

From: [ARB Clerk of the Board](#)
To: [Bechtold, Bradley@ARB](mailto:Bechtold_Bradley@ARB)
Subject: FW: Comment re. Scoping Plan
Date: Thursday, December 15, 2022 11:56:11 AM

Katie Estabrook

Manager
Board Administration & Regulatory Coordination Unit
Executive Office
[she/her/hers](#)
VoIP: 279-208-7745

From: David Jens Thomas Pedersen <djtpedersen@gmail.com>
Sent: Thursday, December 15, 2022 11:49 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: Comment re. Scoping Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

My name is David Pedersen and I am a resident of Saanichton, British Columbia, Canada (the traditional unceded territory of the WSÁNEĆ people).

I am submitting these comments today because I believe that all Californians should be able to live cancer-, asthma-, and pollution-free lives. I believe in a California where everyone has the ability to breathe clean air and water and that our children and their children will be able to do the same.

I want to thank the Board's leadership in improving the final scoping plan. In particular, I would like to appreciate the Board's creation of a planning space for an oil refinery phase-down for California, cutting vehicular-miles-traveled targets to lead to more mass-transit use and expansions, and saying no to new gas plants and setting strong interim targets for winding down gas power plants and other related infrastructure.

Unfortunately, this climate plan still includes sky-high targets for carbon capture and storage (CCS) which will endanger Californians. *Inter alia:*

- CCS is a fossil-fuel and biomass greenwashing tool that will extend the life of polluting oil, gas, and biomass in California.
- CCS on refineries and gas power plants will just keep those harmful polluters online while doing nothing to address the air and water pollution they cause and/or contribute to.

I urge the Board to continue listening to the voices and realities of frontline Californians. As this agency turns to other regulatory processes and to implement this scoping plan, I hope to see:

A dedicated rulemaking process for CCS permitting that ensures that CCS projects don't increase air or water pollution in overburdened communities – like families already living next to oil wells or breathing in pesticides from industrial farming.

- NO CCS on refineries or gas power plants at all. For generations, oil refineries have poisoned our air, land, water, and the people we love. We have the tools we need. California should invest in renewable energy, not carbon capture that locks in oil and gas infrastructure.
- Reform the Low Carbon Fuel Standard to improve the health of communities and stop corporate grifters from profiting off of public subsidies. In particular, we need to ensure that climate-warming methane is regulated directly, production of fuels like biogas from animal agriculture, dirty (grey/blue) hydrogen, and biofuels (especially wood biomass) that pollute communities aren't subsidized, and credits aren't given to polluters that already received state subsidies for the same so-called "emissions reductions".
- A permanent Environmental Justice Advisory Committee (EJAC) for implementation of the Scoping Plan. This year's Scoping Plan shows real leadership, and that would not have been possible without the tireless efforts of the EJAC. California's frontline communities should be centered in Scoping Plan implementation to make sure that working-class communities of color benefit from the clean energy transition, and the best way to do that is to make sure we have a seat at the table via a permanent EJAC.
- Integrate Comprehensive Public Health Equity Analyses into all Scoping Plan implementation rulemaking processes to ensure that California's strategies to reduce greenhouse gas emissions also protect the health of environmental justice communities.

The bottom line is that the decisions of staff and Board will determine whether we have a safe and healthy future for all Californians, so please take the above into consideration to maximize the scope and benefits of the Plan. Thank you for your time and consideration.

Have a happy holiday season and new year,

David Pedersen

778-677-2809

Online @FedUpWithBadAir