From: ARB Clerk of the Board
To: Bechtold, Bradley@ARB
Subject: FW: ejac
Date: Thursday, December 15, 2022 8:35:32 AM

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-----Original Message-----
From: Jennifer Valentine <faboo1028@yahoo.com>
Sent: Wednesday, December 14, 2022 1:34 PM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: ejac

first i want to thank the Board for its hard work, and acknowledge the efforts of the Environmental Justice Advisory Committee. i strongly support for EJAC's recommendations.

1. There is much to commend in the Scoping Plan, including its commitment to an interagency planning process for a supply-side phasedown of oil refining. This is a huge step forward from the state's exclusive focus on demand reduction. However, there must be robust and immediate follow-through on that commitment to refinery phasedown. The proof is in implementation.

Petroleum phasedown plans must address the growing export by California refiners of their excess production of gasoline, diesel, and other petroleum fuels, and the pollution produced by that refining for export. The current Plan only accounts for export of finished fuels to two states. It must consider all foreign exports and the pollution associated with those exports.
Independent assessment shows that if we curb pollution from refining for export, we could cut up to one-third of our total petroleum emissions, and simultaneously reduce in-state oil drilling and oil imports, without any risk whatsoever to our in-state fuel supply.

2. The Plan's continuing reliance on carbon capture and sequestration (CCS) for oil and gas operations is deeply misguided. Large-scale deployment of CCS will indefinitely lock in fossil fuel infrastructure, exacerbate pollution, and undermine California's climate leadership. Depending on engineered carbon removal to meet our climate goals is a serious mistake. We need direct emissions reductions.

Risky and ineffective carbon capture technologies have been heavily promoted by fossil fuel lobbyists because they maintain business as usual. But decades of investment in CCS projects has not produced good results, despite all the hype: CCS has repeatedly failed to cut carbon emissions as promised.
Moreover, it requires large amounts of energy, which threatens California's grid stability. It also increases water usage and risks polluting groundwater and air quality.
Finally, transportation and storage of carbon dioxide endangers communities, even with guardrails in place. Communities targeted for CCS already experience unacceptable levels of risk and pollution. They don't need the additional risk and dangerous health impacts of pipeline ruptures and leaking wells full of carbon waste.

3. The health analysis conducted by CARB was extremely limited in scope and not fully integrated into the economic modeling. It failed to inform the CARB Board and the public about the comprehensive public health

threats, benefits, and costs of the potential policies and scenarios within the Scoping Plan. To minimize the adverse health equity consequences of the 2022 Plan, and to develop the most health-protective overall climate strategy for our state, we need a comprehensive health equity analysis, performed by public health experts, to inform the implementation of each of the Plan's components. To this end, CARB needs to immediately establish a Public Health Advisory Group.

thank you for your attention - j valentine