

Comment 1 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Damian

Last Name: Walters

Email Address: dam272440@gmail.com

Affiliation:

Subject: GLOBAL WARMING

Comment:

To whom it may concern. I have what I believe to be a viable solution to global warming. I'm in possession of a chemical formula that I believe breaks down carbon dioxide to carbon and oxygen instantaneously. The ombudsman gave me 2 contact at ARB J Collins and Jason Meggs, I E mailed both of them, Collins never replied, Jason Meggs did. I gave him the information I had, he said that he needed more information and told me to go to the outside and get it. This is a solution for global warming. He didn't offer his labs to do the analysis. He throw me under the bus. What I would like is the State to put a contract up for bid stating, breaking down carbon dioxide instantaneously, and will be verified by a government lab. Thanks Damian

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-21 10:43:20

No Duplicates.

Comment 2 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: John

Last Name: Suhr

Email Address: johnsuhr@aol.com

Affiliation: Retired architect

Subject: Publish cost-benefit analyses of all regulations

Comment:

[corrected text] The US Supreme Court now requires the EPA to conduct cost-benefits of its regulations. California now needs to comply with that ruling and publish exactly what benefits its climate change regulations will produce - including EXACT reduction of global temperatures, sea levels, hospital admissions, extreme weather events and all the other global warming claims as well as the costs imposed on each citizen and business. This will require publishing the EXACT relationship between GHG emissions and global temperatures which has yet to be done - which will reveal that California emissions reductions will not have a significant effect on global temperatures and the other effects and therefore the costs will be EXCESSIVE. It should then change focus to concentrate on reducing traffic congestion by application of latest technologies, reducing the urban heat island effect and limiting the health maleffects of unburned hydrocarbons, NOx and SO2 diesel emissions by applying new clean diesel regulations to genuinely improve the environment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-21 16:03:51

No Duplicates.

Comment 3 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Micah

Last Name: Mitrosky

Email Address: mmitrosky@ibew569.org

Affiliation: IBEW Local 569

Subject: Quality of Life Coalition Comments CARB 2030 Target Scoping Plan
Comment:

Please see attached public comment letter from the Quality of Life Coalition on the 2017 Climate Change Scoping Plan Update: the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-scopingplan2030-AHFUJwBgUG8KZQF1.pdf>'

Original File Name: Quality of Life Coalition CARB 2030 Targets 012717.pdf

Date and Time Comment Was Submitted: 2017-01-27 12:11:01

No Duplicates.

Comment 4 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Charles
Last Name: Spraggins
Email Address: B4R.Grandkids@gmail.com
Affiliation: 4R Grandkids

Subject: Flaws to 2030 Scoping Plan
Comment:

-- 4R Gandkids Campaign --
Save Our Water Ventura
4666 Vanderbilt Court
Ventura, CA 93003-1929
B4R.Grandkids@gmail.com
805.633.1061

January 29, 2017

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Public comment regarding THE FLAWED AND INADEQUATE 2017 CLIMATE
CHANGE SCOPING PLAN UPDATE - THE PROPOSED STRATEGY FOR ACHIEVING
CALIFORNIA'S 2030 GREENHOUSE GAS TARGET

Dear Sirs:

Everyone agrees that climate change and greenhouse gases are a serious problem. AB32 and SB32 were necessary to enable some hope for our future generations. However, the proposed strategy for achieving the 2030 target is flawed and inadequate. It should not be approved unless changes are made to the plan.

The flaws and inadequacies are as follows:

1. Although AB32 was passed many years ago, no one at the local level (city council level) is paying attention to GGE objectives. Numerical objectives for each county and city are not published regularly on city and county websites. In fact, a look at the state's ten year history of GGE emissions shows that total emission have flat lined for the LAST FIVE YEARS. CARB has failed to publish local and regional data, to keep it current, and to make that data readily available to the public. Failure to provide specific quantifiable state, county and city data has created a constant moving target -- which has led to business as usual. Quantifiable data is needed in order to increase public involvement and participation.

2. CARB has increased the probability of failure by allowing

"business as usual" adjustments during CEQA reviews when calculating GGE compliance. This failure was discussed in the California Supreme Court's (S217763) 2015 review of Newhall Land and Farming's project for a new community of 58,000 residents. As you will recall the CEQA review by the California

-- next page --

Page 2 of 2 -- Spraggins to CARB

Department of Fish and Wildlife concluded that there would be no significant impact of GGE from the proposed new community of 58,000 residents. Our belief is that this kind of CEQA outcome demonstrates that CARB scoping has been a failure. Calculating GGE savings using "business as usual" adjustments defeats the intent of AB/SB32.

3. The Scoping Plan does not allow local communities to make their own decisions on how to reach objectives. For example, Appendix B ("Local Actions") simply provides a list of things to do with regard to development projects. There is no guarantee that compliance with this list will result in a 40% reduction in GGE.

4. The Scoping Plan's macro economic model is flawed because it does not adequately consider micro economic impacts across various sectors of the population. The model considers environmental justice for low income groups, but it does not adequately consider what will happen to California's middle class families, particularly those who work in the "non-unionized" private sector. The model simply is provided to show that the measures will be neutral from the standpoint of tax collection. There are going to be winners and losers. The public needs more clarification of what looks like a zero-sum game.

5. The omission of population growth control is a major failure. The scoping plan does not include the possibility GGE compliance by means of population control by limiting growth in over populated local communities. There is no mention of limiting foreign immigration, no mention of any need for birth control programs. There is no mention of the need to eliminate the RHNA requirements. Thus, GGE savings will be substantially negated by population growth.

6. An adequate Scoping Plan must recognize the following Three Rules of Neo-Sustainability: 1) Environmental Primacy; 2) Systems Thinking; 3) Limits to Growth.

7. The proposed Scoping Plan is an "open barn door" designed to accommodate lobbyists, a door which will allow "business as usual", and the objectives of AB32/SB32 will never be achieved unless the above deficits are corrected.

Respectfully,

Charles Spraggins, Chair
4R Grandkids Campaign
SaveOurWaterVentura.org

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-scopingplan2030-BjRQZlNjVjIKUwQ1.pdf>'

Original File Name: 2017 1229 Comment California Air Resources Board.pdf

Date and Time Comment Was Submitted: 2017-01-29 17:13:25

No Duplicates.

Comment 5 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Al

Last Name: Davis

Email Address: azboulder@gmail.com

Affiliation:

Subject: Comments on Scopingplan2030

Comment:

Dear Air Resources Board,

Thank you for this update on the proposed strategy for achieving our 2030 GHG targets. I am concerned that a refinery that chooses to process oil derived from tar sands -- the excavation and processing of which releases 37 times more GHGs than typical oil -- does not see a direct consequence of this decision in the cap and trade market, because the market is based on end smokestack emissions alone, regardless of source, yet clearly some sources are vastly more harmful to the atmosphere than others. Is there a way to account for incredible cradle to grave GHG emissions of the fuel source? California needs a strong enough cap and trade system that refineries choosing to process tar sands oil will need to pay vastly more into the market, given the true GHG cost.

Thank you,

Al Davis
Mountain View

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-31 22:19:42

No Duplicates.

Comment 6 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Anthony

Last Name: Wexler

Email Address: aswexler@ucdavis.edu

Affiliation: UC Davis

Subject: Inhaled Anesthetics as Greenhouse Gases

Comment:

See enclosed

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-scopingplan2030-BnVXMLI8WXoDbAZo.pdf'

Original File Name: Scoping Plan Comment (20170122).pdf

Date and Time Comment Was Submitted: 2017-02-02 08:26:57

No Duplicates.

Comment 7 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: John

Last Name: Brennan

Email Address: jb96094@gmail.com

Affiliation:

Subject: less air pollution from vehicular emissions

Comment:

There is a weight fee attached to commercial vehicles e.g. for my '99 Ford F250 it's \$204. [for a 1/2ton truck]

There are many large RV's, such as Winnebagos, on the road which are far heavier, say 12-18000# which have no weight tax on their registration.

If the weight tax were applied to these large emitters, their numbers would decline. Benefits:

1. More funds for air quality planning and management and road maintenance
2. Less emissions of ROCs, NOx, and PM 10 soot.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 12:53:58

No Duplicates.

Comment 8 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Dr. George B.

Last Name: Kauffman

Email Address: georgek@mail.fresnostate.edu

Affiliation:

Subject: Adopt strong climate change plan!

Comment:

Adopt strong climate change plan!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 13:03:09

No Duplicates.

Comment 9 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: James R

Last Name: Monroe

Email Address: randy@monroescienceed.com

Affiliation:

Subject: Climate Change Scoping Plan

Comment:

The section on "Climate Science" be strengthened and include: the unprecedented Arctic warming that is driving accelerated sea level rise, and a discussion of how the lower future emissions scenarios are also associated with fewer climate impacts to inform the importance of the climate mitigation choices we face today so as to avoid the most serious impacts by the end of this century.

The section on the water-energy nexus be supported, including implementing the registry for greenhouse gas emissions from the water sector under SB 1425; reducing the carbon footprint of water systems and water uses; and advancing water conservation and management strategies that are both water and energy efficient to meet California's, water, safety, health, environment, and economic needs.

CARB consider additional renewable procurement beyond what's required by the current Renewable Portfolio Standard (RPS) and explore this option for load-serving entities (LSEs) through the Integrated Resources Plan process. Meeting the 50 percent RPS under SB 350—and even exceeding it—is achievable and feasible for many LSEs and will be important for maximizing the emission reducing potential of switching from gasoline-powered to electric vehicles (EVs) as more EVs are brought onto the grid.

The state initiate action to reduce natural gas use in homes and businesses beyond what would be reduced through energy efficiency programs by accelerating the electrification of buildings' air and water heating and cooling systems, given that natural gas use in buildings represents 9 percent of the state's total carbon emissions.

The final scoping plan be updated to reflect the recent midterm review of the Zero Emissions Vehicle (ZEV) Program, indicating that ZEV sales for 2025 will fall short of targets, and, therefore, include a commitment to additional measures needed to stay on track to 2025 and the ultimate goal of 4 million EVs by 2030.

A near-term action be included to evaluate self-driving car technologies, their climate impacts, and policy options—in collaboration with Department of Motor Vehicles and California Energy Commission—to identify: (1) strategies to pair self-driving technology with EVs and ride-sharing and (2) policies and strategies to prevent negative climate outcomes from potential increased vehicle miles traveled from self-driving cars. Studies indicate both enormous potential and risks of self-driving vehicles: they could help reduce vehicle emissions by nearly 50 percent or nearly double them.

Much stronger targets for electrifying heavy-duty vehicles be

adopted, including the last mile delivery rule and drayage trucks, greater freight efficiency, and a more ambitious target for zero emission freight vehicles and equipment by 2030. For example, electric transit buses powered by today's grid in California are more than 70 percent lower lifecycle emissions than the newest diesel or natural gas buses. California continue to utilize a price on carbon as one important tool in the suite of policies the state relies on to cut global warming emissions. Regardless of the exact approach (e.g., extending the cap-and-trade program, adopting a carbon tax or other design), the state's carbon pricing program should be designed to benefit communities most burdened by pollution. Moreover, the draft 2030 Scoping Plan should reduce emissions in ways that improve public health such as the direct refinery emissions reductions, among others.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 13:12:43

No Duplicates.

Comment 10 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jason

Last Name: Herring

Email Address: jaherring@usa.net

Affiliation: Citizen of California

Subject: Emissions 2030 - mine the sky

Comment:

Sunny California: the moniker that is one of the reasons I moved to this state 20 years ago. Beautiful weather and temperate climate provide an environment made for widespread deployment of a powerful weapon in the fight against climate change and for clean air: solar energy. It seems like a no-brainer that the state known for it's pleasant weather would be an ideal place to combat emissions and pollution leveraging a natural climate resource. Fight climate change with climate, if you will.

Germany, hardly an undeveloped country with a low energy grid demand, made history in 2014 by tapping solar power for more than 50% of it's total energy grid needs for a couple of days in June of that year.

<http://theweek.com/speedreads/451299/germany-gets-50-percent-electricity-from-solar-first-time>

This is impressive for any modern nation, but even moreso when you look at the meager solar potential available in it's territory by comparison:

<http://solargis.info/imaps/>

The German people haven't exactly had to tighten their belts and endure hardship to reach this state of solar grid deployment. With excellent transportation infrastructure, national healthcare for all citizens and a high GDP one has to wonder why the United States, much less California, isn't out ahead of this. The only state in the US which has lower "solar mining" potential than Germany is Alaska. Take some time to explore that solar map link above. Take all the time you need. Then, ask yourself, why aren't we *doing* this?

Another powerful method to combat climate change with the roofs over our heads in limiting heating and cooling energy requirements and, sometimes, create a little something for the dinner table, are green roof initiatives. From residences to grocery stores, buildings around the world are putting a little mother nature on top of tar and paper. Organizations such as Brightfarms(.com) partner with supermarkets to grow urban farm-fresh produce a few dozen feet from where they are sold. This not only provides substantial insulation for the supermarket and extra-fresh produce for their customers but shortens the supply chain and removes

transportation energy consumption. Roof-to-table. Why is this happening more in Chicago and Boston than in California?

Recently some cities around the globe have begun to require new construction to have solar or green roof treatment. Cities as diverse as Hamburg, Germany, Basel, Switzerland, Toronto, Canada and San Francisco here in California have crafted regulations and initiatives, a combination of carrot and stick, to push the rooftop revolution forward. France has considered national legislation along these lines. This type of program should be elevated to a statewide one to reach toward our emissions targets.

Solar or green, or better yet, a combination of the two, can take a large bite out of emissions created by energy production and transportation. California has historically been a world leader in environmental action and set the standard others follow. The challenge has never been greater, and the forces aligned against the clean energy movement now stretch all the way to the White House. Despite that, I firmly believe that by mining our great natural solar resource we can make powerful advances toward a cleaner future. Investment in our untapped roofs in this challenge will certainly bear fruit, or at least herbs and vegetables.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 13:57:28

No Duplicates.

Comment 11 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Martin

Last Name: Frost

Email Address: me@cs.stanford.edu

Affiliation:

Subject: Climate change scoping

Comment:

The section on "Climate Science" should be strengthened and include: the unprecedented Arctic warming that is driving accelerated sea level rise, and a discussion of how the lower future emissions scenarios are also associated with fewer climate impacts to inform the importance of the climate mitigation choices we face today so as to avoid the most serious impacts by the end of this century.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 14:06:55

No Duplicates.

Comment 12 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Don

Last Name: Miller

Email Address: don.miller@a-m-eng.com

Affiliation:

Subject: Climate Change

Comment:

If there was every a time to address climate it is now.

As a life-long Californian we must:

- price carbon so that it is not a worthwhile investment
- switch to renewable energy
- require solar on every home & building
- build safe clean low impact energy storage
- energy clean trucks, buses, trains
- modify our cities to provide ease of human powered transportation

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 14:37:12

No Duplicates.

Comment 13 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Richard

Last Name: Gray

Email Address: richardgray@wavecable.com

Affiliation: 350 Bay Area

Subject: Achieving 2030 GHG goals

Comment:

Carbon pricing must be part of the strategy to produce reductions in gasoline demand. Cap and Trade has failed to bring down GHGs because it is too easy for polluters to buy credits by setting aside forest in distant states or counties. In any Carbon pricing scheme the cost of Carbon must be raised to at least \$100/ton to have any beneficial effect, and any offsets should be local and benefit the most impacted communities.

California refineries must have their emissions capped so they cannot switch to dirtier oil feedstocks which would have detrimental effects on the health of frontline communities. Nor should ARB take any actions which would facilitate the import of tar sands bitumen for refining for export as demand for fuels declines in CA. Importing Baaken crude raises serious safety concerns due to its volatility and tendency to explode.

Realistically, in order to achieve the state's goals, the oil industry must expect its business to contract, so limiting their ability to expand operations or permitting upgrades which would allow capacity to increase production should not be permitted.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 14:36:26

No Duplicates.

Comment 14 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Arthur

Last Name: Gribben

Email Address: piercerel@hotmail.com

Affiliation:

Subject: Climate Change

Comment:

Climate change must be observed and dealt with if we are to survive and pass on the land to next generations. Helping the earth means helping ourselves.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 15:05:35

No Duplicates.

Comment 15 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jeffrey

Last Name: Tischler

Email Address: jeff.tischler@yahoo.com

Affiliation:

Subject: meeting greenhouse gas targets

Comment:

A carbon tax is essential to put all viable technical solutions on an equal footing, without choosing technological winners and losers politically.

Low speed, self driving rail car shuttles between adjacent cities would save energy, make cars optional, better the urban and suburban experience and give a safe transportation alternative to an aging population. This would be an R & D initiative comparable to the Airbus project in Europe. Rather than importing from the lowest bidder, we could form a cooperative venture between states, cities and private investors. Reprogramming existing rolling stock is not the answer. There isn't an "app" for this neglected sector of transportation between medium size cities and surrounding low density areas. High speed rail is more for show than to help peoples lives, when there is no connecting network to get people to their final destinations.

Reduce speed limits connecting "ranchettes" to town. People are driving Teslas, when a golf cart would serve, because they are afraid of 3 to 5 miles of highway driving. A little urban planning would go a long way for saving fuel.

Work with cities to take advantage parking lot and architectural siting of solar energy. Open space is precious and should not be wasted.

Lastly, educate and motivate people to have smaller families. We don't make progress so long as population growth out strips efficiency gains. Life is less hectic when there is more of nature and less of us. The call for more young people to fund old people's retirement is disingenuous and destructive.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 14:58:16

No Duplicates.

Comment 16 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Scott
Last Name: Forrest
Email Address: hmbScott@mac.com
Affiliation:

Subject: scopingplan2030
Comment:

Dear California Air Resources Board,

I urge you to take the strongest possible action to reduce Greenhouse gasses possible. I favor carbon taxes as the most transparent and best able to harness market forces.

In any case please select the actions that will make the most impact in reducing greenhouse gasses. Global warming is beyond urgent at this late date!

Please do not bow to industry lobby pressures to weaken your actions.

Thank You Sincerely

A concerned citizen of California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 18:22:11

No Duplicates.

Comment 17 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: francis

Last Name: mangels

Email Address: bioguy0311@sbcglobal.net

Affiliation: ucs,sierra,audubon,nrdc,+20etc.

Subject: climate change comment

Comment:

As a retired USDA scientist of 35 years, I have noticed local ecological deterioration from climate change and UV-AB radiation. That is beyond question, but I suggest remedies:
Tax heavily the motorized toys like snowmobiles, pleasure boats, and mud quads. Tax heavily the conspicuous consumption lifestyles and water users, like owning multiple houses, real estate valued over a million dollars, having a swimming pool, owning a large estate, large SUV cars, large trucks, any larger than a million dollar estate tax heavily. Give a break to food gardeners and small homeowners with incomes under \$100,000. Bluntly I propose a Thoreau type lifestyle of "SIMPLIFY" be encouraged by the tax system to cut fossil fuel use and encourage more pleasure in sociability that in owning stuff.
Further, discourage military spending, for they waste more and build nothing practical, but are made to destroy, with only a denigration of our planet as their obvious goal of total waste of war. Don't fall into the Reaganese trap of religious fundamentalism which say "The world is ending, use it up NOW!" which is but hypocritical hedonism. Bluntly we need this world. It's the only one we have. If people are too stupid to see that, or too greedy as corporation executives to see that, Use the big stick of taxes and law to beat some sense into them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 21:05:24

No Duplicates.

Comment 18 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kimberly

Last Name: King

Email Address: kimgerly@outthinkthebox.net

Affiliation: Out Think The Box

Subject: Ethane | A Green(er) Clean(er) Transportation Fuel Opportunity

Comment:

I would encourage CARB further consider improving policy and regulations for incorporating and advancing ethane as a low carbon transportation fuel.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-scopingplan2030-UDNcNQBsaIFQM1I8.pdf>'

Original File Name: Compendium_Ethane.pdf

Date and Time Comment Was Submitted: 2017-02-08 05:15:10

No Duplicates.

Comment 19 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Scott

Last Name: Crass

Email Address: scrass@csulb.edu

Affiliation:

Subject: strengthen the plan

Comment:

I urge the board to continue to address greenhouse gas reductions aggressively. In view of a federal government that's hostile to environmental regulation, California's actions are all the more significant. The market for renewable energy generation must be driven more rapidly. Accordingly, placing an appropriate price on carbon emissions through taxation should be the highest priority.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-08 08:15:06

No Duplicates.

Comment 20 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: gary

Last Name: baxel

Email Address: bacatselos@gmail.com

Affiliation:

Subject: environmental/climate change

Comment:

Hello,

As a retired engineer and longtime CA resident, I urge you to keep our state in the vanguard of environmental protection and global warming reduction. Fight the federal gov't rollbacks that likely will occur.

Setbacks for women's rights, etc. can be reversed by future administrations, but time is critical when it comes to climate change.

The most progressive measures come, not from the federal gov't, but from municipalities, counties & states. For example, banning single use plastic bags. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-08 11:48:03

No Duplicates.

Comment 21 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Richard

Last Name: Blish

Email Address: Richard.Blish@gmail.com

Affiliation: Spansion Sr Fellow, emeritus

Subject: How can we attain climate goals?

Comment:

This is not a prioritized list but rather what came to mind as stream of consciousness

The key would be to make sure progressive CA standards extend to other states and even other countries, as there is power in numbers. Many initiatives with large upside are underway and are highly useful (solar, wind), while others are pretty well tapped out (hydro, geothermal), but there are some initiatives that would benefit from more attention:

- there are many inexpensive (high return) options for conventional gasoline engines (kill the diesels due to nitrogen oxides) that should be implemented to get to fleet average of 50 mpg;
- BTW, fleet average should be in gallons/mile as one 50 mpg vehicle and one 10 mpg vehicle does NOT average out to 30 mpg. It take MANY 50 mpg vehicles to make up for one gas guzzler;
- Make truck emissions substantially more difficult as trucks use big engines and run MANY hours per day
- Require that ships NOT burn bunker fuel within the 200 mile fishing limit and turn off engines in port to use the mains;
- Require gas wells to achieve leak rate less than 0.1% as methane has a Green House Warming Potential about 20 times that of carbon dioxide
- Stop use and transport of coal in particular, but also cramp down on oil and gas;
- While I support more nuclear power (MUCH less Uranium needed than coal, while mining is destructive and dangerous), but public paranoia precludes this
- Fusion power is still on the distant horizon;
- Off shore wind makes sense to me ... is a rotor any uglier than ubiquitous power line poles?;
- Remove restrictions local power companies put on residential rooftop solar?
- Make rooftop solar more attractive for early adopters;
- Using tides to advantage makes sense but I have not yet seen a pilot;
- Make sure climate decisions are made on the basis of facts and scientific rigor rather than ideological beliefs:
- Maybe put bird distress calls on tips of wind generators?;
- While jet aircraft efficiency is difficult (GE, Boeing et al are working the issues), I would note that aircraft are more effective than surface travel (safer as well);
- High speed rail is NOT a valid answer as distances and density mitigate against it, driving cost through the roof;

Delivery services such as UPS, FedEx, DHL, Amazon and USPS are substantially more efficient than individual, so maybe a discount for a delivery service would be a good idea (such as Amazon does with Prime);
Drones and driverless cars are likely to be useful options soon but regulation needed:
FYI, I think we are holding driverless cars to an overly high standard ... we demand absolute perfect from the machines, yet humans are highly flawed and acceptable ... I object to the term "driverless" as it's more likely similar to an aircraft "autopilot"
The problem is that if the device is TOO good, the driver will doze off and be unavailable when override is needed ... What if the software inserted some bad (small, minor) decisions on a random time basis to keep the driver alert?: FYI, the search for the Higg's boson used this technique, wherein deliberate artifacts were inserted by a few overseers to see if the software would detect the anomalies;

I'm finally out of ideas!
Richard Blish, PhD (Materials Science, BS Physics)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-08 13:31:00

No Duplicates.

Comment 22 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Carroll

Last Name: Nast

Email Address: canast@colfaxnet.com

Affiliation:

Subject: Comment to scopingplan2030

Comment:

CARB should consider additional renewable procurement beyond what's required by the current Renewable Portfolio Standard (RPS) and explore this option for load-serving entities (LSEs) through the Integrated Resources Plan process. Meeting the 50 percent RPS under SB 350—and even exceeding it—is achievable and feasible for many LSEs and will be important for maximizing the emission reducing potential of switching from gasoline-powered to electric vehicles (EVs) as more EVs are brought onto the grid.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-08 21:14:30

No Duplicates.

Comment 23 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Richard
Last Name: Solomon, PhD
Email Address: risolom@gmail.com
Affiliation: retired

Subject: 2017 Draft of the Climate Change Scoping Plan
Comment:

I am writing to make comments on the CARB's 2017 plan.

As a citizen concerned about the impact of climate change on our society I support the need for strong sector specific policies in conjunction with a price on carbon that is well designed. As a clinical psychologist with 30+ years of experience working in public health related programs I would suggest the following things in particular.

First, natural gas use in buildings represents 9 percent of the state's total carbon emissions. As such, this fossil fuel is making significant contributions to the air pollution which causes respiratory illnesses in our citizens. Thus, I think the state should initiate action to reduce natural gas use in homes and businesses beyond what would be reduced through energy efficiency programs. This should be done by accelerating the electrification of buildings' air and water heating and cooling systems.

Second, oil refinery emissions adversely affect the health of those living in close proximity. The Scoping Plan must reduce these emissions much more significantly and more quickly than it does.

Third, vehicle electrification needs to happen more rapidly. It looks as if ZEV sales for 2025 will not meet the targets that have been established. More measures need to be in place to ensure that the goal of 4 million EV's by 2030 will be met.

Fourth, much stronger targets for electrifying heavy-duty vehicles should be adopted. These include the last mile delivery rule and drayage trucks, greater freight efficiency, and a more ambitious target for zero emission freight vehicles and equipment by 2030. For example, electric transit buses powered by today's grid in California are more than 70 percent lower lifecycle emissions than the newest diesel or natural gas buses.

Thank you for your attention to these suggestions. I look forward to their being included in the Draft being prepared.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-11 04:49:13

No Duplicates.

Comment 24 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Evan

Last Name: Edgar

Email Address: evan@edgarinc.org

Affiliation: California Compost Coalition

Subject: Comments on the Draft Environmental Analysis for the Proposed Strategy for Achieving Calif

Comment:

The Environmental Analysis needs to recognize baseline conditions for organic waste management practices such as landfilling when assessing the emissions from composting and anaerobic digestion facilities. Page 62 (copied above) states that compost facilities could potentially increase VOC and PM emissions, but does not discuss the baseline conditions of these materials being landfilled, with methane and other associated landfill operations emissions. Since the SLCP measures are diverting food waste and green waste from landfilling, these baseline conditions need to be recognized where the net benefit of both greenhouse gas reductions and criteria pollutants can be demonstrated when diverting green waste and food waste from landfills to composting and/or anaerobic digestion facilities.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-scopingplan2030-VjUGY1Q2V1tWYlNj.pdf>'

Original File Name: CCC 2017 Climate Change Scoping Plan Update Draft Environmental Analysis Comments 020617.pdf

Date and Time Comment Was Submitted: 2017-02-15 12:36:06

No Duplicates.

Comment 25 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Laura

Last Name: Rosenberger Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation: Sierra Club, Fresnoans Against Fracking

Subject: comment on AB 1685 & ARB Scoping Plan

Comment:

Vehicular exhaust has a higher association/correlation with heart attacks than cholesterol and cardiovascular disease. In addition, there are 8 studies across the country showing the greatest risk of giving birth to an autistic child is how close to a highway the mother lives. Scientists made lab rats obese and diabetic from auto exhaust & air pollution. (byWalter Crinnion, ND)

Including this comment in your Enforcement Policy, would inform polluters of the high public health cost of the vehicles they sell and of the possibility of lawsuits and motivate compliance. Traffic is a significant factor in classifying some communities as disadvantaged. I am willing to do further research on the health effects of vehicular exhaust to aid disadvantaged communities in litigating against companies that contribute to air pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-16 08:58:35

No Duplicates.

Comment 26 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: WILLIAM

Last Name: BOURCIER

Email Address: WBOURCIER@GMAIL.COM

Affiliation: private citizen

Subject: GHG release from desalination feeds

Comment:

The potential for GHG release from subsurface intakes for ocean desalination has been overlooked as a source of GHG release. The State of California's Ocean Plan requires that future ocean desalination plants source their feed waters from subsurface intakes rather than open ocean intakes. Waters sourced from these wells will contain significant GHG contents (CO₂ and CH₄) that would be released in the desalination process in volumes that could be as high as millions of tons per year CO₂e for a 50 million gallon per day desalination plant.

I have brought this to the attention of the regulators of the State's Ocean Amendments. Attached are three documents related to this issue: (1) my report documenting the likelihood of GHG release; (2) a follow-up study funded by the State to verify or refute my claims; and (3) my comments to the follow-up study.

My recommendation to the State is that measurement of GHG in potential desalination feed waters be required by the State prior to permitting any subsurface feeds for desalination plants in California. The issue of potential GHG releases has not been considered but in my opinion needs to be considered for siting desalination plants.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-scopingplan2030-B2ABbwdhBHkBbgJx.zip>'

Original File Name: GHG.issues.subsurface.desal.intakes.Bourcier.zip

Date and Time Comment Was Submitted: 2017-02-16 18:39:09

No Duplicates.

Comment 27 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: Proposed 2030 Scoping Plan

Comment:

Endangered Habitats League (EHL) appreciates the opportunity to comment on the 2030 Scoping Plan.

We particularly support the following component:

"Protect land from conversion to more intensified uses by increasing conservation opportunities and pursuing local planning processes urban and infrastructure development patterns that avoid greenfield development."

"Protecting natural and working lands that are under threat of conversion can promote infill development, reduce VMT, limit infrastructure expansion, and curb associated GHG emissions."

As noted above, when land is converted to development, it not only releases stored carbon immediately but, when used for automobile-dependent growth, locks in high ongoing carbon emissions for the future.

We also concur with additional work on natural and working lands inventories, particularly the role of carbon sequestration in soil, which is not affected by wildfire.

Based upon the known carbon sequestration by natural lands, and the known release of carbon when conversion occurs, we urge allocation of Cap and Trade revenues to natural lands protection. We note that agricultural lands already receive such investment in order to avoid conversion to urban uses.

An excellent off-the-shelf program deserving investment is State of California Natural Communities Conservation Planning, or NCCP, which conserves biodiversity in those areas of the state most threatened by development. Making good on existing State commitments to these programs would not only lock in carbon sequestration but also achieve co-benefits of ecosystem resilience to climate change, recreation for urban communities, and watershed protection.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-02-26 12:54:39

No Duplicates.

Comment 28 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Lloyd

Last Name: Levine

Email Address: Lloyd@FilamentStrategies.com

Affiliation: CA Emerging Technology Fund

Subject: Broadband as a "Green Strategy"

Comment:

The uploaded file reflects the comments we offered at the public hearing, and includes more specificity and detail.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-scopingplan2030-AWIHZAdyVmNQCQBt.pdf>'

Original File Name: CETF March 2017 CARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2017-03-01 10:49:07

No Duplicates.

Comment 29 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jeli

Last Name: Gavric

Email Address: jelisavetag@car.org

Affiliation:

Subject: CORRECTED: C.A.R. Comment Letter Regarding the 2017 Climate Change Scoping Plan Update

Comment:

To Whom It May Concern:

Here is the corrected version of our letter. The previous submission was scanned incorrectly. Please use this version as our formal submission. If you have any questions, please contact us at (916) 492-5209.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-scopingplan2030-BmVReQRkVClXIwAu.pdf>'

Original File Name: C.A.R. Comment Letter 2017 Climate Change Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-03-03 14:07:47

No Duplicates.

Comment 30 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Howard
Last Name: Cohen
Email Address: howard@cohensw.com
Affiliation:

Subject: Please reject cap and trade
Comment:

Tracy Jensen
1001 I Street
Sacramento, CA 95814

Dear Jensen,

I urge you to reject the false climate solutions of cap and trade and a carbon tax in favor of direct source reductions, i.e., emission reductions made directly at the source of pollution.

A 2016 report found that industrial facilities are more often located in low-income communities and communities of color, and that many of these industrial polluters (which are covered by the cap-and-trade market) have had increases, not decreases, in localized greenhouse gas emissions. In addition, carbon cap and trade has not been successful in achieving significant and rapid emission reductions anywhere it has been implemented.

Similarly, a carbon tax has not been proven as an effective means to reduce emissions. British Columbia's carbon tax actually saw an increase in taxed emissions of 4.3 percent from 2009 to 2014. Given the immediate threat we now face, we do not have time to "wait and see" if a carbon tax will work a decade from now. Rapid, significant reductions in greenhouse gas emissions are needed now.

Only by adhering to the legislature's mandate for "direct source" reduction approaches and by forgoing market "solutions" will California achieve the significant and swift emission reductions our planet needs. This can be achieved if ARB adopts the "Alternative 1: No Cap-and-trade" scenario of its scoping plan.

Please enact meaningful protections for our climate through direct source reductions, rather than market schemes like cap and trade.

Sincerely,

Howard Cohen, Ph.D.

Palo Alto, CA 94306-3004

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-04 17:32:58

215 Duplicates.

Comment 31 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Martha

Last Name: Booz

Email Address: mlbooz@calnatives.com

Affiliation:

Subject: Consider Direct Pollution Reductions

Comment:

I see a choice presented as between Cap and Trade OR a Carbon Tax. I have favored a carbon tax for some years, but a more direct immediate answer to the problem of California's carbon emissions (and other greenhouse gas emissions, is to directly reduce emissions at the source of pollution. I urge you to reject the false climate solutions of cap and trade and a carbon tax in favor of direct source reductions, i.e., emission reductions made directly at the source of pollution. I agree with the idea that we should forego market solutions for reducing our global warming emissions. It is my observation as a citizen watching the ARB try to regulate our emissions that cap and trade has not worked. We must give up this attempt.

The ARB has catalogued all the sources of emissions, now, though there is some question still about how to get soil to absorb carbon dioxide instead of giving it off. I am very gratified to note the thorough manner in which the cataloguing of carbon emissions sources has been accomplished. Good job! Now set up regulations for each of the types of point sources. I understand from an article on KQED that small diesel or gasoline engines (leaf blowers, etc) will be the biggest source of global warming emissions by 2020. Regulating these point sources will mean giving up these small engines, and switching to electricity driven equipment. This will hit a lot of hard-working people hard, but they must switch to electric (corded or battery driven) equipment for taking care of people's yards. Other off-road point sources of diesel pollution must all be curbed.

A 2016 report found that industrial facilities are more often located in low-income communities and communities of color, and that many of these industrial polluters (which are covered by the cap-and-trade market) have had increases, not decreases, in localized greenhouse gas emissions. In addition, carbon cap and trade has not been successful in achieving significant and rapid emission reductions anywhere it has been implemented.

Similarly, a carbon tax has not been proven as an effective means to reduce emissions. British Columbia's carbon tax actually saw an increase in taxed emissions of 4.3 percent from 2009 to 2014. Given the immediate threat we now face, we do not have time to "wait and see" if a carbon tax will work a decade from now. Rapid, significant reductions in greenhouse gas emissions are needed now.

Only by adhering to the legislature's mandate for "direct source" reduction approaches and by forgoing market "solutions" will California achieve the significant and swift emission reductions our planet needs. This can be achieved if ARB adopts the "Alternative 1: No Cap-and-trade" scenario of its scoping plan.

Please enact meaningful protections for our climate through direct source reductions, rather than market schemes like cap and trade.

Sincerely,

Martha Booz
El Sobrante, CA 94803-3118
mlbooz@calnatives.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-04 18:49:01

No Duplicates.

Comment 32 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sherman

Last Name: Lewis

Email Address: sherman@csuhayward.us

Affiliation: Hayward Area Planning Association

Subject: Comment on Scoping Plan 2030

Comment:

lquattro@arb.ca.gov sent me an email with <http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>, which had a lot more links than the scoping plan and also many links under the plan heading. As a member of the partially informed public, it would have helped to have a more obvious single link and a cleaner layout for the rest. In an age of remarkable progress for public comment, there are still challenges for visual ergonomics. I will make a guess: the web page was not field tested with citizen users or focus groups.

Being interested in modeling, I clicked on "modeling Information," which instead took me to meetings, to <https://www.arb.ca.gov/cc/scopingplan/meetings/meetings.htm>. That did not go well; it took me to a new page on AB 32 Scoping Plan Events with a new set of links to the plan--with eight modeling links. I tried https://www.arb.ca.gov/cc/scopingplan/pathways_2.4.0_19jan2017.zip which took me to C:\Users\sherm\AppData\Local\Temp\pathways_2.4.0_19jan2017-2.zip, and a PATHWAYS file with the extension .ana, which I could not open.

The next link down took me to the California PATHWAYS Model Framework and Methods PDF. Good stuff. On to look for model inputs relating to systemic urban issues of suburban dispersion /auto dependency and walkable density / non-auto modes, and pricing and subsidies.

Darn. Out of luck. Policy can't deal with what policy does not look at.

On to transportation, 2.4.1 MODEL SUMMARY. I see population as an undifferentiated input to Transportation Service Demand. That can't be right. Maybe population is differentiated; I just need to look further.

Yes! a search finds Table 18 with rows for high density and low density scenarios. Maybe that's a small start. Oops! It about water.

One last chance. I know that ARB and SGC work together to model project emissions from proposed projects in the AHSC program. Maybe that makes it into the Scoping Plan.

Foiled again. Land use is not modeled. Pricing is not modeled.
Neighborhood systems are not modeled.

The Scoping Plan is impressive. It just does not seem to model some
of the most important issues relating to GHG.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-05 09:34:35

No Duplicates.

Comment 33 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on 2030 Scoping Plan Update

Comment:

Bioenergy Association of California Comments on 2030 Scoping Plan (2017 Update).

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-scopingplan2030-UTNQNwdlBwtXMLQ7.pdf>'

Original File Name: BAC Comments on 2030 Scoping Plan (2017 Update).pdf

Date and Time Comment Was Submitted: 2017-03-05 11:26:16

No Duplicates.

Comment 34 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sherman

Last Name: Lewis

Email Address: sherman@csu Hayward.us

Affiliation: Hayward Area Planning Association

Subject: Comment on Scoping Plan 2030

Comment:

Carbon Tax.

Impressive big picture discussion but short on psychology, incentives to adopt, and incrementalism. Paying attention to the big picture may get in the way of thinking about a smaller but major part of the big picture, i.e., vehicle fuels only. They have the advantage of limited ability of buyers to escape a tax, especially a small one. They could even be implemented by county, again, if the price differential with just-across-the-border is not too great.

I've always supported a return of funds to the general population, but recently I've had to admit to myself that the psychology is wrong because it pits a known cost increase against a possible future small benefit (a semi-rebate), and has administrative overhead to make the transfer.

Think about the success of county level sales taxes for transportation. The county leaders worked out a wish list (expenditure plan) and sold it to the voters. The voters still had a cost they didn't like but benefits they couldn't get otherwise. The rules for a county GHG tax (ad valorem tax on fossil fuels) could channel funds to GHG reducing actions--even rebates--and away from GHG increasing things. Now the psychology is based on an incentive for local officials and trade offs the public can understand.

While the tax would have to be fixed, it would probably be on the low side, preventing disruption, and would not prevent add-ons. A system like this works better psychologically and incrementally. As with the sales tax, success in the initial counties led to others doing it.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-05 16:04:42

No Duplicates.

Comment 35 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Mara

Last Name: Duncan

Email Address: maraduncan@pacbell.net

Affiliation:

Subject: Please reject cap and trade

Comment:

See attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-scopingplan2030-VjtWMVEiWWtWDwRg.pdf'

Original File Name: mara duncan comment.pdf

Date and Time Comment Was Submitted: 2017-03-06 11:37:19

No Duplicates.

Comment 36 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Adam

Last Name: Lane

Email Address: alane@labusinesscouncil.org

Affiliation: Los Angeles Business Council

Subject: Los Angeles Business Council Feedback on the 2017 Climate Change Scoping Plan Update

Comment:

Dear Chairwoman Nichols,

On behalf of the Los Angeles Business Council (LABC), we would like to thank the California Air Resources Board for allowing us to provide feedback on the 2017 Climate Change Scoping Plan Update. The Scoping Plan is of utmost importance to our membership as the key driver of how we will achieve our ambitious and necessary climate change targets in a manner that will best address environment, economy and equity.

The Los Angeles Business Council is a vital advocacy and educational organization, representing over 150 members that support economic competitiveness and sustainability in the areas of energy, transportation, and housing. The LABC was an early business supporter of AB 32, which targeted a drop of GHG emission in California to 1990 levels, and shortly thereafter, SB 32, that set the target even lower to reduce GHG emissions by 40 percent below 1990 levels. Our membership believes that these crucial policies help us achieve a cleaner environment, while making California economically competitive by driving innovation and creating a new clean-tech economy.

We believe the Scoping Plan Update lays out an ambitious win-win scenario of fostering substantial economic development while reducing dependency on fossil fuels. Specifically, we support the Proposed Scoping Plan Scenario including the extension of the Cap-and-Trade Program post-2020 and strategies to for emissions reductions at refineries.

Cap-and-Trade:

As a business organization, the market-driven mechanism of cap-and-trade has made the program attractive for our members as a tool to reduce GHG emissions. Cap-and-Trade has also allowed for investments to be made in areas of utmost concern to Los Angeles, including affordable housing, transportation and equity. Several of our members have been direct recipients of cap-and-trade funding under the Affordable Housing and Sustainable Communities program. This includes the LA County Metropolitan Transportation Authority who has received hundreds of millions of dollars to complete projects crucial to the expansion of Los Angeles' public transit system that will reduce the number of cars on the road and help connect Angelenos from their homes to their jobs. As California and

Los Angeles' aim to address our affordability and homelessness crises, the funding from the AHSC program has gone directly to help building affordable and mixed-income housing to help alleviate rent-burden facing so many Californians. We encourage including more of a discussion on how cap-and-trade in California will set an example for the rest of the nation to follow. As the program continues to reduce emissions, while creating good-paying, clean-tech jobs it will attract the attention of other state's and nations who will look to follow in California's footsteps.

Transportation:

We applaud the Update's inclusion of transportation as a key driver of reducing GHG emission. We believe the development of the High Speed Rail is a major development in California's transportation infrastructure that would supplant many privately used automobiles and thereby decrease emissions, while creating jobs and economic growth. We would recommend the addition of mentioning the growing electronic rail system in Southern California and its impact on the region.

A Shift at the Federal Level:

One other notion not addressed in the Scoping Plan Update has been recent events occurring at the federal level. Although California has made efforts to work in concert with the global community to reduce GHG emissions, the new administration in Washington D.C. may challenge our State's efforts to be a leader in fighting climate change. In the face of this face, we request that there is more discussion in the Update on how California will maintain its leadership role in preserving the natural environment, increasing renewable energy/energy efficiency and potential avenues of partnership and commitment to international treaties in the chance that the federal government pulls its support.

We hope that our feedback informs the California Air Resource Board's Scoping Plan Update in a meaningful way. We believe that significant strides have been made to lay out a substantive blueprint to reaching SB 32 benchmarks. If you have any questions regarding the remark made here, please contact us at your earliest convenience.

Best,

Mary Leslie
LABC President

Nadine Watt
LABC Chair

Brad Cox, LEED AP
LABC Institute Chairman

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-scopingplan2030-VTIVMIU2VmZVDAFn.doc>'

Original File Name: LABC Feedback on the Scoping Plan Update.doc

Date and Time Comment Was Submitted: 2017-03-06 17:23:10

No Duplicates.

Comment 37 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Tristan

Last Name: Carland

Email Address: carlandt@gmail.com

Affiliation: Citizens Climate Lobby

Subject: scopingplan2030 - A carbon fee and dividend would be very effective in achieving goals

Comment:

The attached file is in regards to the 2017 Climate Change Scoping Plan and Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-scopingplan2030-WzhXPlc7V2kAYwRq.docx>'

Original File Name: Comments_UUFSD.docx

Date and Time Comment Was Submitted: 2017-03-06 18:36:50

No Duplicates.

Comment 38 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: Los Angeles County Waste Mgmt Task Force

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

See attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-scopingplan2030-UydVNVMNUWEDalQ5.pdf'

Original File Name: TF Comments on 2030 Scoping Plan 3.7.17.pdf

Date and Time Comment Was Submitted: 2017-03-07 10:17:12

No Duplicates.

Comment 39 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sherman

Last Name: Lewis

Email Address: sherman@csu Hayward.us

Affiliation: Hayward Area Planning Association

Subject: Comment on Scoping Plan 2030

Comment:

The plan is commendable in its concern for land use--some 40 references. "Vibrant" got only 13 uses despite its popularity among those who don't define it. Footnote 160 took me to ARB, "Potential State - Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel VMT) -- for Discussion." All the references to land use were as undefined as vibrant, except that sprawl is not good and needs boundaries, and compact is good. I agree, and this a scoping plan and thus allowed to be vague.

The discussion document does get much more detailed and invites discussion, but does not say how the discussion works, so my two bits comes here.

It's basically good, but, if you are serious, you really need to find a way to include it in modeling. It is unlikely to make any difference in the modeling unless it uses block group or block person densities from American Fact Finder and differentiates for densities above 50 persons per acre, as well as density brackets below that. At densities above 50 non-auto modes shift to 60% or more of the auto/non-auto total (unimportant modes need to be ignored). The only modal data for small areas is for Means of Transportation to Work, available at the block group level.

The relevant high density block groups are a very small percent of the total and don't amount to a hill of beans in state wide aggregates. It is too easy to say it doesn't matter, but it is, compared to average densities, a way of knowing how much VMT can be reduced by policies moving up the density scale. You don't need to speculate, you can quantify. The CA Household Transportation Survey also has geocoded data which can not be used at the record level, but the guardians of the data can export to you records aggregated by density level as proxy neighborhoods.

I've done a lot of the above; contact me if interested.

The SB375 MPO strategies are worthwhile but weak, single measure nudges short of a systemic approach of enough density and enough green mobility to get to 60 percent non-auto modes.

The OPR effort to analyze projects and the SGC guidelines for the AHSC program are not bad but would be much better if they would support explicitly the ideas attached. It's not a question of

requiring them, but letting applicants know these policies will be favored and get more points. Similarly, the ARB modeling of projects is way too simplistic with three, limited percent awards of reduced VMT, when projects need a multi-variate analysis based on a range of best-practice projects that show much more VMT can be reduced than ARB is recognizing.

I can't find fault with the discussion document for commission, but I feel there is a problem with omission, i.e., omission of a recognition that a complex of policies needs to work together to be effective. For neighborhoods, for example, doing ten things right might get to a 20% VMT reduction while doing those ten plus three more get to a 60% reduction: because the system reaches a tipping point where non-auto modes (walk, rapid shuttles, urban rail transit, public cars [taxis, ride apps, car share/rental]) compete with owning a car, unbundling, and smart meters.

This is so not a state wide strategy; it only applies in corridors and centers where densification can reduce vehicle traffic while increasing trips.

For an essay on the big picture, look for my article on Walkable Neighborhood Systems.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-scopingplan2030-AHcFYgFsAjoHaARq.docx>'

Original File Name: Walking Oriented Development for SGC.docx

Date and Time Comment Was Submitted: 2017-03-08 11:37:23

No Duplicates.

Comment 40 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jenny

Last Name: Bard

Email Address: Jenny.Bard@Lung.org

Affiliation:

Subject: Expanded Public Health Evaluation of the 2030 Scoping Plan

Comment:

Attached please find our letter from the American Lung Association in California, American Heart Association - California, Public Health Institute and Center for Climate Change and Health, and California Public Health Association - North requesting an expanded and independent health evaluation of the 2030 Scoping Plan.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-scopingplan2030-VCdRNFU7VHcGaVQ6.pdf>'

Original File Name: Scoping Plan Health Evaluation Ltr.pdf

Date and Time Comment Was Submitted: 2017-03-10 09:52:20

No Duplicates.

Comment 41 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Tracy
Last Name: Delaney
Email Address: tdelaney@phi.org
Affiliation: Public Health Alliance of Southern CA

Subject: Health and Equity Analysis of Scoping Plan
Comment:

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814
CC: Clerk of the Board

Re: AB 32 Scoping Plan Comments

March 10, 2017

Dear Chairperson Nichols and Members of the Board,

The Public Health Alliance of Southern California is a coalition of 9 local health departments. Collectively, the members have statutory responsibility for the public health of 60% of California's population. We strive to prevent the conditions that cause poor health, well before residents must visit the doctor's office. The prestigious British medical journal, the Lancet, has identified climate change as the biggest global health threat of the 21st century". As public health professionals charged with protecting and promoting the health of the population, the Alliance is particularly committed to addressing the disproportionate health impacts of climate change on vulnerable populations.

The Alliance strongly supports the leadership that the California Air Resources Board (CARB) has taken in developing the proposed 2030 Scoping Plan. This plan represents an unmatched opportunity to protect California residents from the health impacts of Climate Change. To achieve this goal, and maximize the health benefits of the plan, we recommend that CARB:

1. Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document and Environmental Impact Report, and
2. Integrate clear and ambitious Vehicle Miles Traveled (VMT) Reduction targets from the SB 375 target-setting process into the Scoping Plan.

A rationale to support each recommendation is provided as follows:

Recommendation #1: Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document, and Environmental

Impact Report (EIR):

We are pleased that CARB has included high-level health and equity discussions in the 2030 Scoping Plan. Although these statements provide a good general overview of the connections between health and the scoping plan, this overview does not currently analyze specific health impacts of the differing strategies and scenarios. It is also missing an analysis on the relative contributions of both health benefits and impacts as they affect population sub-groups. Because of the significance of the Scoping Plan as a guidance document, we urge you to fund an independent

contractor with experience in comprehensive analysis of health impacts of programs and policies to conduct a health equity assessment of the strategies and alternatives in the Scoping Plan. This study should assess the expected magnitude and distribution of health costs and benefits for each strategy. It should include projected changes to physical and mental health resulting from the strategies proposed in the scoping plan, including land use and transportation patterns, green infrastructure, energy efficiency, building design, and air quality. It is also fundamentally important that the analysis assess the distributional impacts and benefits of strategies and scenarios in different sub-groups of California's population.

A strong, independent analysis of public health impacts of the Scoping Plan is important in fulfilling statutory requirements. AB 197 stipulates that CARB consider the social costs, including impacts to public health, of emissions reduction measures included in this scoping plan. Additionally, CEQA states that public projects that may cause substantial adverse effects on human beings, either directly or indirectly, must prepare an Environmental Analysis (EA) that discusses health and safety problems caused by the physical changes. The Scoping Plan EA should consider the full range of potential health impacts, assess the cumulative impacts of these health effects, and analyze the likely distribution of potential impacts among population sub-groups. As written, the scoping plan section on Public Health (III.C, page 76) is primarily a qualitative description, and does not provide goals and policies. As a result, the EA lacks clear health impacts in the Mandatory Findings section page 171.

To fulfill AB 197 and CEQA requirements, a stronger health analysis should be included. The Alliance will be happy to serve in an advisory role, assisting CARB's contractor in identifying the parameters of these health analyses. We would also recommend that CARB routinely include a comprehensive health impact analysis on future scoping plans due to the significant reach and impact on public health. We believe this critical information will provide CARB and the public with a clearer sense of the health and equity benefits and impacts to aid in more informed decision-making.

Recommendation #2: Integrate clear and ambitious VMT Reduction targets from the SB 375 target-setting process into the Scoping Plan.

The Scoping Plan notes that VMT reductions are necessary to achieve the 2030 target, and includes reductions in the proposed scenario. The Plan further notes that these reductions will come from stronger SB 375 targets, as well as additional strategies identified in the Appendix C: Vibrant Communities and Landscapes

and Potential VMT Measures document. Prior research indicates that Greenhouse Gas (GHG) reduction strategies that replace car trips with active transportation and transit use deliver extremely strong health co-benefits. These strategies must be a key piece of California's climate change efforts.

The Scoping Plan however, does not appear to set specific targets for VMT reductions for either of these programs. We recommend that CARB set ambitious targets for both SB 375 and for Appendix C—strong enough to meet our climate goals—and clearly spell out these targets in the Scoping Plan document. Additionally, we recommend that the Scoping Plan include additional detail regarding the steps that will be necessary to meet these targets. The plan includes ambitious active transportation goals (four-fold and nine-fold increases respectively for walking and biking). We strongly support these goals, and applaud the overall direction of the strategies included in Appendix C. However, neither the Scoping Plan nor Appendix C currently provides feasible strategies to achieve these targets. Stronger policy and funding commitments with clear implementation actions are needed.

Similar specificity is needed for SB 375 and Appendix C in the EA. The EA includes "Increased Stringency of SB 375 2035 Targets for Sustainable Communities Strategies" as a measure within the project description. However, the project description does not contain adequate detail (numerical targets) to accurately determine environmental impacts. Additionally, while the Plan relies on the strategies proposed in Appendix C to meeting GHG reduction goals, these strategies do not appear in the EIR's project description, and it is not clear whether they are included in the alternatives analysis. We encourage the many strong suggestions and strategies given in Appendices A and C to be clearly integrated into the Environmental analysis.

The Public Health Alliance of Southern California is deeply thankful for your efforts to address climate change and protect the health of California residents. We are pleased that the State has affirmed health co-benefits as a clearly stated goal of California's climate policy. As such, it is our recommendation that all plans and policy documents should analyze health cost/benefit as a matter of course, and use this analysis to inform the resulting decision-making.

Thank you for your leadership on this issue, and your consideration of our recommendations. We look forward to continued work with you to ensure a sustainable and healthy future for our state.

Sincerely,
Tracy Delaney, Ph.D., R.D., Alliance Executive Director
Selfa Saucedo, MPH, Alliance Co-Chair
S. Michael Johnson, MPH, Alliance Co-Chair

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-scopingplan2030-W2lcalBgWT0AKwQ0.pdf>'

Original File Name: 2017-0309_Letter_AB_32_Scoping_Plan_Comments_FINAL.pdf

Date and Time Comment Was Submitted: 2017-03-15 14:57:55

No Duplicates.

Comment 42 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Daniel

Last Name: Brotman

Email Address: dhbrotman@gmail.com

Affiliation:

Subject: Cap & Trade vs. Carbon Fee

Comment:

I attended the ARB/EJAC meeting in Los Angeles on March 15. I was disappointed to see how the ARB presenters wrote off the alternative of a carbon fee without a clear rationale. They were unable to address questions on the economic assumptions that they based their conclusions on to decide that a fee would be less effective than cap and trade.

I would like to see the ARB do a transparent comparative analysis in which the public can understand the model assumptions and make comments. I am an economist (teaching at Glendale College) and I can see no economic logic to argue that cap and trade is superior to a fee. Virtually all economists believe a fee is cheaper to administer and more transparent than cap and trade, and if the fee is set at the right level can deliver more GHG reductions for the same cost than cap and trade. To the extent that your analysis reaches a different conclusion, the assumptions must be skewed to arrive at a politically predetermined conclusion. This is no way to make public policy.

A fee structure in California would provide a model for national level legislation. Ultimately, that is where we need to go for us to make a meaningful impact on climate change. Furthermore, a fee (coupled with the right direct regulations) would create greater cost certainty for industry and insure a more predictable income flow to the state for application to climate justice initiatives.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-21 15:16:12

No Duplicates.

Comment 43 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Laura

Last Name: Colban

Email Address: lauracolban@gmail.com

Affiliation: Unitarian Universalist Fellowship of SD

Subject: Religious organization in support of a Carbon Tax and Dividend
Comment:

February 26, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2030 Target Draft Scoping Plan

Dear CARB and stakeholders,

We appreciate your work to reduce GHG emissions and are thank you for the opportunity to comment on the CARB 2030 Target Scoping Plan.

For context, the Unitarian Universalist Fellowship of San Dieguito is a non-profit religious organization that seeks to affirm seven principles of faith: 1) The inherent worth and dignity of every person; 2) Justice, equity and compassion in human relations; 3) Acceptance of one another and encouragement to spiritual growth in our congregations; 4) A free and responsible search for truth and meaning; 5) The right of conscience and the use of the democratic process within our congregations and in society at large; 6) The goal of world community with peace, liberty, and justice for all; 7) Respect for the interdependent web of all existence of which we are a part. Based on these collective values, our vision for our fellowship and world includes sustainable living. It is with these principles and vision foremost in our minds that we write to express our comments regarding the CARB 2030 Target Scoping Plan.

We are concerned about climate change and the economic drain on our local economy from importing fossil fuels into our state. We have analyzed the economic effects of importing over \$100 billion in fossil fuels from outside California, and we believe that replacing imported fossil fuels with locally produced renewable energy will stimulate our local economy. Our research regarding Cap and Trade (C&T), which has been tried since 2012, shows it to be ineffective in reducing GHGs. Our analysis of the British Columbia carbon tax and of the relevant articles cited in your Scoping Plan, led us to conclude that the tax, while too low, has had moderate success. We believe that California can reduce GHG emissions while stimulating the local renewable energy sector of our state economy in an efficient and equitable manner through a carbon fee/tax and

dividend. In this letter, we present government data supporting our findings.

As mentioned, we advocate a carbon tax and dividend. If the tax is downstream near the consumer, an additional tax on leaks, particularly wellhead leaks such as Aliso Canyon, would be an important component. If the tax is upstream, it must be structured to include all GHG emissions from fossil fuels, including those that escape through leakage. In order to avoid hardship and further efficiency and equity, it would be necessary to return most of the revenue to California residents in the form of a dividend, divided equally among all residents, with half shares for children. A portion of the revenue could be used to fund other state-sponsored programs.

We understand your concern "If we set the price too high, we have made the program unnecessarily expensive, and if we set the price too low, we will not achieve enough GHG reductions." We believe that there is little risk to setting the carbon tax too high, as this will only serve to decrease fossil fuel consumption and stimulate the economy, provided that the tax is accompanied by a corresponding tax credit (dividend) paid to each resident. We also believe that it is possible to ascertain the correct level of the tax by an examination of our own state's history with fluctuating gas prices.

California's history with high gas prices evinces the effects of \$4.00/gallon pricing on consumption and on the renewable energy sector of our state's economy. Your own 2014 report, "Impacts of Gas Price on Passenger Vehicle Use and Greenhouse Gas Emissions" states:

Overall, changes in gas price can lead to significant effects on travel behavior, with some (usually limited) effects visible in the short run and (most) others measurable only after several years (long-run effects).

In 2014, when gas prices exceeded \$4.00/gallon, purchases of hybrid vehicles increased and carpools became more common. (See charts below.) Now that gas prices have been under \$3.00 for nearly a year, light trucks sales have begun to increase, while car sales have decreased.

The consumer response to price fluctuation supports a carbon tax in the range of \$100-150/metric ton (\$0.88 - \$1.32/gallon) as an ideal first step, phased in slowly and possibly followed by additional increases, to motivate Californians to reduce their consumption of gasoline.

Although there is little recent data regarding the price elasticity of demand for fossil fuels other than gasoline, the increased production of renewable energy in California over the last couple of years indicates that Californians are ready and eager to substitute local renewable energy for imported fossil fuels. According to the EIA, from December 2015 to December 2016, the net generation of electricity from small-scale solar generation increased 28%. During the same period, utilities increased electric generation from 786,000MW to 988,000MW. Our state is now producing over 5% of our electricity from solar energy, and nearly half from renewable sources. (See California Net Electricity Generation by Source chart below.) This recent surge indicates that we are at a tipping point where a tax on carbon would lead to a significant increase in investment of renewable energy. Yet Sempra and other

electric providers are still advocating for constructing additional gas-fired power plants. A carbon tax would provide strong motivation to abandon such plans and construct additional solar farms, wind farms, and hydroelectric plants. A carbon tax would speed the shift, which has already begun, but is happening too slowly, from fossil fuels to renewable sources such as solar, wind, and hydroelectric.

We believe that some of the assessments in the Scoping Plan were based on a misunderstanding of the BC report "Trends in Greenhouse Gas Emissions in B.C. (1990-2014)". The Scoping Plan states "BC's emissions have increased by 2.7 percent from 2011 through 2014," citing this report. This is a misrepresentation in various ways. The BC tax was implemented in 2008, and amended in 2010 to phase out the exclusion of forestry related emissions for biofuels such as biodiesel, ethanol, and hydrogenated vegetable oil (HVO). Emissions from 2011 to 2014 are more closely related to the 2010 amendment than to the 2008 implementation of the tax itself. Furthermore, the same report states that emissions dropped from 66.3 Mt CO₂e in 2007 to 62.7 Mt CO₂e in 2014, a decrease of 5.5%. To fully understand the effect on the tax, it is important to look at additional data, such as GHG data from 2007, GDP data, and population data.

As you can see from the Greenhouse Gas Emissions charts below, GHG emissions seem to have decreased after the tax, but not substantially. In relation to population and GDP, GHG emissions seem to have decreased substantially. This trend began just before the tax was implemented, which could indicate a weak correlation between the tax and emissions. However, that could be due to fossil fuel price variations. Fossil fuel prices spiked in 2008, then BC Greenhouse Gas Emissions

BC Greenhouse Gas Emissions

CARB, in the Scoping Plan, expresses a concern regarding an "unnecessarily expensive" carbon tax, but does not specify exactly what that concern is. Based on our assumption that your concern is economic, we will address the effects on the economy here. We do ask, however, that you specify your concern if it is not an economic one.

If revenues from the carbon tax are used primarily to pay a dividend to residents, there is no concern that the economy will be stifled. Rather, it will be stimulated by the shift from fossil fuels imported from outside the state to local renewable energy.

The costs to California of these imported fuels is substantial. According to the EIA, California spent a total of \$137,720 million on energy in 2014, including \$102,265 million for fossil fuels (oil, gas and coal), and \$35,455 million for "other" forms of energy. Of the \$102,265 million spent on fossil fuels, \$86,002 million was for 629.5 million barrels of oil, \$16,128 million was for 2,351 billion cubic feet of natural gas, and \$135 million was for 1.7 million short tons of coal. From a fiscal perspective, this would be fine if that money stayed in our state. But it doesn't. In contrast with renewable energy which is produced locally, very little of the fossil fuels we consume are produced within our state. California only produced 204,699 barrels of oil, 218,590 million cubic feet of gas, and no coal. Thus, California imports 68% of its oil at a cost of approx. \$58,481 million; 91% of its natural gas at a cost of \$14,676 million and 100% of its coal at a cost of \$135 million, equating to a total cost of \$73,292

million for imported fossil fuel.

And this is not all. A significant portion of the \$35,455 million for "other" was spent to import electricity. \$562 million was paid to Canada and Mexico to import 12,369,304 million MW of electricity from Canada and Mexico. An additional 79,719,494 million MW of electricity was also imported from other states, at varying prices, which likely cost over \$30,000 million. When this is added to the \$73,292 million paid for imported fossil fuels, we find that over \$100 billion is being sent from California to outside our state for fossil fuels. An aggressive carbon tax will incentivize us to buy local renewable energy, thus enabling us to keep much of that \$100+ billion in our state. This would be a tremendous boon to our economy.

Another important effect of a carbon tax is psychological. Our state could make a tremendous statement regarding the environmental cost of GHGs by being the first to implement a carbon tax. Even if the tax is too small to have a measurable impact on emissions and needs to be accompanied by a cap and trade system, a tax on carbon would make a statement about our state and about our understanding of the impact of fossil fuels. This, in and of itself, is important.

With regard to Cap and Trade (C&T), there are a number of issues that were not addressed by your Scoping Plan. First, the major beneficiaries of C&T are the Wall Street firms, such as Goldman Sachs and J.P. Morgan, which create the market for carbon offset. Other beneficiaries include developers of renewable energy projects outside California. This is a cost to our state and a drain on our economy.

Second, the economists, Chichilniski, Heal and Starett, who developed the concept of C&T back in the 1990's and pushed it through Kyoto, have basically abandoned it as unworkable.

Finally, the assertion that C&T provides emissions certainty is unfounded. Emissions have increased since the implementation of C&T in 2012. The downward emissions trend that began in 2007, ended in 2011, at 352.4 mill metric tons CO₂, and then went up. In 2014 it was 358.0 mill metric tons (See California Carbon Dioxide Emissions, below).

In conclusion, we believe that a carbon tax/fee and dividend can provide an effective, efficient and equitable means of enabling our state to meet or exceed our emissions reductions targets while also stimulating our state's economy.

We appreciate your work to promote the health and well-being of our state and the planet, and we are thankful for the opportunity to comment on your Scoping Plan. Please do not hesitate to contact Laura Colban (858-692-2528 lauracolban@gmail.com) if you have any questions.

Sincerely,

By unanimous vote of the Board of Directors of the Unitarian
Universalist Fellowship of San Dieguito:
Alisa Guralnick, President
Mark Tuller, Vice President
Heather Stroud, Secretary

Rich Franzwa
Bob Quick
Clint Stoddard
Alison Schlick
Rev. Meghan Cefalu

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-scopingplan2030-VzRUPVwwUW8EZm0d.docx>'

Original File Name: Comments for UUFSD.docx

Date and Time Comment Was Submitted: 2017-03-21 18:00:28

No Duplicates.

Comment 44 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Andy
Last Name: Wunder
Email Address: wunder@ceres.org
Affiliation: Ceres Inc.

Subject: BICEP Comments on 2017 Climate Change Scoping Plan Update
Comment:

Please see Business for Innovative Climate and Energy Policy (BICEP) comments on the 2017 Scoping Plan update attached.

Thank you,
-Andy Wunder

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-scopingplan2030-UzFdMgBiBDIDdVUm.pdf>'

Original File Name: BICEPSupport_CAScopingPlan_March2017.pdf

Date and Time Comment Was Submitted: 2017-03-23 15:45:19

No Duplicates.

Comment 45 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Greg

Last Name: Piccinnno

Email Address: gpiccininno@aol.com

Affiliation:

Subject: Auto Emissions Standards

Comment:

Yippi, please push forward the stricter emissions for autos and trucks. Oddly, your act is more GOP then DEM in that you are fulling the GOP Dream of State Rule vs Federal Rule. So the GOP really should be quite on this and we the people can decide what we feel is acceptable science and emission standards. Since I live in a state (CT) that follows your standards, I believe I also have the right to cheer you on and support you in your efforts to keep our country clean.

Greg

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-25 04:05:40

No Duplicates.

Comment 46 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: George

Last Name: White

Email Address: co2isnotevil@palisad.com

Affiliation:

Subject: climate science

Comment:

I've studied climate science to a level of detail that few can comprehend and I can say with absolute certainty that the IPCC and its self serving consensus over estimates the effect of incremental CO2 by at least a factor of 3 to 4. If you pursue the path of regulating CO2 for the purpose of mitigating climate change, you will be a party to the stupidest thing ever done in the name of science. Climate science has been horribly corrupted since the inception of the IPCC, who needs a significant anthropogenic effect to justify their existence, yet has become the arbiter of what is and what is not climate science by virtue of what they publish in their reports. This conflict of interest is intolerable and as it has morphed into a political dividing point, it's reached the point of insanity. I urge you to pay attention to the actual science and stop this politically motivated war against CO2, whose only measurable effect has been the greening of the planet. I will predict with absolute certainty that mankind's biggest problem, once we actually do run out of oil, will be how do we enrich atmospheric CO2 to keep agriculture from crashing.

Regards,
George White

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-25 20:20:17

No Duplicates.

Comment 47 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ronald

Last Name: Bohigian

Email Address: rjbohig@gmail.com

Affiliation: private citizen

Subject: Greenhouse Gas Emission Standards

Comment:

I read in the Fresno Bee that the Air Board voted unanimously to "reaffirm their commitment to tough standards to reduce greenhouse gas emissions from cars..."

Thank you. Our family appreciates the Air Board's position. Please continue to maintain high, aggressive anti-pollution standards for California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-03-26 16:59:55

No Duplicates.

Comment 48 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Katherine

Last Name: Jones

Email Address: katherine.jones@tpl.org

Affiliation: The Trust for Public Land

Subject: 2017 Climate Change Scoping Plan Update- The Trust for Public Land
Comment:

See attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-scopingplan2030-BzVvY1NjAGQKUwY2.pdf'

Original File Name: 2017_0316_TPL Comment Letter_ Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-03-28 10:32:42

No Duplicates.

Comment 49 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Cedric

Last Name: Twilight

Email Address: ctwight@spi-ind.com

Affiliation: Sierra Pacific Industries

Subject: Scoping Plan Appendix G

Comment:

Attached is Sierra Pacific Industries comments on Appendix G of the proposed Scoping Plan 2030. We are interested in how the ARB staff will address our concerns about the accuracy of the carbon accounting depicted in Appendix G and whether they will seek additional input from the experts at the University of California Division of Agriculture and Natural Resources.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-scopingplan2030-BXZcM1QwU3IBdQhp.pdf>'

Original File Name: Sierra Pacific Industries_Comment_Letter_ScopingPlan_AppendixG.pdf

Date and Time Comment Was Submitted: 2017-03-28 13:50:35

No Duplicates.

Comment 50 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Lloyd

Last Name: Levine

Email Address: Lloyd@FilamentStrategies.com

Affiliation: Western Pavement Maintenance Assoc.

Subject: GHG reductions in paving sector through increased use of asphalt rubber
Comment:

Dear Chair Nichols and Board:

Attached, please find comments from the Western Pavement Maintenance Association (WPMA) detailing the significant GHG reductions that can be obtained in the paving sector through an increase in the use of Asphalt Rubber products. The draft scoping plan does not calculate or include any GHG savings from the paving sector. The WPMA is asking that GHG reductions from the use of Asphalt Rubber be specifically calculated and included in the scoping plan.

Our industry has long known, in addition to diverting millions of tires from landfills, there are significant GHG reductions to be realized from a significant increase in the use of Asphalt Rubber instead of conventional hot mix asphalt paving strategies.

The Western Pavement Maintenance Association (WPMA) is comprised of companies involved in pavement preservation who produce and apply Asphalt-Rubber. The WPMA represents some of the largest Asphalt-Rubber and tire processing companies in California.

The WPMA's mission is to educate policy makers at all levels of government as to the numerous, significant advantages of using Asphalt-Rubber in highway and road paving projects. In addition to helping to educate policy makers, the WPMA acts as a resource to provide information and assistance in matters concerning waste tire processing, crumb-rubber production, and Asphalt-Rubber pavement.

Sincerely,
Lloyd Levine
Executive Director, WPMA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-scopingplan2030-BWNRPIE+UmBQOIcI.pdf>'

Original File Name: Final WPMA Comments to CARB Draft Scoping Plan - March 2017.pdf

Date and Time Comment Was Submitted: 2017-03-30 17:38:57

No Duplicates.

Comment 51 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Janelle

Last Name: London

Email Address: jlondon@stanfordalumni.org

Affiliation: Menlo Park Environmental Quality Commiss

Subject: Support for AB32 Scoping Plan 2030

Comment:

March 16, 2017

The Honorable Mary Nichols

Chair, California Air Resources Board

1001 I Street

Sacramento, CA 95814

AB 32 Scoping Plan: Please continue your good work to support strong standards for health and climate protection – especially regarding clean vehicles

Dear Chair Nichols and esteemed members of the CARB:

First, THANK YOU for approving the oil and gas rule to reduce methane leaks. Very few people realize that these leaks can render natural gas as carbon-intensive as coal.

I serve on Menlo Park's Environmental Quality Commission. We are working to promote clean air and emissions reductions in our city. These efforts could be more successful with the help of CARB.

This is to ask that you please continue to support the strongest possible clean vehicle rules, standards and incentives for California. Help make California the state that prompts the S-curve in EV sales; the state that proves the feasibility of taking large numbers of gas cars off the road in the US.

As you probably know, major cities around the world are already taking action to limit gas cars and/or electrify their vehicles. Beijing is taking 67,000 taxis electric. Manila is experimenting with e-trikes in place of tuk tuks. Fed Ex has come out with an electric delivery truck. Chrysler has a plug in electric hybrid minivan. We're seeing more and more fuel cell vehicles on the streets of Menlo Park.

We need your continued leadership to ensure California is the role model for what's possible. As a result, Californians will save money on gasoline, benefit from cleaner air, and do our share of reducing carbon emissions. And we'll be bringing environmental justice to the disadvantaged communities that currently suffer the health impacts and risks of living and working near sources of air pollution, especially from fossil fuel combustion.

Specifically, I ask that you please do at least the following:

- Double down on California's commitment to implement existing federal U.S. Environmental Protection Agency/National Highway Traffic Safety Administration vehicle emission standards, and California's 2025 Advanced Clean Cars and Zero Emission Vehicle program.
- Promote and accelerate development of clean car and zero emission technology standards to reduce ozone-forming pollutants, fine particles, and climate pollution, and to strengthen and extend the Zero Emission Vehicle standard. This effort should be aligned with the 2050 (or sooner) goal of 100% zero emission vehicle sales.
- Work to make California's state vehicle fleet zero emissions to the extent possible, as soon as possible.
- Incentivize (or require) cities and counties to adopt an "EV First" policy of replacing municipal and county vehicles with electric vehicles to the extent possible as soon as possible.
- Incentivize cities to reduce red tape and reduce or eliminate fees for EV charging station permits.
- Incentivize cities to update their built environment so cars are not needed within city limits. According to Stanford professor Stefan Heck, the ideal building height is 6 stories – at that height, no steel is required, and it creates the right mix of dwelling and commercial/retail space. Incentivize piloting e-trikes-only sections of town or communities.
- Update building codes to require that new residential and commercial buildings include EV charging stations, and rooftop solar to the extent feasible to support those chargers.
- Invest in EV charging stations in rural areas; offer larger rebates on EVs and home charging stations to low-income residents.
- Facilitate the Hyperloop or other high-speed train coming to California – thereby reducing car trips and flights between LA and SF and other California cities.
- Facilitate the addition of High Occupancy Toll lanes on high-traffic streets, freeways and highways, and experiment with raising the tolls to both fund transit and make it more attractive. Consider reimbursing the tolls for low-income Californians who must drive during those hours for their work (e.g., gardeners and construction folks).
- Keep working to increase the gasoline tax – again, with a possible rebate for low-income workers for whom driving gas vehicles is required.
- Incentivize/facilitate fuel savings via connectivity and platooning between vehicles, such as that offered by Peloton.
- Consider a comprehensive plan to increase the number of trees in the state – a great way to absorb CO₂.
- Impose a carbon tax.

In sum, please do everything in your power to maintain California's leadership in standards for clean air and climate protection,

especially regarding vehicles.

Thank you for your leadership and support.

Sincerely,
Janelle London
Menlo Park, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-02 15:54:22

No Duplicates.

Comment 52 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Christopher

Last Name: Sheppard

Email Address: csheppard@dpw.lacounty.gov

Affiliation: LA County Department of Public Works

Subject: Comments on the 2017 Climate Change Scoping Plan Update

Comment:

Thank you for the opportunity to comment on the 2017 Climate Change Scoping Plan Update. Attached please find comments from the County of Los Angeles Department of Public Works.

Sincerely,

Christopher Sheppard

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-scopingplan2030-VmVTeAY0BGcAK1Bh.pdf'

Original File Name: 3-30-17 CARB Plan Update -LA County Public Works Comments.pdf

Date and Time Comment Was Submitted: 2017-04-03 06:53:18

No Duplicates.

Comment 53 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jamesine

Last Name: Rogers Gibson

Email Address: jvrogers@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on 2030 Target Draft Scoping Plan Update
Comment:

Attached please find UCS' comments on the 2030 Target Draft Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-scopingplan2030-BXBRNFEjWFQFYANs.zip'

Original File Name: UCS comments Draft Scoping Plan 4.5.17.zip

Date and Time Comment Was Submitted: 2017-04-05 09:06:02

No Duplicates.

Comment 54 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David
Last Name: Townley
Email Address: dtownley@ctcglobal.com
Affiliation: CTC Global Corporation

Subject: CTC Global Comments on 2030 Scoping Plan Update
Comment:

Attached please find CTC Global's comments on the 2017 Climate Change Scoping Plan Update.
Thank-you.
David Townley
Director of Public Affairs
CTC Global Corporation

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-scopingplan2030-WjlVJ1IwBwtSMwFt.pdf>'

Original File Name: CTC Global Comments on 2017 Climate Change Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-05 09:05:43

No Duplicates.

Comment 55 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David

Last Name: Belden

Email Address: davebelden@earthlink.net

Affiliation:

Subject: Reducing vehicle miles traveled per person

Comment:

As I understand it vehicle miles per person have not gone down in decades. That means whatever improvements may have been made in public transport, bike paths, and carpooling have only kept pace with population growth. This is truly pathetic! Please, please, get serious about reducing vehicle miles traveled per person!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-05 13:01:18

No Duplicates.

Comment 56 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Arthur

Last Name: Pugsley

Email Address: arthur@lawaterkeeper.org

Affiliation: Los Angeles Waterkeeper

Subject: LAW comments on 2017 Scoping Plan Update

Comment:

please see attached file- text reproduced below for convenience:

Dear Chair Nichols and Board Members:

Thank you for the opportunity to comment on the 2017 Climate Change Scoping Plan Update ("2017 Update"). Los Angeles Waterkeeper (LAW) submits these comments primarily to point out the large existing GHG emissions associated with California's outdated system of water supply. Our water supply relies primarily on pumping water over vast distances, using it once, treating it, and then dumping it as "wastewater," often into California's rivers and bays where it becomes a source of water pollution. The inefficiency and wastefulness of the current system is also an opportunity—the increased commitment to conserve water and to develop local sources of sustainable water supplies, rather than relying on imported water pumped over great distances, could prove to be the single greatest steps California can take to reduce its GHG emissions. Such a commitment would also effectuate improvements in water quality. Now is the time to seize this win-win opportunity for our air and our water, as the world looks increasingly to California for environmental and political leadership on climate change issues.

LAW is a nonprofit environmental organization with over 3,000 members dedicated to protecting and restoring all surface and ground waters in Los Angeles County and ensuring an environmentally and socially sustainable water supply. LAW advocates the "4R" approach to Integrated Water Management: Reduce use of water through conservation with a goal of 50/gallons/person/day; Reuse greywater and capture stormwater; Recycle through wastewater reclamation; and Restore watershed health both in source areas of water supply and in the increasingly important aquifer underlying large sections of the San Fernando Valley.

The GHG emissions associated with California's current wasteful water supply choices are unsustainable, especially given the ambitious and now legally binding goal to reduce California GHG emissions to 40% below 1990 baseline levels by the year 2030. But the very GHG inefficiency of the water supply system presents an enormous opportunity to realize large additional reductions in GHG emissions through a mix of water conservation and increased reliance on multi-benefit stormwater capture projects and increased water recycling. For example, U.C. Davis researchers found that

between June 2015 and February 2016, when mandatory water conservation measures were in place due to an historic drought, California's water conservation rate of 23.9 percent over 2013 levels resulted in energy savings that translated into a reduction in greenhouse gas emissions of 219,653 metric tons. LAW also recently filed an administrative appeal with the State Water Resources Control Board, seeking to quantify the benefits- including the GHG benefits- of ending ocean discharge of treated "wastewater" from the Hyperion Water Treatment Plant in Los Angeles. LAW believes these discharges constitute an unconstitutional waste and unreasonable use of a California water resource. While the GHG analysis is currently lacking (necessitating in part the appeal), LAW has no doubt that the GHG reductions from ending open ocean discharge of municipal wastewater are substantial. LAW requests that CARB consider carefully and fully the GHG benefits of a more efficient water supply as it plans for meeting the 40% GHG reduction target. The efficiency improvements should come from increased emphasis on conservation, increased and aggressive use of water recycling, and increased use of stormwater capture and infiltration for multi-benefit projects including water supply.

LAW thanks you for the opportunity to comment on the 2017 Update.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-scopingplan2030-VDcHbVA4VWsDZAZy.pdf>'

Original File Name: climate plan comments.pdf

Date and Time Comment Was Submitted: 2017-04-05 15:48:33

No Duplicates.

Comment 57 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rob
Last Name: DiPerna
Email Address: rob@wildcalifornia.org
Affiliation:

Subject: 2017 Climate Change Scoping Plan Update
Comment:

Dear CARB:

Attached Please find comments of the Environmental Protection Information Center (EPIC) and referenced associated attachments to these comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-scopingplan2030-UDQFYAdgUWEFcwJd.pdf>'

Original File Name: dcfcp_comments_epic0301717_Final.pdf

Date and Time Comment Was Submitted: 2017-04-06 09:14:10

No Duplicates.

Comment 58 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rob
Last Name: DiPerna
Email Address: rob@wildcalifornia.org
Affiliation:

Subject: 2017 Climate Change Scoping Plan Update
Comment:

Dear CARB:

Attached Please find comments of the Environmental Protection Information Center (EPIC) and referenced associated attachments to these comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-scopingplan2030-VTZcOwNwBzYDN1Ji.pdf>'

Original File Name: carb2017spu_comments_epic040717FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-06 09:14:10

No Duplicates.

Comment 59 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Julian

Last Name: Kraus-Polk

Email Address: JKraus-Polk@foe.org

Affiliation: Friends of the Earth - US

Subject: A School Lunch Recipe to Combat Climate Change

Comment:

Dear responsible officials:

As you well know, climate change is painfully real—and our meat-centered diets are a major part of the problem, spewing tons of greenhouse gas emissions and chewing up gobs of water. Fortunately for our future, schools and kids are showing we can reduce climate damage—and save money—by eating less and better meat and dairy products.

This isn't a pie-in-the-sky notion. As comment on the Scoping Plan Update Friends of the Earth - United States humbly submits for consideration a groundbreaking new study carried out in collaboration with the Oakland Unified School District. The study, A Recipe For Combating Climate Change: Shrinking the Carbon and Water Footprint of School Food, found that by trimming back the meat and cheese in kids' lunches and serving more plant-based nutritious meals, the district reduced the carbon and water footprint of its food service by 14 and 6 percent respectively in just two years. In the process, the district saved \$42,000 by cutting costs per meal by 1 percent, and was able to afford better-quality and more sustainable meat from organic, grass-fed dairy cows.

California's policy makers should take note of this powerful untapped strategy for mitigating climate change. This study shows how food institutions of all kinds—universities, hospitals, business campuses, restaurants and prisons—can help downsize our carbon footprint and heal the planet, while saving money and improving our health. This is one of those rare silver bullet opportunities when a single solution can address many challenges at once.

If every California K-12 school food service matched Oakland Unified School District's carbon reductions, they would collectively reduce their carbon footprint by 80 million kg of CO₂ emissions—equivalent to driving almost 200 million fewer miles per year. Imagine if all food-serving outlets in California put more plant-based foods and more sustainable, less resource intensive animal foods on the menu.

Why eat less meat and dairy for the climate and planet? Extensive research shows that meat and dairy livestock operations are a top source of climate-harming greenhouse gas emissions. In California,

agriculture production—particularly large-scale industrial meat and dairy operations—generates 8 percent of emissions, not including emissions from processing, distribution and other energy intensive related activities.

Yet while 60 percent of California's methane emissions (a potent global warming gas) stem from livestock production, California's policy makers—and even the state's climate change scoping plan—ignore the most obvious solution: Shrink California's meat and dairy carbon footprint by slicing demand for industrial meat and dairy products and promoting healthier more environmentally sound pasture based livestock.

Consider just one popular lunch food whose main ingredient comes from methane spewing California dairies: pizza. Friends of the Earth's analysis found that one serving of pizza sports a carbon footprint three times higher than that of vegetable biryani, a popular vegan dish with Indian flavors.

Reducing demand for industrially produced meat and dairy is not just good for combatting climate change—it will also help California save precious water resources to weather future droughts. As it is now, livestock feed (alfalfa and corn) for dairy and beef cows chews up one-fourth of the state's irrigated water use. Reducing demand for grain-fed animal products and promoting more sustainable alternatives would also reduce the massive load of nitrate pollution caused by industrial farming's huge problem of excess manure. Meanwhile, the shift would help build healthier soils to sequester carbon, another key ingredient in fighting climate change.

As one of California's largest school districts with 85 schools and 37,000 students, Oakland has created an inspiring model for the state and nation's food institutions to lead the way in curbing climate change. When we can save money, improve consumption of healthy food, and reduce environmental harm—all while increasing student satisfaction and meeting federal school meal requirements—what are we waiting for?

Thank you very much for your consideration of this report and we look forward to seeing the findings integrated into a revised version of the Scoping Plan Update.

Attached: A Recipe For Combating Climate Change

Link:
http://webiva-downton.s3.amazonaws.com/877/8b/1/9786/FOE_FoodPrintReport_7F.pdf

Respectfully,
JulianKraus-Polk

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-scopingplan2030-UzVUPQFIVV1WMQFe.pdf'

Original File Name: FOE_A Recipe For Combating Climate Change.pdf

Date and Time Comment Was Submitted: 2017-04-06 14:56:29

No Duplicates.

Comment 60 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ping
Last Name: Chang
Email Address: chang@scag.ca.gov
Affiliation: SCAG

Subject: SCAG Comments on the Draft Scoping Plan
Comment:

Attached please see the SCAG comment letter on the ARB 2030 Target Draft Scoping Plan.

Please confirm!

Sincerely,

Ping Chang, Acting Manager
Compliance & Performance Monitoring
Southern California Association of Governments
213-236-1839

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-scopingplan2030-AXJcOVQ6U3ALZAFv.pdf'

Original File Name: Scoping Plan_SCAG Comments.pdf

Date and Time Comment Was Submitted: 2017-04-06 16:51:36

No Duplicates.

Comment 61 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Molly

Last Name: Wright

Email Address: mwright@airquality.org

Affiliation: Sacramento Metropolitan AQMD

Subject: AB 32 Scoping Plan Update

Comment:

Please accept the Sacramento Metropolitan Air Quality Management District's comments (attached) on the 2017 Climate Change Scoping Plan Update, the proposed strategy for achieving California's 2030 greenhouse gas target.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-scopingplan2030-UyBdNgBgVnQFbgRg.pdf'

Original File Name: SMAQMD_AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-07 10:13:32

No Duplicates.

Comment 62 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Petition -- Integrate EJAC Recommendations into Scoping Plan Update

Comment:

On behalf of Friends of the Earth – United States (FOE-US) this petition with 6271 California resident signatures are provided as comment on the Draft 2030 Target Scoping Plan Update (SPU) and Related Public Workshops (Workshops). Friends of the Earth – United States defends the environment and works for a healthy and just world.

The substance of this petition goes to the heart of our environmental and social justice concerns regarding the road map for future California climate policy as it is presented in the SPU. Clearly there are tremendous challenges to be met, and we appreciate the enormity of the task put before the Air Resources Board (ARB) staff for developing an economically just, ecologically literate, and scientifically defensible plan for the State of California to meet greenhouse gas emissions reductions goals.

We commend the State of California political leadership for taking a vocal and public stance challenging those political forces that would suggest that global climate change does not present tremendous risks and existential threats to human society and the planet's life systems. We are steadfast in our belief that making a priority of addressing climate change is an imperative for the State of California, and we appreciate the public stance regarding the importance of addressing climate change that has been taken by political leadership in the state government.

Our organization and the undersigned humbly request that this petition be considered:

The environmental justice community in California has made important recommendations to improve the 2030 Scoping Plan for meeting the state's ambitious greenhouse gas emissions reduction objectives. These recommendations include prioritizing reducing greenhouse gas emissions at their source and abandoning the scientifically dubious, economically inequitable and socially unjust pollution trading mechanisms of California Cap-and-Trade. California can and must be a global climate leader by aggressively and effectively addressing the state's addiction to fossil fuels. Please incorporate the recommendations of the Environmental Justice Advisory Committee into the Scoping Plan, and prioritize emissions

reductions at the source.

Thank you for your attention to this petition.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-scopingplan2030-Wz1SJIE5BTNQOAFI.pdf>'

Original File Name: Friends of the Earth Petition_Strengthen Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:05:31

No Duplicates.

Comment 63 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Please find attached written comments submitted on behalf of 90 international, national, state, regional and local organizations regarding the integration of natural resources into the 2017 Scoping Plan Update.

Thank you for the opportunity to comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-scopingplan2030-AWIFYlwvBTQKUwln.pdf>'

Original File Name: CARB NR Letter.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:37:19

No Duplicates.

Comment 64 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Emily

Last Name: Burns

Email Address: eburns@savetheredwoods.org

Affiliation: Save the Redwoods League

Subject: 2017 Climate Change Scoping Plan Update Comments

Comment:

We appreciate the opportunity to provide the attached comments on the January 20, 2017 Draft of the 2017 Climate Change Scoping Plan Update.

Thank you,
Emily Burns, PhD

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-scopingplan2030-VTIQM1Y2BTFXJFI3.pdf>'

Original File Name: League Scoping Plan Comments 7April2017.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:52:18

No Duplicates.

Comment 65 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Amy

Last Name: Mmagu

Email Address: Amy.Mmagu@calchamber.com

Affiliation:

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Please see attached comments from California Chamber of Commerce

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-scopingplan2030-UWNda1xsUTUBWAV2.pdf>'

Original File Name: 2017 Scoping Plan Update 04.07.17.pdf

Date and Time Comment Was Submitted: 2017-04-07 13:56:19

No Duplicates.

Comment 66 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Danielle

Last Name: Blacet

Email Address: dblacet@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: 2017 Climate Change Scoping Plan Update - CMUA Comments

Comment:

Please accept the attached comments from the California Municipal Utilities Association on the proposed 2017 Climate Change Scoping Plan Update. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-scopingplan2030-UDFXIwBjWFRXY1Bg.pdf'

Original File Name: ARB 2017 Climate Change Scoping Plan Update - CMUA Comments - April 10 2017.pdf

Date and Time Comment Was Submitted: 2017-04-07 14:05:12

No Duplicates.

Comment 67 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: sheldon

Last Name: zakreski

Email Address: szakreski@climatetrust.org

Affiliation: Climate Trust

Subject: 2030 Scoping Plan Comments

Comment:

Attached please find The Climate Trust's comments on ARB's 2030 Scoping Plan.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-scopingplan2030-UiZRNfYjUl5WMQJw.pdf>'

Original File Name: TCT ARB Scoping Plan Comments-170406-CAM-DFT.pdf

Date and Time Comment Was Submitted: 2017-04-07 14:40:13

No Duplicates.

Comment 68 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Todd

Last Name: Shuman

Email Address: tshublu@yahoo.com

Affiliation: Wasteful Unreasonable Methane Uprising

Subject: WUMU Comment on 2017 Climate Change Scoping Update

Comment:

Comments of Todd Shuman, Wasteful Unreasonable Methane Uprising,
April 7, 2017

A. Appendix E in the current CA ARB Scoping document does not model a Cap and Tax approach. It just refers to the modeling for Alternative 1 to provide insight into how a Cap and Tax approach might function and impact emission reductions and overall state economic activity. This failure to fully model a Cap and Tax approach constitutes a CA ARB failure to comply with CEQA.

B. CA ARB fails to explore the conditions under which a Cap and Tax system could minimize leakage and economic relocation. A fully-compliant CEQA ARB analysis needs to explore and input a variety of assumptions and scenarios and then model them to generate a range of possible results based on the varying assumptions and scenarios. CA ARB should also have explicitly explored conditions in which Darien Shanske's "formulary apportionment" approach (which I previously submitted to CA ARB and which I again submit to CA ARB) is incorporated into the carbon tax and cap and tax alternative modelling. Failure to do so constitutes CEQA non-compliance.

C. CA ARB's comparative analyses between the recommended proposal (mostly a supplemented Cap and Trade system) and the carbon tax alternative remains biased against the carbon tax concept. Wara and Cullenward have repeatedly critiqued CA ARB in previously submitted comments concerning this matter, and the most recent CA ARB document does not appear to address such critique, especially with regard to the "quantity certainty" issue - which is fundamentally related to the "unlimited allowance banking"* that would still be allowed during the 2020-2030 period under the current preferred ARB proposal. As a result, the CA ARB analysis currently remains slanted and biased against both the carbon-tax-only alternative and the cap-and-carbon-tax alternatives. Such bias constitutes CEQA non-compliance.

D. The "social cost of carbon" values used in Appendix E are taken from EPA. These EPA values are very low relative to a more comprehensive social/environmental cost of carbon dioxide/ton

presented in Dr. Drew Shindell's "The Social Cost of Atmospheric Release", 2015 (\$46/ton versus \$110/ton, CO₂.) The use of such a low social cost of carbon (in terms of CO₂ tonnage) severely distorts the ARB analysis and renders it in non-compliance with CEQA. [See "The social cost of atmospheric release", Drew T. Shindell, Climatic Change (2015) 130:313-326, DOI 10.1007/s10584-015-1343-0, page 319, Table 2, Median total; declining rate.

E. Finally, CA ARB fails to reference and discuss a recent study concerning leakage that is likely relevant to the different alternatives. The study and its findings are discussed below. (See <http://legal-planet.org/2016/05/30/the-economic-impact-of-ab-32-on-california/>).

Dan Farber [the Sho Sato Professor of Law at the UC Berkeley School of Law and Co-Director of the Center for Law, Energy & the Environment] wrote this observation about the May 30, 2016 Resources for the Future study: "[O]verall, the economic impact seems small. That's also important because it means that carbon leakage from production shifting is also probably small.")

Sincerely,

Todd Shuman, Camarillo, WUMU, <http://wumu-wuru.my-free.website>

[*Wara/Cullenward note that "unlimited allowance banking" in cap in trade systems typically results in emissions reduction "overcompliance" early on (when compliance costs are lower) and emissions reduction "undercompliance" later on (when compliance costs are higher, relative to the earlier phase of a typically decadal compliance period.)]

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-scopingplan2030-VTMAaQN3ByYBcwNr.pdf'

Original File Name: Fourth Carbon Tax Column FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-07 14:50:29

No Duplicates.

Comment 69 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Samuel

Last Name: Bayless

Email Address: bayless@cioma.com

Affiliation: California Independent Oil Marketers

Subject: Comments on 2030 Scoping Plan

Comment:

Please find the attached comments from CIOMA on the 2030 Scoping Plan.

The California Independent Oil Marketers Association (CIOMA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and about one quarter of the state's 10,000 service stations. Our members provide services to local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among others.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-scopingplan2030-VjUBbII8U21QN1cI.docx>'

Original File Name: CIOMA 2030 Scoping Plan Comments.docx

Date and Time Comment Was Submitted: 2017-04-07 16:01:45

No Duplicates.

Comment 70 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Christa

Last Name: Anderson

Email Address: andersn@stanford.edu

Affiliation: Stanford University

Subject: Comments on the 2017 Climate Change Scoping Plan Update: Natural and Working Lands

Comment:

Dear ARB Board Members and Staff,
Please find attached our comment letter and additional information.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-scopingplan2030-UyBWM1Q6BSZWOQBu.zip'

Original File Name: Scoping plan comment.zip

Date and Time Comment Was Submitted: 2017-04-07 16:10:47

No Duplicates.

Comment 71 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Nicole

Last Name: Vermilion

Email Address: nvermilion@placeworks.com

Affiliation: AEP Climate Change Committee

Subject: AEP Climate Change Committee Comments on the Draft 2030 Target Scoping Plan
Comment:

On behalf of the Association of Environmental Professionals (AEP), Climate Change Committee, we appreciate the opportunity to provide comments on the January 20, 2017, Draft 2017 Climate Change Scoping Plan Update, The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Draft 2017 Scoping Plan Update).

AEP's Climate Change Committee has the following key comments on the Draft 2017 Scoping Plan Update. A discussion of these key comments follows this list:

1. Methodology, assumptions, and data within the Pathways model should be made publicly available.
2. Describe how Statewide GHG reduction measures will affect existing development vs. new development separately.
3. The 2017 Scoping Plan should include a Measure to establish a Statewide GHG Offset Program to Assist CEQA Lead Agencies in mitigating the potential increase in GHG emissions generated by new land use projects.

We applaud the efforts by CARB in developing a statewide framework for continuing to reducing GHG emissions in the post-2020 timeframe.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-scopingplan2030-BWQBYlAhU5VMFc4.pdf>'

Original File Name: AEP_Comments_ARB_Draft2017ScopingPlan.pdf

Date and Time Comment Was Submitted: 2017-04-07 17:02:10

No Duplicates.

Comment 72 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments on the Proposed Comments 'on 'The 2017 Climate Change Scoping Plan Update'

Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition regarding 'The 2017 Climate Change Scoping Plan Update.'

Should you have any questions or need anything further please contact Shelly Sullivan at (916) 858-8686.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-scopingplan2030-BWZdOAZ3WWlXDIAj.pdf>'

Original File Name: CCPC_SP_Comments_April_7_2017.pdf

Date and Time Comment Was Submitted: 2017-04-07 18:28:03

No Duplicates.

Comment 73 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Dennis

Last Name: Scherzer

Email Address: dcsasia@earthlink.net

Affiliation: Director, East Palo Alto Sanitary Distri

Subject:

Comment:

Report attached.

Future GHG control efforts must recognize the implications of use of bio-gasification systems at POTWs. The anaerobic digesters within these systems do not function unless they generate gases - all of which are GHGs. The digester gas mix is approximately 50 / 50 CO₂ and methane.

The anaerobic digesters utilize feedstocks consisting primarily of biosolids and food wastes. These materials are an industrial waste byproduct of the agricultural industry. This is a fossil fuel intensive industry. Use of biosolids to generate "bio"-methane is often represented as having less environmental impact than methane derived from a mineral well source. Such an assessment would not be factual if the full carbon footprint of digester gas is accurately plotted.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-scopingplan2030-UzBSNVM+VmAFcwJj.doc>'

Original File Name: CalEPAGHG ltr 4-10-17 EDIT.2.doc

Date and Time Comment Was Submitted: 2017-04-09 10:56:13

No Duplicates.

Comment 74 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chris

Last Name: Trott

Email Address: ctbioenergy@gmail.com

Affiliation: Yosemite Stanislaus Solutions (YSS)

Subject: Scoping Plan 2030

Comment:

Please accept these comments from Yosemite Stanislaus Solutions collaborative (YSS). YSS is an independent collaborative representing over 23 diverse interests, ranging from timber companies to environmental organizations to local government representatives, and also includes six liaison members entities. The primary goal of YSS is to work together to assist public and private land managers in achieving healthy forests and watersheds and the other resources they impact. Please find the YSS comments attached. Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-scopingplan2030-WyIGc1EjUV0FYAdo.pdf'

Original File Name: YSS Comments on Draft Scoping Plan to ARB 17-4-9.pdf

Date and Time Comment Was Submitted: 2017-04-09 18:24:14

No Duplicates.

Comment 75 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

CLFP comments to Scoping Plan Update

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-scopingplan2030-BWZRO1w7WHtSC1Az.pdf>'

Original File Name: CLFP Comments on 2017 Scoping Plan - April 10 2017.pdf

Date and Time Comment Was Submitted: 2017-04-09 22:24:15

No Duplicates.

Comment 76 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Nilmini

Last Name: Silva-Send

Email Address: silvasend@sandiego.edu

Affiliation: Energy Policy Initiatives Center, USD

Subject: Comments on 2030 Scoping Plan Update
Comment:

Please see attached document.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-scopingplan2030-UiEBZFU7V3QEawhm.docx'

Original File Name: Scoping Plan Update 2017 Comments_EPIC_041017.docx

Date and Time Comment Was Submitted: 2017-04-09 23:23:45

No Duplicates.

Comment 77 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation: Ad Hoc Offsets Group

Subject: 2030 Scoping Plan Comment Letter-Offsets Group

Comment:

Please find attached the comments from the Ad Hoc Offsets Group to the 2030 Proposed Scoping Plan.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-scopingplan2030-UmYBKlBgUTJSeQY3.pdf'

Original File Name: 4-10-17 Ad Hoc Offsets Comments on 2030 Proposed Scoping Plan-final.pdf

Date and Time Comment Was Submitted: 2017-04-10 05:50:06

No Duplicates.

Comment 78 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Robert

Last Name: Harlow

Email Address: bob@harlow.com

Affiliation: MVCAN Environmental Group

Subject: Price on Carbon

Comment:

Even though the legislature has recently passed a tax increase on gas and diesel fuel, more needs to be done to discourage the use of fossil fuels for industrial processes at stationary sources of pollution. We strongly urge placing a predictably increasing fee on crude oil and natural gas used for industrial processes, to be collected from refineries, concrete plants, utilities, etc., in proportion to the dirtiness of the fuel used. Furthermore, all proceeds from these fees should be returned equally to household throughout the state, to mitigate against the expected higher prices for electricity, gasoline, and other industrial products that use these fossil fuels.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 07:50:54

No Duplicates.

Comment 79 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Willard
Last Name: Richards
Email Address: willard@sonic.net
Affiliation: SCTL

Subject: Scoping Plan Update
Comment:

Actions by local authorities are essential to reduce the "carbon footprint of cities; provide understandable guidance to enable ordinary people to act more quickly and effectively.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-scopingplan2030-B3QGYwRxAzwBZFAP.pdf>'

Original File Name: SCTL Ltr to CARB -- Target Scoping Plan Upadte Comments 2017-04-10.pdf

Date and Time Comment Was Submitted: 2017-04-10 07:59:26

No Duplicates.

Comment 80 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: Comments from The Nature Conservancy on the January 2017 Draft Scoping Plan Update

Comment:

Please accept the attached comments on the January 2017 version of the Climate Change Scoping Plan Update. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-scopingplan2030-BjRGYwBgU3QEqM0d.pdf'

Original File Name: Scoping Plan comments_04_10_17.pdf

Date and Time Comment Was Submitted: 2017-04-10 08:14:41

No Duplicates.

Comment 81 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Michelle

Last Name: Overmeyer

Email Address: movermeyer@mst.org

Affiliation:

Subject: Transit and GHG emission reductions

Comment:

Official comments from Monterey-Salinas Transit are attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-scopingplan2030-Uz5cKQRxUV0FYAFu.pdf>'

Original File Name: MST comment letter on Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 08:25:17

No Duplicates.

Comment 82 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Mark

Last Name: Fenstermaker

Email Address: mark@csgcalifornia.com

Affiliation:

Subject: Santa Clara Valley Open Space Authority Comments to Proposed Scoping Plan
Comment:

Hello,

Please accept the attached comments to the Proposed Scoping Plan from the Santa Clara Valley Open Space Authority.

Thank you,

Mark

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-scopingplan2030-BmlWI1AwUV1QJQRn.pdf'

Original File Name: OSA Scoping Plan Discussion Draft Comments - Round 2.pdf

Date and Time Comment Was Submitted: 2017-04-10 08:24:23

No Duplicates.

Comment 83 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Miya

Last Name: Kitahara

Email Address: miya@stopwaste.org

Affiliation: StopWaste

Subject: StopWaste Comments

Comment:

Please find attached comments pertaining to supporting resilient economic growth, local plan-level GHG reduction goals, low carbon energy sector, natural and working lands sector, waste management sector, and water sector.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/102-scopingplan2030-VSYHdVQ6BCcGdwRl.pdf>'

Original File Name: StopWaste Comments on CARB 2017 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 08:55:01

No Duplicates.

Comment 84 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Eric

Last Name: Mork

Email Address: Eric.Mork@ICMinc.com

Affiliation: EBR Development, LLC

Subject: Scoping Plan: CCS Rule Making

Comment:

Perhaps in 15 years electrical vehicles are the norm on the highways of California, but today liquid renewable fuels, if provided the opportunity, can combine with Carbon Capture and Sequestration (CCS) rules used in conjunction with enhanced oil recovery (EOR) to keep the Low Carbon Fuel Standard reduction goals of the state on track to meet established law. Grain starch is plentiful, more economical for consumers and in many cases can have a much lower carbon score delivered to California than Brazilian imported sugar cane ethanol.

I. CCS and Enhanced Oil Recovery Sequestration Opportunities:

Alongside of federal tax legislation to be introduced this year, the California Air Resources Board with the establishing of reasonable CCS field monitoring requirements could incentivize the ethanol and pipeline industries to deliver and sequester over 12,000,000 million metric tons per year of "recycled" carbon dioxide. Photosynthesis and CCS through EOR, achieves true mitigation when compared to combustion source capture or the capture of mined sources of CO₂ that also exist. The Permian basin of west Texas has long term (decades) of CO₂ demand exceeding the volume referenced above with economic potential from EOR surpassing those of other basins in the United States.

Many states support geological survey departments which oversee the proper injection of carbon dioxide in these fields for stimulation with established rules protecting important shallower ground water supplies and validating geology so neighboring fields and injections do not interact. These Class II rules have been practiced by operators for many years, are understood and have a track record which has led to good stewardship of the surface and reservoirs targeted for dozens of successful tertiary oil recovery projects. The hope by industry is that the Air Resources Board will acknowledge and make use of existing state legislation in establishing monitoring rules which overlap well with their own carbon reduction goals. Seldom are goals of various public and private parties and institutes found so uniquely aligned. Producers want injected CO₂ to remain in the reservoir for continued oil stimulation and to reduce the high purchasing expense of compressed CO₂ supplies. Just like an individual consumer, if he or she had to pay five dollars a pound to air up their car tires, they would be much more diligent in buying tires that would not leak. EOR producers live with this same incentive, boding well for CCS progress, domestic jobs and an increased tax base.

To accelerate an agreement and project development to this end however, EBR Development, LLC would propose a "Default Decree" option for ethanol plants, refiners and the CO2 purchasers they are working with for CCS / EOR purposes. Whatever the volume of CO2 captured and compressed at the ethanol plant and taken by pipeline to an oilfield, under the Default Decree (or whatever the name) if these ethanol gallons are destined for California and the state gasoline pool, the California ethanol buyer (refiner) and the ethanol plant (seller), in order to avoid long term (decades) of carbon storage liability risk (which will kill projects) could agree to accept the decree, hence, only 95% of the carbon intensity (CI) reduction as measured with GREET for the ethanol plant would inure to the refiner's California carbon mitigation obligation. For the EOR producer, this would enable them to stay free of additional monitoring requirements beyond Class II state rules. The California obligated refiner could have access to lower CI ethanol gallons (due to ethanol plant CO2 now being sequestered) but would now be required, based on the quarterly average for carbon prices in California, to pay this unrealized 5% CO2 captured volume, multiplied by the quarterly price for carbon into a newly established Environmental Justice (EJ) research fund. This fund would be managed by ARB with resources dedicated to research and perhaps direct project investment targeting emission issues and concerns in the state. If 1.5 billion gallons per year of the ethanol headed to California were associated CO2 pipeline connected gallons, using \$100/mT for carbon, this 5% decree deferment would create around \$11,000,000 each year for this EJ fund and more with higher blends of ethanol discussed below. If a 25 CI point reduction occurs with CO2 capture, then the carbon dollar value of 1.25 points per gallon would go to the EJ fund as the refiner obligation at the same time providing ethanol gallons which continue to be of decreasing carbon scores allowing the refiners continuation of fuel sales in the state within LCFS rules.

PART I Summary:

A) Do not recreate the rules for injection, recycling and monitoring sequestration in EOR projects without providing a mechanism to leverage today's successful approaches. Studies indicate that well over 99% of injected CO2 in these projects stays sequestered. The default decree choice is the avenue to avoid the bureaucratic inertia that appears inevitable without such an option.

The goal should be to create an incentive environment for environmental progress, but there is risk in the opposite occurring with the rule making taking place. Just as the ARB is looking decades ahead, EOR project duration will be decades long as well, so while price assumptions for forecasting is large, risk mitigation and liability assessment loom equally large and should be considerations of ARB in current rule making.

B) CO2 from ethanol plants with the photosynthesis advantage discussed are truly differentiated from others in this evaluation. Much like when baking bread, yeast are eating carbohydrates and releasing the CO2, it is just not in the oven making bread rise. The alcohol from these yeast is captured to create octane (113) for energy. The story could be further enhanced with true atmospheric mitigation by closing the loop on this other

product of good yeast. Again, clearly differentiating this source from that which is mined (drilled for) or others which are typically subsets of a combustion activity is not unfair.

C) Representatives of thirty two ethanol plants to date have had preliminary conversations with EBR Development, LLC and depending on final rules, have expressed interest in CO2 compression equipment being installed in conjunction with a pipeline to transport this supply seamlessly into the oilfield for enhanced oil recovery and sequestration. The final ARB CCS rulemaking activities will determine the viability or need to continue these discussions.

II. Requirements to Reduce NO_x in California:

The Fifth Circuit Court of Appeals ruled last month that the Air Resources Board must find avenues to reduce nitrous oxide emissions. While much of the focus here was on biodiesel, the ethanol industry could be an avenue to a solution while complementary to section I above. Aromatics such as toluene, benzene and xylene boost gasoline octane but are key concerns for both tailpipe and evaporative emissions.

Take a look <https://www.youtube.com/watch?v=sg6sZq8Sefk> and <https://www.youtube.com/watch?v=Mwb02c1wdxg> links. The attached article from Ethanol Across America indicates that aromatics are three times more reactive to forming ozone. This could be reduced with higher blends of ethanol beyond the 10% included in gasoline today. Higher compression engines entering the market are prime candidates to capture power and mpg for the consumer from this cleaner burning, high octane fuel.

Also discussed is the decrease in Reid Vapor Pressure (RVP) as ethanol concentrations increase. Allowing higher blends of ethanol along with the pipeline discussed above would make more low carbon intensity ethanol carry additional benefit in meeting the mandated lowering of carbon in California fuel. NO_x reduction also occurs making higher blends of ethanol one solution to the relief sought by the court in Poet vs. CARB LCFS, all while potentially increasing California emission research dollars through infrastructure i.e.: pipelines for EOR.

III. Fiber Conversion to Ethanol: Carbon Excellence

Gen 1.5™ : Incremental ethanol gallons will soon be created by converting low value corn fiber into fuel. Exciting in that these are existing bushels the ethanol plant is processing today, yet adding 6-9% yields with carbon intensity scoring per gallon of 15-25 g CO₂ e/MJ. Coupling these incremental gallons with the CCS strategy discussed above could generate ethanol gallons with a carbon intensity score of close to "0" g CO₂ e/MJ if a plant is pipeline connected to the oilfield and given credit for sequestration for the CO₂ produced and is also converting their fiber to fuel. Rulemaking will dictate the potential scoring contribution this combination could provide to the low carbon fuel needs of California. Additional low carbon gallons that can go into California from plants that are pipeline connected can help create EJ

fund dollars annually should the markets and producer opt into the default decree through the mechanism discussed.

A tangential benefit also occurs with this fiber separation and conversion process. Today, biodiesel makes an important contribution to progress made to achieving the goals of the LCFS. It was reported in 2015 that 1/3 of the biodiesel sold in California was produced using crude corn oil. The Gen 1.5™ process in addition to accessing and creating fuel from fiber also frees up bound up oil which can lead to additional biodiesel production if needed. Though under review as mentioned, biodiesel typically is a good scoring fuel under the GREET model and more could be produced through lengthening the crude corn oil market.

Conclusion:

"To get what you want, be willing to help enough other people get what they want." Zig Ziglar said this years ago, but I think for success to occur with CCS rule making and this Scoping Plan discussion, this attitude should be at the forefront for all. Agendas of all parties should be kept clear so time is not wasted, which means candor should win the day. I tried to be concise and grow the needs of both state and industry with the approach above. This would be a \$2 B investment to achieve. Plenty of private investment money is available today for good projects, but defining the rules for a forthcoming 20 year period can be tough, so my council to the Air Resources Board would be put yourself in the shoes of the investor and strive for clarity and a realistic rule making outcome that will be stimulative to reaching your goals, not inhibitive.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 09:13:04

No Duplicates.

Comment 85 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ed

Last Name: Pike, P.E.

Email Address: epike@energy-solution.com

Affiliation: Energy Solutions

Subject: Proposed 2017 Climate Change Scoping Plan Update and Fuel Efficient Passenger Vehicle Repl

Comment:

Dear Chair Nichols:

Thank you for the opportunity to provide comments on the proposed 2017 Climate Change Scoping Plan Update (Scoping Plan Update). We have provided these comments via the online ARB comment field, and via a similar attached letter.

Energy Solutions is a professional and engineering services firm whose mission is to create large-scale environmental impacts by providing market-based, cost-effective energy, carbon, and water management solutions to our utility, government and commercial customers. We strongly support the innovative and critical leadership from the Air Resources Board (ARB) in reducing greenhouse gas (GHG) emissions in California.

We recommend adding fuel-efficient passenger vehicle replacement tires to the list of transportation measures and to the Appendix F Environmental Analysis. Replacement tires offered on the market typically lead to a four percent increase in GHG and other emissions compared to tires fitted on new vehicles. Using baseline emissions from CARB's EMFAC2014 model, fuel efficient replacement tires will reduce GHG by more than two million metric tons per year through 2030. This quantity of GHG is cumulatively equal to more than 15% of the proposed cumulative reductions from additional transportation measures, including refineries, through 2030.

Fortunately, ARB has found that "fuel efficient passenger vehicle tires can be utilized by both new and in-use vehicles in the near-term to achieve GHG emission reductions. Deployment of fuel efficient vehicle tires for in-use vehicles could include limited incentives, followed by ratings and then standard setting to permanently shift the market" (May 2014 First Update to the Climate Change Scoping Plan).

We strongly agree. A study for the South Coast Air Quality Management District finds that disadvantaged communities where vehicles operating on replacement tires are more common will particularly benefit from air quality and economic benefits. Based on that study, drivers will save up to \$1000 in fuel costs over the lifetime of their vehicle.

We recommend the following addition to section IV.C of the proposed

Scoping Plan Update:

"Persistent market barriers such as the lack of customer information and standards have led to a significant efficiency gap between tires shipped with new light duty vehicles and tires available in the replacement market. A study for South Coast AQMD estimates that a 4% average vehicle fuel efficiency improvement can be achieved through improved efficiency of replacement tires, resulting in very cost-effective air quality and GHG benefits and major consumer benefits. This study is also consistent with research for ARB and CalEPA, an earlier study by the National Research Council, and research demonstrating the effectiveness of the European Union (EU) program in closing this gap.

The resulting air quality and economic benefits are especially important for lower income and disadvantaged communities where older, higher emitting vehicles that use replacement tires are more prevalent. The prior 2014 Scoping Plan Update highlights policies such as incentives, consumer information and standards to overcome persistent market barriers to fuel efficient replacement tires and unlock these benefits.

While the federal government has not implemented a program to improve the rolling resistance of light duty vehicle replacement tires, California has a timely opportunity to move forward and achieve the replacement tire efficiency goals in AB 844 (Nation, 2003). California can leverage metrics and lessons learned in the EU, Japan and South Korea and collaborate with Canadian efforts to develop a tire efficiency program."

We also recommend the following addition to the Transportation Sustainability "On-going and proposed measures - vehicle technology" sub-section IV.C.3:

"Improve light duty vehicle fuel economy for passenger vehicles by 4% through policies that achieve fuel efficient replacement tires and achieve the goals of AB 844 (Nation 2003)."

We appreciate your consideration of our comments. Please feel free to contact Ed Pike of my staff or have your staff contact him at epike@energy-solution.com or (510) 482-4420 x 239 if you have any questions.

Sincerely,

Mike McGaraghan
Director
Energy Solutions

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-scopingplan2030-VzJQOFYyWHkAYQV8.pdf>'

Original File Name: Energy Solutions 2030 GHG scoping plan letter 4-10-2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 09:20:33

No Duplicates.

Comment 86 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Tim

Last Name: McRae

Email Address: tmcrae@svlg.org

Affiliation: Silicon Valley Leadership Group

Subject: ARB Scoping Plan comment

Comment:

Please find attached the comment of the Silicon Valley Leadership Group and the Coalition for Green Capital on the ARB Scoping Plan Update.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-scopingplan2030-VSZUJABeVWpSMVlz.docx>'

Original File Name: SV Leadership Group and Coalition for Green Capital comments on ARB Scoping Plan Update April 2017 v 2.0.docx

Date and Time Comment Was Submitted: 2017-04-10 09:18:02

No Duplicates.

Comment 87 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Deborah

Last Name: Gordon

Email Address: dgordon@ceip.org

Affiliation: Carnegie Endowment for International Peace

Subject: Comments on Scoping Plan 2030

Comment:

Sirs:

Please see attached comments on refinery GHG emission reduction targets.

Deborah Gordon

Director, Energy and Climate Program

Carnegie Endowment for International Peace

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-scopingplan2030-WzxdNAd0WG9WPwFv.docx>'

Original File Name: Gordon CARB comments 4.10.17 FINAL.docx

Date and Time Comment Was Submitted: 2017-04-10 10:21:14

No Duplicates.

Comment 88 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jeff

Last Name: Cohen

Email Address: jcohen@eosclimate.com

Affiliation: EOS Climate

Subject: 2030 Scoping Plan

Comment:

Please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/110-scopingplan2030-UzZXPlclBQlXMABBy.pdf'

Original File Name: EOS ARB 2030 Scoping.pdf

Date and Time Comment Was Submitted: 2017-04-10 11:10:57

No Duplicates.

Comment 89 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Elizabeth

Last Name: Nussbaumer

Email Address: enussbaumer@fwwatch.org

Affiliation: Senior Researcher

Subject: Food & Water Watch CA 2030 Scoping Plan Public Comment

Comment:

On behalf of Food & Water Watch and our over 186,000 supporters in California, we respectfully submit these comments (attached) on "The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target."

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-scopingplan2030-UTdRIFwqV1sCZwlo.pdf'

Original File Name: FWW CA 2030 Scoping Plan Public Comment Final.pdf

Date and Time Comment Was Submitted: 2017-04-10 11:16:51

No Duplicates.

Comment 90 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Mike

Last Name: Sandler

Email Address: mike@carbonshare.org

Affiliation: Carbon Share

Subject: Return Auction Revenues to People as a Climate Dividend

Comment:

To: California Air Resources Board

Re: Comments on the 2017 Climate Change Scoping Plan Update for Achieving California's 2030 Greenhouse Gas Target

Thank you for considering these comments. Since 2006 my comments have consistently encouraged the California Air Resources Board (ARB) to return most or all of the auction proceeds to the public following the Cap & Dividend model, archived online at www.carbonshare.org.

California has shown leadership on climate change by creating a price on carbon. It can improve the program in its next phase, and perhaps gain supporters for the program's extension, by eliminating subsidies to the fossil fuel industry and returning Cap & Trade revenues back to people as climate dividends.

Currently a large portion of Cap & Trade funds go to high-speed rail and transit-oriented development. Emission reductions from these areas are not expected to materialize for several decades. A better approach would be to return the funds back to people as a climate dividend. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities not just coastal cities.

Many people do not understand climate dividends. It is about transforming the economic system, not about funding specific projects. I urge ARB staff to read Peter Barnes' books, including *Who Owns the Sky?*, *Capitalism 3.0*, and *With Liberty and Dividends for All*.

The dividend can support climate justice in disadvantaged communities. The climate dividend concept can be a bridge to global anti-poverty movements focusing on the concept of "basic income," and international development efforts promoting "unconditional cash transfers." In a separate effort, a climate dividend could help the State's considerations in establishing a State Earned Income Tax Credit (EITC).

The fear of "leakage" has led to the fossil fuel industry receiving millions of permits for free (even though they mostly oppose the

program). The Petroleum Refining, Natural Gas Extraction, and Cement sectors received over 49 million free allowances in 2016. At \$12.73 per allowance, that subsidy is worth over \$629 million per year. Reducing or eliminating this subsidy would help bolster demand which has been lagging in recent permit auctions.

Thank you for your consideration.

Sincerely,

Mike Sandler

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 11:32:50

No Duplicates.

Comment 91 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rebecca

Last Name: Franklin

Email Address: rebeccaf@acwa.com

Affiliation: Association of California Water Agencies

Subject: ACWA Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please find the Association of California Water Agencies' comments on the 2017 Climate Change Scoping Plan Update attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-scopingplan2030-AWAFYFwqVGZXDgZl.pdf'

Original File Name: ACWA Comments on 2017 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 10:50:03

No Duplicates.

Comment 92 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Livia

Last Name: Beaudin

Email Address: livia@coastlaw.com

Affiliation: Coast Law Group

Subject: Climate Action Campaign Comments on 2017 Scoping Plan Update
Comment:

Please see attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-scopingplan2030-UjFVMgRmUl4CZ1U6.pdf'

Original File Name: CAC Comments.2030.Scoping Plan.Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 11:48:19

No Duplicates.

Comment 93 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David

Last Name: Schonbrunn

Email Address: David@Schonbrunn.org

Affiliation: TRANSDEF

Subject: 2017 Scoping Plan Comment Set

Comment:

The attached comment set contains four letters and their respective attachments, separated by index pages. The letter titles are:

General Comments

VT Reduction

Environmental Assessment

Regional Targets Update

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-scopingplan2030-BTdUYlBgB2MEXQl6.pdf>'

Original File Name: 2017 Scoping Plan Comment set.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:02:03

No Duplicates.

Comment 94 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kathryn

Last Name: Phillips

Email Address: kathryn.phillips@sierraclub.org

Affiliation: Sierra Club California

Subject: SierraClubCalifScopingPlanComments

Comment:

Please find attached Sierra Club California's comment letter on the Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-scopingplan2030-VSZRPgFlACEAdABh.pdf'

Original File Name: SierraClubCalifCommentsonScopingPlanUpdate2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:31:56

No Duplicates.

Comment 95 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jason

Last Name: Schmelzer

Email Address: jason@shawyoderantwih.com

Affiliation: Shaw / Yoder / Antwih, Inc.

Subject: SWANA LTF Comments re: Final Proposed 2030 Target Scoping Plan
Comment:

Good Afternoon,

Please find attached the comments on the ARB's Final Proposed 2030 Target Scoping Plan, on behalf of the Legislative Task Force of the Solid Waste Association of North America, California Chapters. Please let us know if you have any questions. Thank you.

Best,

Jason Schmelzer

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-scopingplan2030-WilWJwNjBThWMQIW.pdf'

Original File Name: SWANA LTF Letter to ARB re Proposed Scoping Plan Final.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:34:53

No Duplicates.

Comment 96 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Suzy

Last Name: Hong

Email Address: shong@goodinmacbride.com

Affiliation: USS-POSCO Industries

Subject: UPI Comments on 2017 Climate Change Scoping Plan Update

Comment:

Please find attached USS-POSCO Industries Comments on the 2017 Climate Change Scoping Plan Update. If you have any questions concerning this document or any difficulty with the attachment, please contact me at shong@goodinmacbride.com or (415) 392-7900.

Best regards,
Suzy Hong

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-scopingplan2030-Wy4CdFM7WFQLblU6.pdf'

Original File Name: UPI Comments on 2017 Climate Change Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:28:22

No Duplicates.

Comment 97 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Barry

Last Name: Vesser

Email Address: bvesser@climateprotection.org

Affiliation: Center for Climate Protection

Subject: Comments on the 2017 Climate Change Scoping Plan Update for Achieving California's 2030 Goal

Comment:

Thank you for the opportunity to comment. The Center for Climate Protection has been working since 2006 to encourage the State Legislature and California Air Resources Board (ARB) to return most of the auction proceeds to the public following the Cap & Dividend model.

California has shown leadership on climate change by creating a price on carbon. It can improve the program in its next phase, and perhaps gain supporters for the program's extension, by eliminating subsidies to the fossil fuel industry and returning Cap & Trade revenues back to people as climate dividends.

Currently a large portion of Cap & Trade funds go to high-speed rail and transit-oriented development. Emission reductions from these areas are not expected to materialize for several decades. A better approach would be to return the funds back to people as a climate dividend. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities not just coastal cities.

Many people do not understand climate dividends. It is about transforming the economic system, not just about funding specific projects. I urge ARB staff to read Peter Barnes' books Who Owns the Sky and Capitalism 3.0.

The fear of "leakage" has led to the fossil fuel industry receiving millions of permits for free (even though they mostly oppose the program). The Petroleum Refining, Natural Gas Extraction, and Cement sectors received over 49 million free allowances in 2016. At \$12.73 per allowance, that subsidy is worth over \$629 million per year. Reducing or eliminating this subsidy would help bolster demand which has been lagging in recent permit auctions.

Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 12:40:27

No Duplicates.

Comment 98 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jessica

Last Name: Olson

Email Address: olsonj@ayreslawgroup.com

Affiliation:

Subject: Honeywell Comments on ARB Scoping Plan Update

Comment:

Please find attached comments from Honeywell International Inc. on ARB's 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-scopingplan2030-BzZdbFF9VjVQYggl.pdf>'

Original File Name: 17-04-07 Honeywell Comments on Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:32:01

No Duplicates.

Comment 99 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David

Last Name: Marvin

Email Address: dmarvin@carnegiescience.edu

Affiliation: Carnegie Institution for Science

Subject: Quantitative Scoping Plan Goal for Natural and Working Lands

Comment:

Please see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-scopingplan2030-UD4Cc1Y7WVVVIFU2.pdf'

Original File Name: NWL_scientist_letter_to_CARB_04-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:48:39

No Duplicates.

Comment 100 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Stacey
Last Name: Meinzen
Email Address: staceymeinzen@gmail.com
Affiliation: Center for Climate Protection

Subject: Comments on the 2017 Climate Change Scoping Plan Update for Achieving California's 2030 Gr
Comment:

Thank you for considering these comments.

California has shown leadership on climate change by creating a price on carbon. It can improve the program in its next phase, and perhaps gain supporters for the program's extension, by eliminating subsidies to the fossil fuel industry and returning Cap & Trade revenues back to people as climate dividends.

Currently, a large part of Cap & Trade funds go to high-speed rail and transit-oriented development. Emission reductions from these areas are not expected to materialize for several decades. A better approach would be to return the funds back to people as a climate dividend. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities - not just coastal cities.

Many people do not understand climate dividends. It is about transforming the economic system, not about funding specific projects. I urge ARB staff to read Peter Barnes' books, including Who Owns the Sky? and With Liberty and Dividends for All.

The dividend can support climate justice in disadvantaged communities. The climate dividend concept can be a bridge to global anti-poverty movements focusing on the concept of "basic income," and international development efforts promoting "unconditional cash transfers." In a separate effort, a climate dividend could help the State's considerations in establishing a State Earned Income Tax Credit (EITC).

The fear of "leakage" has led to the fossil fuel industry receiving millions of permits for free (even though they mostly oppose the program). The Petroleum Refining, Natural Gas Extraction, and Cement sectors received over 49 million free allowances in 2016. At \$12.73 per allowance, that subsidy is worth over \$629 million per year. Reducing or eliminating this subsidy would help bolster demand which has been lagging in recent permit auctions.

Thank you for your consideration.

Sincerely,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 12:52:46

No Duplicates.

Comment 101 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Julia
Last Name: Kim
Email Address: jkim@lgc.org
Affiliation: ARCCA

Subject: Comments from the Alliance of Regional Collaboratives for Climate Adaptation
Comment:

Dear Chair Nichols and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation welcomes the opportunity to provide comments on the Proposed 2017 Climate Change Scoping Plan Update. We hope that you find these comments valuable. Please do not hesitate to reach out to us should you have any questions or if there is an opportunity to provide draft language for inclusion in the final Scoping Plan.

Sincerely,

Julia Kim
ARCCA Coordinator
Local Government Commission
jkim@lgc.org

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-scopingplan2030-VDVWIlw+BzdWMQBf.pdf>'

Original File Name: ARCCA Comments - Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:58:19

No Duplicates.

Comment 102 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Richard

Last Name: Rollins

Email Address: richard@rollinscs.com

Affiliation:

Subject: scopingplan2030 comment

Comment:

The state needs to move more aggressively toward clean energy.
Direct regulation (caps) is preferred over cap-and-trade.

I support Alternative 1.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 12:53:34

No Duplicates.

Comment 103 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Paul

Last Name: Samuelson

Email Address: paul@storywrangler.com

Affiliation: Mill Valley CAN

Subject: California carbon tax

Comment:

I strongly encourage our state legislature to consider the use of a carbon tax that would have specified increases over measured times to both promote less use of greenhouse gas producing carbon fuels and return the tax as dividends to state residents to help compensate for the adverse effects of such fuels.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 12:54:35

No Duplicates.

Comment 104 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: Los Angeles County Waste Mgmt Task Force

Subject: Comments on the Draft Environmental Analysis for the 2030 Scoping Plan
Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-scopingplan2030-BXFQMFAOVGRXPgZr.pdf'

Original File Name: TF Comments on Scoping Plan EA 04.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:10:24

No Duplicates.

Comment 105 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: catherine
Last Name: reheis boyd
Email Address: joey@wspa.org
Affiliation: WSPA

Subject: WSPA Comments on ARB's 2017 Climate Change Scoping Plan Update
Comment:

Please see attached WSPA Comments on ARB's 2017 Climate Change Scoping Plan Update. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-scopingplan2030-UCdXIIjVmQGxwBj.pdf'

Original File Name: WSPA Comments on Proposed 2030 Scoping Plan Update 041017.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:12:21

No Duplicates.

Comment 106 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Hannah
Last Name: Goldsmith
Email Address: hannah@caletc.com
Affiliation: CalETC

Subject: CalETC Comments Re Scoping Plan Update
Comment:

Please find CalETC's comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-scopingplan2030-UTJdOgNuV2FRI1c0.pdf>'

Original File Name: CALETC Comments Re Scoping Plan Update Final.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:10:35

No Duplicates.

Comment 107 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Tony

Last Name: Sirna

Email Address: calfact@calfact.org

Affiliation: Californians for a Carbon Tax

Subject: Scoping Plan REsponse from Californians for a Carbon Tax

Comment:

RE: 2030 Target Proposed Scoping Plan

Dear CARB and other stakeholders,

Thank you for the opportunity to comment on the CARB 2030 Target Proposed Scoping Plan.

Californians for a Carbon Tax (CalFACT) is a grassroots, citizen-led effort to promote equitable, efficient, and effective carbon pricing in California.

CalFACT supports the efforts of the of the Environmental Justice Advisory Committee and the Environmental Justice community and has signed on to their Declaration in Support of Carbon Pricing Reform in California.

We applaud CARB for considering multiple options for carbon pricing in the Proposed Scoping Plan. We think it is critical for all California legislators and stakeholders to have enough information and analysis to adequately compare the available carbon pricing options.

We believe that a steadily rising carbon tax would provide the best carbon pricing mechanism for California to meet its climate reduction goals for 2030 and 2050.

A carbon tax implemented as far upstream as possible can cover emissions from fossil fuels throughout the economy. A predictable, annually-rising carbon price that is embedded in the price of all goods will motivate consumers to reduce costs, which will in turn reduce emissions. Even more, it will motivate investors and businesses to make the short- and long-term investments in infrastructure that will transition our economy towards sustainable clean energy.

We also believe that rebating a significant portion of the revenue from a carbon tax to California households is essential to its success. Not only would a rebate protect low-income and vulnerable populations from price increases, but it would maintain political support for the program even as the carbon price increases to the level needed to reach our emissions reduction targets. Furthermore, such a rebate will both stimulate the economy and create local jobs as people spend their money in their local communities.

Attached we offer a supplement to the information you provide on the Carbon Tax Alternative. We hope that you will incorporate these concepts into the next version of the Scoping Plan. First, we provide additional criteria by which we think the scoping plan scenarios should be evaluated. Then we provide an alternative version of Alternative 2: A Carbon Tax, so that it presents a more complete picture of what an effective carbon tax alternative might look like for California.

We also encourage CARB to include greater analysis of the effectiveness of the current cap-and-trade program in California, as well as cap-and-trade in the European Union and in the Northeast, under the Regional Greenhouse Gas Initiative. Recent analysis shows that the primary emission drivers in those areas have not been cap and trade but: (1) the economic recession of 2009 and long-term shifts in economic structure, such as the decline of manufacturing; (2) impact of "complementary" regulatory programs that encourage or even mandate renewables and energy efficiency, which undermine cap and trade; and (3) structural changes in energy economics—the expansion of the production of natural gas, which is displacing coal in the electric generation market, and the ongoing rapid decline in renewable costs.

We provide a detailed analysis on some of the challenges of cap-and-trade in Appendix 1.

We also provide additional information on the effects of British Columbia's Carbon Tax in Appendix 2.

In the interest of providing the most complete and even-handed analysis to the California legislature and the public as you revise the Scoping Plan, leading to sound public policy, we ask you to consider this input.

Thank you again for this opportunity to engage in this process and for all of your work in helping California meet our climate goals.

Tony Sirna
Valerie Bane
Olivia Angus

For Californians for a Carbon Tax (CalFACT)
www.calfact.org

calfact@calfact.org

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-scopingplan2030-BWYGYVQ5BzICZQJh.pdf>'

Original File Name: CalFACT - Scoping Plan Response April 2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 12:57:21

No Duplicates.

Comment 108 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: none

Subject: Need More Aggressive CARB Scoping Plan Targets, Pathways

Comment:

Please select Alternative One. It contains direct environmental justice benefits. Focus is rightly on state regulations not market mechanisms. Regulations provide needed degrees of certainty that goals will be achieved.

Plan generally lacks specificity. Instead of explicit metrics and paths, there is too much "may be", "should try to", and "could" instead of "should". Fix this lack.

Large deficiency is transportation. The Plan should correct grossly inadequate, politicized VMT targets adopted by MTOs. Dodging this problem, again, will constitute a serious shortfall in targeted GHG reduction.

The state's goal should be decarbonization of the energy economy and measures adequate to stabilize the climate in the shortest possible time. This CARB plan falls short.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 13:08:08

No Duplicates.

Comment 109 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Bernard

Last Name: Kotlier

Email Address: LMCCEnergy@gmail.com

Affiliation:

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please see attached letter.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-scopingplan2030-WjkGYVYIVGVXDgBq.pdf'

Original File Name: CARB Joint Scoping Plan Comments,IBEW-NECA,4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:17:20

No Duplicates.

Comment 110 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David

Last Name: McCoard

Email Address: dmccoard@hotmail.com

Affiliation: Mr.

Subject: Strategy alternatives for Scoping Plan 2030

Comment:

All of the actions listed in Alternative 1 should be implemented.

If cap-and-trade is to continue, it must be revised to prevent stationary sources from buying credits to maintain their present level of pollution on their neighborhoods. They must be required to reduce their level of local pollution to the greatest extent possible. This is a public health and environmental justice issue as well as a greenhouse gas issue. The people living near stationary sources are real people and must be given relief.

In fact, such revisions in cap-and-trade must be implemented immediately. Real people are suffering now, and the health effects of local emissions are costing state and local money.

David McCoard

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 13:26:47

No Duplicates.

Comment 111 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Scott

Last Name: Samuelsen

Email Address: gss@nfcrc.uci.edu

Affiliation:

Subject: NFCRC Comments on 2017 Climate Change Scoping Plan Update
Comment:

Attached are the comments of the National Fuel Cell Research Center on the 2017 Climate Change Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-scopingplan2030-B3dUIFM9VXZVPAJx.pdf'

Original File Name: Proposed Scoping Plan Strategy Comments NFCRC 04_10_17.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:50:07

No Duplicates.

Comment 112 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: John

Last Name: Bloom

Email Address: laura@houstonmagnani.com

Affiliation: CSCME

Subject: CSCME Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please accept the attached comments on the 2017 Climate Change Scoping Plan Update from the Coalition for Sustainable Cement Manufacturing & Cement (CSCME).

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/135-scopingplan2030-AGNWI1Y0BTsKaQVa.pdf'

Original File Name: CSCME Comments April 10 2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:52:15

No Duplicates.

Comment 113 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Nancy

Last Name: Pfeffer

Email Address: Nancy@networkpa.net

Affiliation: Gateway Cities Council of Governments

Subject: Gateway Cities COG Staff Comments regarding Draft 2017 Scoping Plan Update
Comment:

The Gateway Cities COG staff submits the following comments regarding the Draft 2017 Scoping Plan Update:

1) Ensure Local GHG Reduction Goals are Voluntary and Applicable Regionally

The proposed local government GHG (CO₂e) goals of 6 MT per capita by 2030 and 2 MT per capita are useful as benchmarks for local jurisdictions engaged in climate planning. The final 2017 Scoping Plan should make it clear that these goals are not enforceable mandates, and that no mitigations or remedies will be required of any jurisdiction that should fail to meet them.

The Gateway Cities are 27 diverse cities in Southeast Los Angeles County - diverse in size, population, capacity, and economic base. Based on a preliminary 2010 community GHG inventory conducted by Los Angeles County, some of our cities already are below 6 MT per capita; others, with a large industrial base and a small residential population, are well above this goal, and are likely to remain so. The recommended 2030 goal of 6 MT per capita may be a useful starting point as a regional target, but it is highly unlikely that each of our cities could meet the goal individually. The ability of any of our cities to reach 2 MT per capita by 2050 is unknown.

2) Restore Focus on Reducing GHG, not VMT

The current 2017 Scoping Plan draft appears to be shifting state policy towards an explicit goal of reducing vehicle miles traveled (VMT) rather than GHG. This would be an unfortunate and short-sighted shift in focus (although there is certainly value in encouraging people to avoid using cars when it makes sense).

As vehicle emissions drop over time with the adoption of cleaner fuels and fleets, VMT reduction will have less and less impact in reducing emissions. Moreover, VMT represent economic activity, so schemes to limit them could have a significant downside that should be evaluated for policy makers' consideration. And the state separately is evaluating VMT fees (mileage charges) as a way to bolster state transportation finance as gas tax revenue drops. The state cannot simultaneously reduce VMT while also hoping to use it to raise revenue.

3) Take Needed Steps to Ensure CA Climate Investments Reach Disadvantaged Communities

The Gateway Cities of Southeast Los Angeles County are home to one of the greatest concentrations of disadvantaged communities in the state. Three-quarters of our two million residents live in census tracts designated as "disadvantaged" according to CalEnviroScreen 2.0. Despite this need, and a robust, participatory planning process over the past 20 years, very little of the cap and trade funding has been awarded to our communities. This is part of a larger pattern where more funding finds its way to the Bay Area than to Southern California.

As of this writing, despite several grant applications under various programs, close involvement with staff of the various state programs, and providing focused workshops for our city staff, the Gateway Cities have received one \$15 million grant under the Affordable Housing & Sustainable Communities program. Additionally, we will benefit (eventually) from deployment of clean-fuel heavy duty vehicles under a portion of the \$23.5 million CARB grant to the South Coast Air Quality Management District. Apart from these awards, 1.5 million disadvantaged residents of the Gateway Cities, and their neighbors, have received no direct investment of cap and trade revenues since the inception of the program.

It is our hope that the state will closely re-evaluate its processes for awarding these funds to ensure that our communities are among those who will benefit going forward. The net effect of continued investment only in the areas that are at the leading edge is to exacerbate inequality, not to reduce it. Surely this cannot be the goal of the state's policies regarding disadvantaged communities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 13:26:46

No Duplicates.

Comment 114 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jeffrey

Last Name: Fort

Email Address: jeffrey.fort@dentons.com

Affiliation: Dentons US LLP

Subject: Comments on 2030 Scoping Plan

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/137-scopingplan2030-WjlcNVE9VGoKaQZo.pdf>'

Original File Name: Comments on 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:49:36

No Duplicates.

Comment 115 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Julia

Last Name: Rege

Email Address: jrege@globalautomakers.org

Affiliation: Association of Global Automakers

Subject: scopingplan2030

Comment:

Please find attached comments on scopingplan2030 submitted by the Association of Global Automakers, Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/138-scopingplan2030-WmgHMOVxsA2cKIQg4.pdf'

Original File Name: 2017-04-10 Global Automakers Comments on ARB 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:55:53

No Duplicates.

Comment 116 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Katherine

Last Name: Hamilton

Email Address: katherine@38northsolutions.com

Affiliation: Advanced Energy Management Alliance

Subject: Advanced Energy Management Alliance Comments on Draft Scoping Plan
Comment:

Attached please find comments from Advanced Energy Management Alliance relative to the Draft Climate Change Scoping Plan.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-scopingplan2030-WjsBYIE9ADJWD1ck.pdf>'

Original File Name: AEMA Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:59:18

No Duplicates.

Comment 117 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jonathan
Last Name: Parfrey
Email Address: jparfrey@climateresolve.org
Affiliation: Climate Resolve

Subject: Comment Letter to Scoping Plan Update
Comment:

To: California Air Resources Board

Dear members of the board,

Please find attached Climate Resolve's comment letter to the 2017 Climate Change Scoping Plan Update.

We thank you for the opportunity to voice our opinion.

Best regards,
Jonathan Parfrey
Executive Director
Climate Resolve

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-scopingplan2030-VjUHbVI6VGoGYQdz.docx'

Original File Name: Climate Resolve Comment Letter - Scoping Plan Update - April 2017.docx

Date and Time Comment Was Submitted: 2017-04-10 13:51:30

No Duplicates.

Comment 118 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Claire

Last Name: Broome

Email Address: cvbroome@gmail.com

Affiliation: Adjunct Professor Public Health

Subject: Comments on Scoping Plan update

Comment:

Attached my comments supporting Scenario Alternative 1, urging CARB to include cost savings from health co-benefits in their economic analyses, and asking for greater accountability from other California agencies such as CEC and CPUC to accomplish California's climate goals.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/141-scopingplan2030-BWZVPwZmBD4DdwFk.docx>'

Original File Name: Claire Broome MD SP comment.docx

Date and Time Comment Was Submitted: 2017-04-10 14:02:37

No Duplicates.

Comment 119 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Charles "Muggs"

Last Name: Stoll

Email Address: muggs.stoll@sandag.org

Affiliation: SANDAG

Subject: ARB 2017 Scoping Plan Update - SANDAG Comments

Comment:

Thank you for the opportunity to comment on ARB's 2017 Climate Change Scoping Plan Update and Draft Environmental Analysis. At this time, the San Diego Association of Governments (SANDAG) is submitting the attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/142-scopingplan2030-AGFRJVMwU15QZAMz.pdf>'

Original File Name: ARB 2017 Scoping Plan Update - SANDAG Comments.pdf

Date and Time Comment Was Submitted: 2017-04-10 13:43:21

No Duplicates.

Comment 120 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 121 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Larissa

Last Name: Koehler

Email Address: lkoehler@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments of EDF on the 2017 Climate Change Scoping Plan Update
Comment:

Comments of Environmental Defense Fund on the 2017 Climate Change Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/144-scopingplan2030-AmNTJVIhVG4BawFe.pdf'

Original File Name: April 2017 Scoping Plan Comments 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:11:10

No Duplicates.

Comment 122 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation: California Environmental Justice Allianc

Subject: 2030 Scoping Plan Comments

Comment:

Attached please find our comments. Thank you very much,
Amy Vanderwarker

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/145-scopingplan2030-AGNXNARvBTcHXgIw.pdf'

Original File Name: CEJA 2030 Proposed Scoping Plan Letter FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:21:40

No Duplicates.

Comment 123 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Mike

Last Name: Bullock

Email Address: mike_bullock@earthlink.net

Affiliation:

Subject: Scoping Plan Update

Comment:

Dear CARB Members and Staff,

Scope of Document:

I am disappointed in the reduction in scope, from the First Update to the Climate Change Scoping Plan, Building on the Framework, ("Update"), which included a section titled "Climate Stabilization". The reduction in scope is clear from the subtitle of this document: "The Proposed Strategy for achieving California's 2030 Greenhouse Gas Target." You are therefore assuming, without being clear, that the California climate mandate is climate stabilizing. There are good reasons to believe it is not. Recently it was stated that starting in 2020, emissions must be cut in half each decade. This would mean that 2030 emissions must be 50% less than in 2020; not 40% less. The last Scoping Update faced the crises squarely in its section on Climate Stabilization. This proposal covers all of that up by pretending we know the SB 32 target is all we need to worry about.

Since the state-policy direction that is defined in this document will have an impact on environmental outcomes, this document is therefore a project under CEQA law. CEQA requires an analysis of the environmental impacts in the physical world, not just whether or not targets set by a law are achieved. Therefore, this document must do much more than just proposing a strategy to achieve California's 2030 greenhouse gas target. An accurate assessment of humanity's situation shows that we must achieve climate-stabilizing targets and that furthermore, measures that go beyond this must also be implemented. Given our dire situation, it is easy to see that all proposed greenhouse gas (GHG) reduction measures that are technologically feasible and cost effective must be adopted. Limiting the scope to one which might fail to stabilize the climate at a livable level is unacceptable, for many reasons, including that it will violate CEQA.

Crisis Description

On Page ES2, you use the oft-used expressions, "worst-case scenarios" and (stave off the) "most severe impacts". However, the CARB members, who are the decision-makers in this case, deserve a more straightforward description of what is at stake. Governor Brown provided this in his comments to the Pope, which he

understood would be quoted all over the world. He said these five simple words: "humanity must reverse course or face extinction."

As important as that statement is, it was preceded by an equally important set of words, "the world may already have "gone over the edge" on global warming." We trust that you understand exactly what that statement means. It may be too late to avoid destabilization.

We appreciate the information you have provided about the various environmental degradations we will experience, such as sea-level rise, on our path to the loss of most forms of life on the planet; or perhaps it will be on the path to nearly losing most life forms on the planet. However, nowhere do you state the simple truth that we are headed towards a devastating collapse of the human population and that it may be too late to prevent this from happening. The Board deserves to know this. The general public deserves to know this.

Target Setting

The current draft says the following:

" 2. Setting the 2030 Statewide Target

The 2030 target set by SB 32 of 40 percent reduction from 1990 levels by 2030 reflects the same science that informs the agreement reached in Paris by the 2015 Conference of Parties to the United Nations Framework Convention on Climate Change (IPCC), aimed at keeping the global temperature increase below 2 degrees Celsius (°C). The California 2030 statewide target represents the most ambitious GHG reduction goal for North America. Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO₂e."

However, that approach is contradicted by your own, "Update", when it says the following:

"B. Achieving Climate Stabilization

Scientific research indicates that an increase in the global average temperature of 2°C (3.6°F) above pre-industrial levels, which is only 1.1°C (2.0°F) above present levels, poses severe risks to natural systems and human health and well-being.

Considering knowledge from the paleo-climate record with changes currently observed in the Greenland and Antarctic ice sheets, we can expect substantial sea level rise, 0.4 to 0.8 meters, with upper end uncertainties approaching one meter above present day during the 21st Century and continued substantial increase after 2100 even with stringent mitigation of emissions to achieve 2°C stabilization. Increased climate extremes, already apparent at present day climate warming (~0.9°C), will no doubt be more severe. To have a good chance (not a guarantee) of avoiding temperatures above those levels, studies focused on a goal of stabilizing the concentration of heat-trapping gases in the atmosphere at or below the 450 parts per million (ppm) CO₂-equivalent (CO₂e, a metric that combines the climate impact of all well-mixed GHGs, such as methane and nitrous oxide, in terms of CO₂).

The CO₂e target is a somewhat approximate threshold, and the exact level of CO₂e is not precisely known because the sensitivity of the climate system to GHGs has uncertainty. Different models show slightly different outcomes within this range. An example of a pre-IPCC assessment study (Meinshausen et al. 2009)¹⁵ which has synthesized many studies on climate sensitivities, concluded that

we would need to stabilize at about 400 ppm CO₂e in order to likely avoid exceeding the 2°C threshold (even at that stabilization target, there is still about a 20 percent chance of exceeding the temperature target). Further, a recent paper by an international team of scientists (Hansen et al. 2013)¹⁶ asserts that the widely accepted target of limiting human-made global climate warming to 2°C above preindustrial levels is likely too high and may subject future generations and nature to irreparable harm. Recognizing this fact, the international community agreed in meetings in Cancun in 2012 to review, by 2015, progress to the 2°C target and consider whether it should be strengthened to a 1.5°C threshold."

The first key statement, taken from those words, is the following, with emphasis added:

"An example of a pre-IPCC assessment study (Meinshausen et al. 2009)¹⁵ which has synthesized many studies on climate sensitivities, concluded that we would need to stabilize at about 400 ppm CO₂e in order to likely avoid exceeding the 2°C threshold (even at that stabilization target, there is still about a 20 percent chance of exceeding the temperature target)."

Of course the problem is that we have already exceeded 400 PPM.

The second key statement is this, again with emphasis added:

"Further, a recent paper by an international team of scientists (Hansen et al. 2013) asserts that the widely accepted target of limiting human-made global climate warming to 2°C above preindustrial levels is likely too high and may subject future generations and nature to irreparable harm."

Given that we may already be going over 2 degrees Celsius and that we should not be going over 1.5 degree Celsius, and based on some of my own independent analysis, I believe that the 2030 target should probably be 80% (not 40%) below the 1990 level by 2030. This is equivalent to saying the Governor's Executive Order S-3-05 target, for year 2050, needs to be achieved 20 years sooner. If you believe that the SB 32 target is climate-stabilizing, in the sense that if it was achieved by the entire industrial world then planet earth would not experience climate destabilization; then that needs to be stated, along with your reasoning as to why the key statements I have just presented, from the Update, can be ignored.

SB 375 Targets

As part of this scoping plan, CARB needs to develop a set of enforceable measures that will cause cars and light-duty trucks (LDVs, the SB 375 emitters) to achieve climate-stabilizing targets. This special treatment for LDVs is warranted by the amount of GHG they emit and the complex nature of the inherent trade-off between fleet efficiency and per-capita driving.

From the 2016 California Democratic Party (CDP) Platform:

- Demand Regional Transportation Plan driving-reduction targets, shown by science to support climate stabilization

To do that, the target-year, fleet efficiency must be known. The California Democratic Party understands this, as shown by the following, also from the 2016 California Democratic Party (CDP) Platform:

- Demand a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed
 1. fleet efficiency and
 2. per-capita driving.

I have attached a plan that does exactly that. It was peer-reviewed by the Air and Waste Management Association. It would serve as an example that could help you prepare such a plan.

Under CEQA, you have a responsibility to have such plan, as part of this Scoping Plan effort. That way, the Board Members can decide if they want to vote approval of a plan that would achieve a climate-stabilizing target. Furthermore, CARB should assign SB 375 targets to the MPOs that support such a plan. The target assignment is critically important and is also a project under CEQA. It has been said, and I believe that it is true, that having no plan to succeed is actually having a plan to fail. Failing will, considering this under CEQA law (cumulative effects), result in the loss of most life forms on our planet, including our own species.

The assigning of targets is a discretionary project under CEQA and so you must follow CEQA law in assigning SB 375 targets.

By the way, for the most part, our extinction will be brought about by a loss of habitat, meaning that we will starve to death. Low-income citizens will starve first; billionaires will starve last. Loss of most life forms on the planet is a very severe environmental impact. Some would say it is unacceptable.

LDVs and Enforceable Measures to Achieve the Needed Driving Reduction

I appreciate your Section IV-C, Transportation Sustainability. I have made a case for your preparing a plan showing how cars and light-duty trucks (LDVs) can achieve climate-stabilizing targets. Your Section IV-C makes the point that making the needed changes will provide significant improvements in health. I also support your call for "the integration of electrified rail and transit to improve reliability and travel times, increase active transportation such as walking and bicycling, encourage use of streets for multiple modes of transportation, improve freight efficiency and infrastructure development, and shift demand to low carbon modes".

All categories of transportation will have to achieve the needed GHG reductions.

However, I must stand firm on my request for a specific LDV plan, to ensure success for the biggest GHG-emitting category. My understanding matches yours when you state the following:

"VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this plan."

And also:

"Stronger SB 375 GHG reduction targets will enable the State to make significant progress"

Again, all of this will be made clear with an LDV plan, which will

quantify this and, most importantly, identify the specific enforceable measures. For example, the one such plan I know of proposes keeping the Corporate Average Fuel Efficiency (CAFÉ) standards, but having them only apply to internal combustion engine (ICE) LDVs. Then, in addition to the CAFÉ standard for ICEs, car manufacturers would need to sell a specified fraction of ZEV vehicles. Such a scheme would need to also allow buying credits from a company that is able to exceed the specified fraction, such as Tesla. Some manufacturers may want to continue to focus on the ICE market. However, the ICE market would, by law, dwindle down to be quite small by 2025 or so. It is important to provide clarity to the manufacturers of LDVs.

A plan for LDVs would need to develop a set of enforceable measures to reduce driving. The following sections show some of the primary enforceable measures, along with estimates for the reduction in per-capita driving they would achieve, from the SB 375 base year of 2005 to the target year of 2030.

1.) Reallocate Funds Earmarked for Highway Expansion to Transit and Consider Transit-Design Upgrades (3%)

For example, San Diego County has a sales tax measure called "TransNet", which allocates one-third for highway expansion, one-third for transit, and one-third for road maintenance. It has a provision that allows for a reallocation of funds, if supported by at least two-thirds of SANDAG Board members, including a so-called weighted vote, where governments are given a portion of 100 votes, proportional to their population. This enforceable measure is to direct SANDAG to reallocate its TransNet amount, earmarked for highway expansion, to transit and to order similar reallocations throughout California.

This money could be used to fund additional transit systems; fund improved transit operations; and/or fund the redesign and implementation of that redesign of existing transit systems. The redesign could include electrification and automation or even upgrading to a completely different technology.

2.) A Comprehensive Road-Use Fee Pricing, Collection, and Payout System to Unbundle the Cost of Operating Roads (7.5%)

Comprehensive means that pricing would be set to cover all costs (including road maintenance and externalities such as harm to the environment and health); that privacy and the interests of low-income drivers doing necessary driving would be protected; that the incentive to drive fuel-efficient cars would be at least as large as it is under the current fuels excise tax; and, as good technology becomes available, that congestion pricing is implemented to protect critical driving from congestion.

The words "payout" and "unbundle" mean that some of the money collected would go to people that are losing money under the current system. For example, the estimate of increased health cost due to LDV-caused air pollution would be the basis for a transfer of funds to reduce health-care costs.

User fees (gas taxes and tolls) are not enough to cover road costs and California is not properly maintaining its roads. Besides this, the improved mileage of the ICEs and the large number of ZEVs needed mean that gas tax revenues will drop precipitously.

This system could probably be implemented in less than 5 years and efforts should start now and make use of the data generated by the soon-completing Road Use Charge (RUC) pilot project that was implemented under SB 1077.

3.) Either Literally, or More Commonly, Effectively, Unbundle the Cost of Car Parking (7.5%)

Unbundling or, effectively unbundling, the cost of car parking throughout California is conservatively estimated to decrease driving by 7.5%. "Effectively unbundling parking" means installing a pricing, collection, and payout system that removes 100% of the unfairness and environmental harm of bundling the cost (at apartments, stores, or rail stations, for example) or of bundling the benefit (at work or schools, for example) of parking. It should be noted that parking is often very expensive to provide and people pay for its use in hidden ways, such as receiving a reduced wage, paying an increased rent or paying an increased cost. These financial burdens are generally invisible, inescapable, and even apply to those citizens who never drive or park a car.

Regarding car parking at work, we cite a CEQA lawsuit against the County of San Diego's Climate Action Plan (CAP). The lawsuit resulted in a published Appellate Court ruling, thereby establishing the legal precedent that CAPs must have meaningful targets, enforceable measures, and must not ignore feasible mitigations that have been proposed. However, to this day, San Diego County, at their downtown office building, which is located near to good transit, and some of the most expensive real estate in the world, provides "free" parking to its employees. The lawsuit proposed a mitigation measure to operate the employee parking as a business for the financial gain of the County employees. The following description is of a system that was found to be feasible mitigation in the CEQA lawsuit against the County of San Diego's CAP:

The municipality would develop a Demonstration Project to Unbundle the Cost of Parking ("Demonstration Project") at a city employee location ("Proposed Location").

The municipality would (assuming the demonstration project was successful) unbundle the cost of the parking at all municipal buildings.

BACKGROUND: Currently, municipal employees do not have the ability to choose between earnings and driving – employees effectively pay for parking out of their salary, whether or not they use the parking. The Demonstration Project will provide the opportunity for the employees to choose between earnings and driving. This implements the California Air Pollution Control Officers Association (CAPCOA) measure of unbundling the cost of parking.

PROJECT: Parking would be charged at a given rate (for example \$0.02/min – roughly \$9.60/day). Funds generated from these parking charges would be distributed as earnings to all employees working at the proposed location in proportion to each employee's time spent at work, at the proposed location. Those who decide not to drive will not be charged for parking but will still make earnings based on time spent at work at the location. Implemented correctly, this free market approach will substantially reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, by reducing the drive-alone mode.

For employees whose parking charges are greater than parking lot earnings, an "add-in" may be included so that no employee loses money, compared to "free parking". With such "add-in" payments, there could be an "Opt in or Opt out" choice, meaning that those that "Opt out" will see no changes on their pay check, relative to "free parking".

This project may be helped by receiving a grant to pay the development and installation cost, as well as the "add in" payments, for some specified number of years. The municipality would need to apply for such a grant.

The County was ordered to rescind their Climate Action Plan and pay all legal fees. They are currently without a Climate Action Plan. However, we still do not know if they will implement the car-parking measure that was found to be feasible. All of the municipal governments in California would benefit if CARB took the initiative on this mitigation measure.

Please start a process to design and implement such a plan, for your own employees, at a site where the parking is currently operated as a bundled benefit (AKA, "free".) We could provide the contact information of a vendor who would be happy to do this work.

There is political support and awareness of the need for such a system and for transportation reform in general. For example, the following is from the 2016 CDP Platform:

- o Work for equitable and environmentally-sound road and parking operations; Support strategies to reduce driving, such as smart growth, "complete streets"; teaching bicycling traffic skills; and improving transit, from local systems to high speed rail

- o Work for shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking;

4.) Good Bicycle Projects and Bicycle Traffic Skills Education (3%)

The best criterion for spending money for bicycle transportation is the estimated reduction in driving per the amount spent. The following strategies may come close to maximizing this parameter.

a.) Projects to Improve Bicycle Access

All of the smart-growth neighborhoods, central business districts, and other high-trip destinations or origins, both existing and planned, should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a "complete streets" project, more shoulder width, or a project to overcome some natural or made-made obstacle.

b.) League of American Bicyclist Certified Instruction of "Traffic Skills 101"

Most serious injuries to bike riders occur in accidents that do not involve a motor vehicle. Most car-bike accidents are caused by wrong-way riding and errors in intersections; the

clear-cut-hit-from-behind accident is rare.

After attending Traffic Skills 101, students that pass a rigorous written test and demonstrate proficiency in riding in traffic and other challenging conditions could be paid for their time and effort.

As an example of what could be done in San Diego County, if the average class size was 3 riders per instructor and each rider passes both tests and earns \$100 and if the instructor, with overhead, costs \$500 dollars, for a total of \$800 for each 3 students, that would mean that \$160M could teach $\$160M/\$800 = 200,000$ classes of 3 students, for a total of 600,000 students. The population of San Diego County is around 3 million.

5.) Eliminate or Greatly Increase the Maximum Height and Density Limits Close to Transit Stops that Meet Appropriate Service Standards (2%)

As sprawl is reduced, more compact, transit-oriented development (TOD) will need to be built. This strategy will incentivize a consideration of what level of transit service will be needed, how it can be achieved, and what levels of maximum height and density are appropriate. Having no limits at all is reasonable if mathematical models show that the development can function without harming the existing adjacent neighborhoods, given the level of transit service and other supporting transportation policies (such as car parking that effectively unbundles the cost or benefit of parking and furthermore supports the full sharing of parking) that can be assumed.

6.) Improve the Way We Pay for the Use of Transit

Eventually, using transit, car parking, and roads should be no different than using water or electricity. This will require a new design. To show an example of how this could be described and as an example showing that people that have become educated on the topic of climate and transportation are ready for change, the following is provided as a resolution that will be submitted to the California Democratic Party. The Democratic Club of Carlsbad and Oceanside has already passed a nearly-identical resolution.

Support for the Development and Installation of a Single System to Operate Roads, Car-Parking, and Transit

WHEREAS, (1) greenhouse gas (GHG) emissions must be reduced; (2) about 35% of California's GHG is caused by driving; (3) given reasonable estimates for future fleet efficiency, to achieve climate-stabilization targets, driving must be reduced; and (4) the second bullet of the Transportation Sub-plank of the 2016 CDP Platform calls for "equitable and environmentally-sound road and parking operations"; and

WHEREAS, in California, (1) user fees (gas tax and/or tolls) do not cover the cost of road maintenance; (2) our fleet must combust less fuel each year, thereby reducing gas-tax revenue yearly; (3) hiding the true cost of road use increases driving, air pollution, congestion, propensity to approve sprawl development, and GHG emissions; (4) a 2011 California Transportation Commission assessment found 58 percent of our roads needing rehabilitation or maintenance; (5) prevailing-wage construction jobs are needed; and (6) there is a current state pilot project for a Road Usage Charge

(RUC) but no legislation to implement a RUC and no RUC system design;

WHEREAS, (1) bundled-cost parking ("bundled-cost" denotes that the parking is offered at no charge because its cost is "bundled" into the cost of other items) increases the cost of everything, from rent to food; (2) bundled-benefit parking ("bundled-benefit" denotes that it is an employee benefit, like a salary, or a medical benefit) reduces wages; (3) the fourth bullet of the Transportation Sub-plank of the 2016 CDP Platform calls for "shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking"; and (4) technology could increase the convenience of paying for driving, parking, and using transit and distributing earnings, taken from these revenue streams, to individuals, as appropriate;

THEREFORE, BE IT RESOLVED, that the California Democratic Party supports a transit-use, road-use, and car-parking-use pricing, collection, and payout system, operated with modern technology and specified by a system-requirements document (such a document unambiguously defines what the system does, as the first step of system design), covering such topics as privacy, protection for low-income users, base-and-congestion price, detection, and statement-mail-out methods, always assuming prevailing-wage jobs.

BE IT FURTHER RESOLVED, that this support be communicated to Governor Edmund G. Brown, Senate Pro-Tem Kevin de Leon, Speaker Anthony Rendon, the Air Resources Board, and the California Transportation Commission.

In conclusion, we need enforceable measures that will reduce driving by reforming our transportation systems. The estimates of the driving reductions that will result from these measures will need to add up to the total needed, given the target-year fleet efficiency and the climate-stabilizing target.

Thank you for your leadership,

Mike Bullock
760-754-8025

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/146-scopingplan2030-WzdXNQF2UFwDdwRh.docx>'

Original File Name: LDV_ReqirmentsToAchieveNeededTargets3.docx

Date and Time Comment Was Submitted: 2017-04-10 13:42:36

No Duplicates.

Comment 124 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Todd

Last Name: Jones

Email Address: todd.jones@resource-solutions.org

Affiliation: Center for Resource Solutions (CRS)

Subject: Preserving the emissions benefits of voluntary renewable energy beyond 2020
Comment:

CRS appreciates the opportunity to submit these comments regarding proposed 2017 Climate Change Scoping Plan update.

Though we understand that the voluntary renewable electricity (VRE) market and the VRE Reserve Account that is a part of the cap-and-trade regulation are not explicitly addressed in the proposed 2017 Scoping Plan, without further action by the California Air Resources Board (ARB), allocations of allowances to the VRE Reserve Account will not continue beyond 2020. This means that, depending on growth in the VRE market and subscriptions to the Reserve Account, VRE allowances will be depleted at some point beyond 2020. VRE demand and investment in the state could suffer as a result. Center for Resource Solutions (CRS) recommends that allowances continue to be allocated to the VRE Reserve Account beyond 2020 in order to ensure that it remains effective.

Cap-and-trade removes the ability of VRE to affect statewide emissions and the VRE Reserve Account ensures that overall emissions reductions are achieved by VRE generation. Emissions reductions beyond the cap and moving the needle on climate change are significant drivers of voluntary demand for renewable energy in the state. Without continued allocations to the VRE Reserve Account, there is significant risk that it could be depleted. Once the Reserve Account is depleted, VRE is no longer surplus to regulation and it no longer has an avoided emissions benefit. VRE will simply reduce emissions to free up allowances and lower the costs of compliance for regulated entities. This represents a shift in compliance costs away from regulated entities and onto those taking voluntary action.

Unless allowances remain available to the VRE market through the VRE Reserve Account, the cap will represent a ceiling not only for emissions but also emissions reductions in the state. Since there are those that want to reduce beyond the level of the cap, the state can and should facilitate that activity, but at the very least it should not harm or hinder the voluntary market by forcing VRE purchasers to pay the price of carbon that should be borne by emitters. This is not only unfair, but it will likely disincentivize voluntary reductions. Continuing allocations to the VRE set-aside will prevent cap-and-trade from becoming the ceiling for reductions and will help to maintain voluntary demand.

We see no argument against continuing allocations to the VRE

Reserve Account on the basis of increased compliance cost. Even if the VRE Reserve Account did reduce supply of allowances such that continuing historical allocations would significantly affect price, the set-aside is effectively cost neutral and the decrease in supply of allowances and corresponding increase in price is offset by the decrease in demand for allowances due to reductions from voluntary renewable energy and corresponding decrease in price. Likewise, discontinuing allocations to the set-aside is benefit neutral for compliance entities: the increase in supply of allowances that are no longer being set aside and corresponding decrease in price is offset by the increase in demand for allowances as VRE no longer pays for reductions and those costs shift to compliance entities, increasing the price. But there is great cost to the voluntary market.

In conclusion, VRE has huge benefits for California, both economically and environmentally. The VRE Reserve Account provides a pathway whereby the appetite for voluntary action can be channeled to clean energy development in California, and avoids a situation whereby the willingness to invest in voluntary action is diverted to out-of-state projects. The VRE Reserve Account also allows consumer preferences for RE to drive more reductions than those achieved by policy mechanisms alone. The state has little if anything to gain and all of the benefits of VRE to lose by discontinuing allocations of VRE allowances after 2020.

Please feel to contact us with any questions about these comments, or if we can otherwise be of assistance.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 14:10:17

No Duplicates.

Comment 125 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Thomas

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels Coal Gas, Inc.

Subject: Comments to Scoping Plan

Comment:

To the Air Resources Board and Staff, congratulations on all you have accomplished since 2006. My comments are oriented to making the Mine Methane Capture part of Cap and Trade more cost effective so more greenhouse gas emissions are captured sooner than later. I believe the invalidation requirements should be adjusted as follows: drop the requirement to identify any MSHA violations if the project is owned and operated by an entity separate and apart from the mine, do not invalidate offsets if there are violations from other jurisdictional agencies who are competent to rule and administer their own enforcement proceedings if they see the need to, if you do not do that than please consider invalidation of destruction device that is assessed a violation not the entire project, finally we recommend being consistent and using the same GWP for methane in the Cap and Trade system as you do in enforcement.

Thank you for all the work you have done and the GHG emission reductions you have caused to occur. Internally in our company we use the most recent IPCC AR 5 of a 20 year GWP of 84 and the most recent scientific recommendation of 100. We do not believe we have 100 years to effect climate change and believe 20 years is the appropriate time frame to use as a GWP for methane.

Because of your cap and trade system we destroyed 440 million cubic feet of methane with the approximate effect of taking at least 120,000 hydrocarbon fueled passenger vehicles off the highway.

Sincerely Tom Vessels

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 14:24:26

No Duplicates.

Comment 126 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jason

Last Name: Schmelzer

Email Address: jason@shawyoderantwih.com

Affiliation: Shaw / Yoder / Antwih, Inc.

Subject: WPWMA Comments on ARB Final Proposed 2030 Scoping Plan
Comment:

Good Afternoon,

Please find attached the Western Placer Waste Management Authority's comments on the ARB's Final Proposed 2030 Scoping Plan.
Thanks!

Best,

Jason Schmelzer

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/149-scopingplan2030-UCcCdFchBTtVMlcl.pdf'

Original File Name: WPWMA Comments on Final Proposed ARB 2030 Scoping Plan Final 4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:47:31

No Duplicates.

Comment 127 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Torri

Last Name: Estrada

Email Address: testrada@carboncycle.org

Affiliation: Carbon Cycle Institute

Subject: Natural and Working Lands, Scoping Plan Comments

Comment:

On behalf of the Carbon Cycle Institute, we are writing to offer comments, suggestions, and amendments to the Discussion Draft of the 2030 Target Scoping Plan Update, with emphasis on agriculture and working lands. We would like to direct you to our December 2016 comments on the earlier draft of the Scoping Plan Update and our comments in response to "Carbon Sequestration Modeling Methods and Initial Results for the Natural and Working Lands Sectors", as those comments are still highly germane and should be reflected in this latest version. We will provide further comment and suggestions related to the proposed actions to "enhance" and "innovate" in the Natural and Working Lands sectors (Chapter IV, Section D4).

We want to highlight our disappointment that this Final Draft of the Scoping Plan Update does not take appropriate and reasonably achievable efforts to define robust goals, actions, and strategies for the 2030 timeframe for Natural and Working Lands. We strongly feel that the lack of completion of the modeling efforts for baseline for the Natural and Working Lands sector should not preclude the development and discussion of near-term goals and actions, including setting a robust overall goal. To that point, there are considerable existing and near-term efforts on carbon sequestration and management of working and agricultural lands that alone could make significant contributions to the 2030 Target, as well as help advance our knowledge and on-the-ground impacts on climate change, resilience, and the drought.

The Carbon Cycle Institute's mission is to stop and reverse climate change by advancing natural, science-verified solutions that remove atmospheric carbon while promoting environmental stewardship, social equity and economic sustainability. To that end, we support projects that promote climate-beneficial management practices on working lands throughout California, work to build the technical capacity of land managers and producers to plan and implement impactful projects that reduce GHGs and sequester carbon in the lands base, and are heavily engaged in gathering scientific data on the important role these practices can play in sequestering carbon from the atmosphere.

California's working lands and rangelands naturally capture carbon from the atmosphere through photosynthesis and transfer it to the soil, where it provides important ecological services, including the enhancement of soil water holding capacity. Land managers can

dramatically increase carbon storage in California's soils by employing a number of practices recognized by the Natural Resources Conservation Service (NRCS) as climate beneficial, including compost application, riparian restoration, no-till farming, windbreaks, agroforestry and other practices. Along with increasing long-term carbon sequestration in soils and plant material, these practices also offer additional water, habitat, and economic viability benefits for farmers and working land managers.

We would like to see increased emphasis on the potential role of soils in helping the state meet its 2030 GHG reduction goal of 40 percent below 1990, in light of both the tremendous demand from producers to implement carbon-beneficial practices and the robust infrastructure and leadership at the regional and local level ready and able to move projects forward at scale. The State's GHG and carbon reductions targets for 2030 and 2050 are extremely ambitious, which we applaud, but they are deeper than what has been accomplished to date. Without the natural and working lands sector, in general, and carbon sequestration and soils, specifically, it is difficult to see how the State will meet its 2030 and 2050 climate goals. As detailed below in our comments, the IPCC and leading climate experts agree that we must engage our soils in agricultural and working lands in a significant manner to address climate change, and we need to take significant steps now to scale our efforts in this arena if we want to reap the benefits in the 2030 (and 2050) timeframe.

Thank you for your just consideration of our comments and recommendations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/150-scopingplan2030-UTABdVEyBwtRJABj.docx>'

Original File Name: ARB Scoping Plan Comments - Jan 2017.docx

Date and Time Comment Was Submitted: 2017-04-10 14:47:48

No Duplicates.

Comment 128 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Amisha

Last Name: Rai

Email Address: arai@aee.net

Affiliation: Advanced Energy Economy (AEE)

Subject: AEE Comments on 2017 Scoping Plan Update
Comment:

Comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/151-scopingplan2030-AGFdPIYyBwtXIghr.pdf>'

Original File Name: AEE Scoping Plan Comments- 4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:50:42

No Duplicates.

Comment 129 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Warren

Last Name: Teitz

Email Address: wteitz@mwdh2o.com

Affiliation:

Subject: Metropolitan Water District comments on Scoping Plan 2030

Comment:

Metropolitan respectfully submits these comments on the 2030 Scoping Plan.

This letter supersedes the letter sent via mail dated April 6th.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/152-scopingplan2030-VzpcLVA1AAwCZwVq.pdf'

Original File Name: MWD Comment Letter on ARB Scoping Plan_REVISED 2017-04-10.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:51:53

No Duplicates.

Comment 130 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association in California

Subject: Lung Association Comments on 2030 Scoping Plan
Comment:

Lung Association comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/153-scopingplan2030-WzdWJVC4V2MKUwdm.pdf>'

Original File Name: Lung Association Scoping Plan Comments 4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:56:02

No Duplicates.

Comment 131 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: George

Last Name: Gentry

Email Address: georgeg@calforests.org

Affiliation:

Subject: Scoping Plan Comment

Comment:

Attached are comments on the Scoping Plan from that California Forestry Association

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/154-scopingplan2030-AjJUZgQ0UjEDNFdg.pdf'

Original File Name: 041017 Scoping Plan comment.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:59:18

No Duplicates.

Comment 132 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jon

Last Name: McHugh

Email Address: jon@mchughenergy.com

Affiliation:

Subject: Support Scoping Plan - Proposal to Increase Co-Benefits

Comment:

California is blessed with a beautiful natural environment and as a California I am proud to be part of a state that attempts to balance economic activity with environmental protection. California's geography also burdens the Los Angeles Valley and the Central Valley with some of the worst air pollution in the United States. In addition to the wealth generation aspects of energy efficiency and renewables, CARB's GHG scoping plan has the significant co-benefits of reducing criteria air pollutants in addition to reducing GHGs.

I am supportive of option 1, direct policy activities to reduce emission of GHG's. I am concerned that Cap and Trade mechanism can be gamed or result in unintended consequences such as those outlined by the comments from Friends of the Earth (see <https://www.arb.ca.gov/lists/com-attach/38-scopingplan2030-ATBXZld7UjNQewk8.pdf>).

I am also concerned that California's miss out on the significant co-benefits from GHG reductions when these reductions are no longer real reductions in state but are potential reductions out of state.

I would like to alert this board the findings of the research brief: "A Preliminary Environmental Equity Assessment of California's Cap-And-Trade Program" by authors from UCB, USC, USF and Occidental College which indicates that 76% of the Cap and Trade offsets were out-of-state. (See http://dornsife.usc.edu/assets/sites/242/docs/Climate_Equity_Brief_CA_Cap_and_Trade_Sept2016_FINAL2.pdf

). Almost half of these offsets were for forestry projects. (See figures 7 and 8 in the report).

Really reducing air emissions in California provides health and amenity benefits co-benefits that are not quantified but result in a "no regrets" approach to reducing GHGs. Limiting trade-offs to within California would increase the cost of emission credits and provide more incentive to directly reduce emissions instead of paying for credits. Some of the largest emitters in the state are located next to disadvantaged communities and thus direct reductions have an added benefit of environmental and social justice.

If CARB is set on maintaining Cap and Trade, I recommend they limit the scope in which sectors are covered and limit the geographical range to California.

Overall I am supportive of CARB's scoping plan and the corresponding efforts taken by the state legislature (i.e. SB 350) to lead on how GHG's can be reduced while having a thriving

economy. Hopefully this is a plan that can be exported to other states and the rest of the world.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 15:03:31

No Duplicates.

Comment 133 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on 2017 Scoping Plan Update
Comment:

Please see attached comment letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/156-scopingplan2030-BmoGYVw5VHBWIAAdY.pdf>'

Original File Name: LADWP Comments on 2017 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:12:29

No Duplicates.

Comment 134 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association: 2030 Target Scoping Plan Letter

Comment:

Attached here are comments from California Transit Association
Executive Director Joshua W. Shaw.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/158-scopingplan2030-VDdcLgRkWVUDNwQ0.pdf'

Original File Name: CTA 2030 Scoping Plan Letter 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:20:30

No Duplicates.

Comment 135 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Cody

Last Name: Hooven

Email Address: chooven@sandiego.gov

Affiliation: City of San Diego

Subject: Comments on Proposed Scoping Plan Update

Comment:

Please see attached comment letter.

Thank you,

Cody Hooven

Chief Sustainability Officer

City of San Diego

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/159-scopingplan2030-WzgFbAd1UWZSC1c0.pdf>'

Original File Name: CoSD CARB Scoping Plan Comments_2017_Final.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:21:38

No Duplicates.

Comment 136 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Iliana

Last Name: Paul

Email Address: iliana.paul@nyu.edu

Affiliation: Institute for Policy Integrity

Subject: Institute for Policy Integrity Comments on 2017 Climate Change Scoping Plan Update
Comment:

The Institute for Policy Integrity submits the attached comments on the 2017 Climate Change Scoping Plan.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/160-scopingplan2030-USEHbLY7BT9XMlcu.pdf>'

Original File Name: Policy Integrity Comments on Jan 20 Scoping Plan Draft_FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-10 14:39:50

No Duplicates.

Comment 137 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Reduce methane from manure and enteric emissions

Comment:

Comments on Methane and Agriculture
by Jim Stewart, PhD

Comments following quotes from text (also attached)

p. 112-113 presents three major agricultural strategies:

"1. Methane from dairy and livestock has a reduction target of -40% and is covered in the SLCP strategy."

However, the reduction target of -40% should be treated as a floor and not a ceiling. There are many ways to reduce methane from manure and enteric emissions.

Methane from manure can be economically and effectively eliminated by allowing animals to graze in pastures where the manure naturally aerobically decomposes with zero methane emissions.

Enteric emissions can be reduced in both dairy and livestock by over 90% by the addition to the feed of only 2% *Asparagopsis* seaweed, as described in several publications. [The red macroalgae *Asparagopsis taxiformis* is a potent natural antimethanogenic that reduces methane production during

in vitro fermentation with rumen fluid. Robert D. Kinley, Rocky de Nys, Matthew J. Vucko, Lorena Machado and Nigel W. Tomkins. *Animal Production Science*, 2016, 56, 282-289

<http://dx.doi.org/10.1071/AN15576>

Identification of bioactives from the red seaweed *Asparagopsis taxiformis* that promote antimethanogenic activity in vitro. Lorena Machado & Marie Magnusson & Nicholas A. Paul & Robert Kinley & Rocky de Nys & Nigel Tomkins. *J Appl Phycol.* 2016.

DOI 10.1007/s10811-016-0830-7]

"2. Nitrous oxide resulting from nitrogen fertilizer applications."

Must be quantified.

"3. Increased carbon sequestration in soil."

The methods (such as no till agriculture) must be specified and the outcome quantified.

Appendix D Pathways says the only reductions in the agriculture sector are "electric and natural gas efficiency improvements assumed in the Reference Scenario, consistent with the 2015 IEPR AAEE building efficiency assumptions described in the section above. These measures result in a 7% to 15% efficiency improvement."

This tiny reduction is far too small, there are many other ways to reduce GHG emissions in the agriculture sector, which should be specified and quantified.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/161-scopingplan2030-VDdWPwFtAD4EZ1c5.docx>'

Original File Name: Comments on Methane and AgricultureStewart.docx

Date and Time Comment Was Submitted: 2017-04-10 15:15:21

No Duplicates.

Comment 138 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Alan

Last Name: Abbs

Email Address: alan@capcoa.org

Affiliation: CAPCOA

Subject: Scoping Plan 2030 Comments

Comment:

Please accept the following comments from the California Air Pollution Control Officers Association. Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/162-scopingplan2030-AWJSNVUkWGgDagNi.pdf'

Original File Name: CAPCOA Letter - 2017 Scoping Plan Comments 4.10.2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:30:22

No Duplicates.

Comment 139 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rachel

Last Name: Golden

Email Address: rachel.golden@sierraclub.org

Affiliation: Sierra Club

Subject: Joint party comments on ARB Updated Scoping Plan

Comment:

Attached are comments on Updated Scoping Plan from Sierra Club, Natural Resources Defense Council, Solar Energy Industries Association, Sacramento Municipal Utilities District, Marin Clean Energy, Build It Green, Local Government Sustainable Energy Coalition, Association of Bay Area Governments, Bay Area Regional Energy Network, Carbon Free Palo Alto, Redwood Energy, and Design AVenues

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/163-scopingplan2030-UiFQP1E1AyIFcQFg.pdf>'

Original File Name: Sierra Club et al Joint Scoping Plan Comments 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:30:49

No Duplicates.

Comment 140 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Promote Climate Change Literacy for High School Students

Comment:

Promote Climate Change Literacy for High School Students

All high school students must know the fundamentals of climate literacy, including (1) causes of climate change; (2) its potential for harm; (3) what is required to avoid climate destabilization; (4) actions needed to ensure a livable future; and (5) the key people and institutions involved in implementing those actions.

Background:

1. The science is clear, greenhouse gas (GHG) levels in the atmosphere and ocean must be drastically reduced immediately, in order to preserve civilization and avoid mass die-offs.
2. The winning political strategies are less clear, but urgent action now is paramount.
3. It is imperative that students are well prepared for the political and environmental challenges associated with climate change, as well as empowered to enact change in their community today.
4. The California State PTA, in May of 2015, passed a resolution stating that climate change is a children's issue, complete with a set of "therefore be it resolved" bullets that constitute a virtual work program for school districts.
5. The California Department of Education convened an Environmental Literacy Task Force which produced an updated Environmental Literacy curriculum in 2015 for grades K-12 that included climate change, but it does not have specific curriculum details, which are left up to local districts to implement.
6. Urgency: Our only hope for the drastic climate action needed is to inform as many students as soon as possible of the crisis and provide options for effective action.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 15:29:40

No Duplicates.

Comment 141 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ralph

Last Name: Moran

Email Address: ralph.moran@bp.com

Affiliation:

Subject: BP Scoping Plan Comments, April 2017

Comment:

BP Scoping Plan Comments, April 2017

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/165-scopingplan2030-VDYHcVAOWXkCZ1M8.pdf>'

Original File Name: BP Scoping Plan Comments 4 17.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:31:01

No Duplicates.

Comment 142 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Expand Education and Outreach Efforts

Comment:

p. 141 says: "Education and Outreach Efforts: California State agencies are committed to meaningful opportunities for public input and effective engagement with stakeholders and the public through the development of the Scoping Plan, and as measures are implemented through workshops and other meetings. Additionally, the State has broad public education and outreach campaigns to support markets for key technologies, like ZEVs and energy efficiency, as well as resources to support local and voluntary actions, such as CoolCalifornia.org. In developing this Proposed Plan, there has been extensive outreach with environmental justice organizations and disadvantaged communities, including the EJAC."

The above efforts are essential and need to be supported and well funded. In addition, we recommend inclusion and support of the promotion of climate literacy through the K-12 schools as an essential component of this plan.

Attachment: "

Original File Name: Use Alternative 1 to save lives in the LA Ports area.docx

Date and Time Comment Was Submitted: 2017-04-10 15:33:32

No Duplicates.

Comment 143 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Laurel

Last Name: Mills

Email Address: lmills2@stanford.edu

Affiliation:

Subject: Reducing emissions through education: Children as agents of behavior change
Comment:

I researched and presented policy recommendations for incorporating improved environmental education into the Scoping Plan Update as my Capstone Project for a joint JD/MS at Stanford University. These recommendations are based on a literature review, discussions with Stanford faculty and researchers, and stakeholder interviews. The attached document outlines a recommended collaboration between CARB and the California Department of Education (CDE) to improve environmental education as a way to promote behavior change and reduce per capita emissions.

I suggest that CARB reach out to the CDE about the feasibility of this potential collaboration, to refine these preliminary suggestions and discuss incorporating them into the Scoping Plan Update.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/167-scopingplan2030-VDhUM1AkAiNRMLI+.pdf>'

Original File Name: Laurel Mills CARB comment.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:35:00

No Duplicates.

Comment 144 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Use Alternative 1 to save lives in the LA-LB Ports area

Comment:

Nearly a half million people live in the LA-LB Ports area with five refineries. Cap and trade just allows them to pay \$12/ton and continue to pollute and kill us.

The co-benefits of regulating GHG emissions from ports and refineries would save thousands of lives. Please save us. Use Alternative 1.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 15:35:58

No Duplicates.

Comment 145 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBZ@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please see PG&E's comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/169-scopingplan2030-WjwFal0yVWdSOAFc.pdf'

Original File Name: Final - PG&E Comments on the Draft 2017 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:30:05

No Duplicates.

Comment 146 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Shannon

Last Name: Harroun

Email Address: sharroun@placer.ca.gov

Affiliation: Placer County APCD

Subject: Comments to Proposed 2017 Climate Change Scoping Plan Update
Comment:

Please find attached Placer County Air Pollution Control District's comments to proposed 2017 Climate Change Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/170-scopingplan2030-UzAAaVwwUW8KaQRq.pdf'

Original File Name: Comments Letter Scoping Plan April 10 2017 FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:45:07

No Duplicates.

Comment 147 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Julia

Last Name: May

Email Address: julia@cbeocal.org

Affiliation: CBE-Communities for a Better Environment

Subject: CBE Scoping Comments - Just Transition to Zero Carbon

Comment:

See attached CBE detailed comments urging:

- Add a Just Transition plan to move to zero carbon jobs.
- Expand Zero Carbon Transportation and equity, eliminating GHGs & smog emissions from three fossil fuel sectors (vehicles, oil refineries, & oil drilling), & providing energy storage for grid renewables.
- Stop Business-As-Usual Refinery expansions, switches to Extreme Crudes, use direct cuts & facility emission caps, phaseout.
- Big problem with encouraging "lighter" crudes, this encourages lighter Bakken crudes with high methane extraction emissions, high benzene, water pollution
- Replace inherently anti-EJ Cap & Trade with Cap & Tax revenues
- Stop expanding gas-fired electricity immediately, continue to decarbonize the Electricity Sector

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/171-scopingplan2030-WzhWMgFIVloAdQBj.pdf'

Original File Name: CBE Scoping Plan Comments 04102017.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:41:02

No Duplicates.

Comment 148 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Toby

Last Name: Roy

Email Address: troy@cdcwa.org

Affiliation:

Subject: 2017 Scoping Plan Update - Comments submitted by CDCWA

Comment:

Attached please find a comments letter on the 2017 Climate Change Scoping Plan Update, provided on behalf of the San Diego County Water Authority by Toby Roy, Water Resources Manager.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/172-scopingplan2030-WmpdbwFfUDJWYABf.pdf>'

Original File Name: 04_10_2017-CARB-2017ScopingPlanUpdate.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:39:24

No Duplicates.

Comment 149 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jerry

Last Name: Secundy

Email Address: Mikhael_Skvarla@gualcogroup.com

Affiliation: CCEEB

Subject: CCEEB's Comments for the 2030 Scoping Plan
Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/173-scopingplan2030-BmVWMwBkADZQNFAP.pdf>'

Original File Name: CCEEB Scoping Plan Comments_4-10.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:12:13

No Duplicates.

Comment 150 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 151 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Elaine

Last Name: Lister

Email Address: elister@cityofmissionviejo.org

Affiliation: City of Mission Viejo

Subject: City of Mission Viejo Comment Letter_ARB 2017 Climate Change Scoping Plan Update

Comment:

Please find attached the City of Mission Viejo's comment letter on the January 20, 2017 Air Resources Board draft of the 2017 Climate Change Scoping Plan Update.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/175-scopingplan2030-AmFTPFEkBC4LUglm.pdf>'

Original File Name: City of Mission Viejo Comment Letter_04-20-2017_2017 Climate Change Scoping Plan Update_04-20-2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:04:20

No Duplicates.

Comment 152 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kevin

Last Name: Bundy

Email Address: kbundy@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed 2017 Climate Change Scoping Plan Update & Draft Env. Analysis

Comment:

See attached comments from Kevin Bundy and Brian Nowicki on behalf of the Center for Biological Diversity.

References follow in separate attachments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/176-scopingplan2030-VWRVZFQKVzQLOQNc.pdf>'

Original File Name: 17 04 10 CBD Scoping Plan comments.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:04:32

No Duplicates.

Comment 153 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Steve

Last Name: Zuretti

Email Address: steven.zuretti@brookfieldrenewable.com

Affiliation: Brookfield Renewable

Subject: Comments of Brookfield Renewable on 2030 Scoping Plan
Comment:

Please find attached comments on behalf of Brookfield Renewable on the Air Resource Board's 2030 Scoping Plan.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/177-scopingplan2030-VTcBdVM9WGRWO1M1.pdf'

Original File Name: Brookfield Renewable_ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:09:45

No Duplicates.

Comment 154 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Abby

Last Name: Halperin

Email Address: ahalperin@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Comments on Scoping Plan Update

Comment:

Please see attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/178-scopingplan2030-ViZXJABjBTpWOVMw.docx'

Original File Name: Public Comments PFT.docx

Date and Time Comment Was Submitted: 2017-04-10 16:13:07

No Duplicates.

Comment 155 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Martha

Last Name: Arguello

Email Address: marguello@psr-la.org

Affiliation:

Subject: Comments on 2030 Scoping Plan

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/179-scopingplan2030-UiJTJl0uUS9WPAhp.pdf>'

Original File Name: PSR-LA 2030 Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:11:07

No Duplicates.

Comment 156 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Comments on Draft 2030 Scoping Plan Update

Comment:

Attached are Friends of the Earth - United States comments on the draft 2030 Scoping Plan Update and Draft EA. Thanks for your attention to this matter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/180-scopingplan2030-WjwFbAFIuy1VJgh7.pdf>'

Original File Name: FOE-US_carb_commentltr_scopingplanupdate.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:12:23

No Duplicates.

Comment 157 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Diana

Last Name: Madson

Email Address: dmadson@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: Sierra Nevada Comment Letter

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/181-scopingplan2030-WyhRPgdjAyIDdwZn.pdf'

Original File Name: Sierra Nevada Comment Letter on ARB Draft Scoping Plan_2017_04_10.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:17:02

No Duplicates.

Comment 158 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Steve

Last Name: Smith

Email Address: ssmith@gosbcta.com

Affiliation:

Subject: SBCTA Comments on 2017 Climate Change Scoping Plan Update
Comment:

Please see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/182-scopingplan2030-UTAFcVY1BGZSY1Ji.pdf'

Original File Name: ARB170410-SS_ScopingPlanCommentsFromSBCTA.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:15:17

No Duplicates.

Comment 159 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: Correction: Sierra Stakeholder Comment on 2017 Climate Change Scoping Plan Update
Comment:

Please disregard the version I submitted at 2:24pm and see the attached corrected comment letter. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/183-scopingplan2030-UCNTNlMNUHBVMFI9.pdf'

Original File Name: SC_Scoping Plan Comment_2017_04_10.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:18:43

No Duplicates.

Comment 160 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Linda

Last Name: Rudolph

Email Address: linda.rudolph@phi.org

Affiliation: Center for Climate Change and Health

Subject: Scoping Plan

Comment:

Please see attached comments on the 2017 Climate Change Scoping Plan Update, from the Center for Climate Change and Health. Our greatest concern is the failure to include a comprehensive health assessment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/184-scopingplan2030-UTJQM1Q7ByAEZ1Qm.docx>'

Original File Name: Center Climate Change and Health Comment Scoping Plan April 2017.docx

Date and Time Comment Was Submitted: 2017-04-10 16:19:24

No Duplicates.

Comment 161 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: V

Last Name: Welch

Email Address: vwelch@ajw-inc.com

Affiliation:

Subject: Comments on Scoping Plan Update from Johns Manville & Nest
Comment:

Pls find attached comments on Scoping Plan Update from Johns Manville and Nest.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/185-scopingplan2030-Vz1VPFE4UG0LfgZZ.pdf'

Original File Name: Johns Manville and Nest Comments on the ARB Proposed SP_4_10_17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:20:47

No Duplicates.

Comment 162 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Janet

Last Name: Stromberg

Email Address: janet.stromberg@gmail.com

Affiliation: 350 Bay Area

Subject: Comments on 2017 Climate Change Scoping Plan Update

Comment:

Attached please find comments submitted by 350 Bay Area on the 2017 Climate Change Scoping Plan Update: The proposed Strategy for Achieving California's 2030 Greenhouse Gas Target.

Regards,

Janet Stromberg
350 Bay Area

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/186-scopingplan2030-AjFSYVZnUGEDZAR9.pdf'

Original File Name: 350BayAreacommentsonCARBScopingPlanUpdate.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:17:32

No Duplicates.

Comment 163 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kenneth

Last Name: Payne

Email Address: ken.payne@edcgov.us

Affiliation: El Dorado County Water Agency

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

See attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/187-scopingplan2030-AWRRM1w+ACQGYQBs.pdf'

Original File Name: EDCWALetter-CARB Scoping Plan-4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:18:07

No Duplicates.

Comment 164 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jason H

Last Name: Giffen

Email Address: jgiffen@portofsandiego.org

Affiliation:

Subject: District Comments on ARB Scoping Plan

Comment:

Please see attached comment letter

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/188-scopingplan2030-UTUAb1clWH8Gcghh.pdf>'

Original File Name: District Comments on 2017 Climate Change Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:04:16

No Duplicates.

Comment 165 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: William

Last Name: Westerfield

Email Address: William.Westerfield@smud.org

Affiliation: SMUD

Subject: SMUD's Comments Re: the Draft 2030 Target Scoping Plan Update
Comment:

Please see the attached comments from Sacramento Municipal Utility District.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/189-scopingplan2030-BmpdPlcxUV1RZLJl.pdf'

Original File Name: LEG 17-0170 SMUD Comments on Draft 2030 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:21:49

No Duplicates.

Comment 166 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environmen

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Comments on the 2017 Climate Change Scoping Plan Update

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/190-scopingplan2030-WmhQZldnBGAEELAk5.pdf'

Original File Name: 2017.04.10 scoping plan comments FINAL with Exhibits.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:19:29

No Duplicates.

Comment 167 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: David

Last Name: Weiskopf

Email Address: david.weiskopf@nextgenamerica.org

Affiliation: NextGen Climate America

Subject: Comment from NextGen Climate America

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/191-scopingplan2030-VTtVNAFjWWtQCQhr.pdf'

Original File Name: NGCA Comment to CARB re 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:25:07

No Duplicates.

Comment 168 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jennifer

Last Name: Morris

Email Address: jhmmorris@semprautilities.com

Affiliation: SoCalGas

Subject: SoCalGas Comments on the 2017 Climate Change Scoping Plan
Comment:

Please find attached comments from the Southern California Gas Company on the 2017 Climate Change Scoping Plan.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/192-scopingplan2030-USIFYF07VVkGMLNj.pdf>'

Original File Name: SCG_2017 Scoping Plan draft 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:24:59

No Duplicates.

Comment 169 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ronald

Last Name: Martin

Email Address: martinrj93638@yahoo.com

Affiliation: Fresnoans against Fracking

Subject: new importance of stopping all fracking to show global warming

Comment:

Due to recent findings on GHGs effects on climate change and methane, the short-term GHG that is so much more heat-trapping than CO2, and the high level of release of methane during fracking and by fracked wells, the best regulation of fracking of oil wells is to prohibit it completely. If we frack and release the methane that fracking does, the world will have only 15 years before reaching the goal of limiting warming to a 1.5-degree temperature rise. If fracking is eliminated, the planet will have 50 years before reaching this degree of heat, which will give us more time to develop sustainable sources of energy. California is and should be a leader in stopping climate change, and prohibiting fracking is an increasingly important aspect of that leadership.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 15:40:39

No Duplicates.

Comment 170 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jeanne

Last Name: Merrill

Email Address: jmerrill@calclimateag.org

Affiliation: CA Climate & Agriculture Network (CalCAN

Subject: Set Natural and Working Lands Goal

Comment:

Please find our comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/194-scopingplan2030-UiEBZF0zAiEAbwhm.pdf>'

Original File Name: Scoping Plan 2030 Update - CalCAN Comments - 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:25:22

No Duplicates.

Comment 171 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please see attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/195-scopingplan2030-ATEBM1R4A2FVY1B9.pdf'

Original File Name: 04-10-17 SCPPA Comments on 2030 Scoping Plan - Final.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:27:50

No Duplicates.

Comment 172 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Cara
Last Name: Martinson
Email Address: cmartinson@counties.org
Affiliation: CSAC

Subject: Scoping Plan 2030 Comments
Comment:

The attached are the California State Association of Counties (CSAC) comments on the 2017 Climate Change Scoping Plan Update: the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis.
Thank you for your consideration.

Sincerely,

Cara Martinson
CSAC Legislative Representative
916-327-7500, ext. 504
cmartinson@counties.org

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/196-scopingplan2030-VTZQJQdnAzMAWVIX.pdf'

Original File Name: CSAC Comments on 2030 Target Scoping Plan Update - Proposed Scoping Plan _4-10-17_FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:30:49

No Duplicates.

Comment 173 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Laura

Last Name: Rosenberger Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation: Fresnoans Against Fracking

Subject: greenhouse gas reduction

Comment:

I support Alternative 1 for direct regulations, no cap and trade offsets, to protect disadvantaged communities from companies that are doing most of their pollution in California and buying the right to pollute. The field of Integrative Medicine found more environmentally linked illnesses every year. Alzheimer's disease was found to be linked to toxic metals and other pollutants.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 16:24:48

No Duplicates.

Comment 174 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Cherylyn
Last Name: Smith
Email Address: cherylynsmith@aol.com
Affiliation: Fresnans Against Fracking

Subject: Reposting: Comments for CARB Scoping Plan Related to Methane Releases from Fracking

Comment:

REPOSTING due to an auto-correct error. My affiliation is with "Fresnans Against Fracking".

Thank You,
Cherylyn Smith,
Freshens Against Fracking

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/198-scopingplan2030-AGMBaARoUmxVNII8.pdf>'

Original File Name: Comments on CARB Scoping Plan related to Methane and Fracking-2.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:28:53

No Duplicates.

Comment 175 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Agricultural Council of California

Subject: Ag Council, Farm Bureau and Dairy Scoping Plan Update Comments

Comment:

Comments on the 2017 Climate Change Scoping Plan Update. Thank you for the opportunity.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-scopingplan2030-VTZdNANvUmwGZQZo.pdf'

Original File Name: Comments on 2017 Scoping Plan - April 10 2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:32:08

No Duplicates.

Comment 176 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Bryn
Last Name: Lindblad
Email Address: blindblad@climateresolve.org
Affiliation: Climate Resolve

Subject: 2017 Scoping Plan Update Comment Letter
Comment:

Dear Chair Mary Nichols and Members of the Air Resources Board,

We thank you for this opportunity to weigh in on the current draft of the 2017 Scoping Plan Update, and also for your continued leadership and dedication to ushering California's greenhouse gas (GHG) reduction strategies to success.

Attached please find a letter containing our comments. As always, we are happy to work in partnership with you as you work through these issues, and are looking forward to upcoming revisions.

Best,
Bryn Lindblad
Climate Resolve

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-scopingplan2030-AXJXMgFvByQHAAJs.docx>'

Original File Name: ScopingPlancommentletterre.VMT-LAStakeholders.docx

Date and Time Comment Was Submitted: 2017-04-10 16:33:59

No Duplicates.

Comment 177 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Danny

Last Name: Cullenward

Email Address: dcullenward@nearzero.org

Affiliation: Near Zero

Subject: Managing uncertainty and risk in the proposed Scoping Plan Update
Comment:

Please see the attached PDF for our comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/202-scopingplan2030-U2EANlBgWDwELwEx.pdf>'

Original File Name: 2017-04-10 comment letter (final).pdf

Date and Time Comment Was Submitted: 2017-04-10 16:37:23

No Duplicates.

Comment 178 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: George
Last Name: Peridas
Email Address: gperidas@nrdc.org
Affiliation:

Subject: Joint comments on the 2017 Climate Change Scoping Plan Update regarding CCS
Comment:

Dear Ms. Sahota,

On behalf of the signatories, please find attached joint comments on the 2017 Climate Change Scoping Plan Update regarding Carbon Capture and Sequestration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-scopingplan2030-VzYGcl0+WFRQJVAz.pdf>'

Original File Name: ARB Scoping Plan CCS Joint Comments_FINAL_Apr10.pdf

Date and Time Comment Was Submitted: 2017-04-10 15:43:08

No Duplicates.

Comment 179 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chris

Last Name: Busch

Email Address: chrisb@energyinnovation.org

Affiliation: Energy Innovation

Subject: Support for Proposed Plan and recommendations to adjust for oversupply
Comment:

We thank the California Air Resources Board (CARB) for the time, labor and expertise that have gone into the 2030 Scoping Plan process. We support your Proposed Plan.

While enthusiastic about the direction the Proposed Plan sets, we do have some recommendations that follow from recent work we have done exploring the balance of supply and demand under the cap-and-trade program. We ask that you consider the attached comments in ongoing policy deliberations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/204-scopingplan2030-AmcHb1QwUHEKawR9.pdf>'

Original File Name: Energy Innovation - Scoping Plan comment (10 April 2017).pdf

Date and Time Comment Was Submitted: 2017-04-10 16:36:01

No Duplicates.

Comment 180 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CA Association of Sanitation Agencies

Subject: Comments on 2017 Climate Change Scoping Plan Update - Proposed Strategy for 2030 Target

Comment:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the January Draft of the 2030 Target Scoping Plan Update (January Draft).

We welcome the opportunity to further discuss and clarify each of the items we have commented on in our attached letter. We want to emphasize that POTWs have opportunities to provide cross-sector benefits to be:

- Suppliers of a renewable fertilizer/soil amendment product in the form of biosolids
- Suppliers of a low carbon fuel
- Providers of renewable energy
- Suppliers of a sustainable (drought-proof) water supply
- Environmental stewards of our natural and working lands

All of these can significantly contribute toward each of the alternatives for meeting the 2030 GHG emissions reduction target. In most cases, all that is lacking is the funding to develop the additional infrastructure, and market certainty for recycling and reuse of resultant products, to make these projects a reality.

Thank you for considering our comments. Please contact me if you have any questions at (925)705-6404 or via email at sdeslauriers@carollo.com. We look forward to working together as proactive partners on our multitude of shared objectives.

Sincerely,
Sarah A. Deslauriers
CASA Climate Change Program Manager

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/205-scopingplan2030-UGBSYAAsvjQBNwgl.pdf>'

Original File Name: 04-10-17 CASA Comments on 2030 Scoping Plan_JanuaryDraft_FINAL.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:03:38

No Duplicates.

Comment 181 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ryan

Last Name: Schuchard

Email Address: rschuchard@calstart.org

Affiliation: CALSTART

Subject: Scoping Plan

Comment:

Please find CALSTART's comments on the Scoping Plan attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/206-scopingplan2030-B2RXMFwxUnICcARl.pdf'

Original File Name: CALSTART Comments on Scoping Plan - April 2017.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:41:43

No Duplicates.

Comment 182 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation: Ca building Industry Assn

Subject: SB 32 scoping plan comments

Comment:

Thank you for accepting these comments on behalf of the California Building Industry Association.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/207-scopingplan2030-V2UFM1FhVzNVDFMg.pdf'

Original File Name: 2017 Scoping Plan Comments 04.10.17 - CBIA.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:41:32

No Duplicates.

Comment 183 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed 2017 Climate Change Scoping Plan Update & Draft Env. Analysis

Comment:

Please see the attached part 1 of references to comments from the Center for Biological Diversity. Comments were submitted separately because of the size of the files.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/208-scopingplan2030-V2YAMVAOVjVQYglW.zip'

Original File Name: 17 04 10 CBD Scoping Plan refs 1.zip

Date and Time Comment Was Submitted: 2017-04-10 16:30:32

No Duplicates.

Comment 184 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Erin

Last Name: Evans-Fudem

Email Address: eevansfudem@cacities.org

Affiliation: League of California Cities

Subject: 2017 Scoping Plan Comments

Comment:

On behalf of the League of California Cities, please accept the attached comments on the 2017 Climate Change Scoping Plan.

Sincerely,

Erin Evans-Fudem

Legislative Representative

League of California Cities

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/209-scopingplan2030-BmdQJFMwBQlWIwZl.pdf'

Original File Name: ARB Scoping Plan Comments 4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:42:59

No Duplicates.

Comment 185 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed 2017 Climate Change Scoping Plan Update & Draft Env. Analysis

Comment:

Please see the attached part 2 of references to comments from the Center for Biological Diversity. Comments were submitted separately because of the size of the files.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/210-scopingplan2030-BTRTYlcJAGMBMwJd.zip'

Original File Name: 17 04 10 CBD Scoping Plan refs 2.zip

Date and Time Comment Was Submitted: 2017-04-10 16:30:32

No Duplicates.

Comment 186 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed 2017 Climate Change Scoping Plan Update & Draft Env. Analysis

Comment:

Please see the attached part 2 of references to comments from the Center for Biological Diversity. Comments were submitted separately because of the size of the files.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/211-scopingplan2030-ATAHNgRaA2AHNQnc.zip'

Original File Name: 17 04 10 CBD Scoping Plan refs 3.zip

Date and Time Comment Was Submitted: 2017-04-10 16:30:32

No Duplicates.

Comment 187 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Susie

Last Name: Berlin

Email Address: admin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on Draft Scoping Plan Update
Comment:

Comments of the Northern California Power Agency (NCPA) on Draft
2017 Climate Change Scoping Plan Update

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/212-
scopingplan2030-BWsCZ1wtVmRWDwVm.pdf'

Original File Name: NCPA comments re 1-20-17 Draft Scoping Plan Update (4-10-17).pdf

Date and Time Comment Was Submitted: 2017-04-10 16:43:38

No Duplicates.

Comment 188 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Tim

Last Name: Carmichael

Email Address: TCarmichael@semprautilities.com

Affiliation: San Diego Gas & Electric Company

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Attached are comments from San Diego Gas & Electric Company related to the 2017 Climate Change Scoping Plan Update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/213-scopingplan2030-BnUCYARiADZRCFAj.pdf'

Original File Name: SDGE SCG Comment Cvr Ltr AB 802 Regulations 4.10.17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:48:40

No Duplicates.

Comment 189 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Greg

Last Name: Nord

Email Address: gnord@octa.net

Affiliation: Orange County Transportation Authority

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Attached are OCTA's comments on the 2017 Climate Change Scoping Plan. A hard copy has also been sent via mail.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/214-scopingplan2030-BTFXf1NIVisLPFVi.pdf>'

Original File Name: 4.7.17_Nichols_CARB_2030ScopingPlanComments.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:45:51

No Duplicates.

Comment 190 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Evan

Last Name: Edgar

Email Address: evan@edgarinc.org

Affiliation: Ca Compost Coalition

Subject: Comments on the Draft Environmental Analysis for the Proposed Strategy for Achieving Calif

Comment:

To assess the air quality impacts, these new CASP emissions from 53 to 74 new facilities can be compared to the landfilling baseline. Using standard industry practices, we have calculated that avoided landfill emissions of VOCs are 1.9 times greater than the VOCs emitted from CASP compost facilities. The net benefit of diverting organics from the landfill to CASP compost facilities is almost 2 times greater than baseline conditions. The comments in the section copied above needed to reflect that only CASP composting will be utilized for new compost facilities, and that VOCs will not increase above baseline, but instead will be cut in half. Plus, the compost industry is in the midst of electrifying their off-road heavy-duty grinders and trommels, and that there will also be a new reduction in those emissions contrary to the statement copied above

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/215-scopingplan2030-UTJSN1Y0UFwDN1Ji.pdf>'

Original File Name: CCC 2017 Climate Change Scoping Plan Update Draft Environmental Analysis Comments 041017 - Grant edits.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:49:32

No Duplicates.

Comment 191 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Dan

Last Name: Severson

Email Address: dbseverson@TID.ORG

Affiliation:

Subject: TID's Comments on 2017 Climate Change Scoping Plan Update

Comment:

Dear Air Resources Board,

Turlock Irrigation District ("TID") respectfully submits the following comments on the 2017 Climate Change Scoping Plan Update. Thank you.

Sincerely,

Dan B. Severson

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/216-scopingplan2030-UmMHNgAxWD8BNgY2.pdf>'

Original File Name: 170410_TID ARB Draft Scoping Plan Comments (00395044xBA8E1).pdf

Date and Time Comment Was Submitted: 2017-04-10 16:46:39

No Duplicates.

Comment 192 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: Berkeley Energy & Climate Institute

Subject: Supporting a smaller offset program and no REDD linkage

Comment:

Please find comment attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/217-scopingplan2030-UmNRYAQoUjECMFV4.pdf'

Original File Name: 17-04-10 scoping plan comments from Haya.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:51:37

No Duplicates.

Comment 193 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Martin

Last Name: Hopper

Email Address: admin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: Draft 2017 Climate Change Scoping Plan Update Comments

Comment:

M-S-R Public Power Agency Draft 2017 Climate Change Scoping Plan Update Comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/218-scopingplan2030-BWgGLVclVyKfgZZ.pdf'

Original File Name: M-S-R comments re draft Scoping Plan Update (4-10-17).pdf

Date and Time Comment Was Submitted: 2017-04-10 16:52:16

No Duplicates.

Comment 194 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Leslie

Last Name: Purcell

Email Address: lesliepurcell@gmail.com

Affiliation:

Subject: CARB Scoping Plan

Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/219-scopingplan2030-UyEGZQNdVXUCZwhn.docx>'

Original File Name: Re Scoping Plan Update.docx

Date and Time Comment Was Submitted: 2017-04-10 16:51:55

No Duplicates.

Comment 195 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ryan

Last Name: Niblock

Email Address: niblock@sjcog.org

Affiliation: SJCOG

Subject: San Joaquin Valley Letter of Support

Comment:

Attached please find a letter of support on behalf of the 8 MPOs of the San Joaquin Valley.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/220-scopingplan2030-WilVMgNsWFRVOVQ7.pdf'

Original File Name: San Joaquin Valley Letter of Support.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:51:27

No Duplicates.

Comment 196 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Public Solar Power Coalition

Subject: additional scoping plan comment added to nov 7,2016 &dec16,2016 and sip march 18 2 on 20

Comment:

Hello there needs to be a time count down timer to know how much time you have left... this track had all of my comments..

im pissedddd.

at the riverside bd meeting nickols slamed me and made fun of me making several comments on the record as is my right as a citizen///bad form mary

the record of eder v. scaqmd is incorporated into the record herein by reference 2013 jan ederv. scaqmd as well as my our comments testimony on the scoping plan march 18 and 2 on the 20th the second one was to dr scott king and this was purged from the record ie no evaluation response

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 16:38:26

No Duplicates.

Comment 197 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: John

Last Name: Wick

Email Address: callarose@gmail.com

Affiliation:

Subject: Waste and Working Lands

Comment:

Thank you for the opportunity to comment. Please see the attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/222-scopingplan2030-AWdcM10yBDYGbAdY.docx'

Original File Name: Final Scoping Plan Comments April 2017 .docx

Date and Time Comment Was Submitted: 2017-04-10 16:53:27

No Duplicates.

Comment 198 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Ronald

Last Name: Martin

Email Address: martinrj93638@yahoo.com

Affiliation: Fresnoans against Fracking

Subject: support of Alternative 1

Comment:

I support alternative 1 of the Scoping Plan Update, for direct regulation and elimination of cap and trade offsets for any reason.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 16:56:23

No Duplicates.

Comment 199 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation: Dietrick Institute Applied Insect Ecolog

Subject: Dietrick Institute Comments 2030 Scoping Plan

Comment:

Our attached comment is related to policy for Natural and Working Lands.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/224-scopingplan2030-VzMCbQZiVXICdgJr.pdf>'

Original File Name: Dietrick Institute comment on ARB 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:54:01

No Duplicates.

Comment 200 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Public Solar Power Coalition

Subject: additional scoping plan comment added to nov 7,2016 &dec16,2016 and sip march 18 2 on 20

Comment:

Hello there needs to be a time count down timer to know how much time you have left... this track had all of my comments..

im pissedddd.

at the riverside bd meeting nickols slamed me and made fun of me making several comments on the record as is my right as a citizen///bad form mary

the record of eder v. scaqmd is incorporated into the record herein by reference 2013 jan ederv. scaqmd as well as my our comments testimony on the scoping plan march 18 and 2 on the 20th the second one was to dr scott king and this was purged from the record ie no evaluation response

I incorporate by reference the whole record from the 2016aqmp as well as bc 119641 la suo court case al eder v. scaqmd et c he pspe

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 16:38:26

No Duplicates.

Comment 201 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chanell

Last Name: Fletcher

Email Address: chanell@climateplanca.org

Affiliation: ClimatePlan

Subject: ClimatePlan comments on draft 2030 Scoping Plan

Comment:

I've attached our coalition's comments on the draft plan. We look forward to partnering with you as the plan continues to develop.

Best,
Chanell Fletcher, Associate Director
ClimatePlan

Attachment: "

Original File Name: Final Scoping Plan Comments 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:57:54

No Duplicates.

Comment 202 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Nikita

Last Name: Daryanani

Email Address: ndaryanani@leadershipcounsel.org

Affiliation:

Subject: comments on 2030 Scoping Plan

Comment:

Comment letter attached here.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/227-scopingplan2030-UmYHL11tUTIBKQk4.pdf'

Original File Name: 4.10.17 scoping plan comments.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:56:16

No Duplicates.

Comment 203 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chanell

Last Name: Fletcher

Email Address: chanell@climateplanca.org

Affiliation: ClimatePlan

Subject: ClimatePlan comments on draft 2030 Scoping Plan
Comment:

I've reattached our comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/229-scopingplan2030-UDYBblU6AjBROwVa.pdf>'

Original File Name: Final Scoping Plan Comments 4-10-17.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:59:53

No Duplicates.

Comment 204 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environmen

Subject: AMENDED Comments on the 2017 Climate Change Scoping Plan Update
Comment:

AMENDED Comments on the 2017 Climate Change Scoping Plan Update

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/230-scopingplan2030-UWNUYlFhVjIKlJi.pdf'

Original File Name: 2017.04.10 scoping plan comments AMENDED FINAL with Exhibits.pdf

Date and Time Comment Was Submitted: 2017-04-10 16:59:48

No Duplicates.

Comment 205 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Sarah

Last Name: Aird

Email Address: sarah@pesticide-reform.org

Affiliation:

Subject: Comments on the 2017 Climate Change Scoping Plan Update
Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/231-scopingplan2030-WjwHaABvUmBQOgRb.pdf'

Original File Name: FINAL Scoping plan CPR Comment Letter 041017.pdf

Date and Time Comment Was Submitted: 2017-04-10 17:02:30

No Duplicates.

Comment 206 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: jean
Last Name: okuye
Email Address: jeanokuye@gmail.com
Affiliation: valley land alliance

Subject: 20230 scoping plan
Comment:

comments on the 2030 scoping plan:

To help the disadvantaged communities in San Joaquin Valley, please encourage planning for development close to transportation hubs and plan for people, not for cars.

With two trains planned for this poor quality air bowl, more people will be moving here. We need alternative transportation, more community building not bedroom sprawl.

Mitigation could help fund improvements in how and where we put people and the bad air which results.

Sincerely,
Jean Okuye, Vice President
Valley Land Alliance
209-394-2421

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 17:01:44

No Duplicates.

Comment 207 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Rick

Last Name: Bettis

Email Address: rckbettis40@gmail.com

Affiliation: see below

Subject: Scoping Plan

Comment:

alternative 1 would be most effective if enabling legislation and funding were available. If not Alternative 4 with the Cap and Trade program would be best. With the recent appeals court decision the cap and trade funds should recover.

the program should include regulatory reform including CEQA exemptions and fast tracking for any GHG reducing projects.

Emphasize rapid implementation of available technologies for renewable energies, wind, solar etc., and energy efficiencies in facilities, buildings industry etc.

Consider Life Cycle analyses. this could lead to upgrading existing facilities as opposed to replacements.

Strengthen laws and regulations on land use to support compact transit oriented sustainable communities.

Support funding for transit and low or zero emission vehicles.

Thank You for Your consideration

Rick Bettis

for Identification purposes only. Active memberships include Breathe Ca., League of Women Voters, ca. Interfaith power and Light. Lung Association. Physicians for social Responsibility, Sierra club. Coalition for Cleaner Air

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-04-10 17:00:07

No Duplicates.

Comment 208 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation: BAAQMD

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/240-scopingplan2030-VjQBZlUIVnRQO1I2.pdf'

Original File Name: BAAQMD Comment Letter 4-10.pdf

Date and Time Comment Was Submitted: 2017-04-20 15:33:47

No Duplicates.

Comment 209 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Amy

Last Name: Vanderwarker

Email Address: Non-web submitted comment

Affiliation:

Subject: California Environmental Justice Alliance Comments On The 2017 Final Climate Change

Comment:

Comments received outside of the comment period. See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/241-scopingplan2030-ViVdOAFvBCcDbABu.pdf'

Original File Name: Scoping Plan CEJA Comments FINAL.PDF

Date and Time Comment Was Submitted: 2017-12-12 08:33:52

No Duplicates.

Comment 210 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Chanell

Last Name: Fletcher

Email Address: Non-web submitted comment

Affiliation:

Subject: Final Proposed 2017 Scoping Plan

Comment:

Comments received outside of the comment period. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-scopingplan2030-AnEFYANtU3AKZQZo.pdf>'

Original File Name: Scoping Plan Comment Letter - December 2017.pdf

Date and Time Comment Was Submitted: 2017-12-12 08:37:19

No Duplicates.

Comment 211 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Kevin

Last Name: Maggay

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on the Draft Scoping Plan Update

Comment:

Comments received outside of the comment period. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/243-scopingplan2030-BXYAZQFvVnUAb1c5.pdf>'

Original File Name: Scoping Plan Comments 12-11.pdf

Date and Time Comment Was Submitted: 2017-12-12 08:39:23

No Duplicates.

Comment 212 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Gary

Last Name: Hughes

Email Address: Non-web submitted comment

Affiliation: Friends of the Earth - US

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Comments received outside of the comment period. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/244-scopingplan2030-UjUAZ1UmVnwLUgZu.pdf>'

Original File Name: Gary Hughes Comment.pdf

Date and Time Comment Was Submitted: 2017-12-12 16:05:19

No Duplicates.

Comment 213 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Andy

Last Name: Wunder

Email Address: Non-web submitted comment

Affiliation: Ceres

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Comments received outside of the comment period. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/245-scopingplan2030-BWRUPFw5V31XDlcg.pdf>'

Original File Name: Andy Wunder BICEP_Scoping Plan_Nov 2017_final.pdf

Date and Time Comment Was Submitted: 2017-12-12 16:09:31

No Duplicates.

Comment 214 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030) - Non-Reg.

First Name: Greg

Last Name: Karras

Email Address: Non-web submitted comment

Affiliation: Communities for a Better Environment

Subject: 2017 Climate Change Scoping Plan Update

Comment:

Comments received outside of the comment period. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/246-scopingplan2030-UTYFcVczVmJRCAli.pdf>'

Original File Name: Greg Karras CBE 2017 Scoping Plan FEA Comment.pdf

Date and Time Comment Was Submitted: 2017-12-12 16:22:57

No Duplicates.

Comment 1 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Martha Dina

Last Name: Arguello

Email Address: Non-web submitted comment

Affiliation: Environmental Justice Advisory Committee

Subject: Presentation to California Air Resources Board

Comment:

See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-scopingplan2030-VTBVOQFhVGQLfQV3.pdf>

Original File Name: ejacpres.pdf

Date and Time Comment Was Submitted: 2017-01-27 12:31:25

No Duplicates.

Comment 2 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: James

Last Name: Bushnell

Email Address: Non-web submitted comment

Affiliation: University of California, Davis

Subject: Comments on the Draft Scoping Plan Update and Analysis

Comment:

See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-scopingplan2030-U2JXZIV5VDYLIAC2.pdf>

Original File Name: 17-1-1presbushnell.pdf

Date and Time Comment Was Submitted: 2017-01-27 12:31:25

No Duplicates.

Comment 3 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Evan

Last Name: Edgar

Email Address: Non-web submitted comment

Affiliation: CA Compost Coalition

Subject: Comments on 2017 Climate Change Scoping Plan
Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-scopingplan2030-BzYAMQEtVDYLIAEw.pdf>

Original File Name: 17-1-1 Evan Edgar.pdf

Date and Time Comment Was Submitted: 2017-02-03 12:03:37

No Duplicates.

Comment 4 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Lloyd

Last Name: Levine

Email Address: Non-web submitted comment

Affiliation: CA Emergency Tech. Fund

Subject: Can the Internet Help Save the Environment

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-scopingplan2030-WmtVZFd7BWcBKlNi.pdf>

Original File Name: 17-1-1 Lloyd Levine.pdf

Date and Time Comment Was Submitted: 2017-02-03 12:03:37

No Duplicates.

Comment 5 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Betty

Last Name: Chu

Email Address: Non-web submitted comment

Affiliation: Calpine Corporation

Subject: Scoping Plan

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-scopingplan2030-ATAGNwQoBWdQe1Bh.pdf>

Original File Name: 17-1-1 Betty Chu.pdf

Date and Time Comment Was Submitted: 2017-02-03 12:03:37

No Duplicates.

Comment 6 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Gary

Last Name: Hughes

Email Address: Non-web submitted comment

Affiliation: Friends of the Earth

Subject: Concerns Regarding Proposed International Sector-based Offsets

Comment:

See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-scopingplan2030-ATBXZld7UjNQewk8.pdf>

Original File Name: 17-2-5 Gary Hughes.pdf

Date and Time Comment Was Submitted: 2017-02-16 16:08:34

No Duplicates.

Comment 7 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Gary C,
Last Name: Rynearson
Email Address: Non-web submitted comment
Affiliation: Green Diamond

Subject: Proposed 2030 Target Scoping Plan
Comment:

See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-scopingplan2030-VmcFNFR4VzZRelJn.pdf>

Original File Name: 17-2-5 Gary C. Rynearson.pdf

Date and Time Comment Was Submitted: 2017-02-16 16:08:34

No Duplicates.

Comment 8 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Gary

Last Name: Hughes

Email Address: Non-web submitted comment

Affiliation: Friends of the Earth - US

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/247-scopingplan2030-BjRBZFU7jUV0FAc2z.pdf>

Original File Name: Gary Hughes written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 09:12:52

No Duplicates.

Comment 9 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Greg

Last Name: Karras

Email Address: Non-web submitted comment

Affiliation: CBE

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-scopingplan2030-B2ABdQBkVmIGXwJp.pdf>

Original File Name: Greg Karras written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 09:15:10

No Duplicates.

Comment 10 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: John

Last Name: Gamboa

Email Address: Non-web submitted comment

Affiliation:

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/249-scopingplan2030-UDpROFA5UWwBWAlu.pdf>

Original File Name: John Gamboa written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 09:15:52

No Duplicates.

Comment 11 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Jennifer

Last Name: Hernandez

Email Address: Non-web submitted comment

Affiliation:

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/250-scopingplan2030-BjRGYwRxAzwSeQY3.pdf>

Original File Name: Jennifer Hernandez written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 14:44:13

No Duplicates.

Comment 12 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Jamesine

Last Name: Rogers Gibson

Email Address: Non-web submitted comment

Affiliation: UCSUSA

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/251-scopingplan2030-B21dOlQ4AjQCd1I7.pdf>

Original File Name: Jamesine Rogers Gibson written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:32:25

No Duplicates.

Comment 13 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: Non-web submitted comment

Affiliation: ALA

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/252-scopingplan2030-AmBUPVQ7UWwKZQht.pdf>

Original File Name: Bonnie Holmes-Gen written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:35:25

No Duplicates.

Comment 14 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Economic

Last Name: Reviewers

Email Address: Non-web submitted comment

Affiliation:

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/253-scopingplan2030-UDVRNAZoUWwHbgJv.pdf>

Original File Name: Economic reviewers written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:36:12

No Duplicates.

Comment 15 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Emanuel

Last Name: Wagner

Email Address: Non-web submitted comment

Affiliation: CHBC

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/257-scopingplan2030-AWRTOFMzU24Bcgdi.pdf>

Original File Name: Emanuel Wagner written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:42:25

No Duplicates.

Comment 16 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Mikhael

Last Name: Skvarla

Email Address: Non-web submitted comment

Affiliation: CCEEB

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/258-scopingplan2030-UD0GaQFrWWIDZFI3.pdf>

Original File Name: Mikhael Skvarla written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:43:02

No Duplicates.

Comment 17 for Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis (scopingplan2030). (At Hearing)

First Name: Mari

Last Name: Rose Taruc

Email Address: Non-web submitted comment

Affiliation: EJAC

Subject: 2017 Climate Change Scoping Plan Update

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-scopingplan2030-AWxQN1EiUGoLUgNx.pdf>

Original File Name: Mari Rose Taruc EJAC written submission.pdf

Date and Time Comment Was Submitted: 2017-12-18 16:43:48

No Duplicates.