​CARB’s use of E3’s detailed top down model of the energy sector identifies potential approaches to reach California's mandated greenhouse gas goals, in preparation for the 2022 Scoping Plan. One of the conclusions in the E3 slide deck was that carbon sequestration will be necessary to reach those goals:

“All scenarios require significant levels of carbon dioxide removal (CDR), with annual amount varying by scenario. This study does not prescribe specific recommendations on CDR strategies, but rather highlights the necessity for them and discusses the range of options, which includes direct air capture with storage (DACCS), bioenergy with carbon capture and storage (BECCS), and natural and working lands strategies (NWL)” (slide 36)

When will CARB be presenting the **quantitative** impact and scaleability from different scenarios and approaches in the Natural and Working Lands sector, so that it is possible to compare the costs of carbon sequestration in the energy sector (which are high) with what might be feasible with **more strategic** investments in the Natural and Working Land sector?

The timeline in the staff presentation indicates there will be additional inputs as CARB moves toward the next iteration of the scoping plan, but all parties (including E3) need a rigorous, transparent, and detailed basis for understanding how carbon sequestration from Natural and Working Lands could contribute, and whether that would be more cost-effective and feasible near term than “researching” to lower the costs of DACCS and BECCS, the strategies advocated in the current report.

When will E3 incorporate the costs of the health impacts of fossil fuel combustion, a direct cost with substantial scientific documentation, in their model? Simply indicating that the high CDR scenario has health impacts is inadequate, especially compared to the exquisite detail in other areas of their modelling.