, and promoting a transition to high road jobs in economic sectors tied to the current fossil fuel economy, can promote improved health outcomes.²⁸⁷

Food Security

The food system is under pressure from numerous factors, and climate change is a key concern. Climate change can affect food production and agricultural yield, impact culturally significant plants and animals for Native American tribes, and exacerbate factors that limit food availability, such as supply chain disruption. Food security is defined as stable access to affordable, sufficient food for an active, healthy life. Many Californians routinely experience food insecurity, and while that impacts Californians of all races and groups, low-income communities and communities of color and children are disproportionately affected by food insecurity. Many Native Americans depend on resources from the land, such as animals and plants for consumption and cultural practices. Strategies that promote sustainable agriculture, access to healthy foods, and reduced organic food waste promote improved health outcomes.

Mobility and Physical Activity

Physical activity is one of the most important factors for a healthy lifestyle, and lack of activity increases the risk of chronic illness and premature death. Research shows that regular physical activity improves health in people of all ages by improving heart and lung

²⁸⁷ According to the California Labor and Workforce Development Agency's High Road Training Partnership program, high road jobs are considered "Quality jobs [that] provide family-sustaining wages, health benefits, a pension, worker advancement opportunities, and collective worker input and are stable, predictable, safe and free of discrimination." https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/08/OneSheet_Job-Quality_ACCESSIBLE.pdf.

function, muscle fitness, mental health and brain function, and sleep quality. A sedentary lifestyle contributes to chronic illnesses, including obesity, heart disease, and Type 2 diabetes among other chronic illnesses. Promoting community design that supports sustainable patterns of land use and transportation enables active transportation choices like walking, biking, and public transit over driving, and can significantly increase physical activity, leading to many valuable health benefits.

Affordable Housing

Housing is an important social determinant of health. The stability of housing, housing quality, conditions inside and outside the home, the cost of housing, and the environmental and social characteristics of the places people live all affect health (including energy efficiency and insulation, cooler building material, tree canopy, home size). Housing affordability is a key factor, and this section highlights how housing affordability supports not only improved health but also more sustainable land use and transportation patterns. A lack of affordable housing is increasing commute distances for low-income renters and creating health burdens. Strategies that support sustainable transportation and housing patterns, together with increased housing affordability, promote improved health outcomes.

Urban Greening

Urban Greening is well recognized as an important amenity, but the inherent health benefits are not always well understood. Under-resourced and vulnerable areas consistently show a lack of urban greening and higher percentages of concrete, asphalt, and impervious surfaces. Under-resourced communities have a greater proportion of concrete and heat-trapping surfaces and a lower amount of tree cover in the neighborhoods in which they live. Areas with reduced urban greening have the potential to create areas of higher temperatures as heat is reflected from pavements and buildings. By contrast, increasing urban greening can provide air pollution buffers and promote physical activity. Strategies that preserve and create urban parks, green space, natural infrastructure, and sustainable agricultural practices support improved physical and mental health outcomes.

No Action Scenario (Reference)

In a no-action scenario, California would remain dependent on fossil fuels and other GHG emitting technologies. Fossil-fuel powered mobile sources including cars, trucks, trains, tractors, and a myriad of other on-road and off-road vehicles and equipment are the largest source of criteria pollutants and toxic air contaminants that directly affect

community health and contribute the largest portion of GHG emissions.²⁸⁸ Other key GHG emission sources include buildings, natural and working lands, and power production and industry. The no-action scenario reflects a continued reliance on fossil fuels in mobile and stationary sectors, including buildings. The continued production and use of fossil fuels; ongoing dependence on gasoline and diesel cars, trucks, buses, and equipment; continued releases of short-lived climate pollutants; and decreased emphasis on forest and ecosystem health will impact communities by reducing climate resilience and health benefits. Green space will likely remain at the same levels or degrade, and urban heat islands will likely increase. With continued growth of vehicle miles traveled, physical activity and the accompanying health benefits will not increase.

Exposure to wildfire smoke will increase, and air quality is expected to worsen as rising temperatures will increase levels of harmful air pollution. Jobs and economic security will be affected by the continuing potential for price spikes in fossil fuels, impacts to the economy from climate change, and fewer job opportunities in green technologies such as solar and electric vehicles. Food security in California will decrease due to the effects of accelerating climate impacts to agriculture; and without increased recovery of organic waste, including food products, food security will continue to decline under a no action scenario. All these impacts can be linked to worse health outcomes. Adverse health impacts are often most felt by Black, Latino, Native American, and other people of color and in low-income communities. These groups are affected more intensely by the physical stress of environmental pollution, social inequities, and the psychological stress of extreme weather events and food and economic insecurity.

Take Action Scenario

In the Take Action scenario, California will drastically reduce reliance on fossil fuels for motor vehicles, freight, buildings, electricity, or other sectors. This scenario is not a specific scenario within this Scoping Plan but examines the broad outcomes of actions to achieve carbon neutrality in 2045. Implementation of this Scoping Plan would achieve a transition to ZEVs, with 100% sales of light-duty ZEVs by 2035 and 100% sales of zero emission trucks by 2040, along with 30% VMT reductions below 2019 levels by 2045. State and local action that supports sustainable land use and transportation patterns and enables more transit and active transportation will lead to substantial health benefits from physical activity, including reduced illness and deaths.

²⁸⁸ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020*.
https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

The economic benefits of improved health through active transportation can be modeled using the Healthy Mobility Options Tool (HMOT).²⁸⁹ In order to demonstrate the important health and economic benefits of VMT reduction, CARB and CDPH used the HMOT to analyze an illustrative trip reduction scenario for 2050 from the California Transportation Plan (CTP). The CTP has a goal of increasing active modes of travel and transit from the current level of 13 percent to a level of 23 percent of all travel trips. While the CTP goal of 23 percent for active modes of travel is not a VMT reduction target, the scenario increases active transportation through a mix of changes in land use planning for increased transportation options, including increases in biking, walking, and transit use, and it helps to show the health benefits of increased active transportation. By achieving the CTP 2050 goals, nearly 8,000 deaths would be avoided in 2050 alone (see Figure 3-14), along with significant reductions in chronic diseases. Achieving this would rank among the top public health accomplishments (see Appendix G [Public Health] for additional modeling results and detailed discussion).

The dramatic reduction in fossil fuel combustion, combined with reductions in VMT and freight and traffic emissions projected in this Scoping Plan will significantly reduce air pollution and its associated health impacts on a statewide basis and in communities near freight sources. Coordinated action strategies will emphasize natural and working lands management changes, including healthy forests, increased vegetative cover, and increased organic farming. Wildfire smoke exposure will reduce significantly with healthy ecosystem management strategies. Since many communities in California are disproportionately impacted by high levels of traffic pollution, the reduction in petroleum fueled vehicles will reduce the additional impacts of living or going to school near historically highly polluting sources. Indoor air quality is also likely to improve through a shift to non-fossil fuel appliances. Concerted state and local action to support sustainable land use and transportation patterns can enable more active transportation with health benefits from physical activity.

²⁸⁹ ITHIM California. 2020. Transportation Planning for Health, Equity, and Climate Change. <https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/>.

Figure 3-14: Quantified health benefits of active transportation from increased physical activity

8,000 avoided deaths
from increasing Active
Transportation*



*Calculated by the Healthy Mobility Options Tool, active transportation (including walking, rolling, cycling, and taking public transit) from the California Transportation Plan 2050 compared to business as usual for 2050.

Overall community resilience is expected to increase as physical activity and green space increases—potentially decreasing urban heat islands. Efforts to support VMT reduction will include coordination across state agencies on affordable housing measures. Reduced fossil fuel dependence will reduce economic pressure from wildfires, droughts, and price spikes in fossil fuels, especially as more jurisdictions implement plans with similar actions. Investment in sustainable agriculture, healthy forests, urban greening, and clean energy technologies will add sustainable jobs and further promote economic security. More sustainable agriculture and food recovery efforts will add to food security. All these impacts can be linked to wide ranging health benefits, including positive respiratory and cardiovascular effects, healthier birth and brain outcomes, improved mental health indicators, improved life expectancy, reductions in chronic illness and cancers, improved children’s health and development, reduced depression, and other benefits. The magnitude of the possible co-benefits is extremely large, especially in areas that are currently the most affected.

Summary of Health Benefits

Below, Tables 3-14 and 3-15 show overall summaries of the directional benefits by co-benefit area estimated for this Scoping Plan. The supporting epidemiological studies used for qualitative or quantitative analysis of each co-benefit area are included in Appendix G (Public Health). Another section of Chapter 3, together with Appendix C (AB 197 Measure Analysis) and Appendix H (AB 32 GHG Inventory Sector Modeling), also includes the quantitative analysis of air pollution related health impacts, including recently added health endpoints for CARB’s ongoing analysis.

Table 3-14: Scoping Plan directional benefits for health co-benefit areas (heat, affordable housing, food security, economic security, and urban greening)

Health Co-benefit Areas*					
Quantitative vs. Qualitative	Reduced Heat Impacts	Increased Affordable Housing	Increased Food Security	Increased Economic Security	Increased Urban Greening
Research was used for Qualitative Analysis	↓ Mortality ↓ Emergency Room Visits for cardiovascular and respiratory causes and intestinal infections ↓ Hospitalization for cardiovascular, respiratory causes ↓ Preterm Birth ↓ Mental Illness	↓ Infectious Disease ↓ Chronic Illness ↓ Asthma ↓ Injuries ↓ Mental Illness ↑ Children's Performance in Schools ↑ Children's Health ↓ Children's Behavioral Problems	↓ Mental Illness ↓ Iron Deficiency ↓ Chronic Diseases ↑ Life Expectancy ↓ Children's Mental Illness ↓ Children's Cognitive Problems ↓ Children's Behavioral Health Problems ↓ Children's Iron Deficiency ↓ Children's Oral Health Problems	↑ Life Expectancy ↑ Health Status ↑ Mental Health	↓ Mortality ↓ Asthma Prevalence ↓ Depression ↓ Adverse Birth Outcomes including low birth weight and small for gestational age ↑ Life Expectancy

*See Appendix G (Public Health) for a table with references to research for each health outcome listed.

Table 3-15: Scoping Plan directional benefits for health co-benefit areas (traffic pollution, wildfire, and active transportation)

Health Co-benefit Areas*			
Quantitative vs. Qualitative	Reduced Traffic Pollution	Reduced Wildfire Smoke	Increased Active Transportation
Research was used for Quantitative Analysis	↓ Children's Respiratory Outcomes, Hospital Admissions ↓ Children's Respiratory Outcomes, Emergency Room Visits ↓ Children's Asthma Onset ↓ Children's Asthma Symptoms	↓ All-Cause Mortality ↓ Asthma, Hospital Admissions ↓ COPD, Hospital Admissions ↓ All Respiratory Outcomes, Hospital Admissions ↓ Asthma, Emergency Room Visits ↓ All Respiratory Outcomes, Emergency Room Visits ↓ All Cardiac Outcomes, Emergency Room Visits	↓ Cardiovascular Diseases ↓ Colon Cancer ↓ Breast Cancer ↓ Diabetes ↓ Dementia ↓ Lung Cancer ↓ Respiratory Disease ↓ Depression ↑ Traffic Accidents
Research was used for Qualitative Analysis	↑ Children's Lung Function Growth ↓ Children's Bronchitic Symptoms ↓ Children's Impaired Cognitive Development ↓ Children's Adverse Birth Outcomes, including low birth weight and preterm birth		

*See Appendix G (Public Health) for a table with references to research for each health outcome listed.

In summary, the qualitative health analysis of the No-Action versus Take-Action scenarios for this Scoping Plan shows an overwhelming benefit for the state by taking action to move forward to carbon neutrality while continuing efforts to increase health equity and resilience in individual communities. Taking action can improve physical and mental health for adults and children, reduce a range of chronic illnesses, and promote improvements in life expectancy. Development and implementation of actions to achieve the outcomes called for in this Scoping Plan should consider how to engage affected communities in implementation, address the existing health and opportunity gaps, and pursue equitable implementation statewide and locally. This Scoping Plan deployment of clean technology and fuels, together with improved land management, will reduce GHGs and air pollution and create more resilient communities that are better able to prepare for and recover from extreme climate events.

Environmental Analysis

In May 2022, CARB, as the lead agency for the Scoping Plan, released for public review the Draft Environmental Analysis (Draft EA) for this Scoping Plan; it assessed the potential environmental impacts of implementing the Scoping Plan. CARB circulated the Draft EA for public review and comment for a period of 45 days that began on May 10, 2022, and ended on June 24, 2022. CARB held a public hearing on June 23, 2022 to provide the opportunity for public comment. During the review period, written and oral comments were received on the Draft EA. CARB reviewed the comments to identify environmental topics and began preparation of responses to those comments.

After the end of the Draft EA public review period, CARB identified potential revisions to certain aspects of this Scoping Plan that merit revisions to the project description. This new information results from, among other things, revisions to the project description regarding energy sector goals (including offshore wind), revised carbon removal targets, and additional strategies for natural and working lands. CARB released a Recirculated Draft EA for a written public comment period that started September 9, 2022, and ended on October 24, 2022. See Chapter 2 of the Recirculated Draft EA²⁹⁰ for further information regarding the changes. The Recirculated Draft EA assesses the potential for significant adverse and beneficial environmental impacts associated with all proposed actions in this Scoping Plan, and provides a programmatic environmental analysis of the reasonably foreseeable compliance responses that could result from implementation of the Scoping

²⁹⁰ CARB. 2022. Recirculated Draft EA. <https://ww2.arb.ca.gov/sites/default/files/2022-09/2022-draft-sp-appendix-b-draft-ea-recirc.pdf>.

Plan.²⁹¹ The Recirculated Draft EA concluded implementation of this Scoping Plan could result in the following:

- Beneficial impacts to: air quality (long-term operational-related) and GHG emissions (short-term construction-related and long-term operational-related)
- Less than significant impacts to: energy demand, mineral resources, population and housing, public services, recreation (short-term construction-related), and wildfire (short-term construction-related)
- Potentially significant and unavoidable adverse impacts to: aesthetics, agriculture and forest resources, air quality (construction-related and operational odors), biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, recreation (long-term operational-related), transportation and traffic, tribal cultural resources, utilities and service systems, and wildfire (long-term operational-related)

Before the public meeting at which the Board will consider this Scoping Plan Update, CARB will publish the Final EA as Appendix B (Final Environmental Analysis) to this Scoping Plan, along with written responses to timely submitted comments raising significant environmental issues received on the Draft EA and the Recirculated Draft EA, which will be presented to the Board for consideration.

²⁹¹ The Recirculated Draft EA is available at <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>.

Chapter 4: Key Sectors

Chapter 4 provides an overview of the major energy sources and technology in use today, and of alternative clean technology and fuels to support decarbonization based on the latest information available. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. AB 32 requires climate change mitigation policies to be considered in the context of the sector's contribution to the state's total GHG emissions. The transportation, electricity (in-state and imported), and industrial sectors are the largest contributors of GHGs in the state and present the largest opportunities for GHG reductions. Actions to reduce fossil fuel combustion in these sectors also can provide critical air pollution reductions in low-income communities and communities of color, which are often located adjacent to these sources. A carbon neutrality framework also elevates the role of CO₂ removal through natural and working lands and mechanical capture and storage. Actions that support energy efficiency, reduced VMT, alternative fuels, and renewable power also can provide benefits by reducing both criteria and toxic air pollutants.

What sets this plan apart from previous Scoping Plans is the focus on the accelerated rate of deployment of clean technology and energy within every sector. As a result, specific actions, including accelerated rates of deployment of clean technology and fuels identified within this Scoping Plan, will need to be translated into both new and amended regulations, policies, and incentive programs. State agencies will need to evaluate current authority to align existing policies or develop new ones to achieve outcomes called for in this Scoping Plan. Legislative support may be needed in some cases to ensure authority and funding is sufficient to ensure this Scoping Plan is translatable to action on the ground. Most regulations, or change to existing regulations, ultimately considered by the Board or other state agencies for adoption will be subject to administrative procedure requirements. Accordingly, they must rely on specific subsequent supporting analysis and extensive public processes and consultations with interested tribes to develop and identify appropriate proposals for effective implementation. For example, any proposal to strengthen the LCFS regulations through amendments increasing the stringency of the carbon intensity (CI) targets would be considered on the basis of a public process, including workshops, and focused environmental, economic, and public health analyses.

Policies that ensure economy-wide investment or program decisions that incorporate consideration of GHG emissions are particularly important. As we pursue GHG reduction targets, we must acknowledge the manner in which built and natural environments are connected, how changes in one may impact the other, and how policy choices in one sector can and do impact other sectors. For example, fostering more compact, transportation-efficient development in infill areas and increasing transportation choices with the goal of reducing VMT not only reduces demand for transportation fuel but also requires less energy for buildings and helps to conserve natural and working lands that

sequester carbon. Therefore, the multiple and often interwoven actions that reduce VMT both reduce emissions from the transportation sector and support reductions needed in other sectors.

Legislation, such as SB 350²⁹² (De León and Leno, Chapter 457, Statutes of 2015), has recognized the need for CARB, the CEC, and the CPUC to work together to ensure the state's energy and climate goals are integrated in procurement decisions by load serving entities as part of Integrated Resource Plans. Moving forward, it is especially critical that similar approaches are adopted to break down silos across state agencies to ensure policies and programs are aligned with multiple state priorities outlined in this plan. Finally, supportive legislative direction, such as SB 905 that requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program, may also benefit emerging areas of policy to provide express agency authority and roles for these nascent efforts, including streamlining of permitting, while ensuring that protections for communities are in place.

Unlike previous Scoping Plans that separated out individual economic sectors, this Scoping Plan approaches decarbonization from two perspectives: (1) managing a phasedown of existing energy sources and technology and (2) ramping up, developing, and deploying alternative clean energy sources and technology over time. This approach supports a more comprehensive consideration of our energy infrastructure, the ability to repurpose existing assets, and the need to build new assets. It also provides multiple metrics beyond just the annual AB 32 GHG Inventory to better enable tracking progress. For example, it clearly demonstrates the production and distribution rates of specific types of clean energy, such as adding 4.3 GW of utility solar and 2.5 GW of storage year-over-year between now and 2035 to be on track to achieve carbon neutrality no later than 2045, and does the same for technology deployment, such as 11 million ZEVs in 2035.

The sections below include key actions to support success in the necessary transition away from fossil combustion, which is an overriding goal of this plan. The wide array of complementary and supporting actions being contemplated or to be undertaken across state government are detailed here. The broad view of actions described in this chapter thus provides context for the specific deployment of clean technology and fuels identified in the Scoping Plan Scenario described in Chapter 2. Actions identified in this Scoping Plan are based on currently known options and the latest science. As part of future Scoping Plan updates, additional clean technology and fuels may be identified and added to the mix of needed tools to continue to reduce the state's GHG emissions, support air quality co-benefits, and remove carbon from the atmosphere.

²⁹² California Air Resources Board. SB 350 Electricity Sector Greenhouse Gas Planning Targets. <https://ww2.arb.ca.gov/our-work/programs/sb350>.

Transportation Sustainability

The transportation sector has long relied on liquid petroleum fuels as the primary energy source for internal combustion engine (ICE) vehicles, including cars, trucks, locomotives, marine equipment, and aircraft. Combustion of fossil fuels in vehicles emits significant amounts of GHGs, criteria pollutants, and toxic air contaminants. In 2019,²⁹³ the transportation sector accounted for approximately 50 percent of statewide GHG emissions²⁹⁴ and thus was by far the single largest source of carbon pollution in the state. In addition, the transportation sector accounted for over 80 percent of statewide NOx emissions and 30% of fine particulate matter emissions, including toxic diesel particulate matter.²⁹⁵

Communities adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentration of toxic pollutants from vehicles and equipment consuming fossil fuels, leading to a number of demonstrated health impacts such as respiratory illnesses, higher likelihood of cancer development, and premature death. In addition, communities located near oil extraction operations or crude oil refineries often experience higher exposure to poor air quality. While CARB's programs, along with local action, have made substantial progress over the past few decades, it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed and pursue policies that result in less driving, in order to meet our GHG and air quality targets.

The transportation sector can be divided into three general categories: Technology, Fuels, and Vehicle Miles Traveled.

- *Technology* refers to the vehicles themselves, as well as the associated refueling infrastructure for those vehicles.
- *Fuels* refers to the energy source used to power vehicles and the facilities that produce them.
- Vehicle travel is measured as *vehicle miles traveled* (VMT), and is a product of development patterns and available transportation options.

²⁹³ In 2020 the state experienced shelter-in-place orders in response to the COVID-19 pandemic. The orders, and the effects of the pandemic, led to a significant year-over-year decline in transportation emissions in 2020. This means 2019 is likely a more representative year for overall transportation emissions and 2020 a likely outlier in the historical transportation emissions trend data.

²⁹⁴ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020*.

https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf. This includes upstream oil extraction and refining emissions.

²⁹⁵ CARB. California Greenhouse Gas Emission Inventory Program. <https://ww2.arb.ca.gov/our-work/programs/ghg-inventory-program>.

Sector Transition

Technology

Vehicles must transition to zero emission technology to decarbonize the transportation sector. Executive Order N-79-20²⁹⁶ reflects the urgency of transitioning to zero emission vehicles (ZEVs) by establishing target dates for reaching 100 percent ZEV sales or fleet transitions to ZEV technology. The primary ZEV technologies available today are battery-electric and hydrogen fuel cell electric vehicles (FCEVs), both of which emit zero tailpipe GHGs, criteria pollutants, and toxic air contaminants, as they do not burn fuel. These vehicles are rapidly growing in performance, affordability, and popularity.²⁹⁷ Plug-in hybrid electric vehicles also offer a limited but increasing range of zero emission operation and will play a role in the transition to ZEVs.

Light-duty passenger vehicles consume the majority of gasoline in the state—12.9 billion gallons in 2019²⁹⁸—and are well-suited for transitioning to ZEVs. EO N-79-20 calls for 100 percent ZEV sales of new light-duty vehicles by 2035, and this target is reflected in this Scoping Plan.²⁹⁹ The Advanced Clean Cars II regulation fulfills the goal in the Executive Order and serves as the primary mechanism to help deploy ZEVs. A number of existing incentive programs also support this transition, including the Clean Cars 4 All Program.³⁰⁰ Heavy-duty trucks are the largest source of diesel particulate matter, a toxic air contaminant that is directly linked to a number of adverse health impacts, and EO N-79-20 also sets targets for transitioning the medium- and heavy-duty fleet to zero emissions: by 2035 for drayage trucks and by 2045 for buses and heavy-duty long-haul trucks where feasible. Replacing heavy-duty vehicles with ZEV technology will significantly reduce GHG emissions and diesel PM emissions in low-income communities and communities of color adjacent to ports, distribution centers, and highways. The existing Advanced Clean Trucks regulation, paired with the proposed Advanced Clean Fleets regulation, are designed to transition a significant amount of the

²⁹⁶ Executive Department. State of California. Executive Order N-79-20. <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>.

²⁹⁷ CARB. 2021. Public Workshop for Advanced Clean Cars II. May 6.

https://ww2.arb.ca.gov/sites/default/files/2021-05/acc2_workshop_slides_may062021_ac.pdf.

²⁹⁸ CARB. 2022. *Fuel Activity for California's Greenhouse Gas Inventory by Sector and Activity*. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/fuel_activity_inventory_by_sector_all_00-20.xlsx.

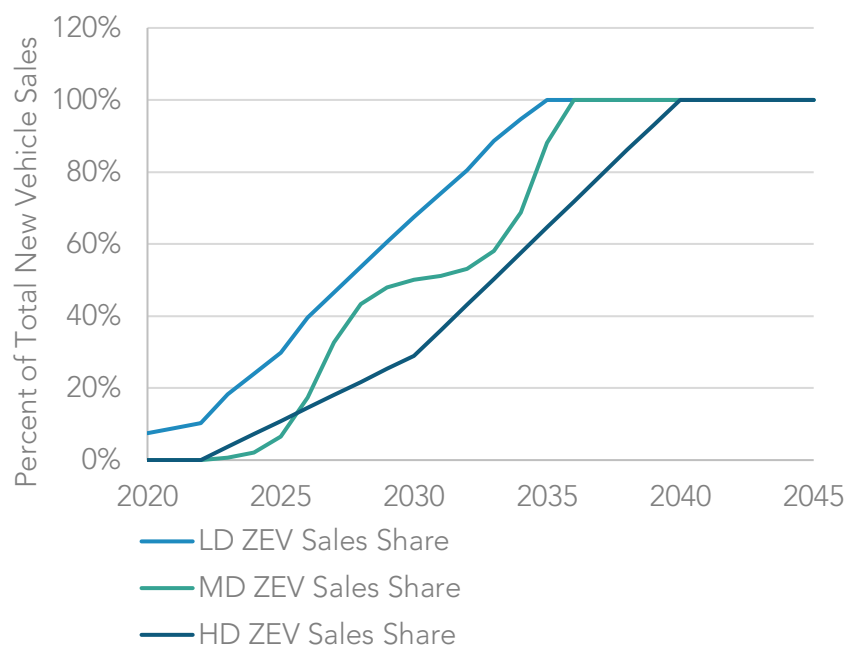
²⁹⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A, with reference to the date at which all new vehicle sales are ZEVs. [finalejacrecs.pdf \(arb.ca.gov\)](https://www.arb.ca.gov/finalejacrecs.pdf).

³⁰⁰ CARB. Clean Cars 4 All. <https://ww2.arb.ca.gov/our-work/programs/clean-cars-4-all>. The Clean Vehicle Rebate Project (CVRP) also supports the transition to ZEVs. <https://cleanvehiclerebate.org/en>.

California truck fleet to ZEV technology. As with the LDV sector, a number of incentive programs support this transition, such as the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP).³⁰¹

Figure 4-1 below illustrates the pace of transition in vehicle technology needed to drastically reduce GHG emissions from vehicles. All vehicle classes reach 100 percent ZEV sales before 2045, with some achieving this well before. The ZEV technology across the vehicle classes is assumed to be primarily battery electric and hydrogen fuel cell (reflecting the primary ZEV technologies available today).³⁰²

Figure 4-1: Transition of on-road vehicle sales to ZEV technology in the Scoping Plan Scenario



Today, off-road vehicles also rely heavily on ICE technology. Executive Order N-79-20 sets an off-road equipment target of transitioning the entire fleet to ZEV technology by 2035, where feasible. There is a great need for both investment and innovation in the off-road space in order to develop and commercialize zero emission equipment types that meet or exceed the performance of existing equipment. A number of funding sources currently support this transition, including programs such as FARMER, Carl Moyer, and

³⁰¹ California HVIP. Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project. <https://californiahvip.org/?msclkid=efaf65f2c26f11eca6bdd08ecc323864>.

³⁰² The light-duty fleet includes more than 11 million battery electric and hydrogen fuel cell vehicles in 2035 and over 23 million battery electric and hydrogen fuel cell vehicles in 2045.

the Community Air Protection Incentives—as well as Low Carbon Transportation Incentives, including the Clean Off-Road Equipment (CORE) program. In addition, the 2021–22 California budget provided record-high allocations for funding ZEVs, including off-road equipment, and the 2022–23 budget is similarly ambitious.³⁰³ Several regulations focused on transitioning to zero emission off-road equipment have recently been adopted or are in the works, and apply to locomotives,³⁰⁴ forklifts, ocean-going vessels at berth,³⁰⁵ commercial harbor craft,³⁰⁶ small off-road engines,³⁰⁷ and more.

Intrastate aviation relies on ICE technology today, but battery-electric and hydrogen fuel cell aviation applications are in development, along with sustainable aviation fuel. The Scoping Plan Scenario includes a transition of 20% of aviation fuel demand to ZEV technologies by 2045 and sustainable aviation fuel for the rest.

Refueling infrastructure is a crucial component of transforming transportation technology. Electric vehicle chargers and hydrogen refueling stations must become easily accessible for all drivers to support a wholesale transition to ZEV technology. Deployment of ZEV refueling infrastructure is currently supported by a number of existing local and state public funding mechanisms, the new National Electric Vehicle Infrastructure (NEVI) federal funding mechanism, California’s electric utilities, the Electrify America initiative that was established in response to the Volkswagen ZEV commitment, and by numerous companies, such as EVgo, ChargePoint, Tesla, Ford, FirstElement Fuel, Chevron, Shell, and Iwatani, who are investing substantial private resources into developing these networks. Private investment in reliable, affordable and ubiquitous refueling infrastructure must drive the transition as the business case for ZEVs continues to strengthen.

Strategies for Achieving Success

- Achieve 100 percent ZEV sales of light-duty vehicles by 2035³⁰⁸ and medium-heavy-duty vehicles by 2040.
- Achieve a 20% zero emission target for the aviation sector.

³⁰³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1C. CARB and the Administration are committed to increasing focus on transportation equity investment as was reflected in the governor’s 2022–23 budget. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁰⁴ CARB. Reducing Rail Emissions in California. <https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california>.

³⁰⁵ CARB. Ocean-Going Vessels At Berth Regulation. <https://ww2.arb.ca.gov/our-work/programs/ocean-going-vessels-berth-regulation>.

³⁰⁶ CARB. CARB passes amendments to commercial harbor craft regulation. <https://ww2.arb.ca.gov/news/carb-passes-amendments-commercial-harbor-craft-regulation>.

³⁰⁷ CARB. Small Off-Road Engines (SORE). <https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore>.

³⁰⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Develop a rapid and robust network of ZEV refueling infrastructure to support the needed transition to ZEVs.
- Ensure that the transition to ZEV technology is affordable for low-income households and communities of color, and meets the needs of communities and small businesses.³⁰⁹
- Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions.³¹⁰
- Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity³¹¹ and hydrogen station grants from the CEC's Clean Transportation Program³¹² pursuant to Executive Order B-48-18.³¹³
- Evaluate and continue to offer incentives similar to those through FARMER,³¹⁴ Carl Moyer,³¹⁵ the Clean Fuel Reward Program,³¹⁶ the Community Air Protection Program,³¹⁷ and Low Carbon Transportation,³¹⁸ including CORE.³¹⁹ Where feasible, prioritize and increase funding for clean transportation equity programs.³²⁰
- Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector.

³⁰⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF6, in the context of communities. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³¹⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF7. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³¹¹ CARB. LCFS ZEV Infrastructure Crediting. <https://ww2.arb.ca.gov/resources/documents/lcfs-zev-infrastructure-crediting>.

³¹² CEC. Clean Transportation Program. <https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program>.

³¹³ EO B-48-18 calls for 200 hydrogen refueling stations by 2025. <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/39-B-48-18.pdf>.

³¹⁴ CARB. FARMER program. <https://ww2.arb.ca.gov/our-work/programs/farmer-program>.

³¹⁵ CARB. Carl Moyer program. <https://ww2.arb.ca.gov/our-work/programs/carl-moyer-memorial-air-quality-standards-attainment-program>.

³¹⁶ California Clean Fuel Reward Program. <https://cleanfuelreward.com/>.

³¹⁷ CARB. Community Air Protection Program. <https://ww2.arb.ca.gov/capp>.

³¹⁸ CARB. Low Carbon Transportation Investments and Air Quality Improvement Program. <https://ww2.arb.ca.gov/our-work/programs/low-carbon-transportation-investments-and-air-quality-improvement-program>.

³¹⁹ Clean Off-Road Equipment (CORE) Voucher Incentive Program. <https://californiacore.org/>.

³²⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1C. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Evaluate and align with this Scoping Plan relevant CARB policies such as Advanced Clean Cars II,³²¹ Innovative Clean Transit,³²² Zero Emission Airport Shuttle,³²³ California Phase 2 GHG Standards,³²⁴ Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts,³²⁵ In-use Locomotives,³²⁶ the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation,³²⁷ Commercial Harbor Craft,³²⁸ Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation,³²⁹ carbon pricing through the Cap-and-Trade Program,³³⁰ and the Low Carbon Fuel Standard.³³¹
- Identify and address permitting and market barriers to successful rapid ZEV technology deployment while protecting public health and the environment.

Fuels

Transitioning away from conventional ICE vehicles is part of the solution, but we must ensure that an adequate supply of zero-carbon alternative fuel and distribution is available to power these vehicles. Electricity and hydrogen are currently the primary fuels for ZEVs,

³²¹ CARB. Advanced Clean Cars Program. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>. Cal. Code Regs., tit. 13, §§ 1900, 1961.2, 1961.3, 1961.4, 1962.2, 1962.3, 1962.4, 1962.5, 1962.6, 1962.7, 1962.8, 1965, 1968.2, 1969, 1976, 1978, 2037, 2038, 2112, 2139, 2140, 2147, 2317, 2903.

³²² CARB. Innovative Clean Transit. <https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit>. Cal. Code Regs., tit. 13, §§ 2023—2023.11.

³²³ CARB. Zero-Emission Airport Shuttle. <https://ww2.arb.ca.gov/our-work/programs/zero-emission-airport-shuttle>. Cal. Code Regs., tit. 17, §§ 95690.1—95690.8.

³²⁴ CARB. California Phase 2 Greenhouse Gas Standards. <https://ww2.arb.ca.gov/our-work/programs/greenhouse-gas-standards-medium-and-heavy-duty-engines-and-vehicles/phase2>. Cal. Code Regs., tit. 13, §§ 1956.8 and 2036; and Cal. Code Regs., tit. 17, §§ 95301, 95302, 95303, and 95663.

³²⁵ CARB. Zero-Emission Forklifts. <https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts>. Cal. Code Regs., tit. 17, §§ 95690.1—95690.8.

³²⁶ CARB. Reducing Rail Emissions. <https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california>. Proposed Cal. Code Regs., tit. 13, §§ 2478—2478.16.

³²⁷ CARB. In-use Off-Road Diesel-Fueled Fleets Regulation. <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>. Cal. Code Regs., tit. 13, §§ 2449, 2449.1, 2449.2.

³²⁸ CARB. Commercial Harbor Craft. <https://ww2.arb.ca.gov/our-work/programs/commercial-harbor-craft>. Cal. Code Regs., tit. 13, § 2299.5.

³²⁹ CARB. In-use Off-Road Diesel-Fueled Fleets Regulation. <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>.

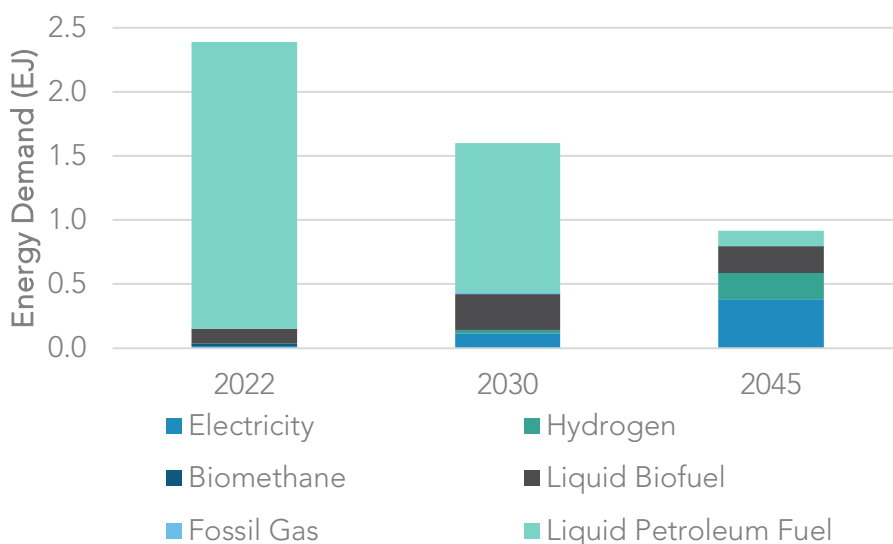
³³⁰ CARB. Cap-and-Trade Program. <https://ww2.arb.ca.gov/our-work/programs/cap-and-trade-program>. Cal. Code Regs., tit. 17, §§ 95801 et seq.

³³¹ CARB. Low Carbon Fuel Standard. <https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard>. Cal. Code Regs., tit. 17, §§ 95480 et seq.

and both fuels must be produced using low-carbon technology and feedstocks to minimize upstream emissions.

The transition to complete ZEV technology will not happen overnight. Conventional ICE vehicles from legacy fleets will remain on the road for some time, even after all new vehicle sales have transitioned to ZEV technology. In addition, some equipment types are only now in the initial stages of development of ZEV technology for propulsion, such as commercial aircraft or ocean-going vessels. In addition to building the production and distribution infrastructure for zero-carbon fuels, the state must continue to support low-carbon liquid fuels during this period of transition and for much harder sectors for ZEV technology such as aviation, locomotives, and marine applications. Biomethane currently displaces fossil fuels in transportation and will largely be needed for hard-to-decarbonize sectors but will likely continue to play a targeted role in some fleets while the transportation sector transitions to ZEVs. Figure 4-2 provides the detail on fuels used in 2020 and the fuel mix under the Scoping Plan Scenario for 2035 and 2045.

Figure 4-2: Transportation fuel mix in 2022, 2030, and 2045 in the Scoping Plan Scenario³³²



Private investment in alternative fuels will play a key role in diversifying the transportation fuel supply away from fossil fuels. The Low Carbon Fuel Standard is the primary mechanism for transforming California's transportation fuel pool with low-carbon

³³² See <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx> for transportation fuels by year.

alternatives and has fostered a growing alternative fuel market. Partially as a result of the powerful market signals from the LCFS, fuels like renewable diesel, sustainable aviation fuel, biomethane, and electricity have all gained significant market shares and continue to displace gasoline and diesel in both on- and off-road vehicles. In addition, Executive Order N-79-20 calls on state agencies to support the transition of existing fuel production facilities away from fossil fuels and directs that this transition also protect and support workers, public health, safety, and the environment. In line with this direction, existing refineries could be repurposed to produce sustainable aviation fuel, renewable diesel, and hydrogen. This trend has already begun, and continuing to develop fuel production capacity in-state to support the energy transition while making the most efficient use of existing assets is critical to avoiding emissions leakage. If fuel demand persists after fuel production facilities have ceased operations, fuel demand will have to be met through imports.

As we transition or build new energy production facilities and infrastructure, it will be important to ensure low-income communities, tribes, and communities of color do not experience increases in existing air pollution disparities and continue to experience a reduction in the air pollution disparities that exist today. California must use the best available science to ensure that raw materials used to produce transportation fuels do not incentivize feedstocks with little to no GHG reductions from a life cycle perspective. A dramatic increase in alternative fuel production must not come at the expense of global deforestation, unsustainable land conversion, or adverse food supply impacts, to name a few examples. CARB will continue to monitor scientific findings on these topics to ensure that California policies, such as the LCFS, send the appropriate market signals and do not result in unintended consequences.³³³

Strategies for Achieving Success

- Accelerate the reduction and replacement of fossil fuel production and consumption in California.³³⁴
- Incentivize private investment in new zero-carbon fuel production in California.
- Incentivize the transition of existing fuel production and distribution assets to support deployment of low- and zero-carbon fuels while protecting public health and the environment.
- Invest in the infrastructure to support reliable refueling for transportation such as electricity and hydrogen refueling.

³³³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1E. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³³⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F3. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Initiate a public process focused on options to increase the stringency and scope of the LCFS:
 - Evaluate and propose accelerated carbon intensity targets pre-2030 for LCFS.
 - Evaluate and propose further declines in LCFS post-2030 carbon intensity targets to align with this 2022 Scoping Plan.
 - Consider integrating opt-in sectors into the program.
 - Provide capacity credits for hydrogen and electricity for heavy-duty fueling.
- Monitor for and ensure that raw materials used to produce low-carbon fuels or technologies do not result in unintended consequences.³³⁵

Vehicle Miles Traveled

Transforming the transportation sector goes beyond phasing out combustion technology and producing cleaner fuels. Managing total demand for transportation energy by reducing the miles people need to drive on a daily basis is also critical as the state aims for a sustainable transportation sector in a carbon neutral economy. Though GHG emissions are declining due to cleaner vehicles and fuels, rising VMT can offset the effective benefits of adopted regulations.

Even under full implementation of Executive Order N-79-20 and CARB's Advanced Clean Cars II Regulations, with 100 percent ZEV sales in the light-duty vehicle sector by 2035, a significant portion of passenger vehicles will still rely on ICE technology, as demonstrated in Figure 4-2 above. Accordingly, VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals. After a significant pandemic-induced reduction in VMT during 2020, passenger VMT has steadily climbed back up and is now closing in on pre-pandemic levels.³³⁶ Driving alone with no passengers remains the primary mode of travel in California, amounting to 75 percent of the mode share for daily commute trips. Conversely, the transit industry, which was significantly impacted during

³³⁵ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1E. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³³⁶ U.S. Department of Transportation. 2021. December 2021 Traffic Volume Trends. Figure 3 - Seasonally Adjusted Vehicle Miles Traveled by Month. https://www.fhwa.dot.gov/policyinformation/travel_monitoring/21dectvt/figure3.cfm.

the lockdown months, and has struggled to recover; ridership only averages two-thirds of pre-pandemic levels,³³⁷ ³³⁸ and service levels also lag behind.

Sustained VMT reductions have been difficult to achieve for much of the past decade, in large part due to entrenched transportation, land use, and housing policies and practices. Specifically, historic decision-making favoring single-occupancy vehicle travel has shaped development patterns and transportation policy, generating further growth in driving (and making transit, biking and walking less viable alternatives). These policies have also reinforced long-standing racial and economic injustices that leave people with little choice but to spend significant time and money commuting long distances, placing a disproportionate burden on low-income Californians, who pay the highest proportion of their wages on housing and transportation. While CARB has included VMT reduction targets and strategies in the Scoping Plan and appendices, these targets are not regulatory requirements, but would inform future planning processes. CARB is not setting regulatory limits on VMT in the 2022 Scoping Plan; the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices.

Appendix E (Sustainable and Equitable Communities) elaborates on reasons for reducing VMT and identifies a series of policies that, if implemented by various responsible authorities, could help to achieve the recommended VMT reduction trajectory included in this Scoping Plan (and related mode share increases for transit and active transportation). These policies aim to advance four strategic objectives:

1. Align current and future funding for transportation infrastructure with the state's climate goals, preventing new state-funded projects from inducing significant VMT growth and supporting an ambitious expansion of transit service and other multimodal alternatives.
2. Move funding for transportation beyond the gasoline and diesel taxes and implement fuel-agnostic pricing strategies that accomplish more productive uses of the roadway network and generate revenues to further improve transit and other multimodal alternatives.
3. Deploy autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
4. Encourage future housing production and multi-use development in infill locations and other areas in ways that make future trip origins and destinations

³³⁷ U.S. Government Accountability Office. January 25, 2022. During COVID-19, Road Fatalities Increased and Transit Ridership Dipped. <https://www.gao.gov/blog/during-covid-19-road-fatalities-increased-and-transit-ridership-dipped>.

³³⁸ American Public Transportation Association. APTA - Ridership Trends. <https://transitapp.com/APTA>.

closer together and create more viable environments for transit, walking, and biking.

The pace of change to reduce VMT must be accelerated. Certainly, structural reform will be challenging, but California has demonstrated time and again that it possesses the collective leadership and commitment to break away from ideas that no longer represent Californians' values and their aspirations for the many generations to come.

Strategies for Achieving Success

- Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.³³⁹
- Reimagine new roadway projects that decrease VMT in a way that meets community needs and reduces the need to drive.
- Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.³⁴⁰
- Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices.³⁴¹
- Expand and complete planned networks of high-quality active transportation infrastructure.³⁴²
- Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
- Streamline access to public transportation through programs such as the California Integrated Travel Project.
- Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support implementation of these plans.

³³⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁴⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁴¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁴² AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1F. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower-income residents.

Clean Electricity Grid

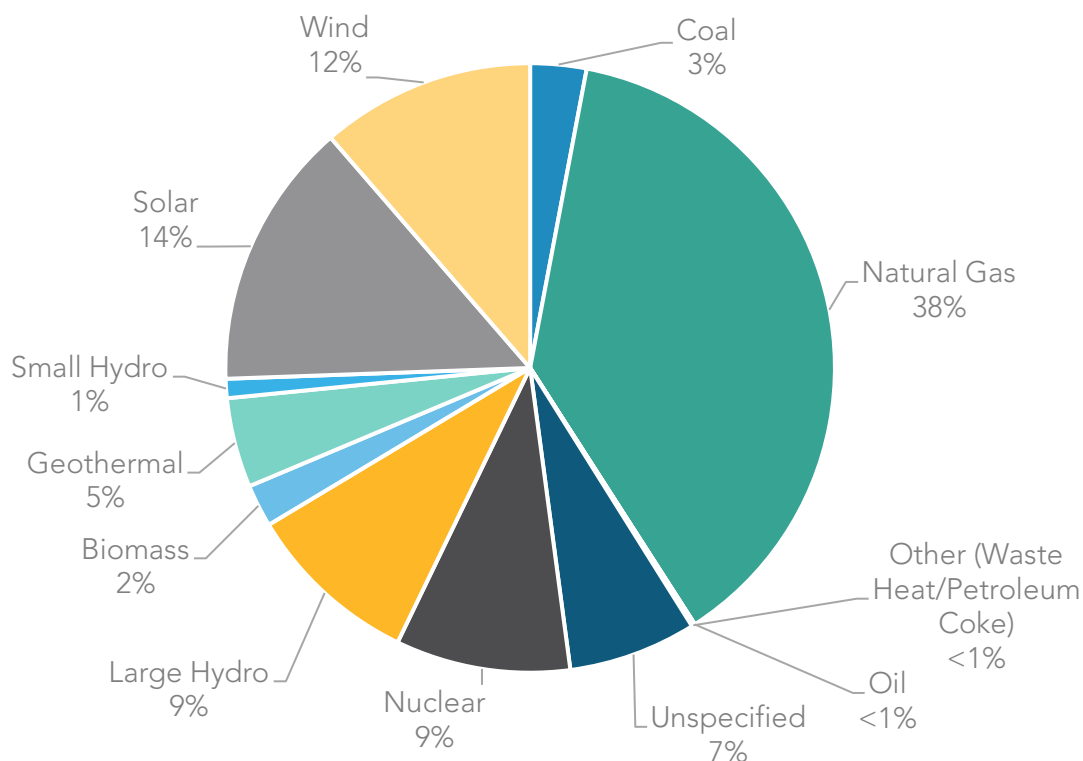
Much of the state's success to date in reducing GHGs is due to decarbonization of the electricity sector as a result of the RPS, SB 100 implementation, and the Cap-and-Trade Program. Moving forward, a clean, affordable, and reliable electricity grid will serve as a backbone to support deep decarbonization across California's economy. Under this Scoping Plan, the role of electricity in powering the economy will grow in almost every sector.

In 2021, 70 percent of California electricity demand was served by in-state power plants totaling about 82 GW, with the rest coming from out-of-state imports.³⁴³ Additionally, approximately 8 GW of customer solar photovoltaic capacity has been installed to date to help with in-state demand.³⁴⁴ Figure 4-3 shows the breakdown of in-state and imported sources of electricity.

³⁴³ CEC. 2021. Electric Generation Capacity and Energy. Data available at: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-generation-capacity-and-energy> and CEC. 2021. Total System Electric Generation. Data available at: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation>. Capacity values are nameplate capacity from sources 1 MW and larger.

³⁴⁴ CEC. 2021. *SB 100 Joint Agency Report Summary: Achieving 100% Clean Electricity in California, An Initial Assessment*. 10. <https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity>.

Figure 4-3: 2021 total system electric generation (based on GWh)³⁴⁵



Note: Imports contributing to total system generation are comprised of 58% zero-carbon energy and 42% non-renewable and unspecified energy. Percentages do not add to exactly 100 due to rounding.

In 2021, about 48 percent of electricity generation serving California came from non-renewable and unspecified³⁴⁶ resources, while 52 percent came from renewable and zero-carbon resources. The state's Strategic Reliability Reserve, established in AB 205 to provide additional reliability insurance during extreme events, may make three of the fossil gas-fired OTC plants planned for retirement available to support the grid on a limited basis after 2023. The state also adopted legislation to facilitate extension of the Diablo Canyon Nuclear Power Plant for five years beyond its 2025 planned closure.³⁴⁷ At the

³⁴⁵ *Total system generation* is the sum of all utility-scale, in-state generation, plus net electricity imports. CEC. 2021 Total System Electricity Generation. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation>.

³⁴⁶ *Unspecified power* refers to electricity that is not traceable to a specific generating facility, such as electricity traded through open market transactions. It typically consists of a mix of resources and may include renewables.

³⁴⁷ In accordance with SB 846 (Dodd, Chapter 239, Statutes of 2022).

same time, the state continues to rapidly expand deployment of clean energy generation and storage resources and plan for increased electrification.³⁴⁸ This is critical to reducing GHG emissions and addressing the long-term impacts of climate change.

Climate change is causing unprecedented stress on California's energy system—driving high demand and constraining supply. Heat, drought, and wildfires can both reduce electricity supply from reductions in hydropower generation and impacts on generation and transmission performance, and increase demand, especially in the evening hours when solar generation is declining.

California has experienced three straight years of energy reliability challenges, including a multi-day extreme heat event across the western United States with temperatures up to 20 degrees above normal in California, resulting in rotating outages in August 2020. In 2021, heat waves in June prompted a Grid Warning and the onset of emergency conditions, and the Bootleg Fire caused the loss of one transmission line, reducing import capability by 3,000 megawatts into the California Independent System Operator (CAISO) balancing authority area. And from August 31–September 9, 2022, a 10-day extreme heat event resulted in an unprecedented, sustained period of high peak loads in the CAISO system, averaging 47,000 MW and maxing at an all-time record of over 52,000 MW on September 6. The Western region also hit its record peak load on September 6, at 167.5 GW.

Reliable electricity service was maintained throughout the 10-day September 2022 heat wave in spite of the record breaking load levels. Factors that contributed to this outcome include the installation of over 3,500 MW of lithium-ion battery storage since summer 2020, enhanced coordination and communication within and outside of California, engagement with customer groups and other stakeholders, state actions to reduce load during critical times, and the additional capacity provided through the Strategic Reliability Reserve and other new state programs authorized in the 2022 Budget to provide load reduction and support the grid in extreme events. CEC, CPUC, CAISO, and the California Department of Water Resources will continue to build out strategies to enhance reliability in light of the increasing and compounding impacts of climate change on the electricity system.

³⁴⁸ In June 2021, the CPUC adopted D.21-06-035 directing procurement of 11,500 MW of new capacity between 2023 and 2026 to ensure systemwide electric reliability as Diablo Canyon and several OTC facilities retire. It requires that, out of the 11,500 MW, 2,500 MW must be from zero-emission resources. Additionally, 2,000 MW must be long lead-time resources, with at least 1,000 MW of long-duration storage and 1,000 MW of firm capacity with zero on-site emissions or that qualifies under the RPS eligibility requirements.

While the electricity sector is using less fossil fuel due to increasing amounts of renewables,³⁴⁹ existing fossil gas generation will continue to play a critical role in grid reliability until other clean, dispatchable alternatives can be deployed at scale. The integration of greater amounts of variable renewable generation resources³⁵⁰ is changing power system planning and operations, and system operators need resources with flexible attributes to balance shifting supply and demand.

High levels of solar generation can lead to instances of oversupply during the middle of the day, when the sun is brightest.³⁵¹ In the evening hours, as the sun is setting, solar generation declines to zero and customers with solar generation shift back to the electric grid. In hot weather, customer demand remains high well into the summer evening period to power air conditioning, which can lead to reliability challenges.³⁵²

Figure 4-4 shows the energy sources used throughout one summer day in July. Renewable energy is consistent during the middle of the day, but it cannot meet all of the evening demand in the gray area. As illustrated in the figure, fossil gas generation is currently a resource that is typically ramped up to meet this evening demand as solar production begins to drop and electrical loads increase. To help address this challenge, resource installations that pair solar with batteries, as well as a greater amount of battery build-out, are coming online currently and over the next five years. Nevertheless, the state's electricity grid is expected to be stressed further in the coming years by heat waves, drought, wildfires, and the growing intermittent power supply from renewables. California must accelerate deployment of diverse clean energy resources to maintain reliability and affordability in the face of climate change.

³⁴⁹ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020*.

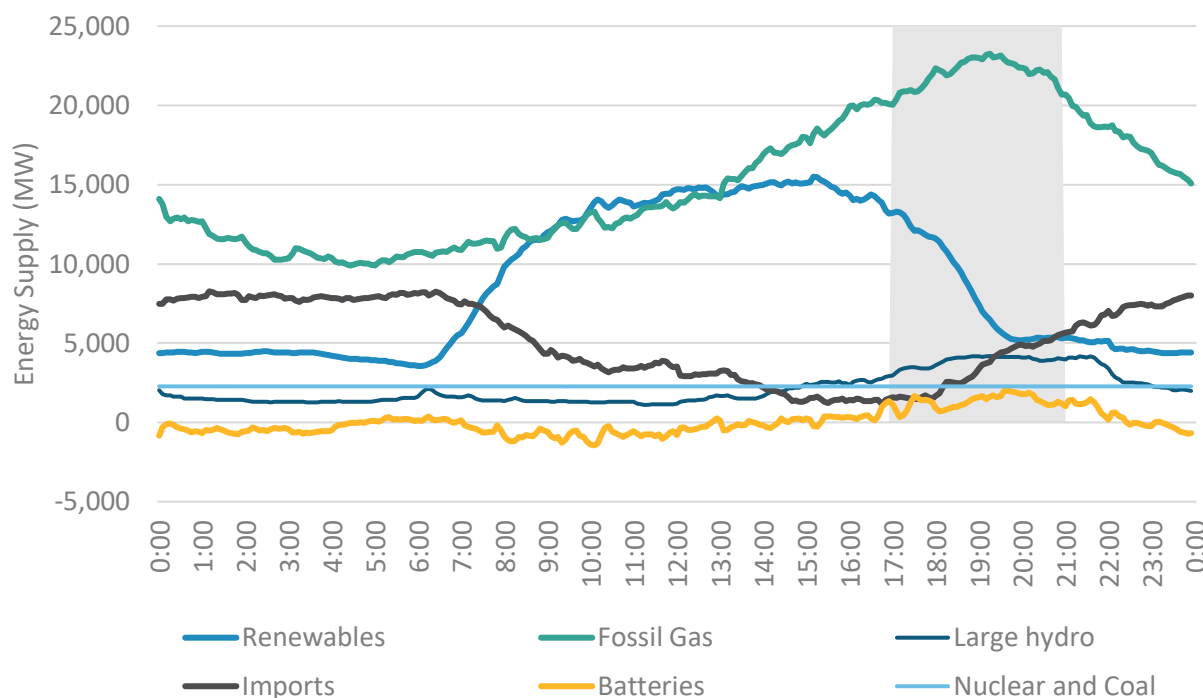
https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

³⁵⁰ A *variable renewable generation resource* is a renewable source of electricity that is non-dispatchable due to its fluctuating nature and only produces electricity when weather conditions are right, such as when the sun is shining or the wind is blowing. Renewable resources that can be controlled and are dispatchable include geothermal, biomass, and dam-based hydroelectric power.

³⁵¹ *Brightness* is used colloquially here; solar energy depends on insolation (e.g., sun-hours), which is the measurement of cumulative solar energy that reaches an area over a period of time.

³⁵² CAISO, CPUC, and CEC. 2021. *Final Root Cause Analysis: Mid-August 2020 Extreme Heat Wave*. <http://www.caiso.com/Documents/Final-Root-Cause-Analysis-Mid-August-2020-Extreme-Heat-Wave.pdf>.

Figure 4-4: Electricity supply trend by resource for a California summer day, July 2022



Sector Transition

Decarbonizing the electricity sector is a crucial pillar of this Scoping Plan. It depends on both using energy more efficiently and replacing fossil-fueled generation with renewable and zero carbon resources, including solar, wind, energy storage,³⁵³ geothermal, biomass, and hydroelectric power. The RPS Program³⁵⁴ and the Cap-and-Trade Program continue to incentivize dispatch of renewables over fossil generation to serve state demand. SB 100 increased RPS stringency to require 60 percent renewables by 2030 and for California to provide 100 percent of its retail sales³⁵⁵ of electricity from renewable and zero-carbon resources by 2045. Furthermore, SB 1020 has added interim targets to

³⁵³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, NF2. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁵⁴ The CEC estimates that 36 percent of California's 2019 retail electricity sales was served by RPS-eligible renewable resources (see CPUC. 2021. CPUC Perspectives on Electric Sector Decarbonization. <https://ww2.arb.ca.gov/sites/default/files/2021-11/CPUC-sp22-electricity-ws-11-02-21.pdf>).

³⁵⁵ SB 100 speaks only to retail sales and state agency procurement of electricity. The 2021 SB 100 Joint Agency Report interprets this to mean that other loads—wholesale or non-retail sales and losses from storage and transmission and distribution lines—are not subject to the law.

SB 100's policy framework to require renewable and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all electricity retail sales by 2040; the governor has asked the CEC to establish a planning goal of at least 20 GW of offshore wind by 2045; and the governor directed that state agencies plan for an energy transition that avoids the need for new fossil gas capacity to meet California's long-term energy goals.³⁵⁶ In addition to grid-level resources, state efforts have supported rapid growth of the distributed solar industry through key actions like the California Solar Initiative (SB 1, Murray, Chapter 132, Statutes of 2006).³⁵⁷ Steps to commercialize microgrids powered by clean resources³⁵⁸ are also being examined as part of SB 1339 (Stern, Chapter 566, Statutes of 2018).³⁵⁹

California also continues to advance its appliance and building energy efficiency standards to reduce growth in electricity consumption and meet the SB 350 goal to double statewide energy efficiency savings in electricity and fossil gas end uses³⁶⁰ by 2030. In 2018, the CEC adopted a building energy efficiency code requiring most new homes to have solar photovoltaic systems³⁶¹ (or be powered by a solar array nearby) starting January 1, 2020. In 2019, California reached the milestone of 1 million solar rooftop installations.

Increased transportation and building electrification and continued policy commitment to behind-the-meter solar and storage will continue to drive growth of microgrids and other distributed energy resources (DER).³⁶² The CPUC's High-DER proceeding is examining how to prepare the electric grid for a high DER future by determining how to integrate

³⁵⁶ Newsom, Gavin. July 22, 2022. Letter from Governor Newsom to CARB Chair Liane Randolph. <https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf>.

³⁵⁷ More information on the program, which closed in 2016, can be found on the CPUC website, including annual program assessment reports, at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative>.

³⁵⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, In part (NF2, NF13). [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁵⁹ CPUC. Resiliency and Microgrids. <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/resiliency-and-microgrids>.

³⁶⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, ES1. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁶¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF2. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁶² Distributed energy resources include rooftop solar and other distributed renewable generation resources, energy storage, electric vehicles, time variant and dynamic electric rates, flexible load management, demand response, and energy efficiency technologies.

millions of DERs within the distribution grid to maximize societal and ratepayer benefits from DERs while ensuring grid reliability and affordable rates.³⁶³

SB 350 also aims to connect long-term planning for electricity needs with the state's climate targets. This is primarily accomplished through CARB's establishment of 2030 GHG emissions targets for the electricity sector in general and for each electricity provider, which inform the CPUC and publicly owned utilities' integrated resource planning. A GHG planning target range of 30 to 53 MMTCO₂e—informed by the 2017 Scoping Plan—was originally developed and adopted by CARB in 2018. In its 2021 IRP planning cycle, the CPUC adopted a 38 MMT GHG target for the electricity sector in 2030, which drops to 35 MMT in 2032.³⁶⁴

The Scoping Plan Scenario incorporates SB 350's energy efficiency doubling goal, aligns with the CPUC's IRP 2030 GHG target and latest GHG emissions benchmarks through 2035,³⁶⁵ the governor's 20 GW offshore wind and no new gas generation³⁶⁶ goals, and SB 100's 2030 RPS and 2045 zero-carbon retail sales targets to reduce dependence on fossil fuels in the electricity sector by transitioning substantial energy demand to renewable and zero-carbon resources.³⁶⁷ As described in Chapter 2, CCS is applied in limited sectors, including on 16.7 MMT of CO₂ from existing fossil gas electricity generation in 2045, to ensure the state achieves the 85 percent reduction in anthropogenic emissions required by AB 1279. Continued transition to renewable and

³⁶³ The High-DER proceeding is one of four “anchor” proceedings in the CPUC's DER Action Plan 2.0 and is within the Action Plan's infrastructure track. Information on the High-DER proceeding is available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/distribution-planning>. The Action Plan can be accessed at: <https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division/der-action-plan>.

³⁶⁴ The February 10, 2022, Decision 22-02-004 by the CPUC adopts the 2021 Preferred System Plan, completing the 2019–21 IRP cycle.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M451/K412/451412947.PDF>. The Decision requires load serving entities to submit plans in the next IRP cycle detailing how they will meet their proportionate share of a 30 MMT electric sector target, as well as a 38 MMT GHG target.

³⁶⁵ June 15, 2022, Administrative Law Judge's Ruling for 2022 integrated resource plan filings specifies the need for GHG targets to plan for in 2035 to continue progress toward the 2045 goal. The ruling proposes a straight-line projection from the GHG planning target for 2030. Corresponding to the adopted Preferred System Plan in D.22-02-004, 38 MMT in 2030 leads to a target of 30 MMT in 2035.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M485/K625/485625915.PDF>.

³⁶⁶ The governor's July 22, 2022, letter specifies no new gas generation but does not place any constraints on existing gas resources. Therefore, for purposes of RESOLVE electricity sector modeling, existing gas capacity is an available resource that is able to be reduced over time based on announced retirements or if selected for retirement by the model.

³⁶⁷ CARB. 2021. PATHWAYS Scenario Modeling: 2022 Scoping Plan Update – Attachment B: Generation Technologies to be included in Modeling. https://ww2.arb.ca.gov/sites/default/files/2021-12/Revised_2022SP_ScenarioAssumptions_15Dec.pdf.

zero-carbon electricity resources will enable electricity to become a zero-carbon substitute for fossil fuels across the economy.

Figure 4-5 shows the modeled resource capacity to meet the SB 100 retail sales target.³⁶⁸ Energy efficiency moderates some of the need for additional electricity generation. However, that is quickly surpassed by growing electricity demand of 26 percent by 2030 and 76 percent by 2045 compared to today (2022) from increased population and electrification of other sectors, as shown in Figure 4-6. The estimated resource build needed to meet this level of demand amounts to approximately 72 GW of utility solar³⁶⁹ and 37 GW of battery storage by 2045. Annual build rates (over the 2022–2035 period) for the Scoping Plan Scenario will need to increase by about 60 percent and over 700 percent for utility solar and battery storage, respectively, compared to historic maximum rates.³⁷⁰ To reach the 2045 target, the state will need to quadruple its current level of wind and solar capacity. This does not include capacity associated with hydrogen production nor mechanical CDR, which was modeled off-grid; assuming hydrogen production via electrolysis, this would roughly be equivalent to an additional 10 GW³⁷¹ of solar generation needed in 2045, and an additional 64 GW of solar generation for direct air capture in 2045. The scale of solar and battery build rates needed could be reduced through the commercialization of new zero-carbon technologies.

³⁶⁸ SB 846 requires that load-serving entities exclude energy, capacity, or any attribute from the Diablo Canyon power plant in their resource plans. The Scoping Plan Scenario excludes energy, capacity, or any attribute from the Diablo Canyon power plant after the prior planned retirement date of 2025.

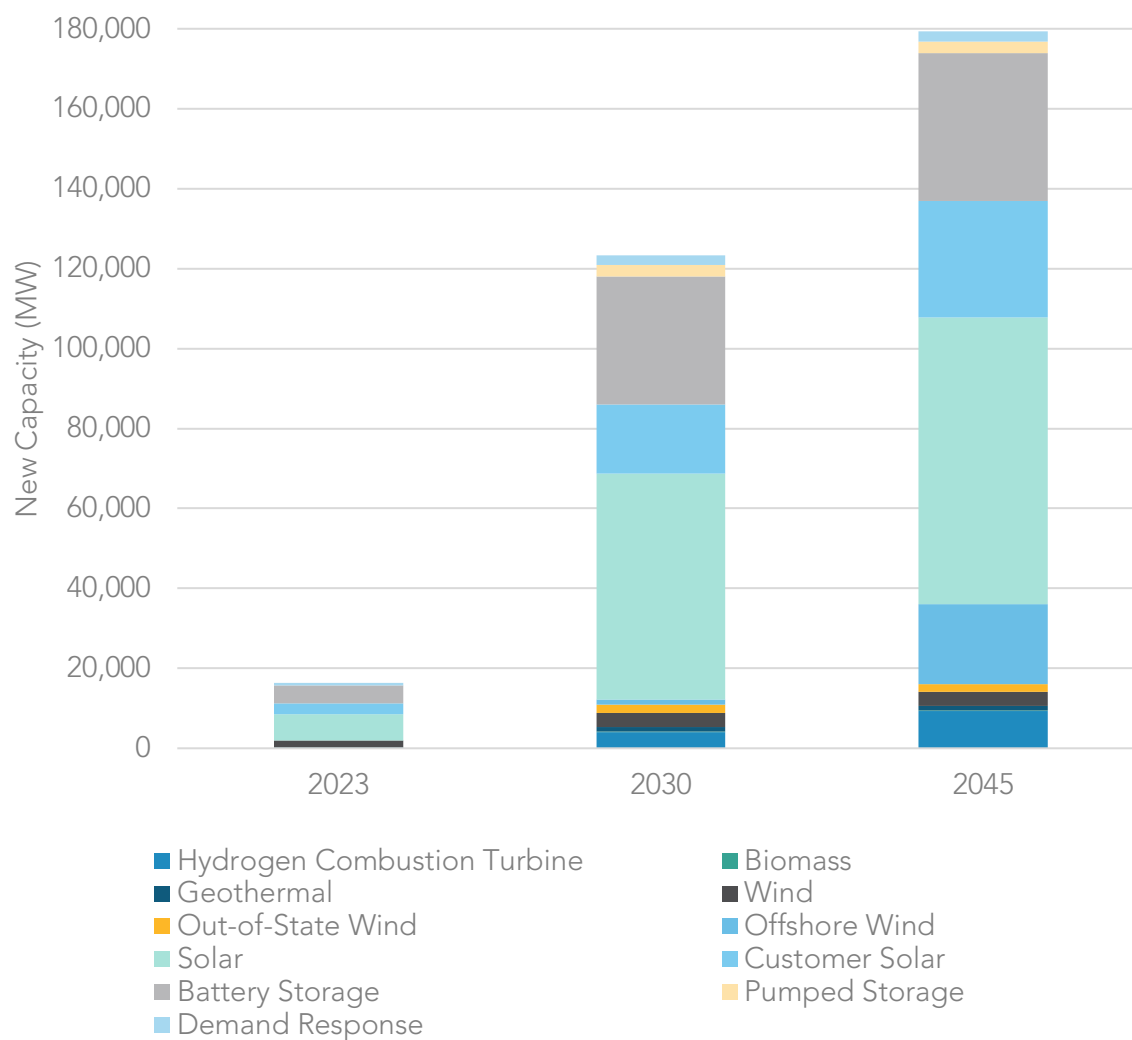
³⁶⁹ The amount of additional customer solar included in the Scoping Plan Scenario is 29,208 MW by 2045.

³⁷⁰ E3. 2022. CARB Scoping Plan: AB32 Source Emissions Final Modeling Results. PowerPoint.

<https://ww2.arb.ca.gov/sites/default/files/2022-11/SP22-MODELING-RESULTS-E3-PPT.pdf>. Build rates are from EIA data historical builds in the 2011–2021 time frame.

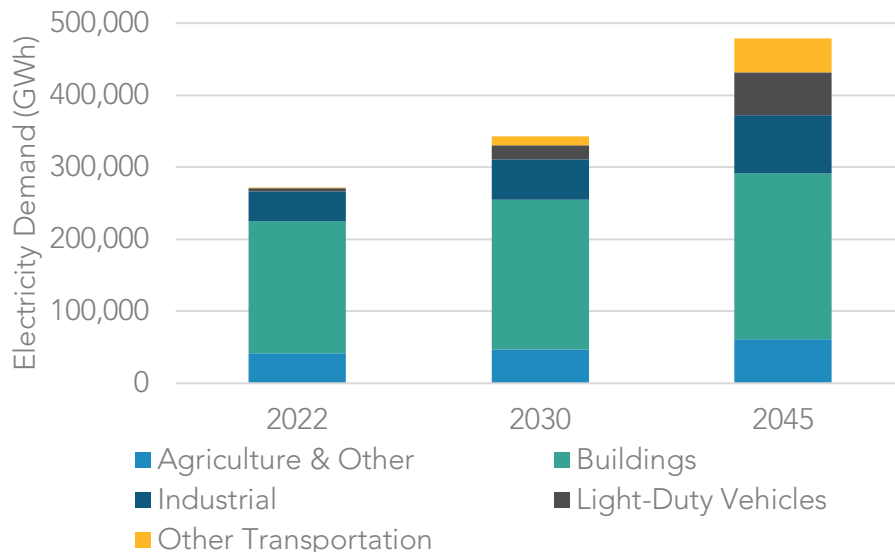
³⁷¹ The estimate does not include hydrogen production assumed to be produced with bioenergy with carbon capture and storage (BECCS) and steam methane reforming (SMR).

Figure 4-5: Projected new electricity resources needed by 2045 in the Scoping Plan Scenario³⁷²



³⁷² See <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx> for the capacity build-out by resource type.

Figure 4-6: Electric loads in 2022, 2030 and 2045 for the Scoping Plan Scenario³⁷³



This transformation will drive investments in a large fleet of generation and storage resources but will also require significant transmission to accommodate these new capacity additions. Transmission needs include high-voltage lines to access out-of-state resources and major in-state generation pockets. In consideration of typical 8- to 10-year lead times for many projects, the CAISO published its first 20-Year Transmission Outlook to inform transmission planning focused on meeting the needs identified through the 2021 SB 100 Joint Agency Report process. The outlook calls for significant transmission development to access offshore wind and out-of-state wind and reinforce the existing CAISO footprint at an estimated cost of \$30.5 billion.³⁷⁴

Presently, fossil gas power plants provide about 75 percent of the flexible capacity for grid reliability as more renewable power enters the system. Moving forward, other resources such as storage and demand-side management are essential to maintain reliability with high concentrations of renewables. Hydrogen produced from renewable resources and renewable feedstocks can serve a dual role as a low-carbon fuel for existing combustion turbines or fuel cells, and as energy storage for later use. Reliability

³⁷³ *Other Transportation* includes all non-light-duty vehicles and reflects electrification of modes like passenger and freight rail, aviation, and ocean-going vessels.

³⁷⁴ CAISO. 2022. *20 Year Transmission Outlook*. <http://www.caiso.com/InitiativeDocuments/20-YearTransmissionOutlook-May2022.pdf>.

also can be supported through increased coordination and markets in the interconnected western power grid; this is already helping to better integrate renewables.³⁷⁵

Strategies for Achieving Success

- Use long-term planning processes (Integrated Energy Policy Report, IRP, CAISO Transmission Planning Process, AB 32 Climate Change Scoping Plan) to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment.
- Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, statewide and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets.
- Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state's decarbonization roadmap for adjustments as may be needed.
- Facilitate long lead-time resource development through the IRP and the SB 100 interagency process and through technology development and demonstration funding³⁷⁶ that includes resources such as long-duration energy storage and hydrogen production.
- Continue coordination between energy agencies and energy proceedings to maximize opportunities for demand response.
- Continue to explore the benefits of regional markets to enhance decarbonization, reliability, and affordability.
- Address resource build-out challenges, including permitting, interconnection, and transmission network upgrades.
- Explore new financing mechanisms and rate designs to address affordability.³⁷⁷
- Per SB 350, double statewide energy efficiency savings in electricity and fossil gas end uses by 2030, through a combination of energy efficiency and fuel substitution actions.³⁷⁸
- Per SB 100 and SB 1020, achieve 90 percent, 95 percent, and 100 percent

³⁷⁵ CEC. 2021. *2021 SB 100 Joint Agency Report – Achieving 100 Percent Clean Electricity in California: An Initial Assessment*. Publication Number: CEC-200-2021-001.

³⁷⁶ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, ES2. The committee recommendation speaks specifically to offshore wind production. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁷⁷ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF30. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁷⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, NF2. [finalejacrecs.pdf \(arb.ca.gov\)](#).

renewable and zero-carbon retail sales by 2035, 2040, and 2045, respectively.

- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Target programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community owned or controlled solar or wind, battery storage, and microgrids) for communities most at need, including frontline, low-income, rural, and indigenous communities.³⁷⁹
- Prioritize public investments in zero-carbon energy projects to first benefit the most overly burdened communities affected by pollution, climate impacts, and poverty.³⁸⁰

Sustainable Manufacturing and Buildings

Fossil gas is the primary gaseous fossil fuel used to produce heat at industrial facilities, as well as in residential and commercial buildings. In buildings, space and water heating, cooking, and clothes drying all rely on gaseous fuels today. Industrial processes that require heat for conventional boilers and other processes also rely on gaseous fuels. Refineries rely on fossil gas and other gaseous fossil fuels, like liquefied petroleum gas and refinery fuel gas, and fossil gas is also used to generate electricity, as discussed earlier.

Gaseous fossil fuel use can be displaced by four primary alternatives: zero-carbon electricity, solar thermal heat, hydrogen, and biogas/biomethane. Displacing gaseous fossil fuel use can yield indoor air quality benefits, protect public health and property from unexpected fossil gas leaks, and reduce short-lived climate pollutants, which are many times more potent in affecting climate change than CO₂. The Scoping Plan Scenario reduces dependence on fossil gas in the industrial and building sectors by transitioning substantial energy demand to alternative fuels. Reducing fossil gas combustion also will help toward achieving our air quality and equity goals by reducing pollution in neighboring areas and communities. In addition, reduced dependence on gasoline and diesel in the transportation sector diminishes the need for gaseous fossil fuels to support oil and gas production and petroleum refining operations as those are phased down relative to the demand.

³⁷⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF2, NF9, NF11, NF12, NF13. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁸⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF14. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Sector Transition

Industry

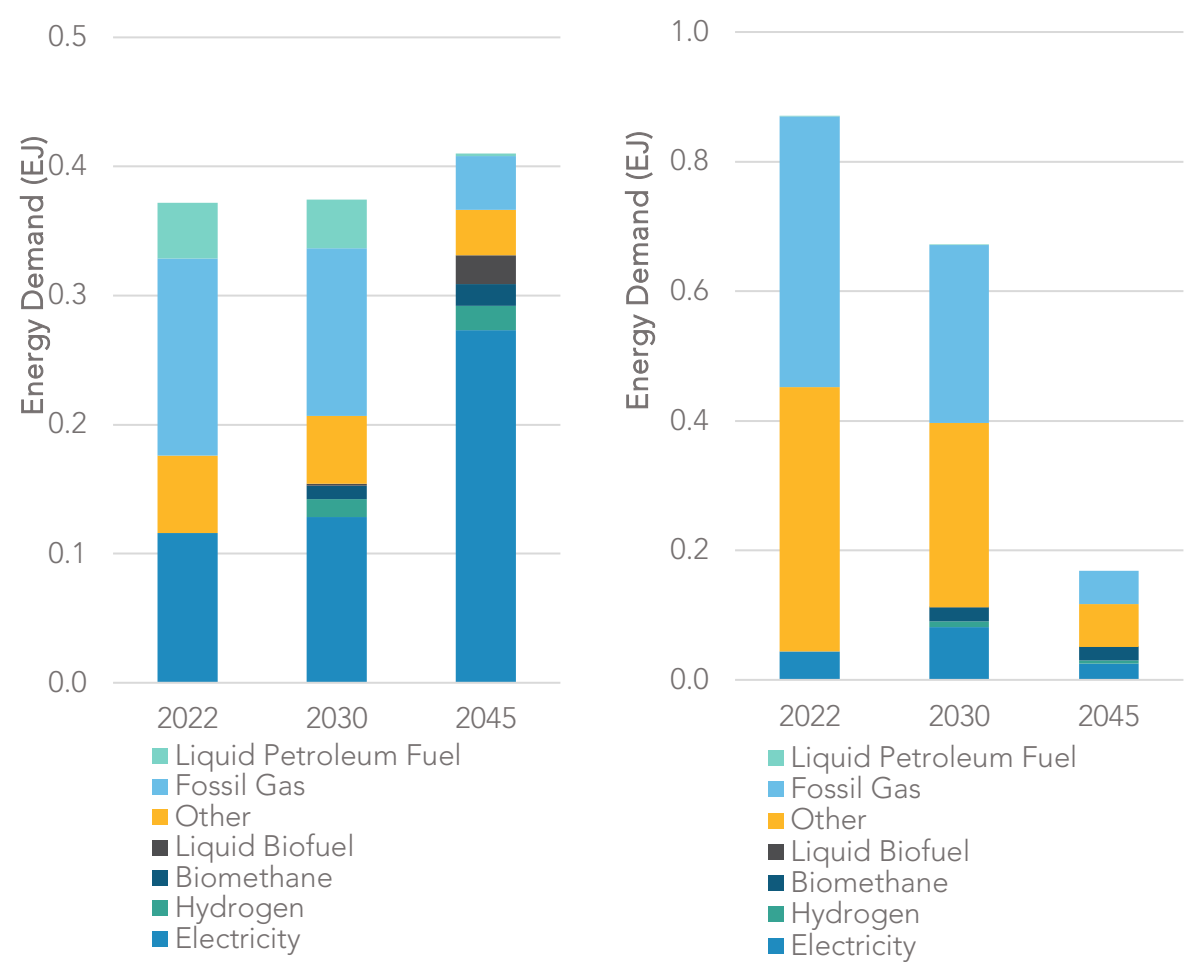
California's industrial sector contributes significantly to the state's economy, with a total output from manufacturing in 2019 of \$324 billion (10.4 percent of the state total)³⁸¹ and employment of 1,222,000 manufacturing jobs (7.6 percent of the total state workforce).³⁸² California industry includes a diverse range of facilities, including cement plants, refineries, glass manufacturers, oil and gas producers, paper manufacturers, mining operations, metal processors, and food processors. Combustion of fossil gas, other gaseous fossil fuels, and solid fossil fuels provide energy to meet three broad industry needs: electricity, steam, and process heat. Non-combustion emissions result from fugitive emissions and from the chemical transformations inherent to some manufacturing processes. About 20 percent of the GHG emissions from the industrial sector are non-combustion emissions.

Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions. Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion CO₂ emissions can be captured and sequestered. The strategy employed will depend on the industrial subsector and the specific processes utilized in production. The left side of Figure 4-7 illustrates the fuels used to meet industrial manufacturing energy demand in 2020. Industrial manufacturing energy demand needs to transition to the fuel mix shown for 2035 and 2045. The right side of Figure 4-7 illustrates the fuel mix needed to meet the energy demand of oil and gas extraction and petroleum refining operations for the same years. Energy demand in this portion of the industrial sector declines along with decreased demand for gasoline and diesel in the transportation sector. In both figures there is a continuing demand for fossil gas due to lack of non-combustion technologically feasible or cost-effective alternatives for certain industrial sectors. Policies that support decarbonization strategies like electrification, use of renewable energy, and transition to alternative fuels are needed.

³⁸¹ National Association of Manufacturers (NAM). 2021 California Manufacturing Facts. <https://www.nam.org/state-manufacturing-data/2021-california-manufacturing-facts/>.

³⁸² NAM. 2021 California Manufacturing Facts. <https://www.nam.org/state-manufacturing-data/2021-california-manufacturing-facts/>.

Figure 4-7: Final energy demand in industrial manufacturing (left) and in oil and gas extraction and petroleum refining (right) in 2022, 2030, and 2045 in the Scoping Plan Scenario³⁸³



Electrification and solar thermal heat are best-suited to industrial processes that have relatively low heat requirements, such as food processors, paper mills, and industries that use low-pressure steam in their processes. Approaches could include replacing fossil gas boilers with electric boilers, process heaters with industrial electric heat pumps, steel forging furnaces with induction heaters, and implementing other sector-specific process electrification. Under current rate structures for industrial electricity and fossil gas in

³⁸³ *Other* fuel in the industrial manufacturing sector is primarily coke and coal for cement production. *Other* fuel in the petroleum refining sector is primarily fossil gas associated with refining petroleum products.

California, most projects to electrify a fossil gas-powered industrial process will face operating cost barriers and potential reliability concerns. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities.

There are fewer commercially available and economically viable electrification options to replace industrial processes that require higher-temperature heat. For these processes, onsite combustion may continue to be needed, and decarbonization will require fuel substitution to hydrogen,³⁸⁴ biomethane, or other low-carbon fuels. Fuel substitution and continued combustion will require monitoring and mitigation of any potential air quality impacts, especially in low-income and communities of color which already face disproportionate air pollution burdens. Industries in California with high heat needs include steel forging, glass manufacturing, and industries with calcination processes, such as manufacturing lime and cement.

Onsite emissions from cement manufacturing derive from two main sources: (1) fuel combustion to heat the kiln to a very high temperature and (2) process CO₂ emissions from the chemical transformation of limestone. Over 60 percent of emissions from the sector are process emissions unrelated to fuel use, and most emissions related to fuel use are from coal and petroleum coke combustion. Process emissions from cement manufacturing are significant and will continue even if the sector were to operate using only zero-carbon fuels; thus carbon capture and use/sequestration will be a likely component of any strategy to fully decarbonize cement manufacturing. There are additional opportunities to reduce GHG emissions from cement manufacturing via the combination of fuel-switching to low-carbon fuels (e.g., biomethane, municipal solid waste, biochar), increased blending of non-clinker materials, and efficiency improvements. High technological and economic barriers exist to electrifying kiln process heat at cement plants, as clinker production requires temperatures in excess of 1,500°C. There are potential decarbonization opportunities throughout the value chain of cement use, including in cement manufacturing, concrete mixing, and construction practices.³⁸⁵ SB 596 (Becker, Chapter 246, Statutes of 2021), which was signed by Governor Newsom in September 2021, requires CARB to develop a comprehensive strategy for cement use in California to achieve a GHG intensity 40 percent below 2019 levels by 2035, and net-zero emissions by 2045.

³⁸⁴ Griffiths, Steve, Benjamin K. Sovacool, Jinsoo Kim, Morgan Bazilian, and Joao M. Uratani. 2021. "Industrial decarbonization via hydrogen: A critical and systematic review of developments, socio-technical systems and policy options." *Energy Research & Social Science* 80. 102208, ISSN 2214-6296. <https://doi.org/10.1016/j.erss.2021.102208>.

³⁸⁵ California Nevada Cement Association. Achieving Carbon Neutrality in the California Cement Industry. <https://cncement.org/attaining-carbon-neutrality>.

Oil and gas extraction and refining make up over half of California's industrial GHG emissions. Reduced demand for transportation fossil fuels corresponds to reduced supply of fossil gas and other gaseous fossil fuels for refineries to produce these fuels. Some refining operations will continue to operate to produce fossil fuel for the remaining transportation energy demands, along with renewable diesel and sustainable aviation fuel, as discussed in the Transportation Sustainability section of this chapter.

Across industrial subsectors and processes, California facilities also could realize significant reductions in GHG emissions and energy-related costs by implementing advanced energy efficiency projects and tools.³⁸⁶ While enhanced operation and maintenance practices are typical at industrial facilities, additional strategic energy management practices offer greater efficiency gains by focusing on setting goals, tracking progress, and reporting results.

Strategies for Achieving Success

- Maximize air quality benefits using the best available control technologies for stationary sources in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities.³⁸⁷
- Prioritize alternative fuel transitions first in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities.³⁸⁸
- Invest in research and development and pilot projects to identify options to reduce materials and process emissions along with energy emissions in California's industrial manufacturing facilities, leveraging programs like the CEC's Electric Program Investment Charge (EPIC).³⁸⁹
- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Support electrification with changes to industrial rate structures.
- Develop infrastructure for CCS and hydrogen production to reduce GHG emissions where cost-effective and technologically feasible non-combustion alternatives are not available.
- Implement SB 905.

³⁸⁶ Therkelsen, Peter, Aimee McKane, Ridah Sabouini, and Tracy Evans. 2013. *Assessing the Costs and Benefits of the Superior Energy Performance Program*. U.S Department of Energy. <https://www.osti.gov/servlets/purl/1165470>.

³⁸⁷ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT14. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁸⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT15. [finalejacrecs.pdf \(arb.ca.gov\)](#).

³⁸⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, M20. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Establish markets for low-carbon products and recycled materials using Buy Clean California Act and other mechanisms relying on robust data
- Develop a net-zero cement strategy to meet SB 596 targets for the GHG intensity of cement use in California.
- Continue to leverage energy-efficiency programs, including the U.S. DOE's ENERGY STAR program,³⁹⁰ U.S. DOE's Superior Energy Performance program,³⁹¹ and ISO 50001.³⁹²
- Evaluate and continue to offer incentives to install energy efficiency and renewable energy technologies through programs such as CPUC decisions as part of rulemaking R.19-09-009³⁹³ and the CEC's Food Production Investment Program (FPIP) and EPIC programs.³⁹⁴
- Leverage low-carbon hydrogen programs, including the Bipartisan Infrastructure Law, for regional hydrogen hubs, hydrogen electrolysis, and hydrogen manufacturing and recycling.
- Evaluate the role of hydrogen in meeting GHG emission reductions, including policy recommendations regarding the use of hydrogen in California as required by SB 1075.
- Address cost barriers to promote low-carbon fuels for hard-to-electrify industrial applications.

Buildings

Buildings have cross-sector interactions that influence our public health and well-being and affect land use and transportation patterns, energy use, water use, and indoor and outdoor environments.³⁹⁵ There are about 14 million existing homes and over 7.5 billion square feet of existing commercial buildings³⁹⁶ in California. Fossil gas supplies about half of the energy consumed by end uses in these buildings. In addition to GHG emissions, fossil gas usage in buildings also produces CO₂, NO_x, PM_{2.5}, and

³⁹⁰ ENERGY STAR. ENERGY STAR Guidelines for Energy Management.

<https://www.energystar.gov/buildings/tools-and-resources/energy-star-guidelines-energy-management>.

³⁹¹ Energy.gov. Superior Energy Performance 50001. <https://www.energy.gov/eere/amo/superior-energy-performance>.

³⁹² ISO. ISO 50001 Energy Management. <https://www.iso.org/iso-50001-energy-management.html>.

³⁹³ CPUC. January 14, 2021. CPUC Adopts Strategies to Help Facilitate Commercialization of Microgrids Statewide. <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M360/K370/360370887.PDF>.

³⁹⁴ Bailey, Stephanie, David Erne, and Michael Gravely. 2021. *Final 2020 Integrated Energy Policy Report Update, Volume II: The Role of Microgrids in California's Clean and Resilient Energy Future, Lessons Learned From the California Energy Commission's Research*. California Energy Commission. Publication Number: CEC-100-2020-001-V2-CMF.

³⁹⁵ See Appendix F (Building Decarbonization).

³⁹⁶ CEC. 2021. California Building Decarbonization Assessment.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=239311&DocumentContentId=72767>.

formaldehyde.³⁹⁷ Each year, about 120,000 new homes³⁹⁸ and more than 100 million-square feet³⁹⁹ of commercial buildings are newly constructed across California. These new buildings will represent between a third to half of the total building stock by mid-century.

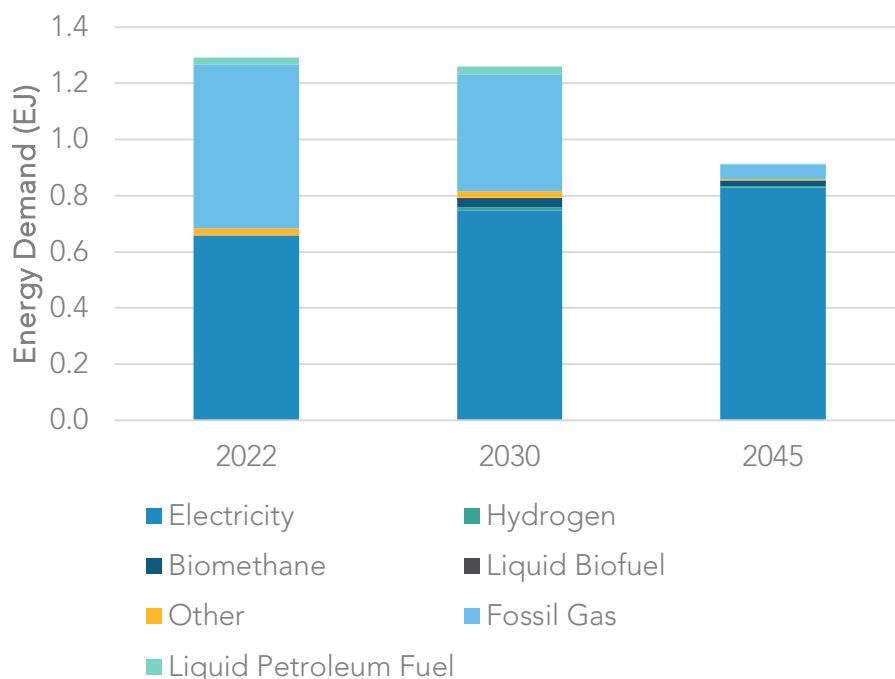
Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings, and will rely primarily on advancing energy efficiency while replacing gas appliances with non-combustion alternatives. This transition must include the goal of trimming back the existing gas infrastructure so pockets of gas-fueled residential and commercial buildings do not require ongoing maintenance of the entire limb for gas delivery. Blending low-carbon fuels such as hydrogen and biomethane into the pipeline further displaces fossil gas. Pipeline safety and reliability must be evaluated to accommodate low-carbon fuels. Figure 4-8 illustrates the energy Californians use in buildings at present compared with the Scoping Plan Scenario, which introduces alternatives to fossil gas. In that scenario almost 90 percent of energy demand is electrified by 2045, and the remaining energy demand is met with combustion of hydrogen, biomethane, and fossil gas.

³⁹⁷ Zhu, Yifang, et al. 2020. *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California*. UCLA Fielding School of Public Health Department of Environmental Health Sciences.

³⁹⁸ Construction Industry Research Board. 2018. Annual Building Permit Summary. <http://www.cirbreport.org>.

³⁹⁹ Delforge, Pierre. August 11, 2021. California Forging Ahead on Zero Emission Buildings. Blog. NRDC. <https://www.nrdc.org/experts/pierre-delforge/california-forging-ahead-zero-emission-buildings>.

Figure 4-8: Final energy demand in buildings in 2022, 2030, and 2045 in the Scoping Plan Scenario⁴⁰⁰

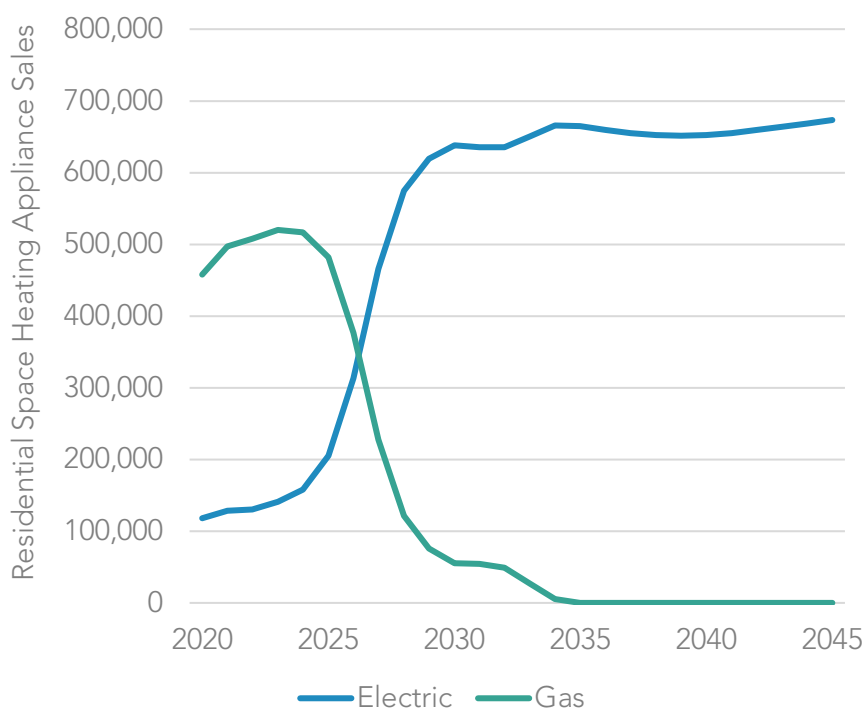


This transition is achieved when all new buildings constructed include non-combustion appliances, and appliances in existing buildings are replaced at the end of their useful life with non-combustion alternatives. Currently, electric alternatives, combined with the decarbonizing of California’s grid, are the most effective alternatives, and the Scoping Plan Scenario modeled these alternatives. The Scoping Plan Scenario assumes three million all-electric and electric-ready homes by 2030 and seven million by 2035. Figure 4-9 illustrates the pace at which electric space heating appliance sales increase and gas space heating appliance sales decrease in residences in the Scoping Plan Scenario, such that by 2035 100 percent of residential home appliance sales are electric. By 2030 over six million electric heat pumps are installed statewide. The residential electric space heating appliance sales increases rapidly in the near term as new all-electric buildings are constructed and as existing buildings are renovated to utilize electric appliances. A similar transition is envisioned for other home appliances. Commercial buildings also will undergo a transition away from gas appliances to electric appliances, achieving 80 percent sales of all-electric appliances by 2035 and 100 percent by 2045. Appendix F (Building Decarbonization) describes a holistic policy approach to rapidly grow the

⁴⁰⁰ *Other* fuel in the buildings sector is primarily liquid petroleum gas and waste heat.

number of zero emission appliances and buildings, to surmount the market barriers, and to prioritize an equitable transition for vulnerable communities.

Figure 4-9: Residential space heating appliance sales in the Scoping Plan Scenario



Strategies for Achieving Success

- Prioritize California’s most vulnerable residents with the majority of funds in the new \$922 million Equitable Building Decarbonization program, created through the 2022–2023 state budget. This would include residents in frontline, low-income, disadvantaged, rural, and tribal communities. This program is dedicated to a statewide direct-install building retrofit program for low-income households to replace fossil fuel appliances with electric appliances, energy-efficient lighting, and building insulation and sealing while also coordinating reductions in gas infrastructure in specific geographic areas.
- Achieve three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030.
- Expand incentive programs to support the holistic retrofit of existing buildings, especially for vulnerable communities.
- Ensure that incentive programs prioritize energy affordability and tenant protections, promote affordable and low-income household retrofits that improve habitability and reduce expenses, protect and empower small landlords and homeowners, address overlooked consumer groups, and pair decarbonization

with other critically needed renovation efforts to ensure that buildings support human health and are climate- and weather-resistant.⁴⁰¹

- End fossil gas infrastructure expansion for newly constructed buildings.⁴⁰²
- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Strengthen California's building standards to support zero-emission new construction.
- Develop building performance standards for existing buildings.
- Adopt a zero-emission standard for new space and water heaters sold in California beginning in 2030, as specified in the 2022 State Strategy for the State Implementation Plan.
- Expand use of low-GWP refrigerants within buildings.
- Support electrification with changes to utility rate structures and by promoting load management programs.
- Increase funding for incentive programs and expand financing assistance programs focused on existing buildings and appliance replacements.
- Expand consumer education efforts to raise awareness and stimulate the adoption of decarbonized buildings and appliances, especially in vulnerable communities.
- Implement biomethane procurement targets for investor-owned utilities as specified in SB 1440 (Hueso, Chapter 739, Statutes of 2018) to reduce GHG emissions in remaining pipeline gas and reduce methane emissions from organic waste.

⁴⁰¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF23, NF24, NF25, NF26, NF28. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁰² AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF22. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Carbon Dioxide Removal and Capture

Climate Change 2022: Mitigation of Climate Change,⁴⁰³ a report by the IPCC released in early 2022, states “The deployment of CDR to counterbalance hard-to-abate residual emissions is unavoidable if net zero CO₂ or GHG emissions are to be achieved. The scale and timing of deployment will depend on the trajectories of gross emission reductions in different sectors. Upscaling the deployment of CDR depends on developing effective approaches to address feasibility and sustainability constraints especially at large scales.” In line with that report, this Scoping Plan considers CDR as a complement to technologically feasible and cost-effective GHG emissions mitigation, and the size of its role will depend on the degree of success in reducing GHG emissions at the source across the economy.⁴⁰⁴ The modeling shows that emissions from the AB 32 GHG Inventory sources will continue to persist even if all fossil related combustion emissions are phased out. These residual emissions must be compensated for to achieve carbon neutrality. Options for CDR include both sequestration in natural and working lands and mechanical approaches like direct air capture. Chapter 2 provides estimates on how much CO₂ removal is possible by our natural and working lands and how much must be removed by mechanical CDR.

CCS, which is carbon capture from anthropogenic point sources, is described in Chapter 2 and involves capturing carbon from a smokestack of an emitting facility. Direct air capture, on the other hand, captures carbon directly from the atmosphere. Direct air capture technologies, unlike CCS, are not associated with any particular point source.

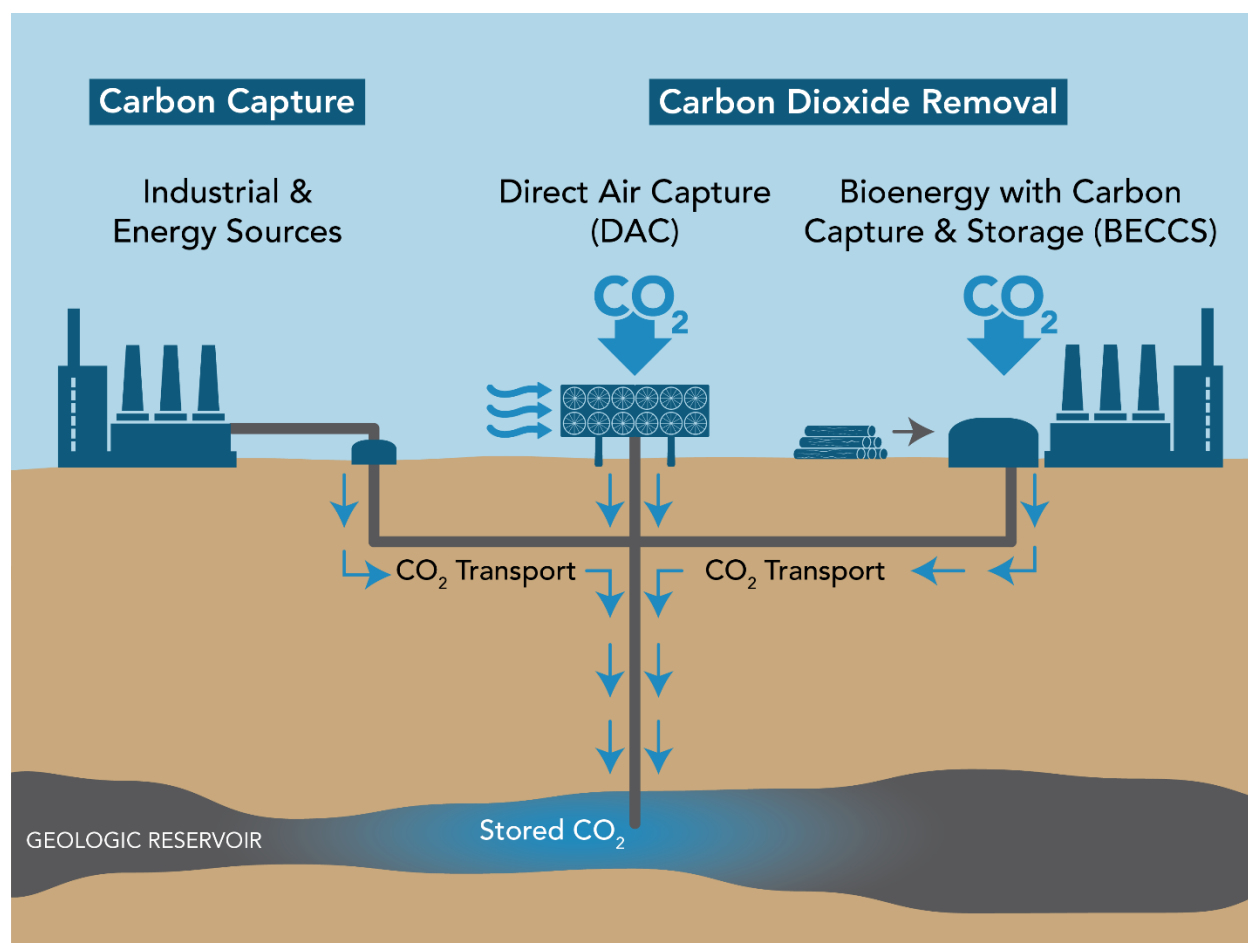
For this section, *carbon management* refers to the capture, movement, and sequestration of CO₂ through mechanical solutions for both capture at point sources and direct removal from the atmosphere through direct air capture.⁴⁰⁵ Enabling policies and regulations across each of these steps are necessary for individual projects, and on a broader scale, for delivering reductions in support of the state’s carbon neutrality and long-term carbon-negative goals. Figure 4-10 provides a graphic of the typical carbon management infrastructure.

⁴⁰³ IPCC. 2022. *Climate Change 2022: Mitigation of Climate Change*. <https://www.ipcc.ch/report/sixth-assessment-report-working-group-3/>.

⁴⁰⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.7. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁰⁵ CDR through natural and working lands is discussed in Chapter 2 and later in this chapter.

Figure 4-10: Carbon management infrastructure



Carbon dioxide removal directly from the atmosphere itself refers to a suite of carbon negative technologies that can be used to draw down ongoing and historical carbon emissions already in the atmosphere. Some CO₂ removal technologies leverage the abilities of both natural photosynthesis and mechanical removal by using biomass wastes as inputs to make low- or zero-carbon energy or fuels, all while capturing and storing produced CO₂.

Captured CO₂ from point sources or from the atmosphere is permanently stored in specialized geologic formations, typically half a mile or more underground. A recent Stanford University study estimated the state's commercial storage potential is nearly 70,000 million metric tons of CO₂, even when excluding oil and gas reservoirs.⁴⁰⁶ California is well-positioned because few other places on the West Coast are suitable for

⁴⁰⁶ Stanford Center for Carbon Storage. Opportunities and Challenges for CCS in California. <https://sccs.stanford.edu/california-projects/opportunities-and-challenges-for-CCS-in-California>.

geologic storage at scale. To inform discussion around CO₂ removal, CARB held two full-day workshops exploring the types of options for carbon capture and geologic storage and utilization in products.^{407,408,409}

The modeling results provided in Chapter 2 demonstrate the targeted need for CCS on large facilities such as refineries and cement. The CCS numbers do not include the potential additional applications for producing hydrogen with biomethane, other manufacturing, electricity, or other bioenergy. If CCS is not deployed, those emissions would be released directly into the atmosphere and instead need to be addressed through CDR to achieve carbon neutrality. Although a study finds California has 76 existing electricity and industrial facilities that are suitable candidates for CCS retrofit,⁴¹⁰ this Scoping Plan proposes a targeted role for this technology such that it would only be used to address sectors where non-combustion options are not technologically feasible or cost-effective at this time, to the extent needed to achieve the 85 percent reduction in anthropogenic emissions as called for in AB 1279. In future updates to the Scoping Plan, there may be additional options for technologically feasible or cost-effective technologies that may be deployed, which would further reduce the need for CCS and CDR except in situations to address historical GHG emissions.

Recognizing the need for carbon capture and utilization sequestration and removal, the Legislature passed, and the governor signed, SB 905. It includes several key requirements in the development of the state's Carbon Capture Removal, Utilization, and Storage Program. The following is a summary of the work to be completed to establish and administer this program. Many of these steps will address the need to evaluate the safety and efficacy of actions to support carbon removal, sequestration, and transfer via pipelines. Note that not all of these actions are under CARB's authority.

- Review technology to evaluate efficacy, safety, viability of CCUS/CDR methodologies.
- Develop monitoring and reporting requirements and schedules.
- Develop a unified permit application.
- Develop financial responsibility requirements.
- Develop a centralized public database for project status.

⁴⁰⁷ CARB. December 11, 2019. Carbon Neutrality Meetings & Workshops. <https://ww2.arb.ca.gov/our-work/programs/carbon-neutrality/carbon-neutrality-meetings-workshops>.

⁴⁰⁸ CARB. August 2, 2021 Scoping Plan Meetings & Workshops. <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops>.

⁴⁰⁹ *Carbon utilization* refers to the use of captured carbon to produce products such as plastics and concrete.

⁴¹⁰ Glenwright, Kara. 2020. *Roadmap for carbon capture and storage in California*. Precourt Institute for Energy. <https://earth.stanford.edu/news/roadmap-carbon-capture-and-storage-california#gs.ysj78q>.

- Consult with CNRA on pore space requirements as CNRA develops a framework for pore space governing agreements.
- Establish a Geologic Carbon Sequestration Group to identify suitable injection well locations, subsurface monitoring, and potential hazards that may require suspension of injection.

SB 905 also has requirements for project developers such as to develop monitoring plans and to avoid any adverse health and environmental impacts at the carbon capture location—or mitigation of unavoidable impacts as required under existing requirements. For the site of injection, there are requirements for site stability, monitoring, and reporting plans. SB 905 also bans CCS with enhanced oil recovery in California and prohibits the transfer of CO₂ via pipeline until the U.S. Department of Transportation's Pipelines and Hazardous Materials Safety Administration (PHMSA) completes its current rulemaking to update existing CO₂ pipeline safety requirements.

An often-cited example of pipeline concerns involves a CO₂ pipeline in Mississippi. On February 22, 2020, a CO₂ pipeline operated by Denbury Gulf Coast Pipelines LLC (Denbury) ruptured in proximity to the community of Satartia, Mississippi. The rupture followed heavy rains that resulted in a landslide, creating excessive axial strain on a pipeline weld (DOT 2022). The combination of weather and topography resulted in a slower dissipation of the gas. The pipeline was also carrying hydrogen sulfide, a flammable and toxic gas. The pipeline failed on a steep embankment, which had recently subsided. Heavy rains are believed to have led to a landslide, which created axial strain on the pipeline and resulted in a full circumferential girth weld failure. The PHMSA investigation also revealed several contributing factors to the accident, including but not limited to: Denbury not addressing the risks of geohazards in its plans and procedures, underestimating the potential affected areas that could be impacted by a release in its CO₂ dispersion model, and not notifying local responders to advise them of a potential failure.

As the Satartia example highlights, appropriate pipeline safety and environmental standards in California are critical to minimize any risks from CO₂ transport in the future. As such, SB 905 also tasks CNRA, in consultation with the Public Utilities Commission, to, no later than February 1, 2023, provide a proposal to the Legislature to establish a state framework and standards for the design, operation, siting, and maintenance of intrastate pipelines carrying CO₂ fluids of varying composition and phase to minimize the risk posed to public and environmental health and safety. The recommended framework shall be designed to minimize risk to public health and environmental health and safety, to the extent feasible. Because SB 905 prohibits the transfer of CO₂ via pipeline until the PHMSA completes its current rulemaking to update existing CO₂ pipeline safety requirements, CCS or CDR projects that would require a pipeline to transfer CO₂ are not feasible at this time within California.

Ultimately, and in accordance with SB 905, the merits of each CCS or CDR project must be evaluated on a case-by-case basis.⁴¹¹ Deployment of CCS and CDR could support skilled jobs and workforces, including those in traditional fossil energy communities. Other co-benefits could include criteria air pollutant reductions and water production. It will be important to design projects that do not exacerbate community health impacts, include early and ongoing community engagement, and are in compliance with local, state, and federal public health and environmental protection laws. It also should be noted that, as these types of projects are an emerging area of governance, additional coordination and discussion will be needed among the various levels of authorities involved. SB 905 has already initiated this process by assigning specific agencies with tasks related to their expertise and authority.

Chapter 2 includes a more detailed discussion about the proposed role of CO₂ removal in this Scoping Plan.

Sector Transition

State,⁴¹² national,^{413,414} and global decarbonization analyses⁴¹⁵ indicate a significant role for carbon management infrastructure, yet relatively few projects are operational. Around the world, about two dozen large CCS projects are capturing tens of millions of metric tons of CO₂ each year, with about a dozen operating in the United States.⁴¹⁶ The vast majority of capacity is at industrial facilities, such as ethanol and fertilizer plants, that would otherwise vent nearly pure CO₂ into the atmosphere as a by-product of normal, non-combustion processes. Future research, development, and demonstration projects must refine and commercialize capture systems for more complex applications, especially

⁴¹¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.5. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴¹² E3. October 2020. Achieving Carbon Neutrality in California Report: Final Presentation. https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_presentation_oct2020_2.pdf.

⁴¹³ World Resources Institute. January 31, 2020. CarbonShot: Federal Policy Options for Carbon Removal in the United States. Working paper. <https://www.wri.org/research/carbonshot-federal-policy-options-carbon-removal-united-states>.

⁴¹⁴ C2ES. No date. Getting to Zero: A U.S. Climate Agenda — Center for Climate and Energy Solutions. <https://www.c2es.org/getting-to-zero-a-u-s-climate-agenda-report/>.

⁴¹⁵ IPCC. Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development. Chapter 2. <https://www.ipcc.ch/sr15/chapter/chapter-2/>. All analyzed pathways limiting warming to 1.5°C with no or limited overshoot use CDR to some extent to neutralize emissions from sources for which no mitigation measures have been identified and, in most cases, also to achieve net negative emissions to return global warming to 1.5°C following a peak (high confidence). The longer the delay in reducing CO₂ emissions toward zero, the larger the likelihood of exceeding 1.5°C, and the heavier the implied reliance on net negative emissions after mid-century to return warming to 1.5°C (high confidence).

⁴¹⁶ Congressional Research Service. 2021. Carbon Capture and Sequestration (CCS) in the United States. R44902. <https://crsreports.congress.gov/product/pdf/R/R44902?msclid=e45e0012c25911ec8085ca575cb61e82>.

for those with limited decarbonization options. It has only been in the last few years that attention has seriously turned to mechanical CDR. As new information and modeling on climate change have been made available, the science has become clearer that avoiding the most catastrophic impacts of climate change requires both reducing emissions and deploying mechanical CDR.

California is paving a path forward on a science-based carbon management infrastructure policy that can serve as an example for other jurisdictions. The LCFS, which reduces the carbon intensity of transportation fuels, includes a protocol for select carbon management projects to become certified and generate LCFS credits.⁴¹⁷ CCS is not a new concept or technology. Twenty years of CCS testing show it is a safe and reliable tool.⁴¹⁸ As mentioned in Chapter 2, while no new CCS projects have been implemented or generated any credits under the CARB CCS protocol, CCS projects have been implemented elsewhere since the 1970s. Moreover, there has been a U.S. Department of Energy CCS research program underway for more than two decades. These all form a foundation of information for future efforts. Certified projects must successfully demonstrate adherence to rigorous pre-construction, operational, and site closure standards designed to strengthen environmental performance, as described in CARB's CCS Protocol. The protocol is designed to layer on top of existing federal carbon sequestration regulations designed to protect the environment. The protocol would need to be reevaluated if CCS were to be more broadly applied across sectors beyond transportation fuel production.

Direct air capture and carbon mineralization have high potential capacity for removing carbon, but direct air capture is currently limited by high cost. Carbon mineralization may also have high potential for removing carbon from the atmosphere, but understanding of the technology is still limited.⁴¹⁹ Direct air capture could also be deployed at higher rates to remove legacy GHG emissions from the atmosphere. Chapter 2 contains additional information on the current status of CCS and mechanical CDR projects globally, as well as federal support of such technologies.

Strategies for Achieving Success

- Implement SB 905.

⁴¹⁷ CARB. 2018. Carbon Capture and Sequestration Protocol under the Low Carbon Fuel Standard. August 13. https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS_Protocol_Under_LCFS_8-13-18_ada.pdf.

⁴¹⁸ National Energy Technology Laboratory. Permanence and Safety of CCS. <https://netl.doe.gov/coal/carbon-storage/faqs/permanence-safety>.

⁴¹⁹ Aines, Roger. No date. Options for Removing CO₂ from California's Air. Lawrence Livermore National Laboratory. https://ww2.arb.ca.gov/sites/default/files/2021-08/lnl_presentation_sp_engineeredcarbonremoval_august2021.pdf.

- Convene a multi-agency Carbon Capture and Sequestration Group comprised of federal, state, and local agencies to engage with environmental justice advocates, tribes, academics, researchers, and community representatives to identify the current status, concerns, and outstanding questions concerning CCS, and develop a process to engage with communities to understand specific concerns and consider guardrails to ensure safe and effective deployment of CCS.⁴²⁰
- Iteratively update the CARB CCS Protocol with the best available science and implementation experience.
- Incorporate CCS into other sectors and programs beyond transportation where cost-effective and technologically feasible options are not currently available and to achieve the 85 percent reduction in anthropogenic sources below 1990 levels as called for in AB 1279.
- Evaluate and propose, as appropriate, financing mechanisms and incentives to address market barriers for CCS and CDR.
- Evaluate and propose, as appropriate, the role for CCS in cement decarbonization (SB 596) and as part of hydrogen production pathways (SB 1075).
- Support carbon management infrastructure projects through core CEC research, development, and demonstration (RD&D) programs.
- Continue to explore carbon capture applications for producing or leveraging zero-carbon power for reliability needs as part of SB 100.
- Consider carbon capture infrastructure when developing hydrogen roadmaps and strategy, especially for non-electrolysis hydrogen production.
- Evaluate and streamline permitting barriers to project implementation while protecting public health and the environment.
- Explore options for how local air quality benefits can be achieved when CCS is deployed.
- Explore opportunities for CCS and CDR developers to leverage existing infrastructure, including subsurface infrastructure.
- Explore permitting options to allow for scaling the number of sources at carbon sequestration hubs.

Short-Lived Climate Pollutants (Non-Combustion Gases)

Short-lived climate pollutants (SLCPs) include black carbon (soot), methane (CH₄), and fluorinated gases (F-gases, including hydrofluorocarbons [HFCs]). They are powerful climate forcers and harmful air pollutants that have an outsized impact on climate change

⁴²⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.9. [finalejacrecs.pdf \(arb.ca.gov\)](#).

in the near term, compared to longer-lived GHGs, such as CO₂. According to the IPCC's *Climate Change 2021: The Physical Science Basis*, in the near-term (i.e., 10- to 20-year time scale) the warming influence of all SLCPs combined will be at least as large as that of CO₂.⁴²¹ The United Nations Environment Programme's Global Methane Assessment⁴²² advises that achieving the least-cost pathways to limit warming to 1.5°C requires global methane emission reductions of 40–45 percent by 2030 alongside substantial simultaneous reductions of all climate forcers, including CO₂ and SLCPs. Action to reduce these powerful emissions sources today will provide immediate benefits—both to human health locally and to reduce warming globally—as the effects of our policies to transition to low carbon energy systems and achieve carbon neutrality further unfold.

In 2017, the Board approved the comprehensive Short-Lived Climate Pollutant Reduction Strategy (Strategy).⁴²³ This strategy explained how the state would meet the following SB 1383-established targets:

- 40 percent reduction in total methane emissions⁴²⁴ (including a separate 40 percent reduction in dairy and livestock emissions)
- 40 percent reduction in hydrofluorocarbon gas emissions
- 50 percent reduction in anthropogenic black carbon emissions
- 50 percent reduction of organic waste disposal from 2014 levels by 2020, and 75 percent by 2025, including recovery of at least 20 percent of edible food for human consumption

The state is expected to achieve roughly half of the SB 1383 targeted emissions reductions by 2030 through strategies currently in place (See Figure 4-11). As directed by the Legislature under SB 1383, state agencies focused on voluntary, incentive-based mechanisms to reduce SLCP emissions in the early years of implementation to overcome technical and market barriers. Under this “carrot-then-stick” strategy, incentives are replaced with requirements as the solutions become increasingly feasible and cost-effective. To meet legislated targets, more aggressive action is needed.

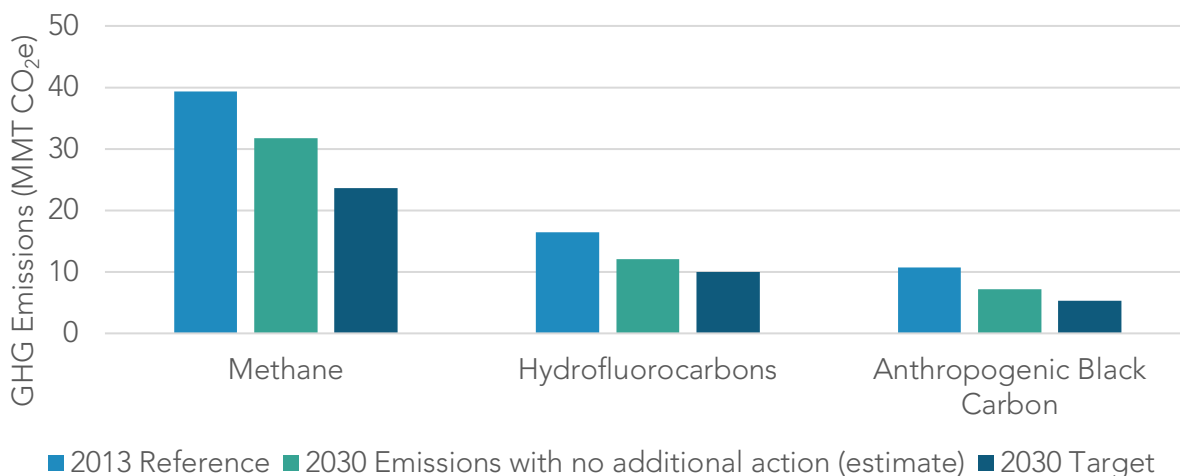
⁴²¹ IPCC. 2021. *Climate Change 2021: The Physical Science Basis*. <https://www.ipcc.ch/report/ar6/wg1/>.

⁴²² United Nations. Global Methane Assessment. Summary for Policymakers. https://wedocs.unep.org/bitstream/handle/20.500.11822/35917/GMA_ES.pdf.

⁴²³ CARB. 2017. Short-Lived Climate Pollution Reduction Strategy. https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf.

⁴²⁴ All SB 1383 emissions reductions are mandated to be realized by 2030 and are relative to 2013 levels.

Figure 4-11: Expected progress toward SB 1383 targeted emissions reductions by 2030 through strategies currently in place



While the state’s overall GHG emissions have declined by 9 percent over the past decade, SLCP emissions reductions have not kept pace with broader progress toward decarbonization. After growing steadily in the preceding decade, methane emissions have remained relatively flat since 2013.

HFCs are the fastest growing source of GHG emissions, primarily driven by their use to replace ozone-depleting substances and an increased demand for cooling and refrigeration.⁴²⁵ Since 2005, statewide HFC emissions have more than doubled. While the rate of increase has slowed in recent years due to the state’s measures, HFC emissions are still on the rise in California, and have grown by over 50 percent since 2010.⁴²⁶ Globally, as temperatures rise, adoption of cooling technologies (and refrigerants) is increasing rapidly. If no measures are taken, it is estimated that HFCs will account for 9 to 19 percent of the total global GHG emissions by 2050.⁴²⁷

⁴²⁵ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020: Trends of Emissions and Other Indicators*. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

⁴²⁶ CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020*. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

⁴²⁷ Velders, G. J., D. W. Fahey, J. S. Daniel, M. McFarland, and S. O. Andersen. 2009. “The large contribution of projected HFC emissions to future climate forcing.” *Proceedings of the National Academy of Sciences* 106(27), 10949–10954.

Methane

Human sources of methane emissions are estimated to be responsible for up to 25 percent of current warming.⁴²⁸ Fortunately, methane's short atmospheric lifetime of ~12 years⁴²⁹ means that emissions reductions will rapidly reduce concentrations in the atmosphere, slowing the pace of temperature rise in this decade. Further, a substantial portion of the targeted reductions can be achieved at low cost and will provide significant human health benefits. For example, the UN's *Global Methane Assessment* (2021)⁴³⁰ found that over half of the available targeted measures have mitigation costs below \$21/MTCO₂e, and that each million metric tons of methane reduced would prevent 1,430 premature deaths annually due to ozone pollution caused by methane.

Following the Twenty Sixth Conference of Parties (COP26) (the United Nations Convention on Climate Change in 2021), over 110 nations have signed onto the Global Methane Pledge (Pledge)⁴³¹ to limit methane emissions by 30 percent relative to 2020 levels. The Pledge covers countries that emit nearly half of all methane and make up 70 percent of global GDP. The UN's *Global Methane Assessment*⁴³² shows that human-caused methane emissions can be reduced by up to 45 percent this decade, which would avoid nearly 0.3°C of global warming by 2045.

As shown in Figure 4-12, the three largest sources of California's methane emissions are the dairy and livestock industry, landfills, and oil and gas systems.

⁴²⁸ IPCC. 2021. *Climate Change 2021: The Physical Science Basis*. <https://www.ipcc.ch/report/ar6/wg1/>.

⁴²⁹ In contrast, the lifetime of CO₂ is hundreds of years. The IPCC Third Assessment Report concluded that no single lifetime can be defined for CO₂ because of the different rates of uptake by different removal processes. According to IPCC Fourth Assessment Report, the majority of an increase in CO₂ will be removed from the atmosphere within decades to a few centuries, while the remaining 20 percent may stay in the atmosphere for many thousands of years.

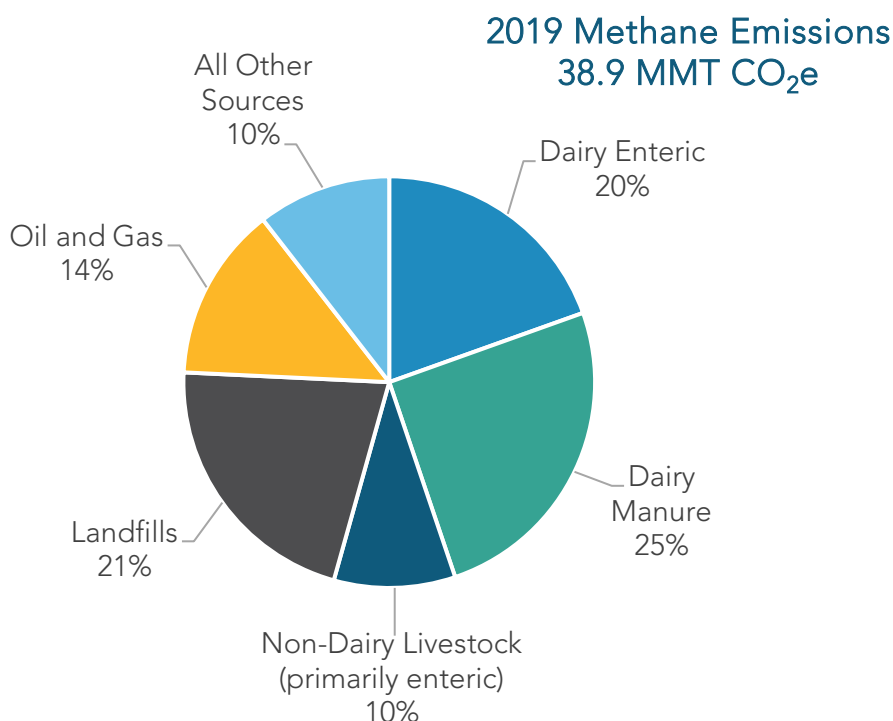
⁴³⁰ United Nations. 2021. *Global Methane Assessment*.

https://wedocs.unep.org/bitstream/handle/20.500.11822/35917/GMA_ES.pdf.

⁴³¹ Global Methane Pledge. <https://www.globalmethanepledge.org/>.

⁴³² United Nations Environment Programme. 2021. *Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions*. <https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions?msclkid=00661370c85811eca078eb8fdbd603d1>.

Figure 4-12: Sources of California methane emissions (2019)



Emissions from dairy and livestock operations come from two main sources: (1) enteric fermentation and (2) manure management operations, especially at dairies that employ open anaerobic lagoons that allow methane to escape into the atmosphere. Landfills, the second largest source of methane emissions, produce methane from the decomposition of organic waste. Although approximately 95 percent of all the waste that has been disposed of in the state has been deposited in a landfill that is equipped with a gas collection and control system, as required by California's Landfill Methane Regulation,⁴³³ a portion of the methane still escapes into the atmosphere. Fugitive methane emissions can be intermittent and highly variable, both seasonally and spatially, particularly at landfills. Research has shown that landfills are complex systems and a wide range of conditions (e.g., atmospheric, operational, biological, chemical, and physical) may contribute to variability in rates of organic waste degradation, methane generation, and capture efficiency, so reducing the amount of organics deposited in landfills is critical to reducing overall landfill methane emissions. And despite the variability in individual landfill emissions, landfill gas collection and control systems remain the most effective strategy

⁴³³ CARB. Landfill Methane Regulation. <https://ww2.arb.ca.gov/our-work/programs/landfill-methane-regulation>.

for reducing methane emissions from waste once it is placed in a landfill. Non-combustion methane emissions from the oil and gas sector are the third largest source of methane emissions in California. Almost three-quarters of the methane emissions from this sector come from leaks and venting from fossil gas transmission and distribution pipelines and equipment.

Hydrofluorocarbons

HFCs are synthetic GHGs that are powerful climate forcers. They are used mainly as refrigerants or heat transfer fluids in refrigeration, space conditioning, and heat pump equipment. Refrigerants are ubiquitous and are used everywhere from supermarkets, convenience stores, cold storage warehouses and wineries, to vending machines and residential and motor vehicle air-conditioners. Additionally, HFCs are also used as foam-blowing agents, solvents, aerosol-propellants, and fire suppressants. While HFCs remain in the atmosphere for a much shorter time than CO₂, the relative global warming potential (GWP) values of HFCs can be hundreds to thousands of times greater than CO₂. The mix of HFCs currently in use in California, weighted by usage (tonnage), have an average 100-year GWP of 1,700.⁴³⁴ The average atmospheric lifetime of the mix of HFCs in use is 15 years.⁴³⁵ Given the short average lifetimes, rapid reductions in HFC emissions can translate into near-term reductions in climate change effects.

As the global temperatures increase, the demand for cooling and refrigerants will continue to grow, as will the use of electric heat pumps to replace conventional fossil gas heating options. Unless addressed, continued use of high-GWP HFCs will perpetuate a feedback loop, where the cooling agents themselves cause additional warming.

In 2016, representatives from 197 nations signed the Kigali Amendment, which amended the existing Montreal Protocol (to reduce ozone-depleting substance production and consumption) to include a global phasedown in the production and consumption of HFCs beginning in 2019.⁴³⁶ As of September 2022, 137 nations have either accepted, approved, or ratified the Kigali Amendment. On September 21, 2022, the U.S. Senate approved ratification of the Kigali Amendment, and it is expected that the United States

⁴³⁴ CARB. 2020. *Initial Statement of Reasons: Public Hearing to Consider the Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses Regulation*. October 20. https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2020/hfc2020/isor.pdf?_ga=2.164659835.592460318.1646664679-912670513.1542398285.

⁴³⁵ Zhongming, Z., et al. 2011. *HFCs: A Critical Link in Protecting Climate and the Ozone Layer: A UNEP Synthesis Report*.

⁴³⁶ United Nations Treaty Collection. Chapter XXVII, Amendment to the Montreal Protocol on Substances that Deplete the Ozone Layer. https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XXVII-2-f&chapter=27&clang=en.

will soon join the 137 nations that have already ratified.⁴³⁷ In the United States, Congress enacted the federal *American Innovation and Manufacturing (AIM) Act* in December 2020.⁴³⁸ The AIM Act authorizes the U.S. EPA to address HFCs in several ways, including a national HFC phasedown that nearly mirrors the schedule of the global phasedown under the Kigali amendment.⁴³⁹

Nearly 90 percent of HFC emissions in California come from their use as refrigerants in the commercial, industrial, residential, and transportation sectors. The timescales over which the HFC emissions occur vary, depending on the type of application. Thus, strategies to reduce HFC emissions must be tailored by equipment type. CARB has several measures in place to tackle HFC emissions from the various sources shown in Figure 4-13 below. This includes the Refrigerant Management Program⁴⁴⁰ that tracks and manages emissions from large commercial, industrial, and cold storage refrigeration facilities in the state. CARB has adopted regulations to reduce HFC emissions from consumer product aerosol propellants, semiconductor manufacturing, and small cans of automotive refrigerant.⁴⁴¹

In 2018, California adopted HFC prohibitions via regulation and legislation for several sectors, including stationary refrigeration and foam end uses to backstop the partially vacated federal Significant New Alternatives Policy (SNAP) program.⁴⁴² Most recently, in 2020, CARB adopted additional measures that place GWP limits on refrigerants used in refrigeration and air conditioning equipment, which are the largest sources of HFC emissions, and are commonly used in residential, commercial, and industrial buildings. Additionally, CARB adopted a unique pilot program requiring the use of reclaimed refrigerant: the Refrigerant Recovery, Reclaim, and Reuse (R4) Program. The newly adopted HFC rules for the refrigeration and air conditioning sectors are the first of their kind in the nation.

⁴³⁷ U.S. Ratification of the Kigali Amendment - United States Department of State.

<https://www.state.gov/u-s-ratification-of-the-kigali-amendment/>.

⁴³⁸ 42 U.S.C § 7675, Pub. L. 116-260, § 103. https://www.epa.gov/sites/default/files/2021-03/documents/aim_act_section_103_of_h.r._133_consolidated_appropriations_act_2021.pdf.

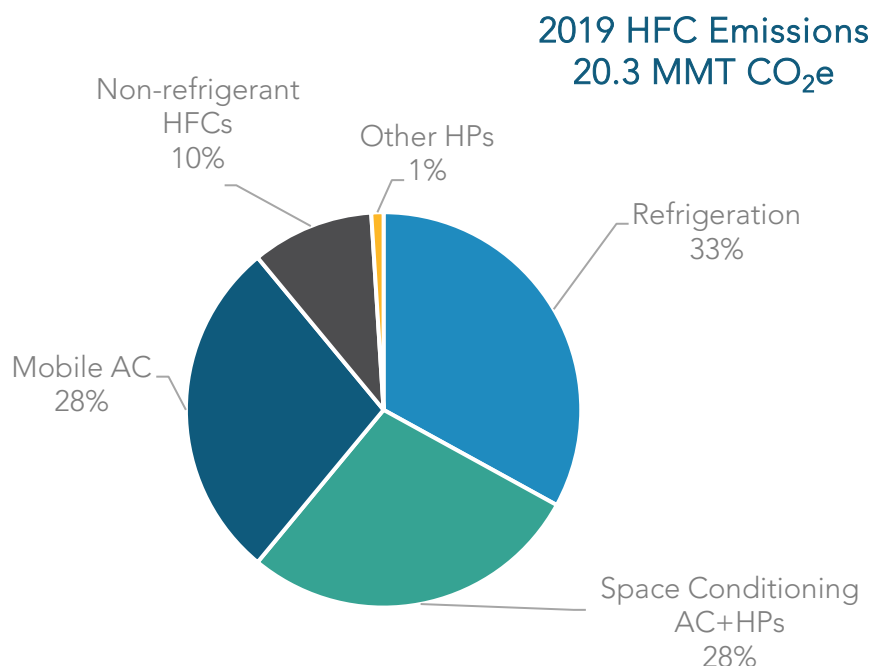
⁴³⁹ 42 U.S.C § 7675, Pub. L. 116-260, § 103.

⁴⁴⁰ Cal. Code of Regs., tit. 17, §§ 95380, et seq.

⁴⁴¹ Contained in various sections, commencing with Cal. Code of Regs., tit. 13, §§ 1900 et seq.

⁴⁴² Cal. Code of Regs., tit. 17, §§ 95371, et seq.; California Cooling Act, Senate Bill 1013 (Lara, Stats. of 2018, Ch. 375, Health & Saf. Code § 39764).

Figure 4-13: Sources of hydrofluorocarbon (HFC) emissions (2019)

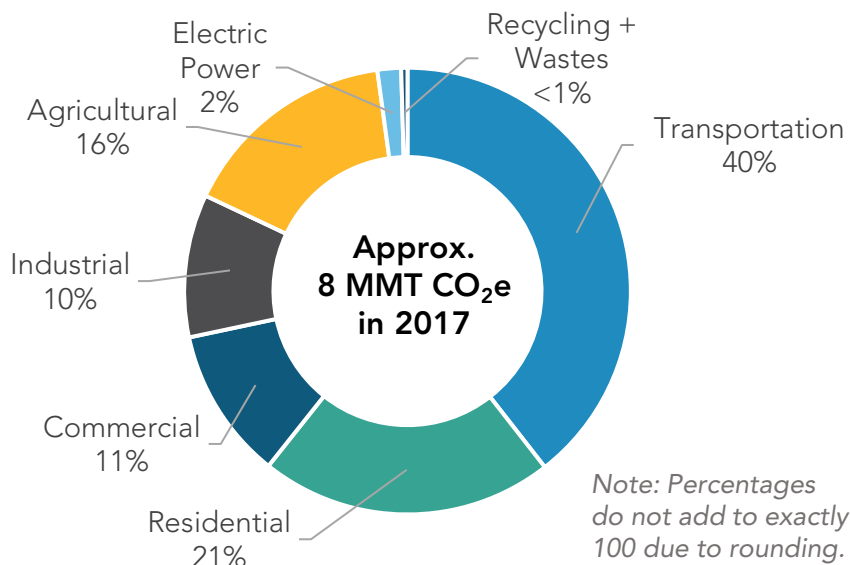


Anthropogenic Black Carbon

Black carbon is not included in AB 32 or the state's AB 32 GHG inventory that tracks progress toward the state's climate targets; however, it has been identified as a powerful climate forcer and is included California's Short-Lived Climate Pollutant Reduction Strategy. The majority of anthropogenic black carbon emissions come from transportation, specifically heavy-duty vehicles, and they have decreased since 2013 due to engine certification standards and in-use rules for on-road and off-road fleets, along with clean fuel requirements and incentives, including California Climate Investments and LCFS credits. Additionally, fuel combustion for residential, commercial, and industrial applications contribute significantly to overall black carbon emissions. Approximately 95 percent of residential black carbon emissions are due to wood combustion; these emissions are being reduced through programs like the Woodsmoke Reduction Program established by SB 563 (Lara, Chapter 671, Statutes of 2017). Alternatives to agricultural burning and policies that phase out agricultural burning will also result in agricultural black carbon emissions reductions. In 2021 CARB provided a preliminary estimate of 2017

black carbon emissions (Figure 4-14).⁴⁴³ This estimate will be finalized as part of a future update to the Short-Lived Climate Pollutant Inventory.

Figure 4-14: Sources of anthropogenic black carbon (preliminary 2017 estimates; AR5 100-yr GWP 900)



Sector Transition

California has long recognized the importance of mitigating non-combustion SLCPs and took several early action measures as part of a comprehensive, ongoing program to reduce in-state GHG emissions under AB 32. The early action measures included CARB's Landfill Methane Regulation,⁴⁴⁴ Refrigerant Management Program,⁴⁴⁵ and Oil and Gas Methane Regulation.⁴⁴⁶

Methane

The methane abatement strategies currently in place are projected to achieve half of the methane emissions needed to meet the overall methane reduction target of SB 1383 (40 percent reduction by 2030). The reduction target translates to a limit of less than 24 MMTCO₂e in 2030 (Figure 4-15). It is anticipated that, since some sectors have fewer

⁴⁴³ CARB. 2021. 2022 Scoping Plan Update – Short-Lived Climate Pollutants Workshop Presentation, September 8. https://ww2.arb.ca.gov/sites/default/files/2021-09/carb_presentation_sp_slcp_september2021_1.pdf.

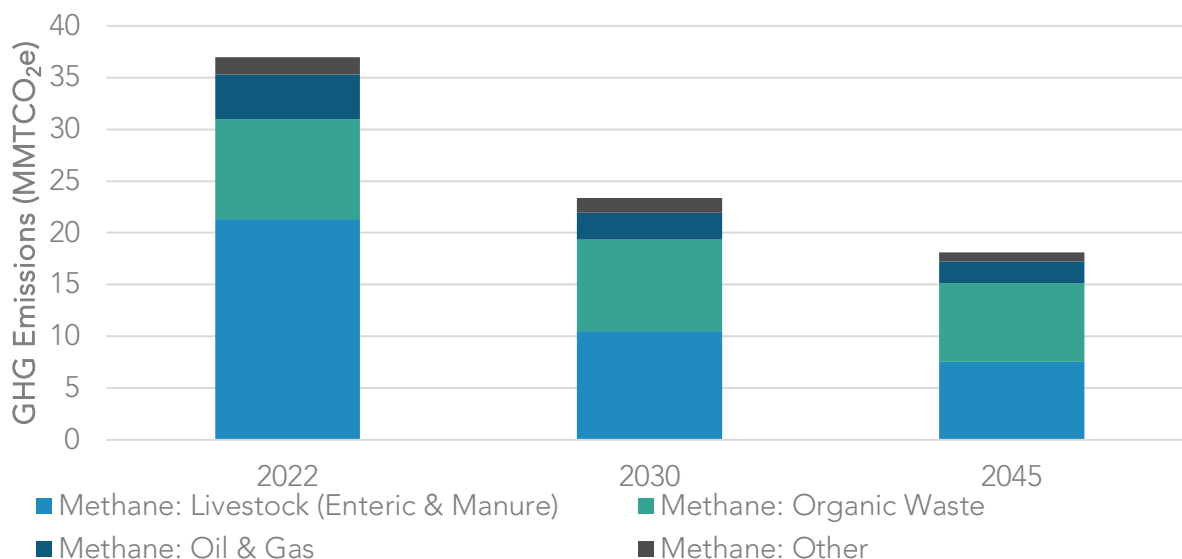
⁴⁴⁴ Cal. Code of Regs., tit. 17, §§ 95460, et seq.

⁴⁴⁵ Cal. Code of Regs., tit. 17, §§ 95380, et seq.

⁴⁴⁶ Cal. Code of Regs., tit. 17, §§ 95665–77.

strategies that can be implemented to reduce methane in the near-term, other sectors will need to go beyond the 40 percent reduction to meet the target.

Figure 4-15: Methane emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario⁴⁴⁷



Dairy and Livestock Methane

California is the largest dairy-producing state, home to one in five U.S. dairy cows. To date, methane emissions reductions from the dairy and livestock sector have mainly been driven by a decreasing animal population and the growing adoption of manure management strategies, including anaerobic digesters and conversion to dry manure systems and pasture systems. CARB recently completed a detailed analysis of the emission reductions expected by 2030 and the estimated additional investment needed to reach the dairy and livestock sector methane reduction target.⁴⁴⁸

Assuming no adoption of additional manure management and enteric mitigations strategies beyond the projects that have committed funding, and a continued annual animal population decrease of 0.5 percent per year through 2030, further reductions of approximately 4.4 MMTCO₂e will be needed to achieve the 2030 methane emissions reduction target for the sector set by SB 1383. If the remaining reductions are met through

⁴⁴⁷ The *Organic Waste* category includes methane from landfills, wastewater treatment, and compost facilities.

⁴⁴⁸ CARB. 2021. Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target. June. <https://www2.arb.ca.gov/sites/default/files/2021-06/draft-2030-dairy-livestock-ch4-analysis.pdf>.

a mix of dairy projects in which half are dairy digesters and half are alternative manure management projects, then it is estimated that at least 420 additional projects will be necessary. Additional emissions reductions beyond this level will likely be necessary to ensure that the overall state methane emissions reduction targets are met.

Despite the considerable methane emissions mitigation potential of enteric strategies like feed additives, little progress has been made, as few products with proven mitigation potential have become commercially available, and unlike manure management strategies, there is a lack of financial incentives for their adoption.

Market conditions favoring farm consolidation and improved production efficiencies have driven reductions in the California and U.S. dairy population over the past decade.⁴⁴⁹ These efficiency gains have allowed California to maintain production levels despite the decreasing population. If demand for dairy and beef products remains steady or increases, continued improvements in production efficiency and adoption of effective manure management and enteric mitigation strategies will be important to support dairy and livestock methane emission reductions.

Strategies for Achieving Success

- Install state of the art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to decarbonize or as a feedstock for energy.
- Increase alternative manure management projects, including but not limited to conversion to “solid,” “dry,” or “scrape” manure management; installation of a compost-bedded pack barn; an increase in the time animals spend on pasture; and implementation of solid-liquid separation technology into flush manure management systems.
- Implement enteric fermentation strategies that are cost-effective, scientifically proven, safe for animal and human health, and acceptable to consumers, and that do not impact animal productivity. Provide financial incentives for these strategies as needed.
- Accelerate demand for dairy and livestock product substitutes such as plant-based or cell-cultured dairy and livestock products to achieve reductions in animal populations.
- In consideration of pace of deployment of methane mitigation strategies and the scale of complimentary incentives, consider regulation development to ensure that the 2030 target is achieved, assuming the conditions outlined in SB 1383 are met.

⁴⁴⁹ MacDonald, James M., Jonathan Law, and Roberto Mosheim. 2020. *Consolidation in U.S. Dairy Farming*. ERR-274. July. <https://www.ers.usda.gov/webdocs/publications/98901/err-274.pdf>.

Landfill Methane

Achieving the 75 percent organic waste disposal reduction target⁴⁵⁰ of SB 1383, and maintaining that level of disposal in subsequent years, would bring annual landfill emissions in 2030 to just below the 2013 baseline. Annual methane emissions will be higher through 2030 than originally anticipated by the SLCP Strategy because the state did not achieve the anticipated reductions in organic waste disposal of 50 percent below 2014 levels by 2020. SB 1383 prohibited the organic disposal regulations from taking effect until 2022,⁴⁵¹ and, as a result, emissions have continued to increase.

Due to the multidecadal time frame required to break down landfilled organic material, the emissions reductions from diverting organic material in one year are realized over the course of several decades. For example, one year of waste diversion in 2030 is expected to avoid 8 MMTCO₂e of landfill emissions, cumulatively, over the lifetime of that waste's decomposition.⁴⁵² Near-term diversion efforts are critical to avoid locking in future landfill methane emissions.

CalRecycle's 2020 report, *Analysis of the Progress Toward the SB 1383 Waste Reduction Goals*,⁴⁵³ estimated that 8 million short tons of composting and anaerobic digestion capacity will be needed to manage organic wastes, above the existing and new capacity expected to be available by 2025. The 2019 report, *Co-Digestion Capacity in California*,⁴⁵⁴ from the State Water Resources Control Board estimated that at least 2.4 million tons of digester capacity is available at urban wastewater treatment plants if sufficient incentives or funding for collection, receiving, and processing operations are provided to enable utilization of this capacity. The CPUC approved a decision in February 2022 implementing the biomethane procurement program, which will require investor-owned utilities by 2025 to procure 17.6 billion cubic feet (BCF) of biomethane produced from organic wastes to support the landfill disposal reduction and SLCP target and reduce fossil gas reliance for

⁴⁵⁰ The target is from 2014 levels by 2025.

Public Resources Code, § 42652.5. CalRecycle approved the SLCP: Organic Waste Reductions regulations (<https://calrecycle.ca.gov/organics/slcp/>) in 2020 and began implementing them in January 2022. These regulations are designed to achieve the 2025 disposal reduction and edible food recovery targets.

⁴⁵² The life cycle emissions reduction is based on anticipated diversion of 27 million short tons of organic waste from CalRecycle (2020) *Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals* (<https://www2.calrecycle.ca.gov/Publications/Details/1693>). Under CalRecycle's SLCP regulations, an alternative to landfill disposal must achieve a life cycle GHG reduction of 0.3 MTCO₂e per short ton of waste diverted.

⁴⁵³ CalRecycle. 2020. *Analysis of the Progress Toward the SB 1383 Waste Reduction Goals*. <https://www2.calrecycle.ca.gov/Publications/Details/1693>.

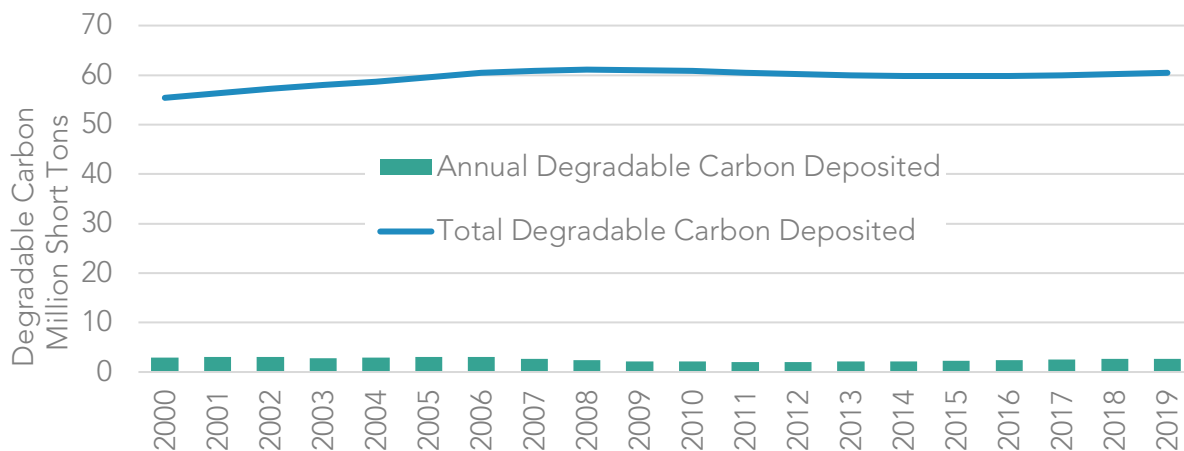
⁴⁵⁴ State Water Resources Control Board. 2019. *Co-Digestion Capacity in California*. https://www.waterboards.ca.gov/water_issues/programs/climate/docs/co_digestion/final_co_digestion_capacity_in_california_report_only.pdf.

residential and commercial customers.⁴⁵⁵ Additionally, the organic waste stream includes more than one million tons of edible food that could be recovered before it enters the waste stream through food rescue programs that combat hunger in communities throughout California.

While reducing organic waste disposal is the most effective means of achieving reductions in waste sector methane, strategies to reduce emissions from waste already in place in landfills also will play a role in achieving near-term reductions. As Figure 4-16 shows, the total degradable carbon (a measure of the amount of waste with potential to generate methane) that is accumulated from waste deposited in previous years is over 20 times greater than the amount added each year. This illustrates that even if we were able to entirely phase out landfilling of organic waste today, the existing waste in place at landfills would continue to generate methane for decades into the future.

Through a combination of improvements in operational practices, use of lower permeability covers, advanced landfill gas collection systems, and increased monitoring to detect and repair leaks, it is estimated that a direct emission reduction of 10 percent is achievable across the state's landfills by 2030. Technologies to utilize landfill gas efficiently can contribute further emission reductions in the energy sector.

Figure 4-16: Degradable carbon deposited in landfills



Strategies for Achieving Success

- Maximize existing infrastructure and expand it to reduce landfill disposal, with strategies including composting, anaerobic digestion, co-digestion at wastewater treatment plants, and other non-combustion conversion technologies.

⁴⁵⁵ CPUC. 2022. Decision 22-02-025.

- Expand markets for products made from organic waste, including through recognition of the co-benefits of compost, biochar, and other products.⁴⁵⁶
- Recover edible food to combat food insecurity.
- Invest in the infrastructure needed to support growth in organic recycling capacity.
- Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity.
- Direct biomethane captured from landfills and organic waste digesters to sectors that are hard to decarbonize.
- Implement improved technologies and best management practices at composting and digestion operations.
- Reduce emissions from landfills through improvements in operational practices, lower permeability covers, advanced collection systems, and technologies to utilize landfill gas.
- Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks, improve understanding of the factors that lead to better capture efficiency, and explore new technologies and practices that can reliably improve methane control at landfills.

Upstream Oil and Gas Methane Reduction

For oil and gas production, processing, and storage, California is currently on track to achieve a 41 percent reduction in methane emissions by 2025 relative to 2013. The additional reductions needed to meet the 2030 target may be achieved by implementing additional regulatory requirements to further reduce intentional venting of fossil gas from equipment. If necessary, additional reductions from transmission and distribution facilities may be achieved by requiring the utilities to increase inspection and repair activities or further reduce emissions from pipeline blowdowns by implementing methods such as using portable compressors, using plugs to isolate sections of pipelines, flaring vented gas, routing gas to fuel gas systems, and installing static seals on compressor rods. Advances in methane detection technologies (e.g., satellites equipped to detect large methane sources) may also help to identify and mitigate methane emissions quickly across the oil and gas sector.

As California transitions away from fossil fuels, in-state oil and gas production will likely decline. This could result in an increase over time in the number of long-term idle and orphan wells (idle wells lacking a financially solvent, responsible owner) in the state. While California has regulations aimed at helping ensure operators manage their idle wells,

⁴⁵⁶ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.4. [finalejacrecs.pdf \(arb.ca.gov\)](#).

there could likely be an increase in California's orphan well population. Plugging all orphan wells, of which there are currently over 5,000, could take decades due to the limited resources California has for orphan well plugging. The benefits from plugging wells include methane emission reductions and job creation; employment gains from well plugging and site remediation activities could help temporarily offset job losses from the oil and gas industry. The California Council on Science and Technology's 2018 report on orphan wells, *Orphan Wells in California: An Initial Assessment of the State's Potential Liabilities to Plug and Decommission Orphan Oil and Gas Wells*,⁴⁵⁷ found that the potential cost to the state of plugging current orphan wells could be approximately \$500 million, and the cost of plugging all active and idle wells could total over \$9.1 billion. As oil and gas production in California declines due to reduced demand for fossil fuels, additional funding will likely be needed to cover the costs of plugging wells that have no viable operator.

Strategies for Achieving Success

- Mitigate emissions from leaks by regular leak detection and repair (LDAR) surveys at all facilities.
- Replace high emitting equipment with zero emission alternatives wherever feasible.⁴⁵⁸
- Have CARB and CalGEM lead a Task Force to identify and address methane leaks from oil infrastructure near communities.
- Pursuant to SB 1137, develop leak detection and repair plans for facilities in health protection zones, implement emission detection system standards, and provide public access to emissions data.
- Minimize emissions from equipment that must vent fossil gas by design (e.g., fossil gas powered compressors).
- Install vapor collection systems on high emitting equipment.
- Phase out venting and routine flaring of associated gas (gas produced as a by-product during oil production).
- Continuous ambient monitoring at fossil gas underground storage facilities to quickly detect large methane sources.
- Reduce pipeline and compressor blowdown emissions.

⁴⁵⁷ The California Council on Science and Technology. 2018. *Orphan Wells in California: An Initial Assessment of the State's Potential Liabilities to Plug and Decommission Orphan Oil and Gas Wells*. <https://ccst.us/wp-content/uploads/CCST-Orphan-Wells-in-California-An-Initial-Assessment.pdf>.

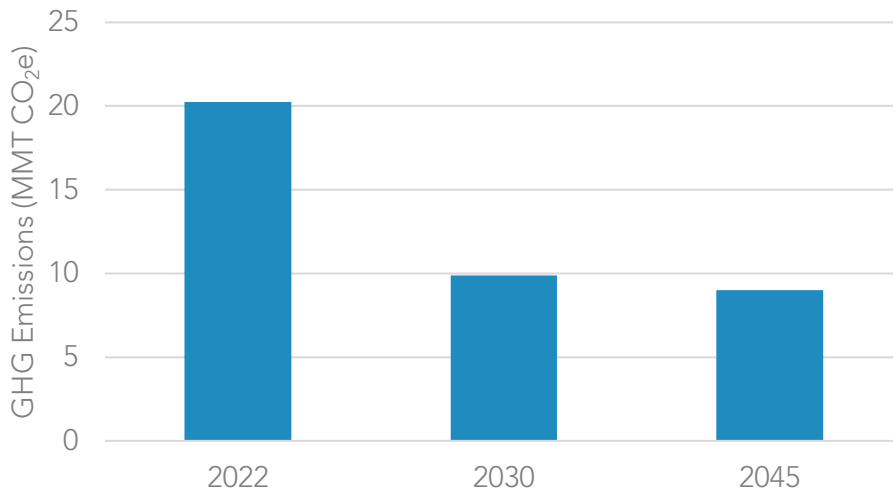
⁴⁵⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, P5. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks.⁴⁵⁹

Hydrofluorocarbons

In California, all the HFC measures currently in place will help achieve more than 70 percent of the reductions needed to achieve the 2030 HFC goal and provide very significant emissions reductions by 2045 and beyond. However, new targeted measures will be needed to maintain the pace of reductions, as demand for technologies that currently predominantly use high-GWP refrigerants is anticipated to grow. Despite decarbonization efforts, high-GWP HFCs are expected to be among the last remaining persistent GHG emission sources, as shown in Figure 4-17.⁴⁶⁰

Figure 4-17: Hydrofluorocarbon emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario



HFC emissions from new and existing sources should be addressed in tandem with building decarbonization efforts to maximize reductions.⁴⁶¹ As buildings are electrified in an effort to decarbonize them, the use of heat pumps for space conditioning, water heaters, and clothes dryers is expected to increase significantly. Heat pumps, while using

⁴⁵⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, CC17. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁶⁰ Energy and Environmental Economics, Inc. 2020. *Achieving Carbon Neutrality*. https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.

⁴⁶¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF26. [finalejacrecs.pdf \(arb.ca.gov\)](#).

electricity, not fossil gas, currently rely predominantly on high-GWP refrigerants. Very low- or no-GWP technologies and solutions are either available or emerging for various heat pump technologies, and likely to develop further as international efforts to mitigate HFCs continue. However, most of these technologies are still nascent in the United States. In addition, some of the alternatives cannot be used until California building codes are updated, which is currently expected at the earliest in mid-2024 for some technologies based on the recently adopted provisions in AB 209⁴⁶² requiring the California Building Standards Commission to adopt the latest safety standards for refrigerant containing equipment into California's building codes. The current updates to the building codes will allow the use of many refrigerants with lower GWPs than HFCs currently in use. However, additional building code updates are needed to expand the choices of ultra-low-GWP alternatives, and that will need to happen in the next few years. The adoption of low-GWP refrigerants must occur in parallel with building decarbonization efforts; without such efforts, the vast GHG benefits of the latter will be partially offset, and the proportion of HFC emissions from buildings will continue to grow.

Leaks from existing air conditioning and refrigeration equipment are a major source of statewide and global HFC emissions. Once installed, refrigeration and air conditioning equipment can stay in place for decades, while leaking refrigerants into the atmosphere. This makes it very important that new installed equipment use refrigerants with a GWP as low as possible. The refrigerants inside existing equipment are sometimes collectively referred to as the *installed base* or *banks* of potential HFC emissions. If released spontaneously, the existing HFC banks would equal 60 percent of all annual statewide GHG emissions in California, as illustrated in Figure 4-18.⁴⁶³

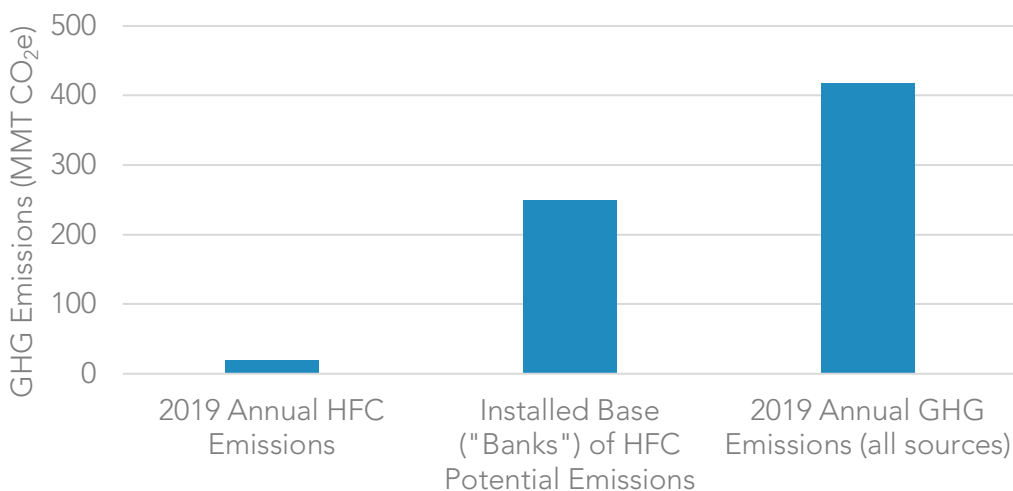
The sales prohibitions on newly produced refrigerants set forth in SB 1206 (2022) and the national/international HFC phasedown will help in reducing HFC emissions from existing equipment by restricting the supply of and increasing the value of existing high-GWP HFCs, thus enabling a circular economy. In the 2022–2023 state budget, CARB received \$45 million in incentive funding for climate-friendly refrigerant technologies; this funding will be critical in shifting the market toward the best available refrigerant technologies in various sectors.

⁴⁶² AB 209: Energy and climate change.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209.

⁴⁶³ CARB. 2021. 2022 Scoping Plan Update – Short-Lived Climate Pollutants Workshop Presentation. September 8. https://ww2.arb.ca.gov/sites/default/files/2021-09/carb_presentation_sp_slcp_september2021_1.pdf.

Figure 4-18: Potential emissions from refrigerants in existing equipment



Strategies for Achieving Success

- Expand the use of very low- or no-GWP technologies in all HFC end-use sectors, including emerging sectors, like heat pumps for applications other than space conditioning, to maximize the benefits of building decarbonization.⁴⁶⁴
- Convert large HFC emitters such as existing refrigeration systems to the lowest practical GWP technologies.⁴⁶⁵
- Prioritize small-scale and independent grocers serving priority populations in addressing existing “banks” of high-GWP refrigerants.⁴⁶⁶
- Improve recovery, reclamation, and reuse of refrigerants by limiting sales of new or virgin high-GWP refrigerants and requiring the use of reclaimed refrigerants where appropriate.⁴⁶⁷
- Assist low-income and disadvantaged communities in obtaining low-GWP space conditioning units to protect vulnerable communities from heat stress and wildfire smoke.⁴⁶⁸

⁴⁶⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF26. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁶⁵ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF22. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁶⁶ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT5 and JT6. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁶⁷ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT1. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁶⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF28, JT5, and JT6. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Accelerate technology transitions in California and the U.S. overall by collaborating with international partners committed to taking action on HFCs under the Kigali Amendment to the Montreal Protocol; this includes addressing barriers to adoption of very low- or no-GWP refrigerant technologies such as high upfront costs, shortage of trained technicians, and lag in updating safety standards and building codes.

Anthropogenic Black Carbon

Significant progress has been made since 2013 to reduce anthropogenic black carbon emissions, primarily from decreased combustion of distillate fuels in the agricultural sector, as well as improvements to provide cleaner, on-road combustion technologies. Under current strategies, anthropogenic black carbon from transportation is expected to be reduced by over 60 percent in 2030. Continued reductions in combustion emissions across all sectors from both the state's climate and air quality programs will also help reduce anthropogenic black carbon emissions going forward.

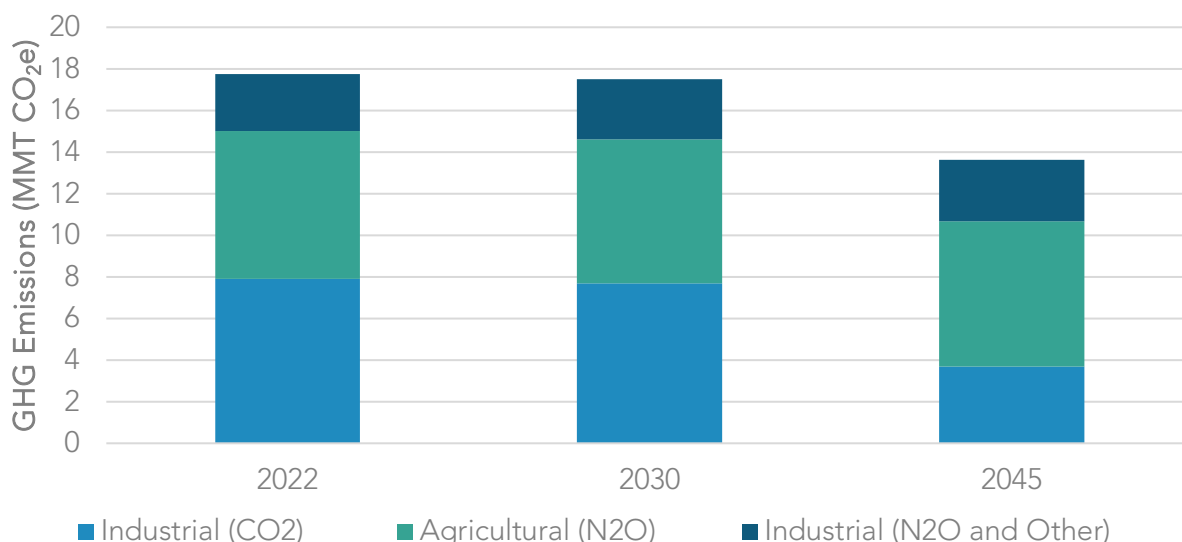
Strategies for Achieving Success

- Reduce fuel combustion commensurate with state's climate and air quality programs, particularly from reductions in transportation emissions and agricultural equipment emissions.⁴⁶⁹
- Invest in residential woodsmoke reduction.

In addition to SLCP emissions, some remaining non-combustion emissions are anticipated to persist in the coming decades, as shown in Figure 4-19. These include CO₂ from industrial processes such as cement manufacturing, oil and gas extraction, and geothermal electric power; N₂O from wastewater treatment, fertilizers, and livestock manure applied to agricultural soils; and other industrial, non-HFC GHG emissions.

⁴⁶⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A and Appendix A (Table Summary of Direct Emission Reduction Strategies). "Emissions reductions from energy consumed by California's agricultural sector, including post-harvest processing, use of tractors and other farm equipment, and water import and irrigation." [finalejacrecs.pdf \(arb.ca.gov\)](#).

Figure 4-19: Remaining non-combustion emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario



Natural and Working Lands

California’s natural and working lands (NWL) cover approximately 90 percent of the state’s 105 million acres,⁴⁷⁰ and include forests, grasslands, shrublands and chaparral, croplands, wetlands, sparsely vegetated lands, and the green spaces in urban and built environments. These lands include California Native American tribes’ ancestral and cultural lands, parks and green spaces in our cities and communities, and the waters and the iconic landscapes we know and love. The diverse landscapes and biodiversity found throughout California’s NWL provide a multitude of benefits to the people of California, including clean water, clean air, biodiversity, food, economic prosperity, recreational opportunities, continuation of traditional tribal ways of life, mental health benefits, and many others.

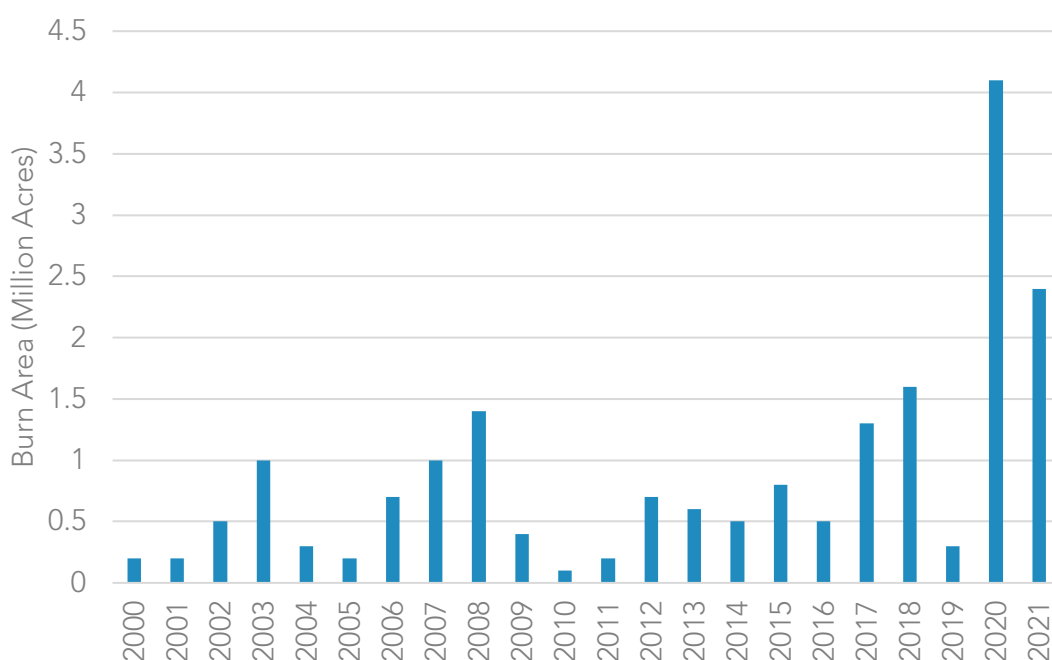
Our lands are a critical sector in California’s fight to achieve carbon neutrality and build resilience to the impacts of climate change. Healthy land can sequester and store atmospheric CO₂. Healthy lands also can reduce emissions of powerful SLCPs, limit the release of future GHG emissions, protect people and nature from the impacts of climate change, and build our resilience to future climate risks. Creation of healthy lands through

⁴⁷⁰ CNRA. 2022. Natural and Working Lands Climate Smart Strategy. https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible_Compressed.pdf.

multi-benefit and mitigation measures can also support tribal and local traditional lifeways. Unhealthy lands have the opposite effect—they release more GHGs than they store and are more vulnerable to future climate change impacts.

Climate change impacts have become more apparent in recent years and are having significant effects on communities throughout the state. One of these impacts is the much more frequent occurrence of unusually large, high-severity wildfires, which are being driven by climate change and by a recent history of fire-exclusion and land management practices that have resulted in forests with high levels of biomass. These recent large and high-severity wildfires have resulted in a significant amount of burned acreage and emissions in California (Figure 4-20).⁴⁷¹

Figure 4-20: Acreage of burned wildland vegetation area



These wildfires deviate from the lower-severity fires that previously occurred at frequent intervals, around which California’s forests evolved. As climate change accelerates, these large, uncharacteristic wildfires are likely to become more common and impact more of our landscapes. Climate change is also expected to have other significant effects on our lands, including more extreme droughts, floods, extreme heat, and the spread of invasive aquatic and terrestrial species, pests, diseases, and parasites. These impacts can lead

⁴⁷¹ CARB. 2022. Wildfire Emission Estimates for 2021.

<https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/Wildfire%20Emission%20Estimates%202000-2021.pdf>.

to negative feedback loops on human and ecological health; for example, increasing the spread of invasive species can lead to increases in pesticide use, if not managed through regulation or mitigation, which can pose risks to human health and the environment.

California's approach to climate action in the NWL sector is not solely focused on maximizing carbon stocks but instead on supporting carbon management that holistically fosters ecosystem health, resilience, provision of overall climate function, and other co-benefits.

Natural systems operate on a longer timescale than the energy and industrial sectors, and benefits from climate action on our lands can take decades to accrue. Scaling climate smart land management in California requires taking action now and playing the "long game" by establishing and maintaining consistent, patient approaches and programs.

Landscapes

For the first time, this Scoping Plan includes modeling for the NWL sector. The focus of the initial modeling is limited to seven land types that align with the those in the NWL Climate Smart Strategy.⁴⁷² Work will continue to incorporate more landscapes and management practices into the modeling over time. The initial landscapes included in the modeling for this Scoping Plan are:

- Forests
- Shrublands and Chaparral
- Grasslands
- Croplands
- Wetlands
- Developed Lands
- Sparsely Vegetated Lands

Each of these land types are a key component to the state's approach to increasing climate action in the NWL sector, as called for in Executive Order N-82-20 and AB 1757.⁴⁷³ The Executive Order directs CARB to update the target for this sector in support of carbon neutrality by 2045 as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. AB 1757 calls for the development of an

⁴⁷² CNRA. 2022. *Natural and Working Lands Climate Smart Strategy. Appendix B.* https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/Appendix-B_04132022_ada.pdf.

⁴⁷³ AB 1757 California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB1757.

ambitious range of targets for the NWL sector to be integrated into the Scoping Plan and other state policies. It directs CARB and CNRA to work closely together to update the NWL Climate Smart Strategy, and establish an expert advisory committee to inform and advise on NWL modeling, targets, and implementation strategies.⁴⁷⁴ Additionally, in 2021, the governor signed SB 27⁴⁷⁵ (Skinner, Chapter 237, Statutes of 2021) into law. It directed CARB to establish CO₂ removal targets for 2030 and beyond and take into consideration the NWL Climate Smart Strategy. The governor's Executive Order, AB 1757, and SB 27 go beyond previous direction from the Legislature and past administrations. These directives emphasize the importance of quantifying land-based carbon both statewide,⁴⁷⁶ and in programs and policies,⁴⁷⁷ setting targets⁴⁷⁸ for NWL to support the state's climate objectives, and advancing land management actions⁴⁷⁹ that support the health and resiliency of these lands.

Blue carbon (also known as carbon captured and held in coastal vegetation and soils, such as seagrasses, seaweeds, and wetlands)—is also important to consider as we look at long-term climate goals. While this landscape is not currently covered by IPCC inventory guidelines or included in California's NWL Inventory, the United States was the first nation to include blue carbon in its national GHG emissions inventory. California's Ocean Protection Council and San Francisco Estuary Institute are partnering to create a new coastal wetlands, beaches, and watersheds inventory. CARB staff will utilize information from this effort and assess other available data to evaluate how this landscape may be integrated into our efforts in the future as more data become available.⁴⁸⁰

⁴⁷⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N20. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁷⁵ SB 27 Carbon sequestration: state goals: natural and working lands: registry of projects. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB27.

⁴⁷⁶ SB 859 Public resources: greenhouse gas emissions and biomass (SB 859, Committee on Budget and Fiscal Review, Chapter 368, Statutes of 2016). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB859.

⁴⁷⁷ SB 1386. Resource conservation: working and natural lands. (SB 1386, Chapter 545, Statutes of 2016). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1386.

⁴⁷⁸ CARB. 2017. 2017 Climate Change Scoping Plan Update. Board Resolution 17-46. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2017/res17-46.pdf>.

⁴⁷⁹ Executive Department. State of California. EO B-52-18. <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/05/5.10.18-Forest-EO.pdf>.

⁴⁸⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N2. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Trends of Carbon on Landscapes

CARB currently tracks the carbon stock changes through the Inventory of Ecosystem Carbon in California's Lands⁴⁸¹ (NWL Inventory), which is summarized in Chapter 1. The NWL Inventory is a key tool for tracking changes in carbon stocks across the state, and it will serve as the inventory of record for this sector, tracking sector-wide progress toward the target. The NWL Inventory provides a retrospective snapshot of the status of California's lands, and captures the gains or losses of carbon stocks that occur over time. In addition to tracking carbon stock changes, the NWL Inventory is an important tool for understanding the impacts of our efforts to increase climate action in this sector (such as those identified in this Scoping Plan and the NWL Climate Smart Strategy) on NWL carbon stocks. The inventory is also used as the foundation for Scoping Plan scenario modeling and target setting.

CARB's inventory shows that carbon stocks decreased in NWL lands from 2001 to 2011, releasing more carbon than they were storing, and then increased slightly from 2012 to 2014.⁴⁸² These trends highlight the interannual and interdecadal variability of lands and their ability to be both a source and a sink of carbon, and the importance of looking at NWL data and trends over multiyear and multidecadal time periods, as opposed to looking only at annual changes. This movement is part of the Earth's carbon cycle, where carbon transfers between the land, ocean, and atmosphere. As part of the carbon cycle, over decades or centuries, fire and plant respiration and decomposition move carbon from the land to the atmosphere, while plant growth and other processes move carbon from the atmosphere to the land. Emissions from fossil-fuel combustion are contributing to putting this cycle out of balance.

Additionally, some historic land management practices that have resulted in the loss of carbon from the soil are also contributing to the atmospheric rise of CO₂ while simultaneously exacerbating the imbalance of the water cycle, which is influenced by and linked to the carbon cycle. These emissions are also contributing to a feedback loop for California's lands: as CO₂ emissions accumulate in the atmosphere—and California experiences more warming, extreme heat events, and droughts—the risk and intensity of carbon losses also increases, which in turn transfers more carbon from the land to the atmosphere. And because forests and shrublands comprise approximately 85 percent of the carbon stocks in California, management strategies and disturbances in forest and

⁴⁸¹ CARB. *An Inventory of Ecosystem Carbon in California's Natural & Working Lands*. 2018 Edition. [nwl_inventory.pdf \(ca.gov\)](#). Accessed 3/2/2022.

⁴⁸² These trends are consistent estimates in the most recent AB 1504 reporting period.

shrubland carbon play an important role in determining whether California's lands are providing either net carbon sequestration or net emissions on an annual basis.

The gains and losses of carbon on our lands will fluctuate in the future; what is important is to restore carbon in places where it has been lost and reduce large carbon losses on our NWL through active, attentive, and adaptive management. For additional details on the nexus between NWL and GHGs, see pages 5–6 of the NWL Climate Smart Strategy.

Goals and Accelerating Nature-Based Solutions

The state's climate mitigation targets are traditionally identified by individual years, (i.e., tons of GHG emissions in 2020 or 2030). However, because NWL processes fluctuate year to year and because it can sometimes take decades for climate action to fully impact carbon in NWL, it is important to consider the statewide, long-term trends of carbon stock change when identifying how this sector contributes to California's pathway to achieving carbon neutrality. Tracking carbon stock change over a multi-decadal period is the best way to assess the full direct impact climate action has on carbon storage. Such an approach filters out fluctuations from year-to-year weather variations and multi-year natural climate cycles, such as El Niño patterns.

Current data sources and methods allow us to track only certain carbon stocks that exist on NWL. For target tracking to be successful, each carbon pool must be inventoried using a methodology that can detect changes due to management and climate change. Certain carbon pools lack the scientific data and methodologies necessary for target-setting and tracking. For example, soils in forests, shrublands, and grasslands are not included in the Scoping Plan carbon stock target because, currently, there is no way to track statewide soil carbon through time in a way that would capture the effects of increased climate action and climate change.

When considering how NWL contribute to the state's goal of carbon neutrality, all lands' carbon stock gains and losses must be considered, and the Scoping Plan target is set in these terms. It is not sufficient to aggregate climate benefits only within areas where projects, management, or climate action occur. Much of the state does not receive active or quantifiable management, but these areas still contribute to the state's overall carbon stock change and GHG emissions. To incorporate the entire carbon balance toward true carbon neutrality, the Scoping Plan target is set in terms of carbon stock change across the entire state. This incorporates all lands that both receive and do not receive active management, and includes the end result of all sequestration, emissions, and other changes to carbon on the landscape.

However, carbon stock change is not equivalent to emissions. Currently, the data and emission quantification science is not sufficient to enable inventories to comprehensively track all NWL emissions in a way that would enable us to set an NWL target in terms of

statewide emissions and sequestration. There is a great need, across the entire NWL sector statewide, for more empirical data, science, and tools to track all carbon stocks across each carbon pool, and to begin to track emission and sequestration rates. As California implements AB 1757, there is an opportunity to update the data, science, and tools to enable this level of tracking and target setting in the future.

As outlined in Chapter 2, California is projected to lose carbon stocks over the coming decades, but this Scoping Plan analysis also shows that increasing the pace and scale of climate smart land management in California will reduce the carbon stock losses and GHG emissions from the NWL sector. In response to EO N-82-20 and AB 1757, the proposed target for NWL is shown in Table 4-1.

Table 4-1: Scoping Plan modeled target for NWL, based on increasing action on NWL

Total Carbon Stock % Change from 2014	
2045	-4

Achieving this target will require significant expansion of the pace and scale of climate action on California’s NWL, including the following:

- Increasing climate smart forest, shrubland, and grassland management to at least 2.3 million acres a year—an approximate 10x increase in management from current levels.
- Increasing climate smart agricultural practices by at least 78,000 acres adopted a year, annually conserving at least 8,000 acres a year of croplands, and increasing organic agriculture to comprise at least 20 percent of cultivated acres in California by 2045—an approximate 7.5x increase in healthy soils practices from previous levels and a 2x increase in total acres of organic agriculture.
- Increasing annual investment in urban trees in developed lands by at least 200 percent above historic levels and establishing defensible space on all parcels by 2045.
- Restoring at least 60,000 acres, or approximately 15 percent of all Sacramento–San Joaquin River Delta (Delta) wetlands, by 2045.
- Cutting land conversion of deserts and sparsely vegetated landscapes by at least 50 percent annually from current levels, starting in 2025.

If the carbon stock target above is met, and the management actions above are implemented, the modeling for NWL indicates that California’s lands will be a net source of emissions, producing approximately 7 MMTCO₂e of average annual emissions.

Additional climate smart management practices and additional landscapes, such as those included in the Climate Smart Strategy and discussed below in Additional Management Strategies, have the potential to increase carbon stocks and reduce GHG emissions from NWL beyond the levels modeled for this Scoping Plan.

The purpose of the NWL target and the above estimated outcomes is to provide a numerical guide that can support the state's efforts to accelerate both near-term and long-term climate action on California's lands, prioritizing durable solutions that deliver multiple outcomes. Taking these actions over the coming decades will reduce the potential carbon losses from NWL, reduce GHG emissions from some landscape types (such as croplands and Delta wetlands), and support sequestration of GHGs from NWL between 2025 and 2045. These actions will also deliver significant benefits to Californians beyond advancing our climate goals, such as reducing wildfire emissions and their associated health impacts, increasing habitat for biodiversity, reducing urban heat island effects, reducing harmful pesticide exposure, expanding economic opportunities, and others. Additional information on several economic and health outcomes from the Scoping Plan Scenario is included in Chapters 2 and 3.

Statewide planning and target setting for the NWL sector will only create meaningful change if followed by effective on-the-ground implementation. State government cannot accomplish this implementation alone. Effective large scale climate action is dependent on partnerships among tribal, federal, state, regional, and local partners, and across governmental, private, nonprofit, and commercial sectors. The NWL sector of the Scoping Plan sets a carbon target with climate action recommendations that can be used to achieve the quantified carbon, health, and economic outcomes. Implementation of these actions must be led by local or regional partnerships that plan and execute projects appropriate to the specific conditions. The technical expertise and local knowledge of land managers and stewards in all sectors must be elevated to ensure relevant, efficient, and effective climate action.

Implementation of climate action should contribute to state targets, maximize local benefits, and alleviate environmental injustices and other social inequities. On-the-ground action is largely executed and managed by local and regional actors, but state government agencies must support communities across the state in implementing nature-based climate solutions that address statewide objectives, such as the Scoping Plan carbon target. This includes providing resources and developing frameworks, while greatly increasing capacity and technical assistance to assist and empower local partners. Examples of how this can be done are the Regional Forest and Fire Capacity Program within the forestry sector, the UC Cooperative Extension in the agricultural and forestry sectors—as well as the work of the state's 10 regional Conservancies. These programs provide strong examples to emulate as they facilitate statewide coordination, and information and resource transfer from the state to the regional and local levels. The Regional Forest and Fire Capacity Program provides funding for local and regional groups

to build their organizational capacity to plan and implement wildfire and forest management projects that are informed by their own local expertise. The UC Cooperative Extension is an example of how the state provides technical assistance to local landowners and community organizations, helping them apply the latest science-based management strategies to their lands. California's regional Conservancies play a pivotal role in implementing regional conservation, restoration, and land management efforts through activities such as grant funding, science generation, and planning assistance.

The state also has identified the need to incorporate and elevate traditional indigenous knowledge into climate action on the regional and local scales. Accomplishing this requires close partnerships with tribes for mutual knowledge and resource sharing, while protecting culturally sensitive knowledge and resources. As Tribes are sovereign nations with specialized cultural knowledge and experience in managing lands, climate action on these lands that contribute to the State of California's climate targets can only be accomplished with the full participation and under the leadership of the Tribes that govern those lands.

Strategies for Achieving Success: Crosscutting Items for all NWL

- Implement AB 1757 and SB 27.
- Implement the Climate Smart Strategy.
- Accelerate the pace and scale of climate smart action, consistent with the management levels identified above, as part of a collective effort between federal, state, private, nonprofit, and individual land managers.
- Prioritize and practice equity, including through meaningful community engagement and prioritizing implementation of nature-based solutions that benefit the communities most vulnerable to climate change.⁴⁸³
- Advance multi-benefit, collaborative, landscape-level approaches that engage communities and landowners, and incorporate adaptive managements.
- Consult and partner with California Native American tribes to increase co-management and tribal management authority; restore, protect, and enhance natural cultural resources, traditional foods, and cultural landscapes; respect tribal sovereignty; and support tribes' implementation of tribal expertise and Traditional Ecological Knowledge and cultural easements.⁴⁸⁴

⁴⁸³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N8. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁸⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N1, N6, N16, N17, N18. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Leverage existing innovative financial and market mechanisms, and explore new ones, between the public, private, and philanthropic sectors to secure funding of climate smart land management.
- In partnership with communities, tribes, and the private sector, expand and develop new infrastructure for manufacturing and processing of climate smart agricultural and biomass products.
- Leverage and support technical assistance providers: such as the UC Cooperative Extension and California's 98 Resource Conservation Districts, that have track records of providing technical assistance to local landowners and implementing agriculture, forestry, natural resource management, and restoration projects across the state.
- Establish and expand mechanisms that ensure NWL are protected from land conversion and parcelization (e.g., conservation easements or Williamson Act), in line with the strategies outlined in CNRA's Pathways to 30x30 California.^{485,486} Pair land conservation projects with management plans that increase carbon sequestration, where feasible.
- Increase opportunities for private and philanthropic investments in nature-based climate solutions, utilizing existing voluntary and compliance carbon markets, existing state and local programs, and the California Carbon Sequestration and Climate Resiliency Project Registry established pursuant to SB 27.
- Expand monitoring and tracking of management actions and outcomes consistent with the tracking and monitoring recommendations of the Climate Smart Strategy.

Forests, Shrublands, and Chaparral

At roughly 29 million acres, forests cover 27 percent of California. Shrublands and chaparral cover 31 percent of the state; roughly 33 million acres. Both types are distinct, with their own ecological dynamics and management strategies, and are modeled within a single model that is calibrated to treat them uniquely.

Together, forests, shrublands, and chaparral support a high biodiversity of plants and animals, in addition to high levels of carbon stocks. They provide important air and water quality benefits to all Californians, as well as recreational opportunities and, for forests, harvested wood products for the state. These landscapes are fire-adapted, and historical tribal management of these lands has fostered ecosystem health and resilience. Over the past century, these lands have been impacted severely by fire exclusion, including

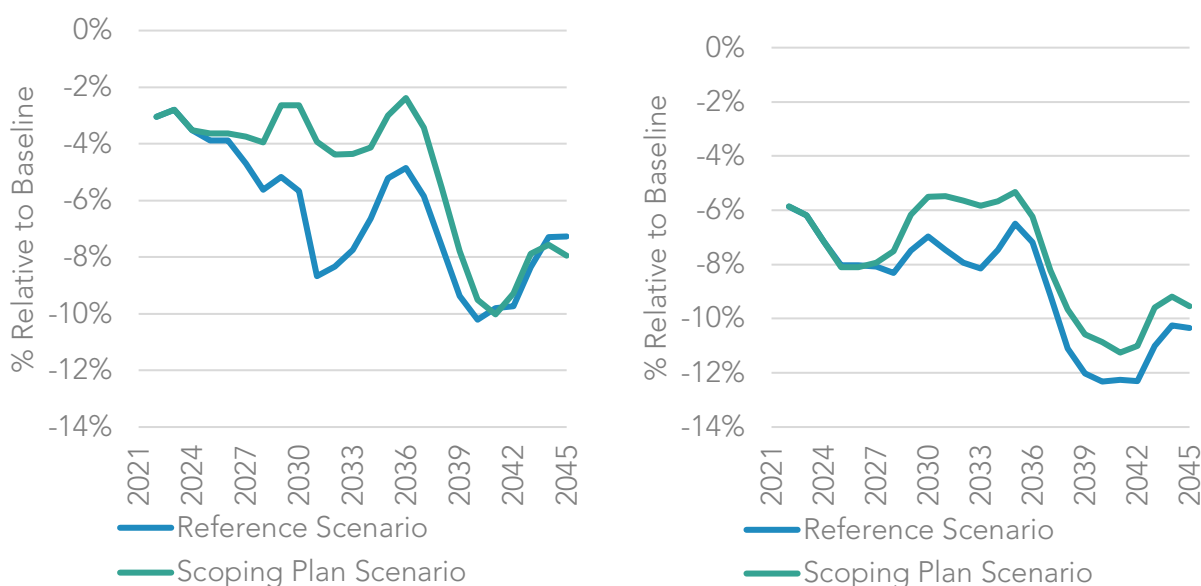
⁴⁸⁵ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N5, N26, N27. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁸⁶ CNRA. 2022. *Pathways to 30x30 California*. <https://www.californianature.ca.gov/pages/30x30>.

exclusion of indigenous people's management and past management practices, which has resulted in less resilient ecosystems and communities and more destructive wildfires today. This, along with drought induced stress and mortality, has changed these landscapes from a carbon sink to a carbon source. Climate smart management can help make forests more resilient to climate change and less prone to catastrophic wildfire. Climate-smart management in shrublands and chaparral face additional challenges and uncertainty, but can still provide protection for threatened communities and natural resources. This management, if conducted on a regular basis to maintain forest health, can help reduce emissions from forests, shrublands, and chaparral, and help strengthen and maintain the co-benefits that Californians experience from them.

Under all management levels, forests and shrublands are expected to lose carbon over the next two decades due to climate change and wildfire (Figure 4-21).

Figure 4-21: Forest (left) and shrubland (right) carbon stocks by 2045^{487,488}



While this decrease in carbon stocks may be inevitable, forest management under the Scoping Plan Scenario can help direct where and how carbon loss occurs. By proactively managing forests and shrublands, the loss of carbon from wildfire can be lessened as the risk of high severity fire is decreased, with the removed biomass going toward a more

⁴⁸⁷ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N13. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁸⁸ This analysis is the aggregation of all forests and shrublands from all ownerships across the entire state of California.

useful purpose such as harvested wood products, bioenergy, and engineered carbon removal. Managing for a diverse and resilient forest landscape also can help forests recover more quickly so that when climate change and wildfire impacts occur, forests will be less affected and can continue to thrive and sequester carbon. Additional details on the climate benefit potential of forests and shrublands/chapparral can be found in Section 2 of the NWL Climate Smart Strategy.

Strategies for Achieving Success

- Accelerate the pace and scale of climate smart forest management to at least 2.3 million acres annually by 2025, in line with the climate smart management strategies identified in this Scoping Plan, the NWL Climate Smart Strategy, and the Wildfire and Forest Resilience Action Plan.⁴⁸⁹
- Establish and expand mechanisms that ensure forests, shrublands, and grasslands are protected from land conversion and that support ongoing, rather than one-time, management actions.
- In collaboration with state and local agencies, accelerate the deployment of long-term carbon storage from waste woody biomass residues resulting from climate smart management, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.
- Expand infrastructure to facilitate processing of biomass resulting from climate smart management.
- Expand permit streamlining in collaboration with state and local agencies to accelerate implementation of climate smart forest management while protecting natural resources.

Grasslands

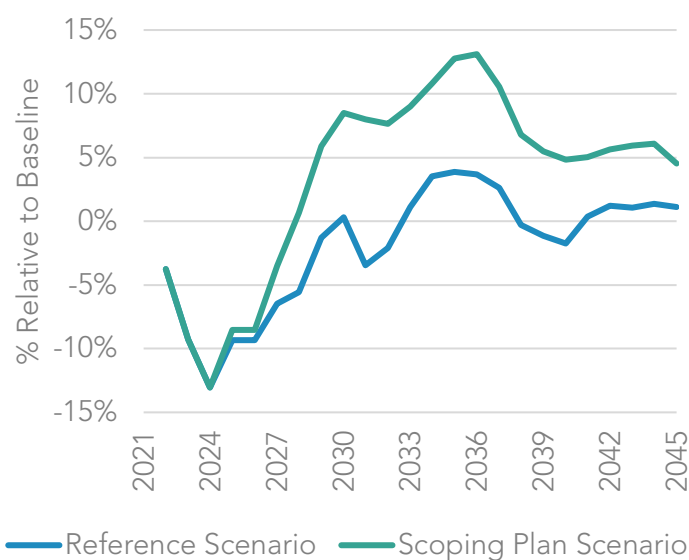
Grasslands cover 9 percent of California, roughly 10 million acres, and are found throughout the state in various landscapes, with concentrations in the foothills surrounding the Sacramento and San Joaquin Valleys. In addition to carbon storage (primarily in the soil), grasslands provide open space, wild habitat, grazing land, and important water filtration and recharge benefits. The protection of grasslands provides an opportunity to reduce sprawl and complement VMT reduction strategies. As grasslands are susceptible to invasive species, climate smart strategies can increase grassland

⁴⁸⁹ Forest Management Task Force. 2021. *California's Wildfire and Forest Resilience Action Plan: Recommendations of the Governor's Forest Management Task Force*. <https://www.fire.ca.gov/media/ps4p2vck/californiawildfireandforestresilienceactionplan.pdf>.

resilience to climate change by improving species diversity and maintaining or increasing soil carbon stocks.

Modeling results show that increased fuels treatments and avoided land conversion can increase carbon stocks on grasslands by 2045, but sequestration rates fluctuate annually. Grasslands are capable of high carbon sequestration rates but are susceptible to carbon losses from wildfire and land conversion. Soil carbon is the major carbon pool on these lands, and continued future improvement of the monitoring and modeling of soil carbon is needed. Similar to forests and shrubland/chaparral, modeling alternatives that include fuels treatments resulted in greater carbon stocks compared to no management, and had lower wildfire emissions. Unlike forests and shrubland/chaparral, which have a general declining carbon stocks trend, the modeling results (Figure 4-22) show grasslands can maintain or increase carbon stocks with active management. Details on the climate benefit potential of grasslands can be found in Section 2 of the NWL Climate Smart Strategy.

Figure 4-22: Grassland carbon stocks by 2045



Strategies for Achieving Success

- Establish and expand mechanisms that ensure grasslands are protected from land conversion/parcelization and that support ongoing, rather than one-time, management actions that improve carbon sequestration.
- Deploy grassland management strategies, like prescribed grazing, compost application, and other regenerative practices, to support soil carbon sequestration, biodiversity, and other ecological improvements.

- Increase adoption of compost production on farms and application of compost in appropriate grassland settings for improved vegetation and carbon storage, and to deliver waste diversion goals through nature-based solutions.

Croplands

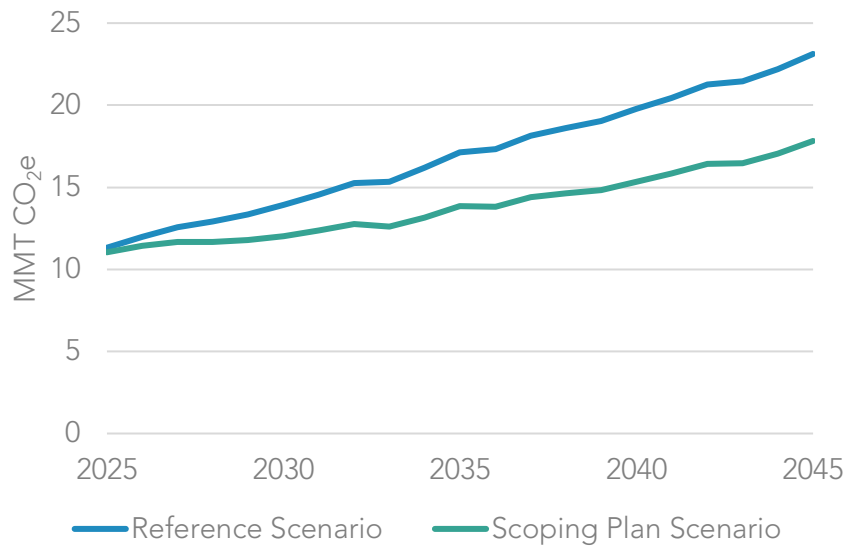
Croplands cover 9 percent of the state, roughly 9.5 million acres. This land is some of the most productive agricultural land in the world, and enables California to be a global leader in agriculture. Aside from developed lands, croplands are the most intensively managed landscapes in the state, and are closely tied to society through the food they produce and the constant, direct contact that people have with croplands through the course of management. In addition to food security, croplands provide considerable carbon storage in the soil and, in perennial croplands, in aboveground biomass. Climate smart practices can improve public health; for example, by reducing synthetic fertilizer and pesticide use. They also help to maintain or increase the climate resilience of cropland productivity through improved soil conditions and increased pollinator habitat.

There is also significant potential to transform this sector to increase soil carbon storage, reduce GHG emissions (Figure 4-23), and reduce pesticide exposure and health impacts. Moving to an agricultural system that improves soil health and water holding capacity reduces over-application of nitrogen, reduces the use of pesticides and fumigants, and increases biodiversity and pollinator habitat, supporting California's pathway to carbon neutrality while simultaneously improving the lives of those who live and work in the agricultural community. Croplands are intricately tied to people, communities, and their health, and through climate smart practices and cropland conservation, these lands have the potential to contribute more to society than just food.⁴⁹⁰ The implementation of climate smart agricultural practices and diversified organic agriculture can help California achieve social and environmental benefits, like improving water use efficiency, increasing pollinator habitat, and reducing synthetic fertilizer and pesticide use.⁴⁹¹ Additional details on the climate benefit potential of croplands can be found in Section 2 of the NWL Climate Smart Strategy.

⁴⁹⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations In-part (N3, N4, N22), N5, N21. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁹¹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Figure 4-23: Cumulative CO₂e emissions from annual croplands in 2045⁴⁹²



CARB recognizes the complex nature of croplands, cross-sector relationships, and the need to build on this analysis to further our understanding of cropland dynamics. Many more aspects of cropland management need to be explored for potential climate benefits, such as water and nutrient use management, pest control methods, crop rotations, and other management practices. The impacts of climate change on water availability, annual/perennial crop growth, and future carbon sequestration trends are uncertain, and recent policies such as the Sustainable Groundwater Management Act may also influence cropland management in unforeseen ways. Nonetheless, it is clear that greater climate smart practice implementation can prepare California for the future and yield tangible benefits for the state.

Strategies for Achieving Success

- Accelerate the pace and scale of healthy soils practices to 80,000 acres annually by 2025, conserve at least 8,000 acres of annual crops annually, and increase organic agriculture to 20 percent of all cultivated acres by 2045.

⁴⁹² AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Utilize the recommendations included in CDFA's Farmer and Rancher-Led Climate Change Solutions⁴⁹³ report to accelerate deployment of healthy soils practices, organic farming, and climate smart agriculture practices.
- Establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture.⁴⁹⁴
- Support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems, such as implementing the California Department of Pesticide Regulation's (DPR's) Sustainable Pest Management Work Group recommendations.⁴⁹⁵
- Conduct research on the intersection of pesticides, soil health, GHGs, and pest resiliency via a multi-agency effort with DPR, CDFA, and CARB.⁴⁹⁶
- Conduct outreach and education to develop and facilitate the increased adoption of safer, more sustainable pest management practices and tools; reduce the use of harmful pesticides; promote healthy soils; improve water and air quality; and reduce public health impacts.
- In collaboration with state and local agencies, accelerate the deployment of alternatives to agricultural burning that increase long-term carbon storage from waste agricultural biomass, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.
- Work across state agencies to reduce regulatory and permitting barriers around some healthy soils practices (e.g., composting), where appropriate.
- Utilize innovative agriculture energy use and carbon monitoring and planning tools to reduce on-farm GHG emissions from energy and fertilizer application or to increase carbon storage, as well as to promote on-farm energy production opportunities.

⁴⁹³ California Department of Food and Agriculture. 2021. Farmer and Rancher Led Climate Change Solutions. https://www.cdfa.ca.gov/oefi/climate/docs/cdfa_farmer_and_rancher-led_climate_solutions_meetings_summary.pdf.

⁴⁹⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N5, N7. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁴⁹⁵ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations N3, N4, N5, N7, N22. [finalejacrecs.pdf \(arb.ca.gov\)](#).

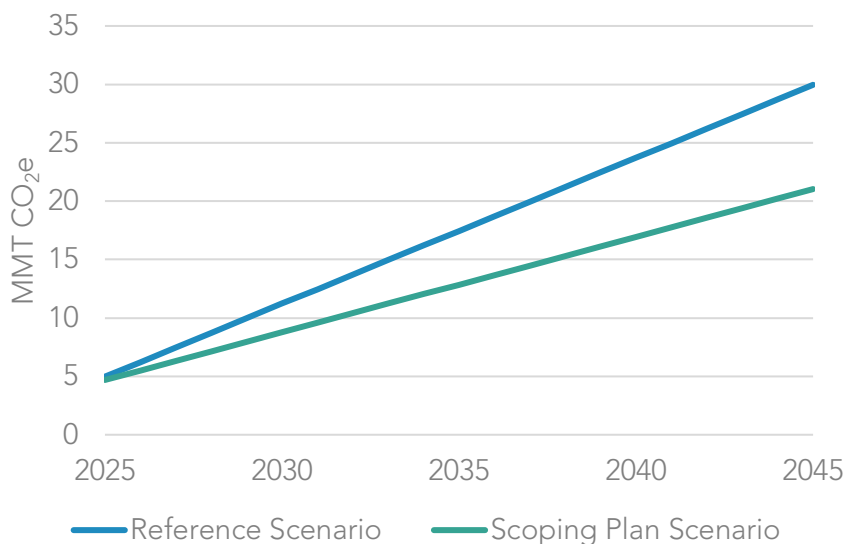
⁴⁹⁶ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Wetlands

Wetlands cover 2 percent of the state (roughly 1.7 million acres) and include inland and coastal wetlands, such as vernal pools, peatlands, mountain meadows, salt marshes, and mudflats. These lands are essential to California's communities as they serve as hotspots for biodiversity, contain considerable carbon in the soil, are critical to the state's water supply, and protect upland areas from flooding due to sea level rise and storms. Wetlands have been severely degraded through reclamation, diking, draining, and dredging practices in the past, resulting in the emissions of the carbon stored in the soils and the loss of ecosystem benefits. Climate smart strategies to restore and protect all the types of wetlands can reduce emissions while simultaneously improving the climate resilience of surrounding areas and improving the water quality and yield for the state. Restored wetlands also can reduce pressure on California's aging water infrastructure. These benefits beyond emissions reductions will help in the future, as climate change is predicted to negatively affect water supply.

Avoided conversion and restoration of Delta wetlands reduces CO₂ and methane emissions from wetlands, with GHG reductions scaling with implementation rates (Figure 4-24). Expansion of conservation and restoration efforts will generate benefits such as the conservation of biodiversity, improved water quality and supply, and reduced flood risk. Additional details on the climate benefit potential of wetlands can be found in Section 2 of the NWL Climate Smart Strategy.

Figure 4-24: Cumulative CO₂e emissions from Delta wetlands by 2045



Strategies for Achieving Success

- Restore 60,000 acres of Delta wetlands annually by 2045 to reduce methane emissions from wetlands and reverse the resulting subsidence.

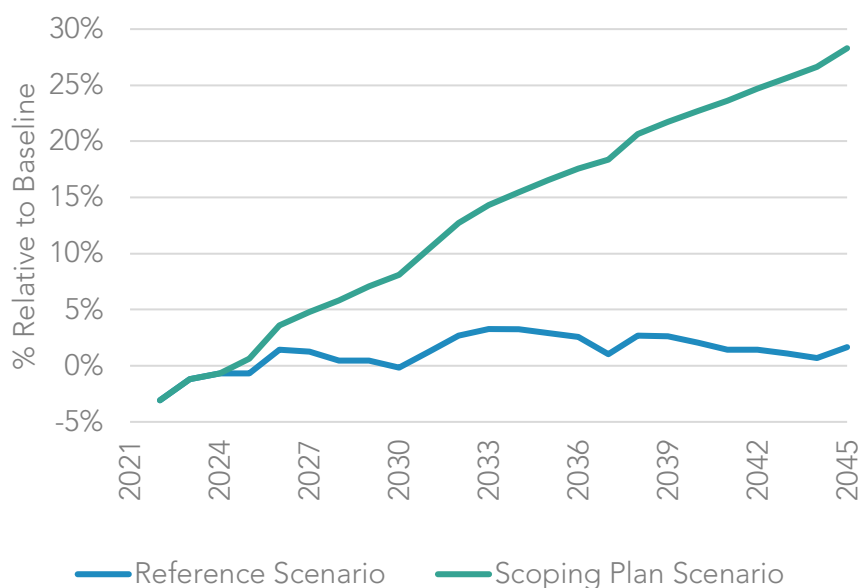
- Identify and prioritize wetland restoration efforts around climate vulnerable communities.
- Leverage other funding and institutions to support wetland restoration projects, including land trusts, local funding (e.g., San Francisco Measure AA), federal funding, and private and philanthropic funding to support wetlands restoration projects.
- Work across state agencies to reduce regulatory and permitting barriers around wetland restoration projects, where appropriate.

Developed Lands

Developed lands cover 6 percent of the state (roughly 6.8 million acres) and include urban, suburban, and rural areas, as well as transportation and supporting infrastructure throughout California. This area encapsulates the land on which the vast majority of Californians reside and call home. The vegetation within cities and communities, and along infrastructure, are all part of developed lands. This vegetation provides numerous benefits to surrounding areas, including carbon storage, air and water filtration, reduced urban heat island effect, and access to nature, aesthetics, and mental health, among others. These areas are susceptible to climate change as well, and climate smart strategies to protect and expand the urban forests, landscaping, green spaces, parks, and associated vegetation can increase their climate resilience and the benefits Californians derive from them. These strategies also have a significant opportunity to benefit disadvantaged communities, who may not have equitable access to these practices or the benefits they provide. Additional details on the climate and equity benefit potential of developed lands can be found in Section 2 and the Introduction of the NWL Climate Smart Strategy.

Urban forests have a significant potential to sequester carbon (Figure 4-25). They are vastly different from wildland forests, as they require investments to maintain and irrigate. This results in the need for a significant increase in investment to increase urban forest carbon. As urban forests become denser and management difficulty increases, the carbon stock returns on investment diminish, making it expensive to maximize carbon in urban forests. Water availability and irrigation efficiency are also an important consideration for increasing urban forest cover. As water becomes scarcer, the prioritization of irrigating trees over lawns or gardens may be required to achieve increases in urban forest carbon.

Figure 4-25: Carbon stocks in urban forests by 2045



Within wildland-urban interface (WUI) areas, defensible space can protect urban and rural communities from wildfire. Analysis results show that 48 percent of parcels are currently fully compliant with defensible space requirements. This highlights how much work needs to be done to protect communities and homes. Defensible space results in a decrease in carbon stocks, as expected when reducing fuels for wildfire.

Strategies for Achieving Success

- Increase urban forestry investment annually by 200 percent, relative to business as usual.
- Increase public awareness of urban forest benefits and, where appropriate, prioritizing irrigation of trees over lawns.
- Provide technical assistance and resources to disadvantaged communities to implement community urban greening projects to provide equitable access to the benefits of urban greening projects.⁴⁹⁷
- Work with state and local agencies to expand technical assistance for and enforcement of the defensible space requirements of PRC 4291 to reduce wildfire risk to homes and structures.

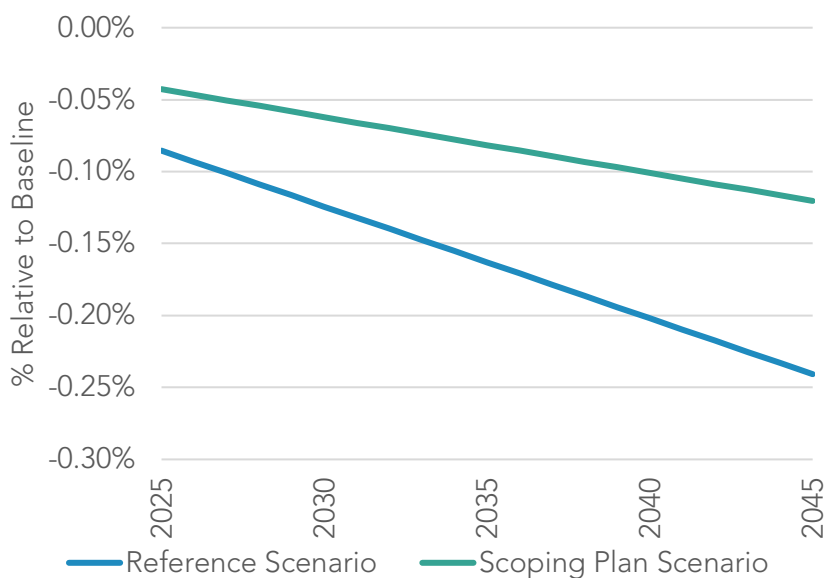
⁴⁹⁷ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N8. [finalejacrecs.pdf \(arb.ca.gov\)](#).

Sparsely Vegetated Lands

Sparsely vegetated lands cover 10 percent of the state, roughly 10.2 million acres, primarily in the east and southern parts of California. These lands include deserts, beaches, dunes, bare rock, and areas covered in ice and snow (e.g., higher mountain elevations). The limited carbon storage of these lands varies from bare rock and mineral soil to more vegetated areas, though severe climate limits the amount of biomass. Nonetheless, sparsely vegetated lands are important for open space and provide rare and unique habitats for endemic species and a diversity of wildlife. These lands present important recreational opportunities for Californians and serve as important protective buffers in coastal and low-lying areas. Land use change threatens these lands, and conservation efforts are important for protecting these unique areas of California.⁴⁹⁸

Avoided conversion of sparsely vegetated lands reduces the organic carbon lost from the soil, which is the major carbon pool in this land type (Figure 4-26). In identifying the outcomes for sparsely vegetated lands, CARB modeled avoided land conversion to another land use.

Figure 4-26: Carbon stocks in sparsely vegetated lands by 2045



Strategies for Achieving Success

- Establish and expand mechanisms that ensure sparsely vegetated lands are

⁴⁹⁸ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N26. [finalejacrecs.pdf \(arb.ca.gov\)](#).

protected from land conversion, prioritizing those areas most vulnerable to climate change and loss.

Additional Management Strategies

Additional nature-based climate solutions beyond those management strategies modeled for this Scoping Plan are available for implementation, but either cannot currently be modeled and/or affect carbon and the landscape in ways that cannot currently be tracked. Nevertheless, it is important to take action even where these technical gaps exist. Some of these actions, such as cultural burning and indigenous farming practices, have been used on large scales for decades or even centuries, while others are relatively new concepts. The state nevertheless recommends implementing the additional solutions listed here to achieve potential additional climate benefits, as well as other co-benefits. These additional solutions were drawn from the NWL Climate Smart Strategy and stakeholder, tribal government, and interagency feedback.⁴⁹⁹

Considerations

Although these practices are recommended, because of the lack of in-depth modeling and analysis available, several considerations must be addressed when implementing them. These considerations also apply to the management strategies included in the Scoping Plan Scenario.

- Future climate change impacts are uncertain: The negative impact that climate change can have on the ability of these practices to maintain expected climate benefits is uncertain and may significantly change in the future. Climate change is expected to further diminish the already constricting growing conditions in California, with increasing droughts, more extreme weather events, and expanding disturbances from fire, insects, and disease. It is estimated that suitable habitat for many native plant and animal species could shift, creating novel ecosystems without historical precedent. Close monitoring of all practices, including no management, across our NWL will be critical to understand if and how future climate change affects outcomes and how to adapt management to meet the needs of the system under climate change.⁵⁰⁰

⁴⁹⁹ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N24. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁵⁰⁰ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N15. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Local conditions: Not every practice is applicable, feasible, or even desirable in every location across California. Implementation of these practices should account for local conditions and needs that may affect the appropriateness of that practice.
- Long-term carbon storage: The ability to sequester additional carbon into NWL is only beneficial to the climate if that carbon stays out of the atmosphere. Many of the additional practices listed here may require continual incentives or interventions to ensure permanence of carbon storage in the soil and biomass. For example, in croplands, it is difficult to estimate how much of the carbon stored by no-tillage can be released by a single subsequent tillage, but a return to conventional tillage would usually be expected to erase most gains.^{501,502}
- Scaling actions: There are uncertainties on how these practices may impact both the environment and communities when significantly expanded. For this reason, it is best to take a cautious and measured approach to ramping up actions to a larger scale.
- Infrastructure and operational needs: Scaling up the implementation of some of these practices demands transformational change in the supporting infrastructure and operational frameworks. For example, increasing forest management to the degree included in the Scoping Plan Scenario will require significant changes to wood-processing infrastructure, workforce capacity, permitting processes, technical assistance, and other operational constraints. The increased application of compost to croplands, and potentially to rangelands, will require a significant increase in organic waste and dairy manure collection to increase compost supply, in line with SB 1383. This will also require additional compost production facilities as well as compost/organic waste transportation and application methods.
- Co-benefits: Many co-benefits from these practices exist beyond the climate benefits. These co-benefits include improved public and worker health; improved microbial, insect, and wildlife habitat; enhanced biodiversity; greater labor demand in the nature-based economy; and improved climate resilience.
- Labor and Economics: Many of these practices require additional labor, and an evaluation of how many more jobs are needed to carry out many of these practices

⁵⁰¹ Muñoz-Romero, V., R. J. Lopez-Bellido, P. Fernandez-Garcia, R. Redondo, S. Murillo, and L. Lopez-Bellido. 2017. "Effects of tillage, crop rotation and N application rate on labile and recalcitrant soil carbon in a Mediterranean Vertisol." *Soil Tillage Res.* 169, 118–123.

⁵⁰² Mitchell, J. P., A. Shrestha, W. R. Horwath, R. J. Southard, N. Madden, J. Veenstra, and D. S. Munk. 2015. "Tillage and cover cropping affect crop yields and soil carbon in the San Joaquin Valley." *California Agron. J.* 107, 588–596.

is currently unknown. There will also be the need to explore the costs and economic benefits of implementing these additional practices.

- **Retreatments:** All of these practices have limits on how long they can enhance carbon sequestration. Many of these practices need to be periodically repeated, followed by complementary practices, or maintained through time. This increases costs and requires diligence and long-term stewardship.

Additional NWL Actions and Strategies

Below is a set of additional actions that should be taken on California's natural and working lands. Again, these practices were not modeled for this Scoping Plan, and all of the considerations listed above should be taken into account before implementing the following actions.

- Conservation of all NWL types (in line with the NWL Climate Smart Strategy and CNRA's Pathways to 30x30 California) is critical to ensuring continued carbon sequestration and provision of co-benefits from these lands for all Californians.⁵⁰³
- Reforestation following disturbance, using appropriate species, is an impactful practice that can help prevent conversion away from forestland and establish new trees to sequester carbon. The number of acres that may need reforestation following high severity wildfires is estimated to continue to increase into the future.
- Restoration of shrublands, chaparral, riparian zones, and oak woodlands across California includes a variety of practices to alter their structure and return endemic species to the areas. These unique habitats provide multiple co-benefits to the state, such as clean water, reduced wildfire risk, and biodiverse habitats for flora and fauna.
- Conservation and restoration of wetlands, beyond the Delta wetlands included in the NWL modeling, can protect these unique habitats and the climate benefits they provide. These wetland types can include but are not limited to coastal wetlands, mountain meadows, vernal pool complexes, alkali sinks and meadows, and floodplains.
- Conservation and restoration of seagrasses and seaweeds provide a number of benefits, including carbon storage and sequestration, habitat provision for many culturally and commercially important species of fishes and invertebrates, shoreline protection, and tourism opportunities.⁵⁰⁴

⁵⁰³ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N26, N27. [finalejacrecs.pdf \(arb.ca.gov\)](#).

⁵⁰⁴ AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N2. [finalejacrecs.pdf \(arb.ca.gov\)](#).

- Prescribed herbivory utilizes various livestock to consume vegetation to reduce fuel loads across an area. This fuel management practice can be used in forests, grasslands, and shrublands as an effective alternative to herbicide use, and should be considered wherever local conditions allow.
- Urban and community greening efforts such as green schoolyards, urban farms, rain gardens, community gardens, community composting, and many more provide numerous health benefits to communities.
- Additional Healthy Soils Program practices on annual croplands such as conservation cover and crop rotation, biomass planting for borders, wind barriers, riparian areas, and improved nutrient management can improve soil health, water retention, and increase carbon stocks.
- Healthy Soils Program practices on perennial croplands and rangelands, such as compost application and alley cropping/cover cropping to improve soil health, water retention, erosion control, and biomass growth.⁵⁰⁵
- Stacking of these Healthy Soils Program practices, where appropriate, in perennial and annual systems, can synergistically improve soil health and provide multiple benefits.
- Mulching adds high carbon materials to croplands or fallowed lands to reduce competing vegetation and retain moisture. This practice can support other benefits such as reduced water use and reduced synthetic pesticide and fertilizer use, as well as provide a use for suitable forest and agricultural waste biomass.
- Reductions in the use of synthetic fertilizers in cropland management, generally supported by the implementation of new management tools or technologies, can lead to reductions in GHG emissions from the production and application of fertilizers. This benefit is in addition to the co-benefits of reduced chemical runoff into waterways and reduced exposure of human populations to their harmful effects.

⁵⁰⁵ Various types of organic amendments are being researched for application to particular landscape types. For example, compost application to rangelands is a relatively new practice that has been shown to improve soil health and increase carbon sequestration in the short term, though the science on the long-term impacts of this practice is still developing and the supply of available compost may be limiting.

Chapter 5: Challenge Accepted

This chapter provides an overview of the next steps and partnerships that will be needed to successfully implement this Scoping Plan. The path forward is not dependent on one agency, one state, or even one country. It will take action on a global level to address the threat climate change poses. But, the work begins at home.⁵⁰⁶ The state can lead by engaging Californians and demonstrating how action at the state, regional, and local levels of government, as well as action at community and individual levels, can contribute to addressing the challenge before us. We must build partnerships with academic institutions, private industry, and others to support and accelerate the transition to carbon neutrality. Ultimately, the success of this Scoping Plan will be measured by our ability to implement the actions modeled in the Scoping Plan Scenario at all levels of government and society. This will depend on a mix of legislative action, regulatory program development, incentives, institutional support, workforce and business development, education and outreach, community engagement, and research and development and deployment. Optimizing this mix will help to ensure that clean energy and other climate mitigation strategies are clear, winning alternatives in the marketplace and in communities—to promote equity, drive innovation, and encourage consumer adoption. Bold institutional action will catalyze continued research and push private investment to create jobs and bring innovative ideas to reality.

State-level Action

Achieving the targets described in this Scoping Plan will require continued commitment to and successful implementation of existing policies and programs and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians.

⁵⁰⁶ This “polycentric” approach to climate challenges, engaging many levels of government, was articulated in leading papers by Nobel laureate Elinor Ostrom. See, for example, Ostrom, E. 2014. “A Polycentric Approach to Coping with Climate Change.” *Annals of Economics and Finance* 15-1, 97–134.

Regulations and Programmatic Development

Meeting the AB 32 2020 GHG emissions reduction target several years earlier than mandated demonstrated that developing mitigation strategies through a public process, where all stakeholders have a voice, leads to effective actions that address climate change and yields a series of additional economic and environmental co-benefits to the state. Following adoption of this Scoping Plan, state agencies will continue to update and implement new and existing programs to align with the outcomes in the plan. Community, tribal, and stakeholder engagement will be a critical part of this work. Several state agencies, including CARB, the CEC, the California State Transportation Agency (CalSTA), the CPUC, and others will need to be part of various subsequent rulemaking processes. Each of these agencies' leadership and technical staff will engage with the public through public meetings, written and oral comment, and other methods of engagement. This work will be informed by evaluations of the health, air quality, environmental, equity, and economic benefits and impacts of regulations, including an assessment of the societal cost of carbon, as required under AB 197.

Incentive Programs

As described in Chapter 1, incentive programs are one of the most important tools the state has in advancing our low carbon future, especially for climate vulnerable communities. The programs ensure clean technology and energy are accessible and are critical to closing ongoing opportunity gaps. These programs also leverage private-sector investment and build sustainable, growing markets for clean and efficient technologies, and they are particularly necessary to support GHG emission reduction strategies for priority sectors, sources, and technologies. Clean technologies are often already the best and lowest cost option over their lifetimes but incentive funding is critical to ensure that they are broadly available, especially in climate vulnerable communities. Incentives also build on California's long track record of driving innovative technology developments, and creating new industries, with targeted investment. The Inflation Reduction Act also provides a new source of funding and tax incentives that must be leveraged to help achieve the state's climate goals.

Many state funding programs are designed to achieve multiple objectives simultaneously: reduce emissions from GHGs, criteria pollutants, and toxic air contaminants; manage natural and working lands for carbon sequestration; and address health and opportunity gaps in disadvantaged communities. California's incentive programs focused on jump-starting the transition to a zero emission transportation future are a good example of this "stacked" approach. The state is investing billions of dollars through programs such as the On-Road Heavy-Duty Voucher Incentive Program and Clean Cars 4 All in order to replace the light- and heavy-duty vehicles most responsible for the state's GHG emissions and poor air quality, all while bolstering the nascent ZEV market. Further strategies aid in developing new technologies, in ramping up access for all, and in shifting to cleaner

modes of transport; for instance, by supporting investments in walkable, bikeable communities and transit, as well as in vehicles. This funding strategy is, of course, paired with the regulatory approach described above.

Local Action

Local action by cities can support and amplify efforts to reduce GHGs. For example, the City of Oakland requires all new construction to be all-electric and is currently working on electrifying existing buildings.⁵⁰⁷ In addition, starting in 2023, the City of Sacramento will require all new buildings under three stories to be all-electric, and it extends the mandate to all new construction by 2026 with some limited exemptions. The City of Sacramento also requires levels of EV charging infrastructure in new construction starting in 2023, higher than the minimum state requirements, and provides parking incentives for zero-emission carsharing and EV charging.⁵⁰⁸ Local governments asserting this type of leadership are critical partners in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment.

California must accommodate population and economic growth in a far more sustainable and equitable manner than in the past. Good climate policy can and should create affordable and pleasant places to live, with effective transport and clean air for all—a future in which local governments and communities are central partners. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority.

Local governments are also frequently the source of innovative and practical climate solutions that can be replicated in other areas. Their efforts to reduce GHG emissions within their jurisdictions are vital to achieving the state’s near-term air quality and long-term climate goals. Local governments must continue to take action that affirmatively

⁵⁰⁷ City of Oakland. Building Electrification. <https://www.oaklandca.gov/projects/building-electrification>.

⁵⁰⁸ City of Sacramento. Electrification of New Construction. <http://www.cityofsacramento.org/SacElectrificationOrdinance>.

builds the projects and expend the funds needed to further the state's collective path toward equitable emissions reductions. As such, aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in this Scoping Plan is critical to achieving the statutory targets for 2030 and 2045. Local governments can implement climate strategies that can effectively engage residents by addressing local conditions and issues that also deliver local economic benefits.

Local Climate Action Planning and Permitting

California encourages local jurisdictions to take ambitious, coordinated climate action at the community scale; action that is consistent with and supportive of the state's climate goals.⁵⁰⁹ As discussed in more detail in Appendix D (Local Actions), local jurisdictions can do much to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—do not substitute for these local efforts. Multiple legal tools are open to local jurisdictions to support this approach, including development of a climate action plan (CAP), sustainability plan, or inclusion of a plan for reduction of GHG emissions and climate actions within a jurisdiction's general plan. Any of these can help to align zoning, permitting, and other local tools with climate action.

Once adopted, the GHG emissions reductions plans detailed in CAPs can provide local governments with a valuable tool for coordinated climate planning in their community. When a local CAP complies with CEQA requirements, individual projects that comply with the CAP are allowed to streamline the project-specific GHG analysis.^{510,511} Effectively, local governments that adopt a CEQA-compliant CAP enable project developers to use this streamlined approach. This saves time and resources and provides more consistent expectations for how GHG reduction measures are applied across projects in the jurisdiction. While the state encourages local governments to follow this approach, we acknowledge not all jurisdictions have the resources to develop a CAP that meets the CEQA requirements.

In addition to being required for a local CAP to comply with CEQA, local GHG reduction targets have long been recommended as part of the process of developing a climate

⁵⁰⁹ This plan provides more detailed guidance and tools to local governments in Appendix D (Local Actions).

⁵¹⁰ Cal. Code of Regs., tit. 14, § 15183.5.

⁵¹¹ California Governor's Office of Planning and Research. n.d. "General Plan Guidelines - Chapter 8 Climate Change."

action plan.⁵¹² One challenge local jurisdictions have faced is how to evaluate and adopt quantitative, locally appropriate goals that align with statewide goals. An effective response to this challenge is to focus on goals that can help implement overall state priorities—enabling the key transformations California needs.

There are many ways that local governments can make key contributions to this transformation, depending on the characteristics of their jurisdiction and community. For example, some jurisdictions will inherently have more land capacity to remove and store carbon, whether through natural and working lands or by other means. Other jurisdictions will be host to GHG-emitting facilities that serve necessary functions and will take time to transition to clean technology (e.g., municipal wastewater treatment plants, landfills, and energy generation and transmission facilities). It is important to recognize that we will need to build new energy production and distribution infrastructure, and repurpose existing ones, for clean technology and energy before we are able to phase down existing fossil sources. There also will be a need to handle the significant amount of biomass resulting from sustainable forest management for catastrophic wildfire prevention, agricultural waste, and landfill diversion.

Regional efforts can support change too: energy and transportation systems that serve Californians do not stop at jurisdictional boundaries, and some local decisions can have ramifications for other communities. For instance, Metropolitan Planning Organizations (MPOs) can help to integrate local efforts by planning consistent with the Scoping Plan and Climate Action Plan for Transportation Infrastructure, including by removing polluting roadway capacity expansions from project pipelines and instead focusing on climate-friendly solutions. These varied capabilities and needs should be taken into account in setting targets for local climate plans. For instance, although net zero targets can often be valuable and achievable, and mitigation is important, targets should be considered in the larger context of these goals. This all means any GHG targets on a local scale should take into consideration the actions and outcomes included in this Scoping Plan. Jurisdictions considering “net zero” targets should carefully consider the implications such targets may have on emissions in neighboring communities and the ability of the state to meet our collective targets.

Jurisdictions without formal CAPs also have important opportunities within this context. These jurisdictions can still take actions that effectively translate key state plans, goals, and targets, including those articulated in this Scoping Plan for local action. For instance, state ZEV targets can advance local efforts to promote broad and equitable access to charging and fueling. Similarly, local jurisdictions can enable reduced dependence on

⁵¹² Climate Smart Communities. 2014. Climate Action Planning Guide. https://cdrpc.org/wp-content/uploads/2015/05/CAP-Guide_MAR-2014_FINAL.pdf.

single-occupancy vehicles by supporting dense infill housing and transit, among other actions. Such actions can be reflected in particular project plans, in general plans, or through other local policies. Regional partnerships among these jurisdictions can also help tap resources and provide for more effective overall action.

Unlocking CEQA Mitigation for Local Success

The California Environmental Quality Act also provides important tools for lead agencies to support the achievement of the state's GHG and VMT reduction goals. Although many climate-friendly local government actions already fall into categories that may not require a full CEQA analysis, thanks to streamlining or other tools, and although certain product types (such as affordable infill housing) are generally clearly consistent with state climate goals, CEQA analyses may still sometimes be required. CEQA can be a powerful and useful tool to engage the public, identify additional opportunities to support climate efforts, and localize change. It is important that lead agencies look for ways to use CEQA to support these core purposes, ensuring that these processes do not become sources of delay but instead unlock more opportunities. The uncertainty analysis in Chapter 2 evaluates how project implementation delays can lead to missed state climate targets and continued dependence on fossil energy. Mitigation measures applied in the communities affected by projects subject to CEQA have the added benefit of improving health, social, and economic resiliency as climate impacts worsen.

Appendix D (Local Actions) explores the role of local government action and CEQA in detail. As discussed there, an important CEQA-related tool is mitigation—which can be used to further drive local action consistent with state climate goals. When a lead agency determines that a proposed project would result in potentially significant GHG impacts due to its GHG emissions or a conflict with state climate goals, the lead agency must impose feasible mitigation measures to minimize the impact. Appendix D (Local Actions) provides suggestions for prioritizing the various types of mitigation, starting with on-site GHG-reducing design features⁵¹³ and mitigation measures, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. After exhausting all the on-site GHG mitigation measures, CARB recommends prioritizing local, off-site GHG mitigation measures, including both direct investment and voluntary GHG reduction or sequestration projects, in the neighborhoods impacted by the project. This could include, for example, development of a neighborhood green space, investment in street trees, or expansion of transit services. Implementing GHG mitigation measures in the project's vicinity would allow the project proponent and the lead agency to work directly with the affected community to identify and prioritize the

⁵¹³ Cal. Code of Regs., tit. 14, § 15126.4(c)(2) and (3).

mitigation measures that meet their needs while minimizing multiple environmental and societal impacts.

Once all potential on-site and local off-site GHG mitigation measures have been incorporated to the extent feasible, Appendix D (Local Actions) provides further suggestions for prioritizing other mitigation types, including non-local off-site mitigation, and voluntary offsets issued by a recognized and reputable voluntary carbon registry (as listed on CARB's website⁵¹⁴) may be appropriate. Additional in-state mitigation also may be available in the upcoming SB 27⁵¹⁵ (Skinner, Chapter 237, Statutes of 2021) registry, which will serve as a database of projects in the state that drive climate action on natural and working lands. Lead agencies should use substantial evidence to demonstrate that the project proponent explored and prioritized investments in feasible, local mitigation prior to moving mitigation to a geography located farther away from the project.

Communities and Environmental Justice

As noted in Board Resolution 20-33,⁵¹⁶ it is incumbent on CARB to function as an agent of responsible social change, especially when it is clear that environmental injustices continue to persist for low-income communities, tribes, and communities of color.

State law defines *environmental justice* as the fair treatment of all people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.⁵¹⁷ Government Alliance for Race and Equity (GARE)⁵¹⁸ defines *racial equity* as when race can no longer be used to predict life outcomes and outcomes for all groups are improved.

For this Scoping Plan to be successful, it must address environmental justice and advance racial equity. Implementation of the plan needs to address the needs of those communities that are disproportionately burdened by climate impacts and continue to face significant health and opportunity gaps. Now, we need to ensure our actions allow these communities to not only have a seat at the table, but also inform and shape the policies

⁵¹⁴ CARB. 2022. Offset Project Registries. <https://ww2.arb.ca.gov/our-work/programs/compliance-offset-program/offset-project-registries>.

⁵¹⁵ SB 27. Carbon sequestration: state goals: natural and working lands: registry of projects. (SB 27, Skinner, Chapter 237, Statutes of 2021). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=20210220SB27.

⁵¹⁶ CARB. 2020. Resolution 20-33: A Commitment to Racial Equity and Social Justice. October 22. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2020/res20-33.pdf>.

⁵¹⁷ Gov. Code, § 65040.12, subd. (e).

⁵¹⁸ Local and Regional Government Alliance on Race and Equity. 2015. *Advancing Racial Equity and Transforming Government: A Resource Guide to Put Ideas into Action*. Page 9. https://racialequityalliance.org/wp-content/uploads/2015/02/GARE-Resource_Guide.pdf.

to ensure their communities thrive. With this Scoping Plan, the state also adds a new tool to identify which communities will be the least resilient in the face of selected climate impacts and will see disproportionate economic impacts as a result. As described in Chapter 3, the CVM will enable the state to target programs and policies to build resiliency in the specific regions that will feel climate impacts more acutely due to existing health and opportunity disparities leading to disproportionate economic impacts. This tool will be critical in the state's efforts to address climate impacts while accounting for environmental injustices and racial inequities. CARB will incorporate the CVM into its work as it moves forward and will share this new tool with other agencies to align our efforts. The goal is to keep expanding the CVM to incorporate additional climate impacts to better identify disproportionate economic impacts as community level data becomes available.

AB 617 is another important tool for both Air Districts and CARB to bring resources to communities that have long been disproportionately burdened by poor air quality. While AB 617 does not require local agencies to participate in the Community Air Protection Program, several AB 617 communities are finding ways to bring local land use agencies to the table to respond to community priorities. We look forward to more opportunities to foster relationships with local authorities and continued collaboration between state and air district programs.

In alignment with AB 32, and to ensure environmental justice and racial equity were integrated into this Scoping Plan, CARB reconvened the AB 32 Environmental Justice Advisory Committee (EJ Advisory Committee) to advise CARB on the development of this Scoping Plan. Since reconvening in May 2021, the EJ Advisory Committee has engaged in the following activities:

- In October 2021, the EJ Advisory Committee sent a letter to the governor requesting a timeline extension for the Scoping Plan process. In response to the EJ Advisory Committee's letter, CARB modified this Scoping Plan process⁵¹⁹ and committed to an active engagement with the EJ Advisory Committee following the approval of this Scoping Plan. The EJ Advisory Committee also presented to the CARB Board⁵²⁰ at its October 2021 Board meeting, reiterating its request for a timeline extension, as well as sharing additional concerns about process.

⁵¹⁹ Randolph, L. M. 2021. LMR October 19 response to Environmental Justice Advisory Committee Letter. <https://ww2.arb.ca.gov/sites/default/files/2021-10/LMR%20October%2019%20response%20to%20EJAC%20Letter%20Final.pdf>.

⁵²⁰ Argüello, M. D., K. Hamilton, S. Taylor, and P. Torres. 2021. EJ Advisory Committee Co-Chair Informational Presentation to CARB Board. October 28. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-4pres.pdf>.

- In December 2021, the EJ Advisory Committee shared its responses to Scenario Input Questions,⁵²¹ as well as a narrative document outlining their concerns⁵²² around the process, the need for evaluation, and the need for a tribal representative. In response to the EJ Advisory Committee Scenario Input Questions, CARB incorporated the EJ Advisory Committee responses into the Scenario Assumptions document,⁵²³ and modeled results from PATHWAYS.⁵²⁴ In response to the EJ Advisory Committee's concerns, CARB worked diligently to appoint a tribal representative⁵²⁵ in February 2022, and to outline additional opportunities for the EJ Advisory Committee to engage in the Scoping Plan process.⁵²⁶
- In March 2022, the EJ Advisory Committee presented at the joint EJ Advisory Committee / CARB Board meeting⁵²⁷ and walked through their preliminary draft recommendations to inform this Scoping Plan. In April, the EJ Advisory Committee shared its revised preliminary draft recommendations⁵²⁸ to inform this Scoping Plan.
- In September 2022, the EJ Advisory Committee presented at the joint EJ Advisory Committee / CARB Board meeting⁵²⁹ and engaged in discussion about priority items as they relate to incorporating environmental justice into the Scoping Plan. By the end of September, the EJ Advisory Committee shared its final

⁵²¹ EJ Advisory Committee. 2021. EJ Advisory Committee Final Responses to CARB Scenario Inputs. December 2. https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Final%20Responses%20to%20CARB%20Scenario%20Inputs_12_2_21.pdf.

⁵²² EJ Advisory Committee. 2021. EJ Advisory Committee Responses to Scenario Input Questions. EJ Advisory Committee narrative document regarding scenario input recommendations. December 1. https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Narrative%20Document%20re%20Scenario%20Input%20Recommendations%2012_1_2021.pdf.

⁵²³ CARB. 2021. PATHWAYS Scenario Modeling. https://ww2.arb.ca.gov/sites/default/files/2021-12/Revised_2022SP_ScenarioAssumptions_15Dec.pdf.

⁵²⁴ E3. 2022. CARB Draft Scoping Plan AB32 Source Emissions Initial Modeling Results. March 15. <https://ww2.arb.ca.gov/sites/default/files/2022-03/SP22-Model-Results-E3-ppt.pdf>.

⁵²⁵ CARB. AB32 EJ Advisory Committee Meeting, February 28, 2022 CARB Update. <https://ww2.arb.ca.gov/sites/default/files/2022-02/CARB%20EJAC022822presentation.pdf>.

⁵²⁶ Fletcher, C. 2021. CARB Response to EJ Advisory Committee Narrative. CARB. December 15. <https://ww2.arb.ca.gov/sites/default/files/2021-12/CARB%20response%20to%20EJAC%20Narrative.pdf>.

⁵²⁷ EJ Advisory Committee. 2022. EJ Advisory Committee Presentation: Preliminary Draft Recommendations. March 10. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/031022/ejacpres.pdf>.

⁵²⁸ AB 32 EJ Advisory Committee. Draft Recommendations. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/031022/ejacrecsrevised.pdf>.

⁵²⁹ EJ Advisory Committee. 2022. EJAC Presentation. September 1. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/ejacpres.pdf>

recommendations⁵³⁰ to inform this Scoping Plan. To the extent possible, CARB has incorporated and cited these recommendations through this Scoping Plan.

In addition to the activities listed above, Central Valley EJ Advisory Committee members hosted a successful community engagement workshop⁵³¹ in San Joaquin Valley in February 2022 with over 100 attendees. Members of EJ Advisory Committee hosted a statewide community engagement workshop⁵³² in June 2022 with more than 165 attendees. Throughout the EJ Advisory Committee's process, members of the Committee continued to work with their communities to ground truth their recommendations to inform the development of the Scoping Plan. The EJ Advisory Committee worked hard to ensure the voices of those communities most burdened by climate impacts were reflected in the plan. The EJ Advisory Committee will continue to play an ongoing role in the implementation of this Scoping Plan to ensure environmental justice and racial equity are prioritized in our effort to address the climate challenge before us.

To the extent possible, the EJ Advisory Committee's recommendations were integrated throughout the plan. This plan directly cites instances where there is alignment between the plan and the EJ Advisory Committee recommendations. This approach seeks to ensure there is more transparency and identify consensus that exists, as well as relevant ways equity and environmental justice are addressed in this plan and in the planning for future related implementation activities. CARB is dedicated to its efforts to ensure this plan does not leave communities behind.

As this Scoping Plan moves into the implementation phase, there will be a need to better understand how to address EJ Advisory Committee recommendations on the following topics:

- Actions under the jurisdiction of other agencies: there are certain EJ Advisory Committee recommendations that are outside of CARB's jurisdiction. As the EJ Advisory Committee continues to convene, it would be helpful to understand the

⁵³⁰ EJ Advisory Committee. 2022. EJAC 2022 Scoping Plan Recommendations. September 30.

<https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/finalejacrecs.pdf>

⁵³¹ San Joaquin Valley Climate Justice & the Scoping Plan. 2022.

[https://ww2.arb.ca.gov/sites/default/files/2022-](https://ww2.arb.ca.gov/sites/default/files/2022-07/SJV%20Climate%20Justice%20%26%20the%20Scoping%20Plan%20Workshop%20Report%20out%20%26%20Recommendations_5.2022.pdf)

[07/SJV%20Climate%20Justice%20%26%20the%20Scoping%20Plan%20Workshop%20Report%20out%20%26%20Recommendations_5.2022.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-07/SJV%20Climate%20Justice%20%26%20the%20Scoping%20Plan%20Workshop%20Report%20out%20%26%20Recommendations_5.2022.pdf)

⁵³² EJAC. 2022. *EJAC/Community Engagement Synthesis Report '22*.

<https://ww2.arb.ca.gov/sites/default/files/2022-07/EJAC-CommunityEngagement-SynthesisReport-2022-English%26Spanish.pdf>.

role that CARB can play as it relates to the EJ Advisory Committee's recommendations for actions outside CARB's jurisdiction and coordinates with sister agencies.

- Actions that require legislative direction: there are certain EJ Advisory Committee recommendations that would require legislative action. As the EJ Advisory Committee continues to convene, it will be helpful to understand how CARB can work with the EJ Advisory Committee to share these recommendations with the appropriate members of the Legislature.
- Actions directly tied to implementation activities: This Scoping Plan is not an implementation document; it is a plan to chart a course to continue to reduce GHG emissions and achieve carbon neutrality. Once the Scoping Plan is approved, there will be follow-up action at CARB, as well as at other agencies. In these follow-up efforts, there will be a role for ongoing EJ Advisory Committee engagement.
- Actions to implement recent legislation, such as SB 905.

CARB proposes to continue to work with the EJ Advisory Committee to better understand how to move forward on EJ Advisory Committee recommendations that fall into the topics listed above and any other recommendations that were not included in this plan. It is also important to note that there are numerous recommendations where CARB shares the goals of the EJ Advisory Committee and can assist in implementation steps. Examples include the following:

- CARB shares the goal of prioritizing non-fossil energy generation and supports non-fossil projects and opportunities to locate behind-the-meter clean resources in communities of concern in programs such as the Solar on Multifamily Affordable Housing program.
- CARB will engage with agencies and academic institutions to further workforce development.
- Many other recommendations related to financial support for various energy projects, such as microgrids, are within the purview of the CPUC or local publicly owned utilities. Similarly, utility scale projects are within the jurisdiction of other agencies. However, CARB supports strategies identified in the recommendations such as offshore wind to reduce the reliance on fossil fuel generation.
- CARB is supportive of rooftop solar, although it is not within CARB's jurisdiction to determine how incentives for those projects are structured.
- CARB is supportive of strong energy decarbonization goals, recognizing that increased reliance on electrification in transportation and other sectors will create significant demand for electricity, and therefore ensuring reliability of a decarbonized grid is a critical need for the state.
- In the transportation sector, CARB is supportive of the EJ Advisory Committee's recommendations to maintain aggressive zero emission vehicle goals consistent

with its statutory mandate to ensure regulations are technologically feasible and in alignment with Governor Newsom's ZEV Executive Order (EO N-79-20). CARB looks forward to continued engagement on rulemakings that will implement these goals.

- As noted elsewhere in this plan, CARB is supportive of the Caltrans California Transportation Plan 2050 and the California Climate Action Plan for Transportation Infrastructure.
- CARB is supportive of additional public support for transit. CARB is supportive of locating EV charging in low-income communities and communities of color.
- CARB is supportive of prioritizing funding incentives for transit and heavy- and medium-duty vehicles, although CARB does believe there is an important role for incentives that support adoption of light-duty vehicles for the time being. CARB will also be opening a rulemaking on the Low Carbon Fuel Standard to ensure it continues to support clean fuels that will displace petroleum fuels and will consider the EJ Advisory Committee recommendations on this program.
- In the industrial sector, in addition to the strategies discussed more fully in this Scoping Plan, CARB continues to work with the Legislature, local agencies, and air districts to support, implement, and enforce effective reductions in emissions of GHGs and air pollutants in stationary sources. The air districts have the authority to directly issue permits addressing a facility's criteria pollutant and toxics emissions levels. These levels are set after careful permit review, under district regulation and statute. However, AB 617 directs and authorizes CARB to take several actions to improve data reporting from facilities, air quality monitoring, and pollution reduction planning for communities affected by a high cumulative exposure burden. CARB will continue to implement AB 617 and look for ways to strengthen the Community Air Protection Program.
- Considerations around the phaseout of oil and gas extraction and refining, and the role of carbon capture are discussed more thoroughly in Chapter 2.

As CARB continues to engage with the EJ Advisory Committee—in addition to the EJ Advisory recommendations that have been integrated throughout this plan—below are the following commitments that CARB is making to ensure that environmental justice is integrated in this plan and its implementation:

- Building decarbonization is a pillar of this Scoping Plan and CARB commits to working closely with state and local agencies to implement the EJ Advisory Committee recommendations that call for prioritization for residents in low-income communities and communities of color in this transition.
- CARB commits to sharing the EJ Advisory Committee's recommendations with the CEC, CPUC, and other agencies administering funds to support building

decarbonization, and to work closely with those agencies as they engage in public processes to further building decarbonization.

- CARB has committed to review the Cap-and-Trade program and determine what potential legislative or regulatory amendments could be necessary to ensure the program continues to deliver GHG reductions needed to achieve the statutory climate goals. In that process, CARB will consider the recommendations of the EJ Advisory Committee⁵³³ and Independent Emissions Market Advisory Committee,⁵³⁴ as well as others.

Critically, the EJ Advisory Committee makes numerous recommendations centered around tracking progress of the various strategies in this Scoping Plan. Currently, progress is tracked and reported in numerous ways, including the annual GHG inventory and reports to the Legislature. Part of the ongoing work of implementation, however, will include consideration of ways to provide more data and information to the public, such as rates of deployment of clean energy and technology as described in Chapter 1. CARB will also continue to collaborate with CDPH and OEHHA on health metrics to track cumulative benefits of air pollution and climate programs, especially in low-income communities and communities of color.

As noted earlier in this document, the EJ Advisory Committee will continue to play a vital role in the Scoping Plan and its implementation to ensure environmental justice and racial equity are prioritized in our effort to address the climate challenge before us. This includes ongoing EJ Advisory Committee engagement to advise CARB on the development of the Scoping Plan and any other pertinent matters in implementing AB 32. The ongoing EJ Advisory Committee will help to ensure integration of environmental justice in implementation efforts as it relates to AB 32, and also help CARB as we work toward a future where race is no longer a predictor for life outcomes.

Academic Institutions and the Private Sector

Academic institutions produce and present the latest science on both the impacts of, and actions to reduce, climate change damages. They are also leading the way by

⁵³³ California Legislative Information. Bill Text – AB 32. Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. (AB 32, Nuñez, Chapter 488, Statutes of 2006).

https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32.

⁵³⁴ California Legislative Information. Bill Text – AB 398. California Global Warming Solutions Act of 2006: market-based compliance mechanisms: fire prevention fees: sales and use tax manufacturing exemption. (AB 398). https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398.

establishing their own climate goals and GHG emissions reductions targets.^{535, 536, 537} They are incubators for innovation and knowledge in clean energy and technology and play an important role in adding to the wealth of robust information to inform policies and programs. Academic institutions have the ability to fill knowledge gaps and push us toward new frontiers. As we move forward, we will continue to see these institutions as partners and resources that can help CARB look for ways to accelerate and introduce actions to reduce GHG emissions and remove and store carbon.

As such, it will be important to maintain and enhance relationships with academic institutions, including community colleges. Community colleges are more likely to have a large proportion of first generation students or students that come from low-income communities or communities of color. The perspective of this diverse student body will be critical to inform discussions on climate change damages and mitigation efforts. This student body is also a future workforce, and courses to teach the skills for a sustainable economy are a chance to close historical opportunity gaps. Importantly, many of the students at community colleges are local residents and community members. This engagement provides another way to invest in communities across our state. The Foundation for California Community Colleges is already leading the way through innovate programs such as their Good Jobs Challenge - California Resilient Careers in Forestry.⁵³⁸ These types of programs could be replicated across other sectors. CARB will evaluate how to leverage the requirements in AB 680 on workforce development in the California Climate Investments programs with the work at the Foundation for California Community Colleges.

As noted in Chapter 1, public and private partnerships will be important as we move forward in the great energy transition. But the private sector is also important in the context of research and development and deployment. Many of these companies have the resources and expertise to build and produce the clean technology and energy we will need. It was through the efforts of several private companies (Bell, Exxon, Telecom

⁵³⁵ University of California. Our Commitment. <https://www.universityofcalifornia.edu/initiative/carbon-neutrality-initiative/our-commitment>.

⁵³⁶ California State University. Energy, Sustainability, & Transportation. <https://www.calstate.edu/csu-system/doing-business-with-the-csu/capital-planning-design-construction/operations-center/Pages/energy-sustainability.aspx>.

⁵³⁷ California Community Colleges Chancellor's Office. Climate Action and Sustainability. <https://www.cccco.edu/About-Us/Chancellors-Office/Divisions/College-Finance-and-Facilities-Planning/Facilities-Planning/Climate-Action-and-Sustainability?msclkid=4a72350ec4f511ecaf292c6b14ac9a4f>.

⁵³⁸ Foundation for California Community Colleges. 2022. Good Jobs Challenge. Developing Resilient Careers in Forestry for Californians. <https://foundationccc.org/What-We-Do/Workforce-Development/Good-Jobs-Challenge>.

Australia) that the photovoltaic solar panels in use today were developed.⁵³⁹ Similarly, it was companies such as General Electric and Texas Instruments that contributed to the development of hydrogen fuel cells.⁵⁴⁰ This Scoping Plan includes the known and emerging clean technologies and fuels available today. The private sector spirit of invention, improvement, and innovation must continue to deliver new tools in the fight against climate change.

Individuals

This Scoping Plan not only projects ambitious availability of clean technology and energy, but also includes aggressive assumptions about consumer adoption of ZEVs, heat pumps, and other energy efficiency practices, among others. When it comes to climate change mitigation, the sum of the parts matters. Only when we add up the impacts of the choices we make do we understand the true impact on GHG emissions. Today, many Californians have opportunities to choose between driving a car, taking a bus, biking, or walking. Many can choose to install a heat pump or buy an electric cooktop. Together, we can increase these opportunities and pick the future we want. We can start or transform businesses that create clean jobs, innovate new technologies, or introduce new systems. We can engage with fellow workers to support durable paths for labor in a clean economy. And we can choose to engage with our community, tribes, and our governments to advocate for change, call out challenges, and propose solutions. Our choices will help determine California's climate future. Down one path is a future of climate impacts that will continue to worsen and further increase disparities across communities. Down the other is a future that avoids the worst impacts of climate change, improves air quality—especially for the most burdened communities—and fosters new economic and job opportunities to support a sustainable economy.

Importantly, we must acknowledge that historical decisions have resulted in health and opportunity gaps for residents in low-income communities and communities of color. Not everyone has the resources or access to make these choices—to buy a ZEV, install a heat pump, or use public transit to get to work. It is here that government can help. Government, at multiple levels, can fund programs and structure policies to provide consumers with more choice and to support them in adopting cleaner technology options. Whether through affordable energy rates or assistance in purchasing zero emission vehicles and appliances, we can use the transition to a carbon neutral economy as an opportunity to close some of these persisting opportunity gaps. By acting now, we can

⁵³⁹ Californiasolarcenter.org. Passive Solar History. <http://californiasolarcenter.org/old-pages-with-inbound-links/history-pv/>.

⁵⁴⁰ Fuel Cell Store. History of Fuel Cells. <https://www.fuelcellstore.com/blog-section/history-of-fuel-cells?msclkid=04a19450c50211ec8d20f2aff4039fe>.

change our planet's fate and build a more resilient, healthier, and equitable future for all Californians.



OFFICE OF THE GOVERNOR

April 21, 2025

Mr. Siva Gunda
Vice Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Dear Vice Chair Gunda,

Thank you for your leadership in protecting consumers and ensuring that California has a safe, affordable and reliable supply of transportation fuels during our energy transition over the next two decades, including through implementation of Senate Bill X1-2 (Skinner, 2023) and Assembly Bill X2-1 (Hart, 2024).

I write to direct you to redouble the State's efforts to work closely with refiners on short- and long-term planning, including through high-level, immediate engagement, to help ensure that Californians continue to have access to a safe, affordable, and reliable supply of transportation fuels, and that refiners continue to see the value in serving the California market, even as demand for fossil fuels continues its gradual decline over the coming decades.

Further, I am directing you, as my Administration's lead representative on this issue, to reinforce the State's openness to a collaborative relationship and our firm belief that Californians can be protected from price spikes and refiners can profitably operate in California – a market where demand for gasoline will still exist for years to come.

Additionally, I am directing you to engage with the Petroleum Strategy Task Force, a cross-agency effort convened by California Natural Resources Agency Secretary Wade Crowfoot and California Environmental Protection Agency Secretary Yana Garcia. That task force is evaluating the State's progress and risks in managing an energy transition in which supply and in-state demand for



petroleum products are both decreasing over the next 20 years. Building on that engagement and the California Energy Commission's (CEC) Transportation Fuels Assessment, I direct you to recommend, by July 1, any changes in the State's approach that are needed to ensure adequate supply during this transition.

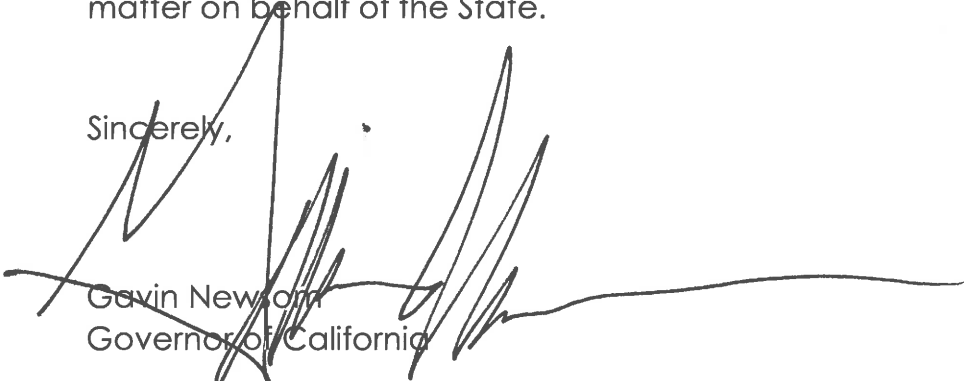
As you know, increasingly in recent years, Californians have experienced rapid fluctuations in retail gasoline prices that too often mean abrupt increases followed by a slow and gradual decline, causing families to incur higher costs unexpectedly for everyday needs. The Legislature responded to this growing problem with SBX1-2, which provided the CEC with critical data transparency tools that facilitate real-time market monitoring.

Using this critical new data provided by SBX1-2, the Division of Petroleum Market Oversight (DPMO), in collaboration with the CEC, was able to identify the root causes of the fall 2022 and fall 2023 retail gasoline price spikes: inadequate supply when refineries went offline for maintenance, low inventories that led to supply shortages during unplanned outages, and a volatile spot market that has an outsized influence on the wholesale price of gasoline. These findings led the Legislature to respond by enacting ABX2-1, which provided the CEC with new tools to mitigate price spikes. The data provided by SBX1-2 has also allowed DPMO to inform the public, in real time, when volatile spot market conditions threaten to raise prices at the pump.

While we've made great progress in addressing spikes and irregularities in the gasoline market, refineries across the country and around the world are facing unprecedented uncertainty. The new federal administration has added more uncertainty and instability to the global economy than ever before – with the oil industry on the front lines of this market turmoil. Refineries have been restructuring, transitioning, consolidating, and closing across the country for years. In January, the 700-hundred-acre LyondellBasell refinery in Houston announced its closure as the company transitions to "broader decarbonization and sustainability objectives." California is not immune to this national trend.

California will continue to lead the way in this transition, but it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades. Thank you for your attention to this critical matter on behalf of the State.

Sincerely,



Gavin Newsom
Governor of California



June 27, 2025

Dear Governor Newsom,

Thank you for the opportunity to respond to your April 21, 2025, letter soliciting recommendations from our office on changes to state policy to ensure adequate transportation fuels supply during this pivotal time in our state's clean energy transition. In the months since receiving your letter, your energy team has engaged with the Petroleum Strategy Task Force, continued deep research into global petroleum market trends, convened roundtables and discussions with diverse stakeholders representing varied interests, and utilized new data afforded to us by legislation enacted over the last several years to better understand the petroleum industry.

This letter offers our strategies and recommendations to address your request for actions to ensure that Californians have access to safe, affordable, and reliable transportation fuels and that petroleum refiners continue to see value in serving the California market, even as in-state demand for petroleum-based fuels declines over the coming decades. These recommendations reflect the complexity of the issue, input from a multitude of stakeholders, and a faithful synthesis of robust data and discussions. We believe that these actions are necessary as the State considers its next steps to further our clean energy transition.

We look forward to working with members of the Legislature, fellow state agencies, industry, and stakeholders to implement these strategies. Together, we will evolve California's strategy to successfully phase out petroleum-based fuels by 2045 while protecting communities, workers, and consumers, and foster market conditions that support the industry's ability to operate safely, reliably, and successfully to meet demand through the transition.

Executive Summary

California's petroleum market is evolving rapidly, as California's pioneering climate and air quality policies, which are critical to protecting our communities' health, have accelerated the adoption of highly fuel-efficient conventional vehicles and zero emission vehicles (ZEVs), leading to a decline in demand for petroleum-based fuels. The decreasing demand for petroleum-based fuels underscores California's success in its transition to a sustainable, clean energy future. But the decreasing demand, economic factors, and volatility of the international petroleum market also introduces uncertainty to the petroleum industry, which impacts consumers, the workforce, and frontline communities. That uncertainty has only been compounded this year by actions of the current federal administration, which have both added more shocks to the global petroleum market and sought to undermine California's transition away from reliance on petroleum-based fuels.

In California, recent years have been marked by higher gasoline retail prices, in-state petroleum refinery conversions and exits, and a growing reliance on fuel imports to meet consumer demand. These impacts are not isolated to California and are also being felt nationally and globally. To address dramatic gasoline retail price spikes, you partnered with the Legislature in 2023 and 2024 to provide the CEC with new industry and market transparency tools to better understand the causes behind gasoline price spikes and to develop strategies to protect consumers during the transition to clean, alternative fuels.

Current analysis indicates a continued decline in gasoline demand; a credible risk of rapid near-term conversions or exits of existing refineries, which is consistent with global refinery industry consolidation; impacts to other critical infrastructure across the upstream, midstream and downstream segments; and safety and reliability challenges associated with disinvestment along the petroleum value chain.

The success of California's decarbonization strategies are transforming the state's transportation sector from its early transition phase into its pivotal and challenging "mid transition" phase.¹ In this phase, demand for the

¹ Grubert and Hastings-Simon (2022). *Designing the mid-transition: A review of medium-term challenges for coordinated decarbonization in the United States*. WIREs Climate Change. <https://doi.org/10.1002/wcc.768>

incumbent petroleum-based fuel system, while declining, remains substantial, as the clean, alternative fuel system continues to scale. In this phase, investor confidence in the incumbent system is expected to falter due to long-term uncertainty about the trajectory and pace at which these two systems evolve.

During this mid-transition phase, the State must simultaneously continue supporting the rapid expansion of new clean, alternative fuels while actively managing a gradual responsible phase-down of the incumbent systems that millions of Californians will continue to depend upon for years to come. Successfully managing this transition and continuing the State's long-standing leadership in addressing climate, air quality, health, and environmental issues will require coordinated actions and strategic alignment of state, regional, and local jurisdictions.

As a result of all of these factors, immediate State actions are necessary to stabilize the near-term vulnerabilities of the entire transportation system and implement a comprehensive strategy to support a successful transition. Given sufficient time, the petroleum market is likely to find a new equilibrium following the disruption of a refinery closure, but in the near term, an abrupt loss of refining capacity and the increased need for imported fuel to compensate is likely to create new risks for stable fuel prices and supply. Keeping in-state and imported fuel competitive will be an important balancing act moving forward, because if the cost of refining fuel in state exceeds the cost of importing fuel, it could further accelerate additional petroleum refinery exits.

Collaboratively, we must harmonize regulations and processes to maximize market-driven solutions and continue to advance State policy goals. By doing so, the State can ensure safe and reliable operations through an orderly, managed transition of the petroleum sector that safeguards California consumers, workers, communities, and the environment.

Since receiving your April 21, 2025 letter, my office has continued its engagement with the cross-agency Petroleum Strategy Task Force, other relevant state and local regulators, industry, and impacted stakeholders and communities. Drawing from this engagement and lessons learned from energy transition challenges in other sectors nationally and internationally, we have identified both risks to fuel supply and

opportunities to support a managed transition in the transportation sector. Our office recommends the pursuit of three concurrent strategies:

1. Stabilize fuel supply through imports of refined fuels and maintaining in-state refining capacity.
 - a. Support necessary import of refined fuel products (such as California-specific gasoline) by addressing regulatory and permitting issues that limit import capacity.
 - b. Retain in-state petroleum refining capacity where possible to maintain resilience of the transportation fuels system.
2. Provide sufficient confidence to industry to invest in maintaining reliable and safe infrastructure operations to meet demand.
 - a. Stabilize in-state crude oil production and distribution to bolster supply for California refineries and support the petroleum fuels system.
 - b. Implement near-term statutory and regulatory changes that improve investment confidence while advancing state policy goals.
 - c. Strengthen coordination across state, regional, and local authorities, communities, and stakeholders to inform policy implementation.
3. Develop and execute a holistic transportation fuels transition strategy.
 - a. Implement a suite of policies and programs to ensure environmental, public health, labor, economic, and consumer protections for a successfully managed transportation fuels transition.

The recommendations laid out in this letter reflect the complexity of the issue, input from a multitude of stakeholders, and a faithful synthesis of robust data and discussions. We believe that these actions are necessary as the State considers its next steps in the clean energy transition.

Introduction and Background:

Over the past two decades, California has embarked on a transformative effort to decarbonize its economy. Through pioneering climate and air quality policies, the state has:

- Catalyzed the development of clean energy technologies,
- Fostered new clean energy industries employing tens of thousands of Californians,
- Decreased annual gasoline demand by more than 2 billion gallons (13.4%) in 8 years,
- Replaced more than 2 billion gallons of fossil diesel with renewable diesel, resulting in nearly 72% of diesel needs met by renewable diesel,
- Increased zero emission vehicle (ZEV) adoption from an annual rate of 7.8 percent new vehicle sales in 2020 to over 25 percent in 2024, and
- Made significant progress in improving air quality for communities across the state, including reducing over 77,500 tons of NOx since 2016, and
- As a result of the Low Carbon Fuel Standard (LCFS), the variety of transportation fuels and consumer choices have increased including rapid deployment of renewable diesel and zero emission infrastructure and will reduce fuel costs for Californians per mile by 42% translating to savings of over \$20 billion in cost savings by 2045.

At every inflection point—whether driven by market changes, climate and public health imperatives, national and global policy shifts, or technological breakthroughs—California has enacted forward-looking policies, regulations, and processes to continue advancing its decarbonization goals while prioritizing affordability, safety, and reliability.

Now, as the transportation sector enters a new phase in its transition, marked by rapid changes in the petroleum fuels system, California needs to once again continue to evolve its strategy to ensure success. If a lack of proactive management during this phase of the transition leads to rising energy prices and less reliable fuel supplies, that instability could erode support for continued decarbonization. We must take the necessary steps to chart a path for an orderly and safe transition away from legacy

petroleum-based systems that maintains system reliability, protects communities, workers, and consumers, and continues to advance the state's decarbonization trajectory.

Shifts in Petroleum Fuel Supply: A Global Issue and Californian Opportunity

California's petroleum value chain is complex and must be considered holistically in managing the transportation fuels transition (Figure 1). It supplies gasoline, diesel, jet fuel and other petroleum derivatives, and consists of interdependent activities and infrastructure that include:

- Upstream activities related to production of crude oil,
- Mid-stream activities related to gathering, storing, processing, and transporting petroleum products, and
- Downstream activities related to refining and distribution, marketing and sale of refined products.

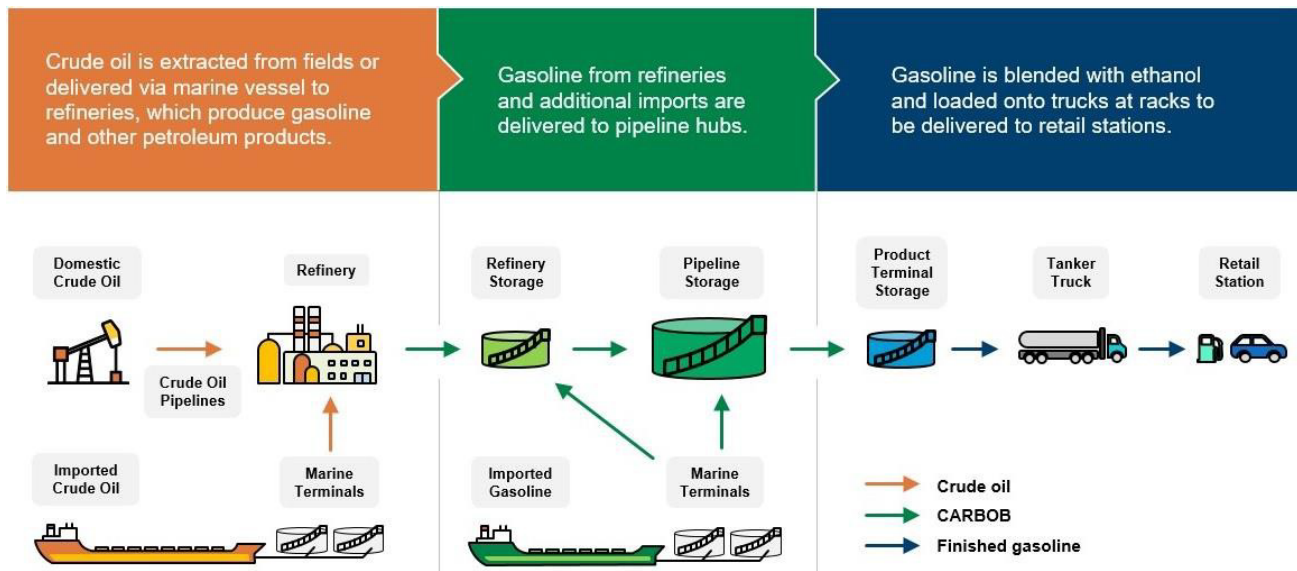


Figure 1. The petroleum value chain is complex and interdependent, and policies should consider the system holistically. Investments across the value chain are necessary for a managed decline.

California currently imports over 75% of its crude oil to meet the demand of in-state petroleum refineries and about 10-20% of its gasoline from out-of-state and foreign sources, depending on refinery maintenance

activities. Gasoline imports statewide could increase to 25-35% of demand by the summer of 2026, and up to 50% in the northern California region after the announced anticipated refinery closures, bringing risk of supply disruptions and price volatility. The interdependent elements of the petroleum-based system therefore cross state and national boundaries and contain critical vulnerabilities tied to changes in local, state, federal, and international policies, markets, and events.

A wide range of factors affecting the petroleum value chain are accelerating the decline and consolidation of the refining industry in many U.S. states, as well as developed economies across the globe. One in five refineries globally risk shutdown by 2030². Across the nation, petroleum refiners face the conjoined challenges of rising operating costs, softening demand for some refined products, and competition from newer, more efficient mega-refineries in other countries. Geopolitical events and changing federal and foreign government policies are also impacting industry decisions. Further, many national petroleum refineries, including some in California, are well over 100 years old and require substantial financial investments to maintain safe and reliable operations. In recent years, these factors have driven the closure of petroleum refineries in places as diverse as Australia, the United Kingdom, and multiple states, including some that have been perceived as especially profitable settings, like Texas.

As a result of such factors and as California's policies continue to drive down demand for petroleum-based fuels, California's in-state petroleum refining capacity has been declining faster than its demand for refined petroleum products and has been supported by increase in imports of refined products. Future trends are uncertain: recent federal actions and policies, including undercutting California's clean air standards and its impact on ZEV adoption combined with global conflicts (currently, about 30% of crude supply to California's refineries comes from the Middle East), are creating further uncertainty in both in-state demand for refined gasoline and global petroleum markets. To prevent a further exacerbated imbalance of supply and demand from harming Californians—whether through disrupted fuel supply, insufficient facility maintenance, or ongoing pollution threatening public health—and to maintain resilience in the

² Wood Mackenzie (2025). *Global 2035 refinery closure threat update: Which assets are most at risk of closure?*. <https://www.woodmac.com/news/opinion/global-refinery-closure-outlook-2035/>

system in light of ongoing uncertainty, the State must actively manage the decline of its legacy petroleum-based systems while maintaining affordable, reliable, safe, and equitable access to transportation fuels statewide.

Proactively Navigating the Challenges of the Mid-Transition

California is entering a pivotal and challenging phase of decarbonization described in scholarly work as the “mid-transition,” in which the demand for the incumbent petroleum-based system, while declining, remains substantial, and the clean alternative fuels, continue to scale up³ (Figure 2). Over the past five years:

- Two Californian refineries, Marathon Martinez and Phillips 66 Rodeo, have converted to producing renewable fuels —transitions that support the State’s shift to cleaner, less carbon-intensive fuels, but that have also reduced gasoline refining capacity in the state.
- Phillips 66 has announced its intent to close its Wilmington refinery in the fourth quarter of 2025. Phillips 66 has committed to working with California to maintain or increase levels of supply to meet consumer needs, including through imports⁴.
- Valero has announced its intent to idle, restructure, or cease refining operations at its Benicia refinery by the end of April 2026.

³ Grubert and Hastings-Simon (2022). *Designing the mid-transition: A review of medium-term challenges for coordinated decarbonization in the United States*. WIREs Climate Change. <https://doi.org/10.1002/wcc.768>

⁴ <https://investor.phillips66.com/financial-information/news-releases/news-release-details/2024/Phillips-66-provides-notice-of-its-plan-to-cease-operations-at-Los-Angeles-area-refinery/default.aspx>

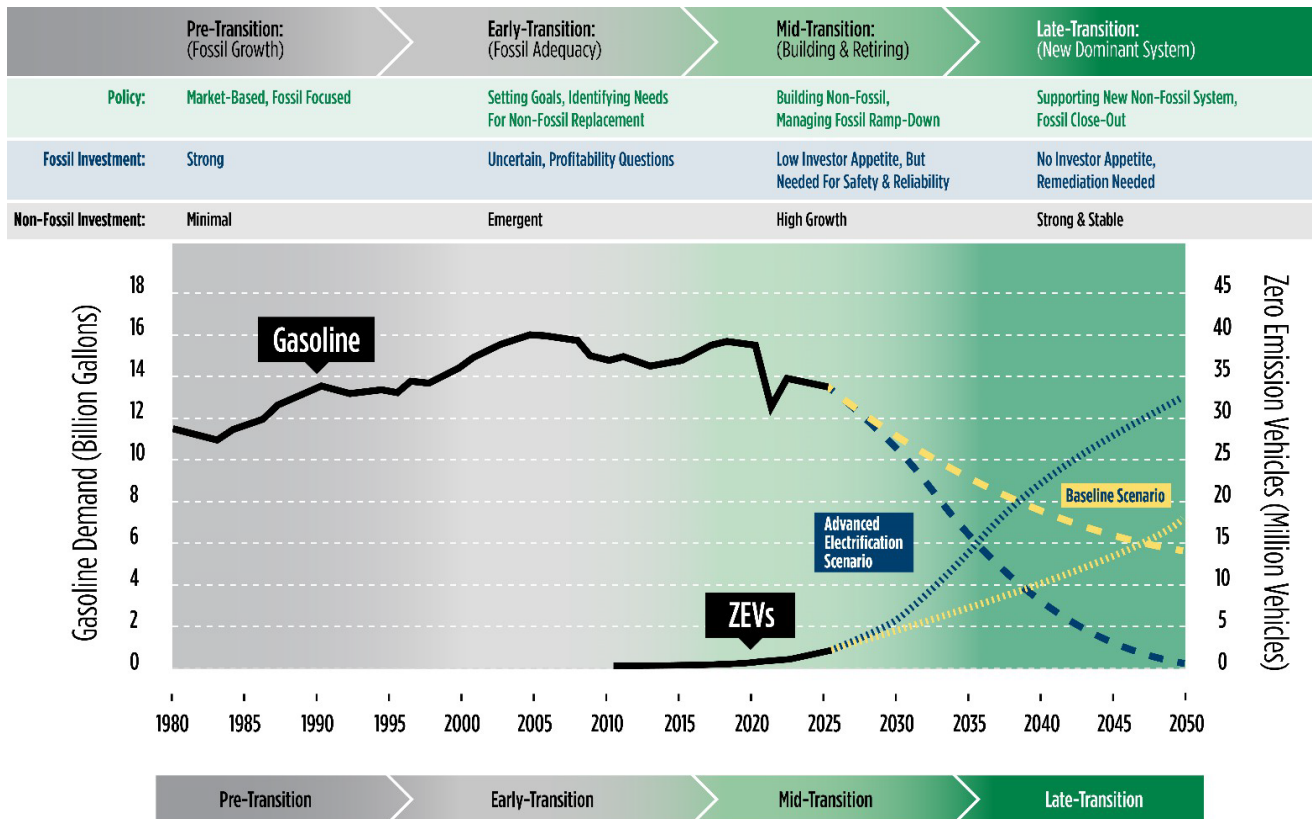


Figure 2. California has entered the mid-transition, a critical phase in which the State must not only support the growth of new clean energy systems but also manage the phase-out of their fossil-fueled predecessors. The CEC's 2024 Integrated Energy Policy Report (IEPR) includes two scenarios for gasoline demand and ZEV adoption: a baseline scenario and a higher transportation-electrification scenario.

To ensure energy reliability and economic stability, sustained investments in both legacy and emerging infrastructures are essential during the mid-transition to support the totality of market needs. Sudden and unmanaged exits of critical legacy energy infrastructure can have significant negative impacts on energy security, local governments, worker safety, consumer prices, public health, environmental protection, and the communities that depend on jobs and revenue from those industries.

To protect consumers, frontline communities, workers, the economy, and the environment, California's policies must simultaneously achieve two objectives:

1. Accelerate deployment of renewable and low-carbon technologies to sustain decarbonization momentum.
2. Establish clear mechanisms and incentives to keep legacy petroleum-based assets safe, reliable, and affordable until the new clean energy system can fully replace them.

Current analysis suggests that under today's market and regulatory conditions, California faces the prospect of continued reduction in in-state petroleum refining capacity that outpaces demand decline for petroleum-based fuels and closures of other critical parts of the state's petroleum-based fuel value chain. Without a clear, state-led transition pathway, these sudden exits create a very real risk of severe price spikes, supply constraints, and long-term liabilities at sites. The industry is likely to become more heavily concentrated with fewer but more powerful incumbent firms. Given sufficient time, the petroleum market is likely to find a new equilibrium following the disruption of a refinery closure, but in the near term, an abrupt loss of refining capacity and the increased need for imported fuel to compensate is likely to increase price volatility. Keeping in-state and imported fuel competitive will be an important balancing act moving forward, because if the state's regulatory paradigms lead to the cost of refining fuel in state exceeding the cost of importing fuel, it could further accelerate additional refinery exits.

By contrast, proactive state policy can not only prevent these potential severe risks, but also achieve a just, least-cost transition to clean energy, while securing major benefits for frontline communities, consumers, petroleum industry workers, and the environment. It will be increasingly important to foster a competitive market open to all. Adjusting conditions that help steer the market in ways that align decline in California's petroleum-based fuel production with in-state and regional demand can also make California's energy systems more resilient in an increasingly unstable national and international context.

These market adjustments must also align with California's trailblazing climate policies. The State's longstanding commitment to protecting air quality, public health, and the environment, as well as recent actions to enhance consumer protections against gasoline retail price spikes, provide a strong foundation on which California can solve the interlocking challenges of the mid-transition. By learning the lessons of past industrial transitions and of refinery closures around the country and the world,

California can once again chart a groundbreaking policy path—this time, for the safe, effective, and necessary transition away from petroleum-based fuels.

In designing policies to manage the decline of California's petroleum fuel system, policymakers face a set of interlocking issues that must be addressed together to support a successful transition:

Reliability and Affordability of Supply: California faces an unusually tight set of constraints on its access to supplies of crude oil and refined petroleum products. Geography and the state's long energy history both largely limit the state to in-state production and marine imports. To combat air pollution and meet federally required air quality standards, California has also long used a specialized gasoline blend that is produced by a limited number of refineries worldwide. Domestic demand for this gasoline already outstrips in-state refineries' cumulative capacity. Under these supply constraints, even a single refinery outage can lead to gasoline price increases.

Increasing marine imports of gasoline to replace lost supply especially in the near term can be costly, slow, and constrained by bottlenecks in import infrastructure. Imports also introduce new vulnerabilities into the fuel supply by making the State more exposed to impacts of geopolitical events, external markets, and regulatory changes in other jurisdictions. Nonetheless, California is likely to become more dependent on imports of refined fuels if the decrease in in-state refining capacity continues to outpace declining demand and proactive planning is needed.

Safety and Reliability of Infrastructure: Petroleum refineries are high-hazard infrastructure that require regular investment in maintenance to protect workers and communities from accidents. Without policy intervention, declining capital inflows could lead to deferred maintenance and heightened dangers. Petroleum refinery accidents can pose grave health risks to workers and residents in the vicinity, and unplanned events impact fuel supply and retail prices, as well as impose unanticipated costs on petroleum refiners, potentially leading to sudden or accelerated closures. For example, Pennsylvania's PES Refinery closed suddenly in 2019 after a major explosion caused by a corroded 50-year-old pipe. Releases and spills can permanently damage entire ecosystems, with acute and chronic public health, ecological, and economic consequences, including potentially many hundreds of millions of dollars in remediation

per site and long-term withdrawal of land from other beneficial uses. It is imperative that refinery operators make necessary investments in refinery maintenance on a timely basis throughout the transition.

Employment Security: Recent petroleum refinery conversions and exits have revealed challenges for displaced workers in finding comparable employment. Workers across the petroleum value chain, including crude oil extraction, similarly face continued job losses and difficult hiring conditions in a declining field. These workers' skills will remain critical for maintaining safe and reliable fuel supplies throughout the duration of the energy transition. Moreover, existing skilled refinery craftsmen are leaving the state to seek similar work in other markets, reducing the experience level of the California petroleum refinery workforce. To retain these workers and their skills, state policy should help ensure that work remains safe and that job transitions are meaningfully supported.

Community Impacts: Petroleum refineries and other elements of the petroleum-based fuel system play significant roles in local economies but also impact the health and safety of fenceline communities. Many examples show that industrial decline can damage community safety, health, and the environment. Because fenceline communities are often dependent on their industrial facilities' tax payments, payrolls, and value chains, a single industrial closure can hollow out the local economy in ways that are very difficult to absorb. Proactive planning and resources will be necessary to prepare communities for a future without petroleum industry, including refineries, and to ensure that fossil fuel-related legacies do not cause new harm.

Smooth Transition for Successful Decarbonization: The many risks posed by an unmanaged clean energy transition also threaten California's continued climate progress. If energy prices rise and fuel supplies become less reliable during the mid-transition, support for continued decarbonization may erode. By contrast, creating clear, transparent, long-term plans for the phase-out of petroleum infrastructure can give the public confidence in the trajectory of state climate policy and create space for industry, state and local governments, and community groups to find least-cost, least-harm solutions to tackling the clean energy transition.

Strategies and Recommendations

Many impacted stakeholders, including representatives from industry, labor, environmental and environmental justice organizations, and state and local agencies continue to engage with the CEC in productively discussing the interlocking challenges of the clean energy transition. While not all groups align in their preferred strategies to address these challenges, there has been shared recognition of different constituencies' priorities and common goals. A holistic solutions framework developed from this consultation guides this response.

The cross-agency Petroleum Strategy Task Force has additionally provided valuable insight and recommendations for addressing these complex and cross-jurisdictional issues. Building off these engagements, lessons learned from transition challenges in petroleum and other sectors nationally and internationally, and previous work including the CEC's Transportation Fuels Assessment, the CEC has identified needs and opportunities to support affordable, reliable, equitable, and safe fuel supply through a managed transportation fuels transition that pursues three concurrent strategies:

1. Stabilize fuel supply through imports of refined fuels and maintaining in-state refining capacity.
2. Provide sufficient confidence to invest in maintaining reliable and safe infrastructure operations to meet demand.
3. Develop and execute a holistic transportation fuels transition strategy.

Solving the challenge of transportation fuel transition will require state policymakers to pursue solutions that achieve these three objectives together, including near-term stabilization actions as well as long-term holistic transition solutions, and that advance the state's commitment to its overarching priorities.

Strategy 1: Maintain capacity to stabilize fuel supply

TOPLINE: *The CEC thinks it is prudent to immediately stabilize in-state supply by working to retain in-state refining capacity while demand persists, and by supporting sufficient imports, storage, and delivery of refined products.*

PROBLEM: In-state petroleum refining capacity is declining faster than gasoline demand and the abrupt exit of a refinery has numerous consequences to consumers, workers, and communities. Northern

California is already experiencing a net regional shortage in refining capacity and is particularly vulnerable if the State fails to maintain existing Northern California refinery operations in the near term and upgrade the import infrastructure capabilities at Bay Area ports. Due to previously enacted legislation, the state receives a one-year notice prior to petroleum refinery operational changes that helps the State plan for the decline in refining capacity. To support system resilience as in-state refining capacity declines, the State needs to receive sufficient and timely volumes of marine-imported fuel.

1a: Supporting Imports of Refined Products

Background:

Crude oil, gasoline, jet fuel, and other petroleum products are imported into California via marine oil terminals, primarily at the Ports of Long Beach and Los Angeles and in the San Francisco Bay region that includes San Pablo Bay and Carquinez Strait. Gasoline refining capacity in California is already insufficient to meet demand, with the shortfall increasing during refinery maintenance events. The shortfall must be made up through marine imports of refined product. To keep fuel supply and prices stable, the import process must be efficient and surge capacity must be preserved. Investments in third-party marine oil terminals, facilities where oil and petroleum products are stored, are key to incrementally increasing import capacity; these terminals are not associated with one individual refiner and can be utilized by multiple market participants, which in turn increase market competition and protects consumers. Greater import capacity will be necessary to maintain resilience in the system as refining capacity in California continues to fall.

Permitting delays and investment uncertainty can be barriers to repairing, optimizing and increasing import, storage, and delivery capacity – in some instances, permit delays can obstruct project completion by months or years. While the rate at which import reliance will increase is uncertain, State action is needed in the short term to make sure California has an adequate supply of fuel to reliably and affordably serve demand. Projects that increase import capacity, without permitting delays, can take anywhere from three to 24 months, with most projects such as dock improvements or pipeline modifications taking between 12 and 18 months. Specific challenges and opportunities to increase capacity and efficiency vary by location and facilities.

Recommendations:

- Support confidence for the private sector to invest in import, storage, and delivery infrastructure through sector-wide regulatory coordination (see Strategy 2).
- Address regulatory and permitting issues to import capacity and efficiency, especially in regions with major refining capacity loss.
- Establish an interagency workgroup that includes the CEC, the State Lands Commission, relevant Air Districts, local governments, and ports to develop a plan to improve coordination, establish clear lines of communication to prioritize critical energy infrastructure projects, enhance early public engagement, and identify efficiencies and reduce redundancies in permitting.
- Explore ways to increase the throughput capacity of third-party terminals to receive and distribute gasoline and jet fuel.

1b: Prudent Retention of In-state Refining Capacity

Retaining in-state refining capacity while demand for refined fuel persists supports the resilience of the transportation fuels system in California. It can also maintain employment and local revenue while giving workers and communities time to plan for the future.

The CEC is engaging with market players to explore strategies to retain operations at existing refineries.

Strategy 2: Provide sufficient confidence to industry to invest in maintaining reliable and safe operations to meet continued demand

TOPLINE: System-wide needs must be addressed in the near term to protect consumers and fenceline communities and ensure needed investments are made to safely meet demand while achieving climate goals and public health protective standards.

PROBLEM: Increasing petroleum business uncertainty in California is leading to reduced industry confidence to invest in the state as they continually seek other, higher-return opportunities. This has prompted company decisions to discontinue operations in California, especially when faced with significant investment decisions (e.g. refinery turnarounds) and uncertain future returns on those investments. Disinvestment in fossil infrastructure with closure on the horizon poses risk to safety and reliability. Due to the interdependencies of the petroleum

value chain (up-, mid-, and downstream), disruptions can have widespread consequences to the entire system (Figure 1). Additional closures and operational challenges elsewhere in the value chain (e.g. viability of crude oil pipelines with low throughput volumes) are likely in the near term and inevitable in the long term.

Industry participants have identified several intersecting regulatory and administrative issues in maintaining system-wide stability: crude oil extraction and delivery, CEC's regulatory tools, At-Berth regulations, Cap-and-Trade, and issues related to other regional, state and local authorities. CEC continues to engage with a wide range of impacted stakeholders and communities to discuss these issues and possible solutions. While not all groups are unified in their preferred approach to these challenges, there has been general recognition of the benefit of a holistic approach and strategically aligning state and local regulation of the petroleum system to support the achievement of state goals and priorities.

In consultation with industry, labor, fenceline communities, and the cross-agency Petroleum Strategy Task Force, the CEC has identified a suite of measures to bolster confidence in the California market and ensure reliable and safe operations during the transportation sector's mid-transition. These measures are organized into two tiers:

- Tier 1 – Immediate Actions: Options for near-term adoption via administrative directives or statutory modifications.
- Tier 2 – Further Exploration: Options requiring additional analysis, stakeholder consultation, and impact assessment before implementation.

Tier 1: Issues to Prioritize for Immediate Action

1. Stabilizing In-State Crude Oil Production and Distribution.

Background:

Crude oil production in California in recent years has dropped far faster than demand from in-state refineries, largely because of California Environmental Quality Act (CEQA) litigation that stalled crude oil production permitting in Kern County. That decline in in-state crude oil production has forced a shift toward increased foreign and Alaskan crude oil imports. This rapid decline in crude production introduces several challenges that include:

- *Refinery Adaptation Challenges and Cost Pressures:* Many California refineries were engineered for the specific qualities of local crude oil. Several refineries are not logistically well set up to receive waterborne imported crude. Without retrofit investment, they incur higher processing costs and reduced efficiency when processing imported crude.
- *Pipeline Throughput Decline and Infrastructure Risk:* California has a network of pipelines, primarily from Kern County, that deliver crude oil to in-state refineries. Reduced in-state crude production has driven several crude pipelines to shut down due to low throughput. Several remaining crude oil pipelines now run intermittently due to low volumes, inflating crude transportation costs.
- *Exposure to Geopolitical Risks:* Relying heavily on imported crude oil ties California's energy security to volatile foreign-policy dynamics and geopolitical tensions.
- *Economic and Fiscal Impacts:* The contraction in domestic crude oil production erodes high-wage jobs and shrinks local tax bases, placing additional strain on oil-dependent communities and public services.

Recognizing the interdependence between in-state crude oil production and related critical infrastructure across the petroleum value chain, we think it is prudent to stabilize in-state crude production to support resilience in the petroleum system.

Recommendation:

As part of a managed transition strategy, we recommend that the State take action to achieve targeted stabilization of crude oil production in California to supply in-state refineries while ensuring that production is consistent with critical health and environmental protections. Specifically, limited production that is needed to achieve targeted stabilization should be prioritized in existing established, and densely developed oilfields, and outside of Health Protection Zones (HPZs) surrounding homes, schools, and other sensitive receptors where new permitting is prohibited by law; and production should not include methods that are prohibited by important environmental protection laws, such as California's ban on new offshore oil and gas leases and California's ban on well stimulation treatments.

The Legislature may wish to consider, for example, statutory changes to declare the Kern County Zoning Ordinance Second Supplemental Environmental Impact Report (SCH20130879) in compliance with CEQA and conclusive for purposes of its use by responsible agencies to allow the County's ministerial approval of oil and gas wells with the mandatory mitigation measures identified in the ordinance. This change would allow for a more appropriate amount of extraction in Kern County's well-established oil fields. While clarifying that oil extraction on those already-disturbed lands, away from neighborhoods, is permissible, the Legislature may also wish to expand the current limitations on new offshore oil and gas development and codify the ban on well stimulation treatments in statute.

Additional legislative or administrative actions could include a targeted regulatory framework that ties crude production and permitting more directly to demand over the transition period. The objective would be to facilitate more timely, predictable, and legally durable permitting for crude oil production outside of HPZs in established, densely developed oilfields coupled with a requirement to permanently seal at least two wells for each new well drilled – one located in that same oilfield and the other located in an HPZ. This would facilitate a managed production decline that aligns with and adapts to declining demand throughout the transition to create more certainty, maintain critical infrastructure investment, and protect consumers, workers, and fenceline communities.

2. Regulatory Tools.

Background:

Several intersecting regulatory authorities supporting the achievement of the State's climate, public health, and consumer protection priorities impact the petroleum industry. Strategic implementation of the State's suite of regulatory tools can support the necessary investment confidence to retain safe and reliable industry operations and achieve policy goals.

To protect California consumers from extraordinary spikes in retail gasoline prices, such as those during 2022 and 2023, you called for two special sessions of the Legislature in 2023 and 2024 resulting in the passage of SB X1-2 (Skinner, Chapter 1, Statutes of 2023 First Extraordinary Session) and AB X2-1 (Hart, Chapter 1, Statutes of 2024 Second Extraordinary Session). These efforts collectively:

- Expanded the CEC's data collection authority that significantly increased transparency into various aspects of the petroleum market and helped identify the key factors that contribute to fuel price volatility;
- Created a new independent market oversight division, the Division of Petroleum Market Oversight (DPMO), responsible for oversight, investigations, economic analysis, and policy recommendations regarding the transportation fuels market;
- Required development of two planning efforts 1) an assessment of California's transportation fuels market with potential strategies to address price spikes, and 2) a Transportation Fuels Transition Plan with CARB; and
- Provided CEC with new regulatory authorities to mitigate retail gasoline price spikes and protect consumers: establishing a maximum gross gasoline refinery margin (GGRM) and penalty, setting minimum inventory requirements for refiners, and establishing resupply requirements for planned refinery maintenance events.

The Legislature required that CEC engage in careful consideration of the impacts to consumers and the petroleum sector from implementing the new regulatory authorities. The CEC has exercised caution by focusing on gathering the necessary information to develop a holistic view of the petroleum value chain and establishing the best ways to protect consumers during this transition.

To protect the public health of local communities near ports, CARB adopted its at-berth regulation in 2007 to address emission reductions from ocean-going vessels when they are docked at California ports. The regulations were most recently amended in 2020 and as of January 2025, crude oil and petroleum product tankers at the Port of Los Angeles and the Port of Long Beach are subject to the regulation.

The majority of tanker industry partners are complying with the regulation through one of two approved pathways: (a) the Innovative Concepts, an alternative compliance approach that applies the emissions reductions from approved projects towards vessel visits, or (b) the Remediation Fund, used as an interim solution until their chosen primary control

technologies—such as shore power or barge-based capture systems—are installed. One barge-based system for tankers has received CARB approval, with additional systems under review. Small terminals may comply under the low-use exception or by using the Remediation Fund in combination with barge-based systems or shore power as approvals are finalized. While systems are undergoing approval, capture and control companies can offer research exceptions to vessel and terminal operators for participating in testing. Tankers will be subject to the regulation at all ports as of January 2027.

AB 32 (Nuñez, 2006) enables CARB to implement programs that are globally recognized as cost-effective tools for reducing carbon pollution and for generating billions in proceeds to support investment in innovative and pollution-reducing projects. One of these tools is the Cap-and-Trade program, which was officially launched in 2012 and carefully balances the steady decline of greenhouse gas emissions, provides utility ratepayer benefits through the climate credit, and provides industry credits to mitigate for leakage. Petroleum market participants are regulated entities under the Cap-and-Trade program.

Recommendation:

The CEC believes that its available refinery regulatory tools should be implemented holistically and prudently to maximize consumer benefit and avoid unintended consequences. The CEC's analyses have demonstrated a relationship between California's volume of gasoline inventory ("days of supply") and retail prices, whereby low inventory volumes are associated with higher retail prices. The CEC sees value in continuing to assess, in collaboration with the industry, how the resupply and minimum inventory strategies could be implemented to promote market liquidity during refinery outages and stabilize prices.

The CEC has determined that additional analytical work is necessary to establish a maximum GGRM and to impose a penalty for exceeding it that would protect California consumers as intended.

In order to prioritize CEC's development and implementation of the resupply and/or minimum inventory regulatory tools, we recommend that the CEC adopt a pause for a reasonable length of time on implementing a maximum GGRM and penalty.

We recognize that there are challenges in technological compliance specifically for tanker vessels and that the regulation can add unanticipated cost and operational burden. We recommend that you request that CARB meet with each refiner and terminal covered by the at-berth regulation and discuss current status and barriers to implementation of all technical tools intended to achieve emissions reductions from tankers at berth to assess the timelines for deployment of those emissions reductions.

We recommend that the Air Resources Board continue to work on the regulatory process for continued implementation of the Cap- and-Trade program, including progress towards required targets, cost containment strategies and minimizing leakage.

Tier 2: Issues for Further Exploration

3. Local and Regional Authority.

Background:

Petroleum infrastructure is subject to various local and regional regulations and often requires permits from a variety of local agencies.

In California, the local air districts have primary authority to regulate all non-mobile pollution sources of air pollution, including stationary sources. This means that local air districts are responsible for adopting regulations to reduce emissions from stationary sources, such as refineries, and for permitting of these sources. All districts with refineries have adopted, implemented, and are enforcing regulations to reduce emissions from the refineries. The regulations reflect the air quality issues in each area and aim to address criteria pollutant emissions in order to comply with the federally enforceable State Implementation Plan, and toxic emissions that impact local communities. The district permits generally require facilities to be in compliance with all applicable regulations, depending on the district and the facility type.

Industry has asserted that the stringency, inconsistency, and compliance costs of air quality requirements placed on refineries, along with extended permitting timelines at air districts and other local and regional agencies, pose uncertainty and risk to their longer-term planning. Industry also has asserted that the potential for new local taxation, fees, and regulatory initiatives causes significant investor uncertainty.

Recommendation:

As noted above, we recommend the formation of an interagency working group to address immediate coordination challenges. In addition, we recognize the importance of working with the Legislature and local stakeholders to address concerns. We think the Administration should consider partnering with the Legislature to advance solutions to strategically align regulations and permitting processes across all levels of government that could best support achievement of State policy goals.

Strategy 3: Holistic Transition Strategy

TOPLINE: Near- and medium-term actions must be part of a holistic transition strategy that is built on shared understanding, collaboration, and development of policies across state agencies and stakeholders. A managed transition is critical for protecting Californians and will depend on coordination and collective action.

PROBLEM: Transitioning California's transportation fuel system away from petroleum-based fuels is providing substantial benefits to consumers, workers, communities, and the environment, but an unmanaged transition poses significant and acute risks to safety, health, environment, economy, and affordability.

While concurrently addressing the previous objectives, the State should implement policies and plans to support a successful transition, which could include:

- Identify and pursue necessary transition funding to support climate, health, community, and worker priorities.
- Protect workers and communities such as through robust process safety management regulations at refineries, which has the added benefit of increasing reliability of the facilities.
- Support and protect California's authority to set emission standards and achieve climate goals.
- Further California's ability to diversify and evolve its transportation sector to comply with federal and state air quality standards and meet climate goals, such as by continuing to expand the availability and reduce the cost of ZEVs.
- Identify challenges, opportunities, and strategies for the future of land affected by the transition (e.g. remediation, marketability, and

value), such as Asset Retirement Obligations and standards for refinery remediation and decommissioning plans.

- Evaluate whether new approaches to California's fuel specifications could continue to protect public health and meet federally required air quality standards while making the State more resilient to disruptions during its fossil fuel transition.
- Continue to evaluate additional options presented in the Transportation Fuels Assessment, e.g. product reserve and production enhancement strategies such as E15 or Reid Vapor Pressure (RVP) modification.
- Explore further pathways to increase resilience in the system, such as improving connectivity between Northern and Southern California fuel markets, e.g. through increased marine oil terminal capacity or repurposing of existing fossil fuel transportation infrastructure.
- Develop strategies that can support a managed phase-out especially during the late transition phase of the transportation sector, such as state management or ownership of assets.

Conclusion

The problems laid out in this letter are complex but solvable. California has entered a critical but challenging phase in its transition to a decarbonized transportation sector, which is made more challenging by California's unique petroleum market, global changes in the refining sector and across the petroleum value chain, and new disruptions at the federal level. The strategies and recommendations laid out here represent our careful, comprehensive, collaborative assessment of the petroleum market and the future of the clean energy transition.

Thanks to your leadership and commitment and the expertise of agencies, stakeholders, and communities, California is rising to the challenge. Equipped with new data made available by forward-thinking policies led by you and the Legislature in the past two years, we have a much clearer understanding of the causes of gasoline price spikes and the strategies needed to protect consumers and communities in the future. We are working closely with a broad range of partners to continue to evolve the State's approach so that we may successfully 1) accelerate momentum to decarbonize California's economy, and 2) ensure that

petroleum firms can continue to supply petroleum-based fuels while the clean, alternative fuels continue to scale.

We are thankful for the opportunity to share this analysis with you, the Legislature, our partners, and the public. We look forward to collaborating with the Legislature, state and local agencies, industry partners, and impacted stakeholders to ensure a reliable, affordable, and safe clean energy future for all Californians.

Sincerely,

A handwritten signature in black ink that reads "G. S. Gargadher". The signature is written in a cursive, slightly stylized font.

Siva Gunda
Vice Chair
California Energy Commission

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Phillips 66 provides notice of its plan to cease operations at Los Angeles-area refinery

October 16, 2024

- Facility expects to cease operations in the fourth quarter of 2025
- Company will work with the state of California to supply fuel markets and meet ongoing consumer demand

HOUSTON--(BUSINESS WIRE)-- Phillips 66 (NYSE: PSX) announced plans to cease operations at its Los Angeles-area refinery in the fourth quarter of 2025 and will work with the state of California to supply fuel markets and meet ongoing consumer demand.

"We understand this decision has an impact on our employees, contractors and the broader community," said Mark Lashier, chairman and CEO of Phillips 66. "We will work to help and support them through this transition." Approximately 600 employees and 300 contractors currently operate the Los Angeles-area refinery.

"With the long-term sustainability of our Los Angeles Refinery uncertain and affected by market dynamics, we are working with leading land development firms to evaluate the future use of our unique and strategically located properties near the Port of Los Angeles," said Lashier. "Phillips 66 remains committed to serving California and will continue to take the necessary steps to meet our commercial and customer demands."

As the California Energy Commission's analysis has indicated, expanding supply capabilities will be critical. Phillips 66 supports these efforts and will work with California to maintain current levels and potentially increase supplies to meet consumer needs. The company will supply gasoline from sources inside and outside its refining network as well as renewable diesel and sustainable aviation fuels from its Rodeo Renewable Energy Complex in the San Francisco Bay area.

Phillips 66 has engaged [Catellus Development Corporation](#) and [Deca Companies](#), two leading real estate development firms, to evaluate the future use of the 650-acre sites in Wilmington, California, and Carson, California. The firms bring strong track records of solving complex redevelopment challenges and will collaborate with Phillips 66 in an advisory role to advance potential commercial development options that support the regional economy and other key stakeholder objectives.

"These sites offer an opportunity to create a transformational project that can support the environment, generate economic development, create jobs and improve the region's critical infrastructure," Lashier said.

About Phillips 66

Phillips 66 (NYSE: PSX) is a leading integrated downstream energy provider that manufactures, transports and markets products that drive the global economy. The company's portfolio includes Midstream, Chemicals, Refining, Marketing and Specialties, and Renewable Fuels businesses. Headquartered in Houston, Phillips 66 has employees around the globe who are committed to safely and reliably providing energy and improving lives while pursuing a lower-carbon future. For more information, visit phillips66.com or follow [@Phillips66Co](#) on LinkedIn.

CAUTIONARY STATEMENT FOR THE PURPOSES OF THE "SAFE HARBOR" PROVISIONS OF THE PRIVATE SECURITIES LITIGATION REFORM ACT OF 1995

This news release contains forward-looking statements within the meaning of the federal securities laws relating to Phillips 66's operations. Words such as "anticipated," "estimated," "expected," "planned," "scheduled," "targeted," "believe," "continue," "intend," "will," "would," "objective," "goal," "project," "efforts," "strategies" and similar expressions that convey the prospective nature of events or outcomes generally indicate forward-looking statements. However, the absence of these words does not mean that a statement is not forward-looking. Forward-looking statements included in this news release are based on management's expectations, estimates and projections as of the date they are made. These statements are not guarantees of future events or performance, and you should not unduly rely on them as they involve certain risks, uncertainties and assumptions that are difficult to predict. Therefore, actual outcomes and results may differ materially from what is expressed or forecast in such forward-looking statements. Factors that could cause actual results or events to differ materially from those described in the forward-looking statements include: changes in governmental policies or laws that relate to our operations, including regulations that seek to limit or restrict refining, marketing and midstream operations or regulate profits, pricing, or taxation of our products or feedstocks, or other regulations that restrict feedstock imports or product exports; our ability to timely obtain or maintain permits necessary for projects; fluctuations in NGL, crude oil, refined petroleum, renewable fuels and natural gas prices, and refining, marketing and petrochemical margins; the effects of any widespread public health crisis and its negative impact on commercial activity and demand for refined petroleum or renewable fuels products; changes to worldwide government policies relating to renewable fuels and greenhouse gas emissions that adversely affect programs including the renewable fuel standards program, low carbon fuel standards and tax credits for biofuels; unexpected changes in costs for constructing, modifying or operating our facilities; our ability to successfully complete, or any material delay in the completion of, any asset disposition, acquisition or conversion that we may pursue; unexpected difficulties in manufacturing, refining or transporting our products; the level and success of drilling and production volumes around our midstream assets; risks and uncertainties with respect to the actions of actual or potential competitive suppliers and transporters of refined petroleum products, renewable fuels or specialty products; lack of, or disruptions in, adequate and reliable transportation for our products; potential liability from litigation or for remedial actions, including removal and reclamation obligations under environmental regulations; failure to complete construction of capital projects on time and within budget; our ability to comply with governmental regulations or make capital expenditures to maintain compliance with laws; limited access to capital or significantly higher cost of capital related to illiquidity or uncertainty in the domestic or international financial markets, which may also impact our ability to repurchase shares and declare and pay dividends; potential disruption of our operations due to accidents, weather events, including as a result of climate change, acts of terrorism or cyberattacks; general domestic and international economic and political developments, including armed hostilities (such as the Russia-Ukraine war), expropriation of assets, and other diplomatic developments; international monetary conditions and exchange controls; changes in estimates or projections used to assess fair value of intangible assets, goodwill and property and equipment and/or strategic decisions with respect to our asset portfolio that cause impairment charges; investments required, or reduced demand for products, as a result of environmental rules and regulations; changes in tax, environmental and other laws and regulations (including alternative energy mandates); political and societal concerns about climate change that could result in changes to our business or increase expenditures, including litigation-related expenses; the operation, financing and distribution decisions of equity affiliates we do not control; and other economic, business, competitive and/or regulatory factors affecting Phillips 66's businesses generally as set forth in our filings with the Securities and Exchange Commission. Phillips 66 is under no obligation (and expressly disclaims any such obligation) to update or alter its forward-looking statements, whether as a result of new information, future events or otherwise.

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Valero Announces Notice to the California Energy Commission Regarding its Benicia, California, Refinery

April 16, 2025

SAN ANTONIO--(BUSINESS WIRE)-- Valero Energy Corporation (NYSE: VLO, "Valero") announced today that its subsidiary, Valero Refining Company-California, has submitted notice to the California Energy Commission of its current intent to idle, restructure, or cease refining operations at Valero's Benicia Refinery by the end of April 2026. Valero continues to evaluate strategic alternatives for its remaining operations in California. "We understand the impact that this may have on our employees, business partners, and community, and will continue to work with them through this period," said Lane Riggs, Chairman, CEO and President of Valero.

In connection with the evaluation of strategic alternatives for Valero's operations in California, a combined pre-tax impairment charge of \$1.1 billion was recorded for the Benicia and Wilmington refineries, and is expected to be treated as a special item and excluded from first quarter 2025 adjusted earnings. Also included in this amount is the recognition of expected asset retirement obligations of \$337 million as of March 31, 2025.

About Valero

Valero Energy Corporation, through its subsidiaries (collectively, Valero), is a multinational manufacturer and marketer of petroleum-based and low-carbon liquid transportation fuels and petrochemical products, and sells its products primarily in the United States (U.S.), Canada, the United Kingdom (U.K.), Ireland and Latin America. Valero owns 15 petroleum refineries located in the U.S., Canada and the U.K. with a combined throughput capacity of approximately 3.2 million barrels per day. Valero is a joint venture member in Diamond Green Diesel Holdings LLC, which produces low-carbon fuels including renewable diesel and sustainable aviation fuel (SAF), with a production capacity of approximately 1.2 million gallons per year in the U.S. Gulf Coast region. See our annual report on Form 10-K for more information on SAF.

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Governance & Engagement ▼

Statements contained in this press release that state Valero's or management's expectations or predictions of the future are forward-looking statements intended to be covered by the safe harbor provisions of the Securities Act of 1933 and the Securities Exchange Act of 1934. The words "evaluate" "believe," "potential," "expect," "should," "estimates," "intend," "target," "commitment," "plans," "forecast," "guidance" and other similar expressions identify forward-looking statements. Forward-looking statements in this release include statements relating to Valero's actions and operations in California, expected timing and cost of obligations, future market and industry conditions, and future operating and financial performance, among other matters. It is important to note that actual results could differ materially from those projected in such forward-looking statements based on numerous factors, including those outside of Valero's control, such as legislative or political changes or developments, market dynamics, cyberattacks, weather events, and other matters affecting Valero's operations and financial performance or the demand for Valero's products. These factors also include, but are not limited to, the uncertainties that remain with respect to current or contemplated legal, political or regulatory developments that are adverse to or restrict refining and marketing operations, or that impose taxes or penalties on profits, windfalls, or margins above a certain level, tariffs, global geopolitical and other conflicts and tensions, the impact of inflation on margins and costs, economic activity levels, and the adverse effects the foregoing may have on Valero's business plan, strategy, operations and financial performance. Other unpredictable or unknown factors not discussed in this release could also have material adverse effects on forward-looking statements. Additionally, the asset retirement obligations recorded require significant judgment and are subject to changes in the underlying assumptions. For more information concerning these and other factors that could cause actual results to differ from those expressed or forecasted, see Valero's annual report on Form 10-K, quarterly reports on Form 10-Q, and other reports filed with the Securities and Exchange Commission and available on Valero's website at www.valero.com.

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