

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

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Affiliation:

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. </strong>The March 28,<sup> </sup>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]</a></p>

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<p>1. &nbsp;&nbsp;&nbsp;<strong>The draft plan drags out elimination of pollution that disproportionately affects poor people and people of color. But rapid elimination of GHG pollution costs less than the health costs of continuing pollution.</strong><a><sup><sup>[8]</sup></sup></a></p>

<p>2. &nbsp;&nbsp;&nbsp;<strong>The Environmental Justice Advisory Council (EJAC), which advises the CARB Board, has demanded faster and more comprehensive measures than in the draft plan so as to protect disadvantaged communities, particularly those suffering from air pollution.</strong><a>[9]</a></p>

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<p>1. &nbsp;&nbsp;&nbsp;<strong>The draft scoping plan recognizes the importance of SLCP abatement but not the importance of moving very quickly.</strong><a>[10]</a></p>

<p>2. &nbsp;&nbsp;&nbsp;<strong>Reduction of emissions from HFC refrigerants having thousands of times more warming effect than carbon dioxide must be greatly accelerated.</strong><a>[11]</a></p>

<p><strong>3. &nbsp;&nbsp;&nbsp;</strong><strong>The draft plan expects to reduce fugitive emissions of methane by 50%, but it needs to be higher in California to keep global warming to no more than 1.5</strong>&deg;<strong>C.</strong><a>[12]</a></p>

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<p>1. &nbsp;&nbsp;&nbsp;<strong>Highly reputable critics of the Cap and Trade program, a market-based carbon pricing method used in California, believe the program may not be able to achieve even its limited emission reduction goal by 2030.</strong><a>[13]</a></p>

<p>2. &nbsp;&nbsp;&nbsp;<strong>As a market-based mechanism, the Cap and Trade program does not reduce major sources of pollution fast enough. &nbsp;&nbsp;&</strong>CARB should consider replacing parts of it by direct regulation.<a>[14]</a></p>

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<div><a>[1]</a> 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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saferedirecturl="https://www.google.com/url?q=https://calmatters.org/environment/2022/04/california-climate-change-strategy/&source=gmail&ust=1655915096294000&usg=AOvVaw3ARXIooY0uH1IVKgFyadSX">https://calmatters.org/<wbr />environment/2022/04/<wbr />california-climate-change-<wbr />strategy/</a></div>

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

href="https://url1005.email.actionnetwork.org/ss/c/Mqag7sw8TIW-nixyBdulQt\_duhFIJ0rHENVduhvASvNOHZaYQBjY69uAVCI8lMKfK\_07lg04t5j9Hl1d74hij8MaHp hGnvZwZNivP\_7PM-pLHSyp9g6ElZ8Q2GA6AEHMKdQmKNlaHdmyFzXIky-5vDboplep07gryNayMXGe014y1rwa09GRt5Q10sAYpyuhgf223QSPC5Hi366\_GFT6S10B0VMOHMRD4tkoQ9dEpDj7AFMCn3APCuwmUjJ14p2Waz4PQaZgFZVXku8feFiKwneR-xW6dTkB9l0j078u9iAsaiSYS9rVoHRPjCrYr8n3M1u9YHou0X05qcNcDRgaIA/3n3/Lk8-oGxrRRagy1Q0KESSdg/h1/M3vLdXaNvr8lJU0ERYCYH7E9CmBSTk115j-jWtK3Yts" target="\_blank" rel="noopener"

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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/</a></p><p><a>[5]</a> 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." <em>arXiv preprint arXiv:2103.07801</em> (2021).</p><p><a href="https://url1005.email.actionnetwork.org/ss/c/P8Elou2Rvc0qoMPEUZrMXRHZ5wZztp7A9\_8D0a5JnHw0cQvmHt7F9pkevJzFdNQ\_QNXz1WlhMSKLDRATHfUifKG6Wcnf2jxiHPhLiuegwOMo\_6VxjqQIyvUEv1MCAS8ZMx4wRI\_kE2viQCYve0a3jn65\_YRy-wgRu43LFmQdEkhHs0SNZHpuFC\_nKPEVrkJGkls5ZhHT9DgL57KNnZ7eT6\_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</a></p>  
<p><a>[6]</a> Cullenward, op cit.</p>  
<p><a>[7]</a> <a  
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>/ar6/wg3/figures/summary-for-<wbr />policymakers</a></p>  
<p><a><sup><sup>[8]</sup></sup></a> Wang, T., Jiang, Z., Zhao, B.  
<em>et al.</em> Health co-benefits of achieving sustainable  
net-zero greenhouse gas emissions in California. <em>Nat  
Sustain</em> <strong>3, </strong>597&ndash;605 (2020). <a  
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>/s41893-020-0520-y</a>.</p>  
<p><a>[9]</a> <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</a></p>  
<p><a>[10]</a> Gabrielle Dreyfus, chief scientist for the Institute  
for Governance & Sustainable Development and lead author of:  
&nbsp;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." <em>Proceedings of the National Academy  
of Sciences of the United States of America</em> 119, no. 22

(2022): e2123536119. <a href="https://url1005.email.actionnetwork.org/ss/c/atcYNHk4Eh2YdGnwBh-YDHHiOrZsFl\_DfgfPPkS905YNWzewpxo65XAcn\_PWFh28SmGclJySpNPk-7hKYx0xEWswne1GwQy0n9H95cBhbJ8fWBMTXrf2xDm02VXRHTFQg9nuDKbM0K0rZVwmy93NKSSKhYJpBcArNmN9vr4d8x\_y3LvSphBEdZJ3q7NWIgkZWUGNju8\_6ypuEidZbhxui5SC\_7Zy3WlSjvETYScho rV9GxWxdGmKuqFnnJXErqacc54xJ8VadZgw3bMwFDMhAINmT67b8ZPN3L3a4eUQxKFCuc8ZoWIYVYG AbBys3iQpG7brm-IBLbn8-TCxVj9snQ/3n3/Lk8-oGxrRRagy1Q0KESSdg/h5/1PLKLJhFN3uY7JrtzPoTF-0l-gv2hL5Bl8Dl8XLsGHI" target="\_blank" rel="noopener" data-bbox="111 198 165 213">data-  
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