

Final Draft

Addressed to: Chair Randolph and Members of the Board

Subject: Comments on Scoping Plan – Proposed Scenario Plan or Alternative 3 is Not Acceptable with Respect to Plans Detailed for CCUS

There are numerous deficiencies one can identify in the Proposed Scenario Plan not the least of which is that it ranks third in its effectiveness and speed at climate mitigation. However, I have chosen to focus my comments on those aspects of the plan surrounding carbon capture.

I urge CARB to pursue a more ambitious alternative that reaches carbon neutrality by 2035 with minimal to no reliance on carbon capture and sequestration (CCUS), most particularly no CCUS on fossil fuel or bioenergy infrastructure. All four Alternatives in the Scoping Plan including the Proposed Scenario Plan, propose building new fossil fuel infrastructure. Rather than building new fossil fuel infrastructure, the Proposed Scenario Plan should pursue additional renewable energy and storage technologies, such as the plans proposed for the Natural and Working Lands portion of the Proposed Scenario. The case is made in various sections of the plan that the cost of adding renewable power sources and accompanying infrastructure is less costly than building new fossil fuel plants and infrastructure. Therefore, from strictly a financial POV, would not the funds expended for unproven technologies fostered by fossil fuel companies be best spent on Mother Nature and her great expertise and experience at sequestering CO₂? As the various alternatives presented in the Scoping Plan makes clear this could be accomplished through direct support of Natural and Working Lands projects.

The funding and support proposed for CCUS in the Proposed Scenario could be redirected to establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture (e.g., regenerative farming). In words lifted from the Draft Plan “...Natural and Working Lands—to ensure that they play as robust a role as possible in incorporating and storing more carbon in the trees, plants, soil, and wetlands that cover 90 percent of the state’s 105 million acres.”

It is appreciated that the Proposed Scenario does recognize past reductions in the role of offsets in the program was in recognition of ongoing concerns raised by environmental justice advocates regarding the ability of companies to use offsets for compliance instead of investing in actions on site to reduce GHG emissions. It is a given that the fossil fuel companies will continue to ‘greenwash’ all efforts to reduce their responsibility for GHG emissions and the climate catastrophe humanity and all life on this planet are facing. Oil and gas companies use deception to avoid/dodge their climate responsibilities. We must reject their efforts.

On somewhat of a side note, I would like to take issue with the draft document in general. It was made abundantly clear in the Executive Summary of the Draft 2022 Scoping Plan that “This is a plan that aims to shatter the carbon status quo and take action to achieve a vision of California with a cleaner, more sustainable environment and thriving economy for our children. When final, this ambitious plan will serve as a model for other partners around the world (my emphasis added) as they consider how to make their transition.” This point is made all that more poignant because “...CA is not only the fifth largest economy on the planet, but ultimately could be one of the most energy-efficient economies, with a track record of demonstrating the ability to decouple economic growth from carbon pollution.” However, what is a bit disturbing is that the Executive Summary does not appear to emphasize CCUS role but in the body of the document the reader comes away with a quite different version. It cannot be overemphasized that the chosen plan scenario must pursue direct emissions reductions and not rely on or fund carbon capture.

There will always be some exceptions, of course, but only the most extreme cases should be considered (e.g., cement manufacture where it is not currently feasible to achieve the high temperatures strictly by renewable energy sources).

Finally, please correct in the Executive Summary and elsewhere in the document the definition of “green hydrogen”. A footnote indicated that “For the purposes of the Draft 2022 Scoping Plan, “green hydrogen” is not limited to only electrolytic hydrogen produced from renewables”. This is incorrect-it is widely accepted that green hydrogen is defined as hydrogen produced using only renewable energy sources.

Sincerely,

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