

Form Letter 1 for Comment 332 for Draft 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

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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.

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<p><a>[4]

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<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>

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<p><a>[12] Ocko, Ilissa B., Tianyi Sun, Drew Shindell, Michael Oppenheimer, Alexander N. Hristov, Stephen W. Pacala, Denise L. Mauzerall, Yangyang Xu, and Steven P. Hamburg. "Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming." Environmental Research Letters 16, no. 5 (2021): 054042. <a href="https://url1005.email.actionnetwork.org/ss/c/AmCPGAa5TKCV0Ya3nRaidBSsrkJ26ITUBn1f2C06Iv4EZE7y6M8ZcWMIqUtLlBYwjF0vagPWVjklic9jNc0jpJiiHrWFX9Ey2lLAOcbkPjFGKDPOj0aNs6yqWeeKkZ9ZJfYpIIEoayuCRThRZN0Gxrynk_RN6x9Q2inwghExEMB_UPVO5bqajJP7CEhXdt7fKJNzcXLeAB_fmzyf6a7v9EgiKiGvL2QEvkfFvekZgBT8x_CPTfX8F88vAUGOFF8BDtEqG_3JDJmee032Y-Jzpb7mZOvo2GWqr_XOAuScbugyOsT-0w_YISj6y4AGu9rOg6gmCc2YTJE2gdb09_RgQSNF1v-SaWkmhwhDB8jq4ei9MDrrXj2kkQ1rG2iXj81_DJuSFdwWIA1TBfi6wVGRiFkDxGcZDlzfzO8AGQuJepg/3n3/Lk8-oGxrRRagy1QOKESSdg/h15/I7p4rkctIDZ-M7hwsrJRhUfbvZ7hptQLF7NF19tDNzk" target="_blank" rel="noopener"
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