

From: [Garcia, Lindsay@ARB](mailto:Garcia.Lindsay@ARB)
To: ARB Clerk of the Board
Subject: FW: Add to SP docket -- FW: comments for draft 2022 scoping plan
Date: Thursday, July 21, 2022 2:41:59 PM
Attachments: [comments draft scoping plan.docx](#)
[comments draft scoping plan JWarren.pdf](#)

From: Jan Warren <jtxwarren@gmail.com>
Sent: Friday, June 24, 2022 10:21 PM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: comments for draft 2022 scoping plan

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Hi, I'm both embedding my comments and also attaching them. 10:20 pm

June 24, 2022

Clerk of the California Air Resources Board
Comment on 2022 Draft Scoping Plan
Dear Clerk and Board Members,

I attended the June 23, 2022 public meeting yesterday in the EPA building in Sacramento. I, like many others who wanted to speak, got up early, in my case 5:20. I was grateful for an opportunity to ride with others on a bus arranged by APEN. We arrived just in time for us to fill out the speaker card, submit it, and enter the Board auditorium.

Since those who came to offer public comments we thought at most there would be a short intro and quickly move to hear from the public. It took almost 2 hours for the lengthy overview of the draft scoping plan and then I had to listen to people privileged In State positions speak. I came to speak and to listen to the public, so I was very disappointed.

Then when the EJ Advisory members rose to share their presentation they didn't get very far before the technicians encountered difficulties with the slides. We waited another 25 minutes for the problem to be resolved so the EJ Advisory members could finish their presentation. The room was full with people waiting to speak.

Our buses were scheduled to leave at 2:30, which meant that a lot of people wouldn't get to speak. Negotiations were made so that one bus would stay and not leave until 5 pm. A smaller group stayed to speak and even some of them didn't get to speak.

We are a large State with 40 million people, so one size doesn't fit all. The poor and those in rural parts of the State are less likely to have access to public transit and other amenities. I listened to many people who said they don't even have the means to buy a gas powered car. The Scoping Plan should include allowances or exemptions to bridge the divide. People who are working 2 and 3 jobs to survive, don't have the luxury to travel to Sacramento for a meeting.

I found it interesting that some of the Board members could tour a carbon capture plant and yet people were extending invitations to come to their community to hear the kind of help that would make a big difference in their lives. A workshop is not a replacement for good listening and dialogue. Please make arrangement for your staff to reach out to these communities.

The focus should be on using solutions that we know work and scaling them with more resources. Pilot projects have their place; however, there shouldn't be so much funding and expectation of

quick fixes.

We need to have a real plan to move off of fossil fuels. The fossil fuel industry continues to pivot with a new way to stay in existence. Biofuels is no more a bridge fuel than natural gas. The industry uses great advertising and marketing. We need to scale natural, clean sources that don't drive up the price of food. Even ethanol was a sales job by the industry. It's proven to not be as clean as was sold to us, when the entire lifecycle is included. The farmers in Iowa are screaming right now on what the CCUS is doing to their land and communities.

- Roughly 2/5's of American corn and soybean crops now end up burned in engines.
- The biodiesel share of soy has increased from 21% in 2010 to 40% in 2021.
- The 90% capture rate assumed in CARB's modeling has no basis in current technological experience at refineries.
- David Clegern, a CARB spokesperson, said the agency expects carbon capture to account for less than 2% emission reductions by 2045.
- We need more focus on 2030 and 2035 reductions.
- Regarding each of the 4 alternatives, each one should have a 2035 with target reductions and a 2045 list of specific ways to reduce carbon that has been proven.
- Instead we are given 2 alternatives for 2035 and 2 for 2045. That's like comparing apples and oranges.
- Trace the money back to who will benefit from the CCUS projects that increase pollution burdens in impacted communities.
- Show us for each pollution reduction plan where the money comes from, who benefits, and who is harmed?
- Precisely explain how the people in impacted communities will directly benefit from the draft scoping plan.
- 2020-2030 is a critical decade. The IPCC says we have 8 years left now to make significant reductions.
- How much of the 2017 scoping plan is on track for reaching goals? How many were implemented?
- In 2013-2017 CA refineries exported 20-33% of production.
- Greg Karras report has shown that using biofuels will just mean more exports.
- Real solutions require more than just goals for 2045.
- The CA refining capacity is over built. The refining industry is seeking to protect its otherwise stranded assets.
- I didn't hear anyone talk about solar. The State is mostly at the mercy of 3 large monopoly utilities who haven't shown that they can manage this transition without fires and blackouts.
- What we need is distributed power through microgrids if we're going to make the transition.
- Building new natural gas plants is a non-starter. We have to quickly address and reduce methane and leakage.

- Modeling is only as good as the assumptions.
- Value the indigenous care of the natural environment and meet with Jill.
- Respect and humility go a long way. Build relationships with people who have lived experiences on the ground, not just people with degrees. Common sense is still a virtue.
- Re-evaluate the LCFS and Cap and Trade with excess credits floating around.

I look forward to seeing the corrected draft and answers to my concerns

Jan Warren
3202 Primrose Lane
Walnut Creek, CA
925-818-6530

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