**I am Clair Brown, an Economics professor at UC Berkeley and a volunteer with 350 Bay Area.**

**The modeling and economic analyses for the Scoping Plan are unrealistic and based on biased and non-transparent assumptions.**

**● The comparison of the four Scoping Plan alternatives is based upon assumptions that overstate the costs to faster phasing out of the oil and gas the, and understate costs of Carbon Capture and Storage (CCS) and health impairment. An over reliance on CCS and Direct Air Capture (DAC) results from unrealistic estimates of their net costs, actual effectiveness, and probability of successful implementation.**

**●  The International Energy Agency’s roadmap to net zero includes no investment in new fossil fuel projects. CARB’s final scoping plan must not include irresponsible investments in new fossil fuel projects, including their proposed:**

**building 33 new fossil gas plants, new investments in refineries to produce blue hydrogen instead of green hydrogen, and new investments to capture CO2 for production of dirty biofuels.**

**Investments must focus on building out renewable energy and restoring natural carbon sinks. The use of CCS must be limited to hard-to-decarbonize sectors.**

**●  CARB’s Scoping Plan has not provided the required transparency.**

**The public has not been given access to the information required to evaluate the models used by CARB. The use of proprietary models PATHWAYS and IMPLAN are based on specific assumptions not applicable to the scenarios, and results in a method that is not transparent and not replicable.**

**The Draft scoping plan provided hasn’t allowed meaningful public assessment.**

**Thank you for working with the CARB staff to improve the scoping plan to reduce greenhouse gas emissions with equity and justice to reach the state’s goals in 2030 and beyond.**