

June 23rd, 2022



Protecting Marin Since 1934

Liane M. Randolph, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on Draft 2022 Climate Change Scoping Plan Update of May 10, 2022

Dear Chair Randolph:

Thank you for the opportunity to comment on the California Air Resources Board (CARB) Draft 2022 Climate Change Scoping Plan. While Marin Conservation League supports CARB's statement of purpose and intent to plan for carbon neutrality by 2045, we have concerns about key elements in the Scoping Plan. Marin Conservation League is an environmental organization with an 88-year history of effective advocacy on behalf of Marin's natural assets.

As the Scoping Plan says, by moving to a framework of carbon neutrality, the scope for accounting is expanded to include all greenhouse gas (GHG) sources and sinks. As such, carbon neutrality is achieved when the flux of GHGs from the sources equal the sinks.

“We have a chance to re-envision California’s future and set the state on a path to be carbon free by 2045 while advancing equity. The Scoping Plan provides a roadmap outlining key policies we can implement to achieve our climate goals while improving the health and welfare of Californians and addressing disparities in health outcomes to create a more equitable future.”

Marin Conservation League concerns. To achieve these critical outcomes, we request that you include in the draft plan more robust analysis on a range of issues which are cause for our concern, including:

- Describing more fully how the state can achieve its 40% GHG 2030 GHG emission reduction goals.
- Modeling on how to reach the 2045 carbon-neutral goal with greater emission reductions, including various scenarios that would place less reliance on still-to-be-proven technologies for carbon capture and storage and direct air capture.
- Accelerating to 2035 a carbon-neutral goal, necessary given the growing urgency of the climate crisis.
- Modeling on how to reach a 100% clean electric grid.
- Elevating the role of Natural and Working Lands, in carbon sequestration and how this could work in concert with achieving the Governor’s 30X30 biodiversity goals.
- Detailing what is needed to improve the cap-and-trade program so that it’s capable of achieving the reductions CARB expects from it.

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Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

Achieving 40% GHG emission reduction by 2030. The new Scoping Plan is intended to address how we meet our statutory goal of reducing emissions to 40% below 1990 levels by 2030, but only six of the 200 pages are devoted to meeting this goal. Moreover, the Scoping Plan states that California is not on track to reach this critical goal. We are convinced the goal is feasible and request a Plan that details how it will be achieved.

Targeting more robust emission reductions. Given the accelerating urgency of climate change impacts on California, the Scoping Plan needs to target more ambitious goals. We request that the Plan include a scenario for reaching carbon neutrality no later than 2035, **through ambitious emissions reductions, accelerated deployment of renewables, and further development of nature-based carbon sequestration.**

Analyzing the feasibility and problems associated with carbon capture technologies. The Scoping Plan relies heavily on very expensive carbon capture and storage and direct air capture technologies to achieve its goals without demonstrating their long-term net effectiveness in reducing carbon in the atmosphere.

Accelerating California's transition to a clean energy grid. The Scoping Plan should identify and prioritize actions necessary to create an adequate and reliable electricity infrastructure, which is at the core of reducing climate change and providing consumers with clean energy options.

Strengthening the role of Natural and Working Lands in carbon sequestration. For the first time, the Scoping Plan includes the contribution of Natural and Working Lands to the state's GHG emissions and carbon sequestration. The capacity of natural forested and woodlands to sequester carbon has already been demonstrated. However, the Plan needs to show more clearly how we might increase carbon storage in the state's working land soils and associated ecosystems. With enhanced management and funds devoted to that purpose, the state's working lands could draw down large amounts of carbon dioxide per year, while also providing numerous other benefits, such as drought resistance, better crop yields, and increased food security.

Marin Conservation League looks forward to hosting a forum on the revised CARB Scoping Plan this fall, hopefully with representation from CARB scientists.

Sincerely,



Robert Miller
President, Marin Conservation League
Chair, MCL Climate Action Working Group