My name is Greg Spooner, and I’m an organizer with Extinction Rebellion and Scientist Rebellion.

All 4 scenarios of the scoping plan rely on CO2 removal (or “CDR”). CARB’s emphasis on CDR is worrisome. Alternative 3 relies on a CDR of ~80 MtCo2e/year in 2045, and only reduces emissions by 80% (while Alternative #1 reduces emissions by more than 90%).

The technologies to achieve this much CDR include: BECCS, DAC and CCS. Let’s consider them briefly:

The best DAC “success story” is the Orca facility in Iceland. It managed to capture 4000 tons per year in a demonstration. Alternative 3 would require us to achieve 20,000 times as much.

The largest BECCS “success story” is an ADM plant in Illinois that captured ~0.5 million tons/year. We would need 160 times this to reach Alternative 3 CDR requirements. As environmental researchers at Lancaster University have written, BECCS is “a largely imaginary technology with poorly understood impacts and resource demands”.

CCS, on the other hand, HAS been successfully demonstrated. But even the best examples achieve only 1 MtCo2e/year. CCS also uses tremendous amounts of water, with the best water use being a few hundred gallons per ton. I estimate we would need the equivalent of 20% of a Lake Hetch Hetchy every year, and likely a lot more.

Is it wise for our plan to rely on energy, water, and land resource intensive technologies still in their infancy? Please consider scenarios like Alternative #1 that more aggressively reduce GHGs.

Finally, the Supreme Court stands ready to gut EPA’s ability to regulate GHS. California MUST lead on climate. Reducing emissions rather than relying on risky CDR technologies is our chance to do so.

Thank you.