

From: [ARB Clerk of the Board](#)
To: [Bechtold, Bradley@ARB](mailto:Bechtold_Bradley@ARB)
Subject: FW: CARB scoping plan
Date: Thursday, December 15, 2022 8:30:00 AM

Katie Estabrook

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From: Rowyn McDonald <rowynm@gmail.com>
Sent: Thursday, December 15, 2022 8:18 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: CARB scoping plan

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Hello,

Thank you for your work on the 2022 Climate Scoping plan. I'm writing to express concerns about the current draft and my support for the recommendations of the Environmental Justice Advisory Committee.

I commend the Scoping Plan's commitment to an interagency planning process for a supply-side phasedown of oil refining. This is a huge step forward from the state's exclusive focus on demand reduction. However, there must be robust and immediate follow-through on that commitment to refinery phasedown. We need to address the growing export by California refiners of their excess production of gasoline, diesel, and other petroleum fuels, and the pollution produced by that refining for export.

Independent assessment shows that if we curb pollution from refining for export, we could cut up to one-third of our total petroleum emissions, and simultaneously reduce in-state oil drilling and oil imports, without any risk whatsoever to our in-state fuel supply.

Additionally, the current draft relies heavily on economic modeling that inadequately incorporates health and equity concerns and privileges dubious carbon removal technologies (CCS) which perpetuate harms to environmental justice communities. These areas of weakness will undermine the achievement of real carbon neutrality.

Thank you,
Rowyn McDonald
Albany, CA