

Form Letter 1 for Comment 332 for 2022 Climate Change Scoping Plan (scopingplan2022) - Non-Reg.

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Affiliation:

Subject: We need a stronger plan!

Comment:

<h4 style="text-align: center;">PROBLEMS WITH THE CALIFORNIA AIR RESOURCE BOARD (CARB) DRAFT SCOPING PLAN</h4>

<h5>Legal Issues</h5>

<p>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.<a>[2] Short-lived climate pollutants are particularly unlikely to achieve a 40% reduction.</p>

<p>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.<a>[3]“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.”<a>[1]</p>

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<h5>Scientific Issues</h5>

<p>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.</p>

<p>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.”<a>[4]</p>

<p>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.<a>[5]</p>

<p>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%).<a>[6]</p>

<p>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>

<h5>Environmental Justice Problems</h5>

<p>1. 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.<a>^{^[8]}</p>

<p>2. 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.<a>[9]</p>

<h5>Short-lived Climate Pollutants (SLCPs)</h5>

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

<p>2. Reduction of emissions from HFC refrigerants having thousands of times more warming effect than carbon dioxide must be greatly

accelerated.<a>[11]</p>

<p>3. 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°C.<a>[12]</p>

<h5>Cap and Trade</h5>

<p>1. 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.<a>[13]</p>

<p>2. As a market-based mechanism, the Cap and Trade program does not reduce major sources of pollution fast enough. CARB should consider replacing parts of it by direct regulation.<a>[14]</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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<p><a>[2] See the critique of the plan by Danny Cullenward, Ph.D.: <a

href="https://url1005.email.actionnetwork.org/ss/c/Mqag7sW8TIW-nixyBdulQt_duhFIJOrHENVduhvASvNOHZaYQBjY69uAVCI8lMKfK_07lg04t5j9H1ld74hij8MaHp hGnvZwZNivP_7PM-pLHSyp9g6ElZ8Q2GA6AEHMkDQmKN1aHdmyFzXIkY- 5vDboplep07gryNAyMXGeO14y1rWa09GRt5Q10sAYpyuhgf223QSPC5Hi366_GFT6S1OB0VMOHMRD4 tkoQ9dEpDj7AFMCn3APCuwmUjJ14p2Waz4PQaZgFZVXkU8feFiKwneR- xW6dTkB91Oj078u9iAsaiSYS9rVoHRPjCrYr8n3M1u9YHouOX05qcNcDRgaIA/3n3/Lk8-oGxrRRagy1QOKESSdg/h1/M3vLdXaNvr8lJU0ERyCYH7E9CmBSTk115j-jWtK3Yts" target="_blank" rel="noopener"
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<p><a>[3] “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.” Lopez, Nadia. “Lower cost, slower gains: California prepares controversial new climate strategy.” CalMatters, April 28, 2022. <https://url1005.email.actionnetwork.org/ss/c/Mqag7sW8TIW-nixyBdulQvmh8Y0iPuGS_WLzvbrBBXN4mZwSpREgwijmusy2zNJz7FWk-DVN4WkvFAVcutrryFy1Herf1YB2eXjyPYv_7i9ODWiEIu-MOe_U1ISSxUqE5qF0iQ-4afse8Hs1Apf5JKrau9tGzA67B3Kk079JoV__2gUGwVuFdCUPnpvyfBWUjr2IpDtSJ3zjw07rNzA8o uclu1WT1IQtCmit04ptbGbuFth_2LXDDd0NnfbesQhLXA7zPYt7BnhMTpwtw9wKPBAcrqZQzgplk03 idknTtEZjy1r_c8AsSqx_2oVGGHiDm3aL9_to4fgLD6heeE7RkVPNeBHJOP6F5nzjeyQukZBil__EN PFqhvguYLQHTtLS/3n3/Lk8-oGxrRragylQOKESSdg/h2/ux6h_4OKENnFEbe4503v_5tVadWG0hwWkujx__I6LVk&source=gmail&ust=1655915096294000&usg=A0vVaw3JIUwidYQopLeb3CNBhWJf">[<https://calmatters.org/<wbr/>environment/2022/04/<wbr/>california-climate-change-<wbr/>strategy](https://calmatters.org/<wbr/>environment/2022/04/<wbr/>california-climate-change-<wbr/>strategy)

<p><a>[4] <https://www.ipcc.ch/sr15/cross-chapter-boxes/&source=gmail&ust=1655915096294000&usg=A0vVaw0FLsAWPlYr8nAZc5-iJlR8">[<https://www.ipcc.ch/sr15/<wbr/>cross-chapter-boxes](https://www.ipcc.ch/sr15/<wbr/>cross-chapter-boxes)

<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><https://url1005.email.actionnetwork.org/ss/c/P8Elou2Rvc0qoMPEUZrMXRHZ5wZ Ztp7A9_8D0a5JnHwOcQvmHt7F9pkEvJzFdNQ_QNXz1WlhMSKLDRATHfUiFKG6Wcnf2jxiPHLieuegwOMo_6VxjqQIyvUEv1MCAS8ZMx4wRI_kE2viQCYveOa3jn65_YRy-wgRu43LFMDsEkhHs0SNZHpuFC_nKPEVrkJGkl5ZhHT9DgL57KNnZ7eT6_DoQfuYGX5YgjVrP23LCX0Rn_kd1j_8rKcgmS2RobWZ2MOJU1NsOIUa0JUrmb-XVZWYUouEhbQqKNsa8NeTHHW3szpTAeLOUTeaKlvV1F3fdKcLybJb0VtiD9bzjLMnQ/3n3/Lk8-oGxrRragylQOKESSdg/h3/AtaRf3aXXosumgDkz3GY5IB9KbLvcMjll3Eq6zla3fc

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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).
^[9]
^[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

(2022): e2123536119. https://www.pnas.org/doi/full/<wbr/>10.1073/pnas.2123536119This article is the most current and comprehensive on the forcing role of CO₂, SLCPs and aerosols.</p><p><a>[11] Daniel M Kammen, Teenie Matlock, <a

href="https://url1005.email.actionnetwork.org/ss/c/4PfL751D8g4IfLXFw3QfXTPTHQGVx3q7Cu90jr_xmf90ZHHejzooWDupeFq4yZWBzrAa3apfTqvmL9MJrvIona48WZUnpeG0GtZGid27Y-89uX1OV5IWXBxh8Z7-
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&usg=A0vVaw3EAMQcb5pykNRoOwJ2nBaC">https://arxiv.org/abs/2103.<wbr
>07801</p>

<p>https://iopscience.iop.org/<wbr />article/10.1088/1748-9326/<wbr />abf9c8?addl_info=2021 The fastest way to slow warming</p>

<p>https://calepa.ca.gov/2021-<wbr />iemac-annual-report/</p>

<p>https://calepa.ca.gov/wp-<wbr />content/uploads/sites/6/2022/<wbr />02/Comment_on_IEMAC_Report___<wbr />CVAQC.a.pdf</p>

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