

Form Letter 1 for Comment 335 for 2022 Climate Change Scoping Plan (scopingplan2022) - Non-Reg.

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Subject: We need a stronger plan!

Comment:

PROBLEMS WITH THE CALIFORNIA AIR RESOURCE BOARD (CARB) DRAFT SCOPING PLAN

Legal Issues

1. The draft plan does not demonstrate that California is on track to even meet the legally mandated goal of at least a 40% reduction in greenhouse gases by 2030. Short-lived climate pollutants are particularly unlikely to achieve a 40% reduction.

2. The draft plan does not follow AB 32's requirement that California achieve "the maximum technologically feasible" emission reductions, using the most cost-effective methods. "Air board officials said they will propose the option that has the least impact on the economy rather than accelerating the pace of achieving carbon neutrality."

Scientific Issues

1. The draft plan will not keep global temperatures close to what scientists say will avoid catastrophe. The world has only ten years to cut greenhouse gas emissions by 50% if we are to attain the goal. President Biden has committed the United States to a 50% reduction by 2030. Yet the draft plan may not achieve even 40% by 2030.

2. The science of climate change requires front-loading our response. "If mitigation pathways are not rapidly activated, much more expensive and complex adaptation measures will have to be taken to avoid the impacts of higher levels of global warming on the Earth system."

3. California's goal should be at least an 80% reduction in emissions by 2030. A former coordinating author of the Intergovernmental Panel on Climate Change and Professor of Sustainability at UC Berkeley, Daniel Kammen, Ph.D., set out a scientifically backed and feasible program for California in 2021. It calls for an 80% reduction in emissions by 2030.

4. The draft plan only aims for an 80% reduction emissions by 2045. The draft plan's reliance on carbon capture and sequestration (CCS) or direct carbon capture (DAC) to balance 20% of our emissions is more than New York (15%) and far more than the State of Washington (5%).

5. Neither CCS nor DAC should be counted

on as scalable. The March 28,2022 IPCC report on the capacity of different actions to reduce greenhouse gases puts CCS as the least effective and most expensive of the 43 climate actions the IPCC evaluated for deployment prior to 2030.<a>[7]</p>

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<div><a>[1] Nadia Lopez. Lower cost, slower gains: California prepares controversial new climate strategy. CalMatters, April 28, 2022. <a

href="https://calmatters.org/environment/2022/04/california-climate-change-strategy/"

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/>environment/2022/04/<wbr />california-climate-change-<wbr

/>strategy/</div>

<p><a>[2] See the critique of the plan by Danny Cullenward, Ph.D.: &<a

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saferedirecturl="https://www.google.com/url?q=https://www.ipcc.ch/sr15/cross-chapter-boxes/&source=gmail&ust=1655915096294000&usg=A0vVaw0FLsAWPLYr8nAZc5-iJlR8">https://www.ipcc.ch/sr15/<wbr />cross-chapter-boxes/</p><p><a>[5] Kammen, Daniel M., Teenie Matlock, Manuel Pastor, David Pellow, Veerabhadran Ramanathan, Tom Steyer, Leah Stokes, and Feliz Ventura. "Accelerating the timeline for climate action in California." arXiv preprint arXiv:2103.07801 (2021).</p><p><a href="https://url1005.email.actionnetwork.org/ss/c/P8Elou2Rvc0qoMPEUZrMXRHZ5wZ Ztp7A9_8D0a5JnHw0cQvmHt7F9pkevJzFdNQ_QNXz1WlhMSKLDRATHfUifKG6Wcnf2jxiHPhLiuegwOMo_6VxjqQIyvUEv1MCAS8ZMx4wRI_kE2viQCYve0a3jn65_YRy-wgRu43LFmQDsEkHs0SNZHpuFC_nKPEVrkJGkls5Zht9DgL57KNnZ7eT6_DoQfuYGX5YgjVrP23LCX0Rn_kd1j_8rKcgmS2RobWZ2M0JUlns0IUa0JUrmB-XVZWYUouEhbQqKnsa8NeTHHW3szpTaeLOUTeaKLvVlF3fdKcLybJb0VtiD9bZjLMnQ/3n3/Lk8-oGxrRRagy1Q0KESSdg/h3/AtaRf3aXXosumgDkz3GY5IB9KbLvcMjll3Eq6zla3fc" target="_blank" rel="noopener"

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vV2">https://arxiv.org/abs/2103.<wbr
>/07801?context=eess.SY</p>
<p><a>[6] Cullenward, op cit.</p>
<p><a>[7] <a
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>/ar6/wg3/figures/summary-for-<wbr />policymakers</p>
<p><a>^{^[8]} Wang, T., Jiang, Z., Zhao, B.
et al. Health co-benefits of achieving sustainable
net-zero greenhouse gas emissions in California. Nat
Sustain 3, 597–605 (2020). <a
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>/s41893-020-0520-y.</p>
<p><a>[9] <a
href="https://caleja.org/wp-content/uploads/2022/05/CARB-draft-plan-vs-EJ-
recommendations-FINAL-CORRECTED.pdf"
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>/uploads/2022/05/CARB-draft-<wbr />plan-vs-EJ-recommendations-<wbr
>/FINAL-CORRECTED.pdf</p>
<p><a>[10] Gabrielle Dreyfus, chief scientist for the Institute
for Governance & Sustainable Development and lead author of:
 Dreyfus, Gabrielle B., Yangyang Xu, Drew T. Shindell, Durwood
Zaelke, and Veerabhadran Ramanathan. "Mitigating climate disruption
in time: A self-consistent approach for avoiding both near-term and
long-term global warming." Proceedings of the National Academy
of Sciences of the United States of America 119, no. 22

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saferedirecturl="https://www.google.com/url?q=https://url1005.email.actionnetwork.org/ss/c/4PfL751D8g4IfLXFW3QfXTPTHQGVx3q7Cu90jr_xmf90ZHhejz00wDUpeFq4yZWBf8BIU7xuZ6seWuBp7BSZHZ3XosIOv2N6q4ZgS5ladpkLYq_HaQ3kbcCOT9nJ1GFu7ebzBdWMJjDNxSmIFILV3zjL5aCR2VKU6GGHkzCJDt0PNNFuFd_brHogZb6zJInpZ7ovuJowDN2MAjDx69kkVCynqpKXl6Gfpp3104-nlrrYi2Gm6WDrx1fj2fTVoUYejy8KjWv6XPqe9SorKfLReJcPT6fEFYLLIwcJVA8uSvj3rGcdcbH6n Gck9tL_RJNJzM5hS43CtJlP5vth2m3NHUvauwN9Z01z8nlRUBG0cnE/3n3/Lk8-oGxrRRagy1Q0KESSdg/h6/8IcftXlxDMczFPFUsJU2-mzGuZy3FuXi3tS0k6caJNA&source=gmail&ust=1655915096294000&usg=A0vVaw3IqpATjG-g0Uhq-ErgyMwt">Daniel M Kammen, Daniel M Kammen, data-
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