



June 23, 2022

Governor Gavin Newsom
California State Capitol
Sacramento, CA 95814

Liane Randolph, Chair
Members of the Board
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted electronically via <https://ww2.arb.ca.gov/applications/public-comments>

Re: Comments on Draft 2022 Climate Change Scoping Plan and Draft Environmental Analysis

Esteemed Governor Newsom, Chair Randolph and Members of the Board:

Biofuelwatch¹ is an international organization that works to increase public understanding and civic engagement on the land-use implications of climate policy. We have a particular focus on the environmental harms and social inequities of large-scale industrial bioenergy projects, and we work extensively on addressing the negative ecological and social outcomes of policy and actions that are justified as being beneficial to the global climate, yet carry with them risks and threats to public health and natural resources. This brief letter is provided by our organization to the California Air Resources Board (CARB) as comment on the Draft 2022 Climate Change Scoping Plan (Draft Scoping Plan), the associated Draft Environmental Analysis (Draft EA) and the June 23, 2022 hearing held by CARB featuring the staff presentation and public comment on these matters.

Draft Scoping Plan Fails to Protect Communities and the Environment

Biofuelwatch stands in solidarity with grassroots and frontline stakeholders, as well as the Environmental Justice Advisory Committee (EJAC), in rejecting the false narratives and erroneous assumptions that are embedded in the Draft Scoping Plan, as well as threaded through out the Draft EA. The Draft Scoping Plan needs extensive revision and reframing to address the needs of our communities, the environment and the climate. Our organization joined more than 150 other organizations in a letter that states:

The goals and benchmarks in California's plan must end emissions at the source and avoid the pursuit of a so-called carbon neutrality that will prop up industry scams like carbon markets, carbon capture, bioenergy, hydrogen and direct air capture that will only serve to worsen the

¹ <http://www.biofuelwatch.org.uk/>

climate crisis, exacerbate water shortages, and continue the disproportionate harm our current energy system has on frontline communities.²

We reiterate the imperative of taking the recommendations³ of the EJAC into greater account when revising the Draft Scoping Plan to actually provide a climate plan that responds to the needs of people and the planet instead of protecting polluters and their profits.

Mitigation Deterrence Must Be Addressed

One of the concerns with the promotion of ‘carbon dioxide removal’ and ‘negative emissions’ in the Draft Scoping Plan arises from the significant amount of resources and political energy that are being focused on the development of technologies that may not achieve their stated goals, and that carry with them extensive threats to water and biodiversity resources, as well as presenting a host of public health and safety concerns. When this political energy is focused on the hypothetical future removal of carbon dioxide from the atmosphere as opposed to the direct emissions reductions that would be the foundation of any science and equity-based plan to respond to climate change it raises questions of **mitigation deterrence**. Mitigation deterrence is referred to as *the risks of negative emissions or carbon removal technologies delaying or deterring climate mitigation activities*. This is an active field of academic and policy study⁴. These dynamics must be addressed by the ARB, and in fact they merit being elevated to being the primary topic of a workshop to the same detail of discussion as related workshops such as that hosted by CARB on ‘Engineered Carbon Removal’. The failure of the Draft Scoping Plan to address in any manner these very serious ethical and moral issues that evidence shows are resulting from the very focus on technologies that is central to the current CARB approach to climate is contributing immensely to the existing crisis in the governance of ‘decarbonization’ erupting across the state.

Conclusion: Members of the Board Must Address Regulatory Capture

Our organization will remain engaged on these processes. There are clear indications that CARB has become beholden to the very industries that the agency should be vigorously regulating. These dynamics must be addressed by the Board and firm direction must be given to staff to reframe the markets and technology-based approach to climate into one that elevates public health and equity as more than rhetorical tools to greenwash dirty energy and a predatory economy.

Sincerely,



Gary Graham Hughes
Americas Program Coordinator
Biofuelwatch
garyhughes.bfw@gmail.com
+1-707-223-5434

² <https://www.foodandwaterwatch.org/wp-content/uploads/2022/06/Group-Letter-Fix-CAs-Climate-Plan-6.21.2292.pdf>

³ <https://ww2.arb.ca.gov/sites/default/files/2022-03/Letter%20to%20CARB%20-%20EJ%20Recommendations%20for%202022%20Scoping%20Plan%2003-09-22.pdf>

⁴ <http://wp.lancs.ac.uk/amdeg/>