Comments on 2022 Draft Scoping Plan – part 2 6/23/22

1. NWL. The plan makes heavy use of emissions reduction and carbon storage on NWL.
	1. But you don’t even know whether it is a net sink or net source.
	2. It varies widely with about a 7-year period. Slide 28. What causes this variation? El Nino or La Nina cycles?
	3. Using a 20-year average is not justified. Any trend is not statistically significant.
	4. These sinks will probably saturate.
	5. How permanent are the forest and soils sinks? Will they last for 50, 100, or 200 years? How about 1000 years?
	6. It seems risky to rely so much on this.
2. How much clean electricity will be needed?
	1. CARB says it must increase 68%.
	2. Many experts and the PUC president say “two or three times” as we electrify everything
	3. It is essential that you get this critical estimate correct.
3. CCS or DACS should be limited to no more than 10% of the required reductions.
4. It is important to increase the adaptation of community solar.
5. Add goals for 2025 and every 5 years through 2045.