Comment 1 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Elton
Last Name: Sherwin
Email Address: esherwin@carbonzeroinstitute.org
Affiliation: Carbon Zero Institute

Subject: Why Methane Matters
Comment:

```
The attached presentation was prepared for the June 13th, 2013
Public Workshop for The 2013 Update to the AB 32 Scoping Plan and
was given by Elton Sherwin, Executive Director of the Carbon Zero
Institute.
```

Attachment: www.arb.ca.gov/lists/com-attach/3-2013-sp-update-ws-B3RTPVw4UXAAcVI7.pdf

Original File Name: Sherwin remarks on methane during public comments for CZ Institute.pdf

Date and Time Comment Was Submitted: 2013-06-14 11:16:17

No Duplicates.

Comment 2 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Steve
Last Name: Raney
Email Address: cities21@cities21.org
Affiliation: Cities21

Subject: Research Need: Behavior Change Scenarios
Comment:

Research Need: Develop Widespread Behavior Change Scenarios, including an “enlightened humanity” scenario.

Between 2013 and 2050, there is chance for widespread human behavior change on the order of World War II US home front collaboration, rationing and economic restructuring. As a provocative GHG behavior-centered example, what if we all became vegetarians in 2022 to reduce GHG production? As part of the process to envision and forecast the resultant CA in 2050, please conduct appropriate behavior change research as this may lead to large scale GHG reduction.

The Behavior, Energy, and Climate Change Conference could become a natural home over the next few decades for ongoing research on behavior change related to CA climate. The conference is held every year in November. Sacramento is the home for the 2010, 2012, and upcoming 2013 conferences. http://beccconference.org/. The BECC Conference is convened by the Precourt Energy Efficiency Center (PEEC), Stanford University, American Council for an Energy Efficient Economy (ACEEE), and California Institute for Energy and Environment (CIEE), University of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-06-14 12:06:03

No Duplicates.

Comment 3 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Steve
Last Name: Raney
Email Address: cities21@cities21.org
Affiliation: Cities21, Palo Alto

Subject: Research Need: Develop Climate Adaptation Scenarios
Comment:

As of 2013, we cannot predict the resultant 2050 world. 2050 is science fiction.

As far as climate impacts occurring within the 2013-2050 timeframe, some climate impacts will tend to dampen energy demand and GHG production, whereas some adaptations may consume relatively more energy (example: widespread use of energy-intensive desalinization to address water shortages). A GHG Climate Adaptation Futures Scenario Group should be convened to develop multiple 2050 scenarios over a range of atmospheric GHG levels (some well beyond the IPCC consensus). Policy, GHG impact, and adaptation planning learnings from these scenarios should be logged.

Andrew Guzman’s book Overheated serves as one starting point. Andrew Guzman is Professor of Law and Director of the Advanced Law degree Programs at Berkeley Law School, University of California, Berkeley.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-06-14 12:15:07

No Duplicates.

Comment 4 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Amy
Last Name: Holm
Email Address: aholm@theclimateregistry.org
Affiliation: The Climate Registry

Subject: AB32 Scoping Plan Comments/The Climate Registry
Comment:

```
Please accept the attached document which outlines recommendations
submitted by The Climate Registry, in regards to the AB32 Scoping
Plan.

Thank you,

Amy Holm
```

Attachment: www.arb.ca.gov/lists/com-attach/6-2013-sp-update-ws-VTRQNF1vUDFWD1Mg.docx

Original File Name: AB32 Scoping Plan TCR Comments.docx

Date and Time Comment Was Submitted: 2013-07-02 14:48:39

No Duplicates.

Comment 5 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Lee
Last Name: Wallace
Email Address: lwallace@semprautilities.com
Affiliation: Southern California Gas Co. / San Diego

Subject: 2013 Scoping Plan Update Workshop
Comment:

We have been using the 2013 EPA GHG inventory to help address questions we have received about methane emissions. It is the most reliable and accepted source of national data available, and has been issued for 18 years. This year's report stated, "Overall, natural gas systems emitted 139.6 Tg CO2 Eq. (6,646 Gg) of CH4 in 2011, a 13 percent decrease compared to 1990 emissions (see Table 3-43, Table 3-44, and Table 3-45) and 32.3 Tg CO2 Eq. (32,344 Gg) of non-combustion CO2 in 2011, a 14 percent decrease compared to 1990 emissions (see Table 3-46 and Table 3-47). The decrease in CH4 emissions is due largely to a decrease in emissions from transmission and storage due to increased voluntary reductions and a decrease in distribution emissions due to a decrease in cast iron and unprotected steel pipelines." Chapter 3, page 56. Here is the link to the entire report:
http://www.epa.gov/climatechange/ghgemissions/usinventoryreport.html
.

We are not referring to the EPA GHG Inventory as the "answer" to the current discussion about methane emissions from the natural gas system. But it does present data about how the natural gas industry performed during a recent period of growing demand for natural gas. The Inventory shows the natural gas system had a steady decline in methane emissions. It also discusses the reasons behind the decline. The report contains a more detailed discussion, but it was primarily voluntary reductions in transmission and storage (e.g. the EPA Natural Gas Star program) and replacement of cast iron and steel pipe. These practices will continue, because there are many reasons we want to reduce leakage, including improved safety, conservation of our product, and of course improvement in the environment.

I also wanted to let you know about California legislation, AB 1257 (Bocanegra), we are supporting. The bill would require the California Energy Commission, by January 1, 2015, and every 4 years thereafter, to prepare and submit to the Legislature and Governor a report containing specified information identifying strategies to maximize the benefits obtained from natural gas as an energy source in California. The report will include:
(10) Evaluating the incremental beneficial and adverse economic cost and environmental impacts of proposed strategies ,including lifecycle greenhouse gas emissions from production, transportation,

and use of natural gas based on authoritative, peer-reviewed, and science-based analysis, or as determined by the State Air Resources Board.
We look forward to working with CARB, CEC and other stakeholders to have a public discussion of this and other issues associated with the future of natural gas, whether or not this bill becomes law.

If you have further questions, please feel free to contact me.

Lee Wallace
Environmental Affairs Manager
Environmental Affairs Department
Southern California Gas Co. / San Diego Gas & Electric
Work: 213.244.8851
Cell: 213.215.3787
Fax: 213.244.8254
Email: lwallace@semprautilities.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-02 15:58:54

No Duplicates.

Comment 6 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Larry
Last Name: Buckle
Email Address: Buckle@IES-ENG.COM
Affiliation: Organic Energy Corporation, Inc.

Subject: COMMENTS TO DRAFT WASTE MANAGEMENT SECTOR PLANS
Comment:

```
Organic Energy Corporation is grateful for the opportunity to
submit comments for the collaborative effort of CalRecycle and the
Air Resources Board (ARB) as they draft plans for development of
Assembly Bill (AB) 341 implementation plan and revision of the AB
32 Scoping Plan.  We applaud the coordination and collaboration of
the two department staffs.

Attached are our comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/8-2013-sp-update-ws-UDFSNgRaAmIBNVMM.pdf

Original File Name: AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-07-08 13:23:52

No Duplicates.

Comment 7 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Theodore
Last Name: Hadzi-Antich
Email Address: tha@pacificlegal.org
Affiliation:

Subject: Legal Authority Beyond 2020
Comment:

Nothing in the California Global Warming Solutions Act of 2006 ("AB 32") or elsewhere provides CARB with the legal authority to impose greenhouse gas emissions limitations beyond those required by California Health & Safety Code Section 38550. Specifically, Section 38550 authorizes CARB to impose by 2020 statewide greenhouse gas emissions limitations equivalent to the level of greenhouse gas emissions in California as of 1990.

Before CARB may impose any greenhouse gas emissions limitations beyond the 1990 emissions level, CARB is first required to "make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 1990," pursuant to Health & Safety Code 38551(c). According, Health and Safety Code 38551(c) displaces any aspect of Executive Order S-3-05 that addresses greenhouse gas emissions reductions after 2020, specifically including any aspects of Executive Order S-3-05 that addresses greenhouse gas emissions targets for 2050.

Therefore, any aspect of the 2013 Amendments to the 2008 Scoping Plan that sets forth goals for emissions reductions beyond 2020 is ultra vires and beyond the authority of CARB or any other California administrative agency to the extent that they constitute anything other than recommendations to the Governor and the legislature under Health & Safety Code 38551(c). In short, CARB is not authorized to implement binding emissions targets beyond 2020 without future duly enacted legislation, based upon recommendations by CARB made pursuant to Health & Safety Code 38551(c), duly authorizing same.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-12 13:20:06

No Duplicates.

Comment 8 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Chuck
Last Name: Helget
Email Address: sectorstrategiesinc@hotmail.com
Affiliation:

Subject: SWIG/SWICS Comments Regarding SPU and Waste Management Sector Documents
Comment:

```
Please see attached the SWIG and SWICS comments on certain draft
waste sector documents presented at the joint CalRecycle and CARB
Workshop on June 18, 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/10-2013-sp-update-ws-VC5XOFEgBHkFeVM6.zip

Original File Name: zip.zip

Date and Time Comment Was Submitted: 2013-07-12 15:42:18

No Duplicates.

Comment 9 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Pat
Last Name: Proano
Email Address: pproano@dpw.lacounty.gov
Affiliation: Los Angeles County Department of Public

Subject: AB 32 Scoping Plan Waste Sector Comments - Los Angeles County
Comment:

```
Attached are comments from Los Angeles County Department of Public
Works regarding the proposed Waste Sector Plan of the AB 32 Scoping
Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/11-2013-sp-update-ws-BnFTNAR2UHcLaAFe.pdf

Original File Name: Waste Management Sector Plan Comments Cover Letter_Howard Levenson_Edie Chang_07-11-13.pdf

Date and Time Comment Was Submitted: 2013-07-12 16:19:30

No Duplicates.

Comment 10 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Kathryn
Last Name: Phillips
Email Address: kathryn.phillips@sierraclub.org
Affiliation: Sierra Club California

Subject: Scoping Plan Update Comments from Sierra Club California
Comment:

```
Please find attached Sierra Club California's comments regarding
the 2013 Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/12-2013-sp-update-ws-BmBXOFM8UWMEbglW.pdf

Original File Name: Final Sierra Club California Comments on CARB 2013 Scoping Plan Update 7.12.13.pdf

Date and Time Comment Was Submitted: 2013-07-12 17:25:16

No Duplicates.

Comment 11 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Rico
Last Name: Mastrodonato
Email Address: rico.mastrodonato@tpl.org
Affiliation: Trust For Public Land

Subject: Scoping Plan Update - Comments Attached
Comment:

```
Please see attached comment on Scoping Plan. Please also share with
the Environmental Justice Advisory Committee. Thank-you!
```

Attachment: www.arb.ca.gov/lists/com-attach/14-2013-sp-update-ws-UTRVOVIyBDQAWQVp.docx

Original File Name: EJAC Letter.docx

Date and Time Comment Was Submitted: 2013-07-17 14:27:50

No Duplicates.

Comment 12 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jeanne
Last Name: Merrill
Email Address: jmerrill@calclimateag.org
Affiliation:

Subject: Scoping Plan Update
Comment:

```
Please find attached comments on the agriculture sector section of
the update, which includes comments relevant to the transportation
(e.g. SB 375/land use issues), energy (e.g. bioenergy technical
assistance for producers, water (e.g. technical assistance for
growers on water stewardship issues) and natural/working lands
(e.g. land conservation) sections of the update.
```

Attachment: www.arb.ca.gov/lists/com-attach/15-2013-sp-update-ws-BmVTNFc6V2cKbVc5.pdf

Original File Name: CalCAN - Scoping Plan Update Comments - 7-19-13.pdf

Date and Time Comment Was Submitted: 2013-07-19 15:59:51

No Duplicates.

Comment 13 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Randal
Last Name: Friedman
Email Address: randalfriedman@gmail.com
Affiliation:

Subject: 2013 SCOPING PLAN UPDATE COMMENTS
Comment:

Comments attached.

Attachment: www.arb.ca.gov/lists/com-attach/16-2013-sp-update-ws-UGIFMwExWDgLUgFy.pdf

Original File Name: 2013 SCOPING PLAN COMMENTS.pdf

Date and Time Comment Was Submitted: 2013-07-23 09:03:56

No Duplicates.

Comment 14 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Marc
Last Name: Fontana
Email Address: solarman08-now@yahoo.com
Affiliation:

Subject: GHG Reduction should include Investing in EV Charging Infrastructure
Comment:

```
Electric Vehicle Charging Infrastructure should be included in
CARB's plan for meeting the goals of AB 32.  Widespread adoption of
EVs depends on the availability of charging stations.
Also, with more EVs on the road, there should be less pollution to
our air and water.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-24 15:19:50

No Duplicates.

Comment 15 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Amber
Last Name: Wyatt
Email Address: amber.wyatt@sce.com
Affiliation: Southern California Edison Co.

Subject: SCE Comments on Scoping Plan Update
Comment:

```
Attached are SCE's comments on the Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/18-2013-sp-update-ws-BnVcOQZiAw9SNwVq.pdf

Original File Name: SCE Comments on Scoping Plan Update (Final).pdf

Date and Time Comment Was Submitted: 2013-07-26 13:48:41

No Duplicates.

Comment 16 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Megan
Last Name: Scott
Email Address: megan.scott@berkeley.edu
Affiliation:

Subject: UC Berkeley Donald Vial Center comments on AB 32 Scoping Plan
Comment:

```
Attached please find comments submitted on behalf of the UC
Berkeley Donald Vial Center on Employment in the Green Economy.
```

Attachment: www.arb.ca.gov/lists/com-attach/20-2013-sp-update-ws-UDQGdlQ2AAwAZQJt.pdf

Original File Name: DVC comments on the 2013 update to AB 32 scoping plan 7-29-13.pdf

Date and Time Comment Was Submitted: 2013-07-29 12:46:49

No Duplicates.

Comment 17 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: James P.
Last Name: Halloran
Email Address: JPH@CAT.COM
Affiliation: CCDC

Subject: Comments of the California Clean DG Coalition
Comment:

```
Please find the attached comments for the 2013 Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/21-2013-sp-update-ws-BmUGY1w5AjIDWlQ3.pdf

Original File Name: CCDC Comments on the CARB 2013 Update to AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-07-30 14:27:58

No Duplicates.

Comment 18 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Eugene
Last Name: Wilson
Email Address: wilson1224@gmail.com
Affiliation:

Subject: Freight Rail
Comment:

Hello--

I would like to know how California can take better advantage of the existing freight rail infrastructure to move freight more efficiently.

Caltrans is working on a California Rail Plan, and the Scoping Plan update should take into consideration that plan. CARB is working on getting cleaner locomotive engines. The ports are all working on freight rail issues.

Rail is a more energy efficient mode than trucking. CARB should determine whether a thorough study has been done of how greater use of freight rail might save on GHG emissions, reduce traffic congestion from trucks, and reduce wear on roadways.

We don't have a good study right now of how the economics and energy efficiency of freight rail might help to reduce GHG emissions. This could start by making some reference in the Scoping Plan to freight rail as a potential GHG solution.

One part of this issue is "logistics sprawl," which is the tendency to locate warehouses on the urban periphery, e.g., Moreno Valley, and then to truck goods to them from the ports of LA and Long Beach over congested freeways. These warehouses go in without even considering freight rail.

This is not an efficient practice, but cheap land on the urban periphery is a crucial consideration for businesses. The issues is "sustainable logistics." A visiting professor at USC just wrote a paper about this issue in Los Angeles--

http://www.sciencedirect.com/science/article/pii/S1877042810010748

A lot of companies are paying attention to this including DHL which has an article here--

http://www.dp-dhl.com/content/dam/logistik_populaer/trends/StudieSustainableLogistics/study_towards_sustainable_logistics.pdf

The Scoping Plan needs to ask Caltrans be working on where the opportunities are for using freight rail and how to partner with

UP, BNSF, and the shortlines to help get freight off freeways and on rail.

This could be a win for business and the environment, but it needs to be elevated in our discussions.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-30 19:04:35

No Duplicates.

Comment 19 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Anthony
Last Name: Andreoni
Email Address: tandreoni@cmua.org
Affiliation: CMUA

Subject: 2013 Scoping Plan Comments
Comment:

```
Please see our attached comment letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/23-2013-sp-update-ws-VjUGbQB0VGZSCwY0.pdf

Original File Name: CMUA 2013 Scoping Plan Comment Letter to ARB 07-31-2013.pdf

Date and Time Comment Was Submitted: 2013-07-31 11:31:09

No Duplicates.

Comment 20 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Betsy
Last Name: McGovern-Garcia
Email Address: betsy.garcia@ci.visalia.ca.us
Affiliation: City of Visalia

Subject: Comments on AB 32 Scoping Plan Update
Comment:

```
Please accept the attached comments on the AB 32 Scoping Plan
Update from the City of Visalia.
```

Attachment: www.arb.ca.gov/lists/com-attach/24-2013-sp-update-ws-AGMGaQZzAykGXwlm.pdf

Original File Name: City of Visalia_Comments_AB32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-07-31 12:06:18

No Duplicates.

Comment 21 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Mitch
Last Name: Mitchell
Email Address: dxjones@semprautilities.com
Affiliation: SoCalGas

Subject: 2013 AB32 Scoping Plan Update
Comment:

```
Attached are comments from Southern California Gas Company
regarding the 2013 Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/25-2013-sp-update-ws-BnUHYgNlAw8KbwRr.pdf

Original File Name: SCG commts-ScopingPlan 7-30-13f.pdf

Date and Time Comment Was Submitted: 2013-07-31 12:45:17

No Duplicates.

Comment 22 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Nicole
Last Name: Vermilion
Email Address: nvermilion@planningcenter.com
Affiliation: The Planning Center/DC&E

Subject: 2013-SP-Update-WS
Comment:

The 2013 Update to the Scoping Plan should establish interim (Post-2020 but pre-2050)targets to address the long-term goal to reduce GHG emissions to 80% below 1990 levels by 2050. These targets should be clearly articulated for the state as a whole (or separate sectors) and qualitative/quantitative goals should be identified for local governments. It may be important to distinguish goals for established (built-out out communities) v. growing communities (communities that will experience an increase in sources of emissions despite federal, state, and regional GHG emissions reductions)when considering local GHG reduction goals for local jurisdictions. One of the most far reaching statements in the 2008 Scoping Plan for local communities was in regard for local governments to achieve a 15% reduction by 2020. While this was never originally intended to apply on a city-by-city (or county-by-county) basis, but for the State as a whole, this local goal was applied by local jurisdictions while preparing local greenhouse gas (GHG) reduction plans and for the California Environmental Quality Act (CEQA) thresholds. Discussion regarding these type of quantitative/qualitative statements should be given careful review in this next update because of the far reaching consequences with regard to CEQA and significance thresholds used in CEQA documents. Furthermore, outreach with local governments on what types of programs are needed to further he state in achieving the long term goal should be conducted. These types of programs (including funding programs)should be considered in the 2013 Update.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-01 09:31:34

No Duplicates.

Comment 23 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Theodore
Last Name: Hadzi-Antich
Email Address: tha@pacificlegal.org
Affiliation: Pacific Legal Foundation

Subject: Legal Auhtority to Go Beyond Reachng 1990 Greenhouse Gas Emissions Levels BY 2020
Comment:

Ladies and Genetlemen,

I offer these comments on behlaf of Pacific Legal Foundation.

The California Air Resources Board ("CARB") does not have the legal authority to implement greenhouse gas emissions reductions beyond the levels specified in A.B. 32, which authorizes CARB to regulate greenhouse gas emissions in California to ensure that, by 2020, such emissions do not exceed 1990 levels in the state. AB 32 does not authorize CARB or any other state agency to further reduce greenhouse gas emissions by an additional 80% by 2050. Yet that is what the 2013 Scoping Plan Amendments portend. Any effort by CARB to go beyond emissions reductions required to be achieved by 2020 is ultra vires under A.B. 32, absent any other authorizing legislation. Furthermore, any legal authority that CARB may have had under Executive Order S-3-05 in connection with 2050 emissions goals has been superceded by A.B. 32, which does not authorize the achievement of such goals. When faced with the decision of whether or not to adopt the golas of Executive Order S-3-05, the California Legilature chose to adopt the 2020 goal only and rejected the 2050 goal by not specifically authorizing CARB to achieve it. See O'Grady v. Superior Court, 139 Cal. App. 4th 1423, 1443 (2006) (a statute "is presumed to exclude things not mentioned." SEe also, Pulaski v. Cal. Occupational Safety and Health Standards Bd., 75 Cal. App. 4th 1315, 1332 (1999) ("Administrative regulations that altar or amend [a] statute or enlarge its scope are void."

If CARB moves forward to issue or promulgate Scoping Plan amendments that include the 2050 goals, it will be acting beyond its legislative authority, and Pacific Legal Foundation plans to bring legal action to challenge any such effort by CARB.

Sincerely,
Theodore Hadzi-Antich
SEnior Staff Attorney, Pacific Legal Foundation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-01 14:13:05

No Duplicates.

Comment 24 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Diane
Last Name: Heinze
Email Address: dheinze@portoakland.com
Affiliation: Port of Oakland

Subject: Energy
Comment:

I attended the workshop in SF this week, and it was very well organized - thanks. The Port of Oakland's seaport has been busy implementing shore power. A major milestone, and hopefully money well spent to control diesel emissions locally, and global climate change. This is in addition to everything else the seaport must do.
As a homeowner, I found myself changing my priority during the meeting for home repairs from re-doing the kitchen floor to installing new windows in the living room. Money is less of a concern then how to go about getting this done. My suggestion therefore is to focus the public on ONE PRIORITY for perhaps two of the five years of the scoping plan. For windows, CARB/BAAQMD could provide homeowners with local contractors, options, costs, and other information to make it as easy as possible to implement. Homeowners could plan ahead for this work which will be costly, and contractors could market customers for this work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-01 14:35:21

No Duplicates.

Comment 25 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Joseph T.
Last Name: Edmiston
Email Address: cartelli@smmc.ca.gov
Affiliation: Santa Monica Mountains Conservancy

Subject: Preservation of Natural Resources in Scoping Plan Update
Comment:

```
Please find the attached comment letter regarding the Scoping Plan
update.

Joseph T. Edmiston, FAICP, Hon. ASLA
Executive Director
State of California--Natural Resources Agency
Santa Monica Mountains Conservancy
```

Attachment: www.arb.ca.gov/lists/com-attach/29-2013-sp-update-ws-AnEGY10zVXYBbgRq.pdf

Original File Name: Scoping Plan Comment Letter _SMMC.pdf

Date and Time Comment Was Submitted: 2013-08-02 10:23:41

No Duplicates.

Comment 26 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jack
Last Name: Macy
Email Address: jack.macy@sfgov.org
Affiliation: San Francisco Department of Environment

Subject: Comments on Waste Management Sector of the AB 32 Scoping Plan Update
Comment:

The City and County of San Francisco Department of the Environment submits the following comments on the Waste Management Sector of the AB 32 Scoping Plan Update. We appreciate many valuable recommended actions proposed in the Sector Plan. Overall we strongly encourage not to incentivize landfilling, incineration, or “thermal/conversion” technologies and prioritizing incentives for anaerobic digestion and composting as well as reuse, recycling, and remanufacturing. More specifically, we strongly encourages that the AB 32 Scoping Plan:

• Prioritize mandating source separated collection of food scraps, starting at least with commercial food scraps, to maximize carbon emission reductions through edible food reuse, animal feed, and anaerobic digestion and/or composting; and prioritize a ban on landfilling organic materials. Start phasing in the landfill ban with landscape plant debris as 23 other states have already done, then commercial food organics as states such as Massachusetts are doing in 2014, and then residential food organics. San Francisco has mandated the source separation for composting collection of all organic materials since 2009, with all sectors participating. Landfill bans or other mandates for composting collection have proven to be the most effective policies in diverting organics from landfills. Therefore, CalRecycle and CARB need to prioritize the adoption of these regulations in order to achieve the 2020 goals of AB 32 and AB 341.

• Prioritize incentives for diversion of organic and recyclable materials from disposal (landfills and incinerators) into reuse, recycling, anaerobic digestion (AD) and/or composting as they are proven technologies that provide significant carbon emission reduction benefits compared to landfilling or incineration. San Francisco has found that 90% of the entire discard material stream (“waste”) can be reused, recycled or AD/composted and CalRecycle studies have found 2/3rds of disposed material is recyclable or compostable. Yet millions of tons of recyclable or compostable materials are still disposed. The biggest obstacle to increased diversion and resulting reduction in carbon emissions is the direct economic competition from landfilling. Emission reduction benefits shown from compost use reducing fossil fuel derived fertilizers, pesticides, irrigation and carbon sequestration, should be accounted for as well as used anaerobic digestion gas to offset fuel emissions. In addition to mandated collection and disposal bans, increased financial incentivizes are needed to support and develop the collection, processing and marketing infrastructure for beneficial diversion to effectively compete against disposal,

including local reuse and remanufacturing such as wood remanufacturing a higher and better use that biomass burning.
• Do not incentivize landfill gas used for energy as that will effectively subsidize the landfilling of organic materials and can run counter to efforts to divert organic materials from landfill into more carbon beneficial anaerobic digestion and/or composting. Landfills should be required to convert their captured gas into energy but not subsidized and given further competitive cost advantage over diversion from landfill. Increased landfilling of organics will increase emissions of greenhouse gases even with landfill gas capture systems and thereby increase global warming pollution, undermining the intent of AB 32.
• Do not incentivize incineration (including “thermal or conversion” technologies) of organic materials as that effectively subsidizes the burning of organic materials and can run counter to efforts to divert organic materials to more proven carbon beneficial anaerobic digestion and/or composting. Incineration results in increased carbon emissions compared to anaerobic digestion and composting that sequester carbon with the land application of compost or digestate. Burning materials made from non-renewable resources should not be considered renewable energy.

• Do not exempt incineration or landfill gas from the cap-and-trade program. Exempting incineration (thermal or conversion) or landfills from cap-and-trade would give these facilities a competitive advantage over higher value diversion programs and facilities resulting in increased net carbon emissions.

Thank you for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-02 11:21:08

No Duplicates.

Comment 27 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jenny
Last Name: Bard
Email Address: jenny.bard@lung.org
Affiliation:

Subject: Lung Association Comments on AB 32 Scoping Plan Update
Comment:

```
Attached please find recommendations from the American Lung
Association in California for the AB 32 Scoping Plan Update.
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Attachment: www.arb.ca.gov/lists/com-attach/31-2013-sp-update-ws-VDhSIVQ7BTFRCAhp.pdf

Original File Name: Lung Association Scoping Plan Update recommendations FINAL 8-1-2013.pdf

Date and Time Comment Was Submitted: 2013-08-02 12:49:13

No Duplicates.

Comment 28 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Mitch
Last Name: Mitchell
Email Address: dxjones@semprautilities.com
Affiliation: SDG&E

Subject: 2013 AB32 Scoping Plan Update
Comment:

```
Attached are comments from San Diego Gas & Electric regarding the
2013 Scoping Plan Update.
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Attachment: www.arb.ca.gov/lists/com-attach/32-2013-sp-update-ws-ViUCYFcxAjQBZANs.pdf

Original File Name: SDGECommt.Scoping PlanUpdate-7-31-13-Final.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:19:47

No Duplicates.

Comment 29 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jason
Last Name: Schmelzer
Email Address: jason@shawyoderantwih.com
Affiliation:

Subject: SWANA Scoping Plan Update Comments
Comment:

```
Hello,

Please the attached comments on the 2013 Scoping Plan Update from
the Solid Waste Association of North America.

Best,

Jason Schmelzer
```

Attachment: www.arb.ca.gov/lists/com-attach/33-2013-sp-update-ws-UyAFdFU1V2pSNQFe.pdf

Original File Name: SWANA Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:35:39

No Duplicates.

Comment 30 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Bill
Last Name: Magavern
Email Address: bill@ccair.org
Affiliation: Coalition for Clean Air

Subject: CCA Comments on Scoping Plan Update
Comment:

Attached

Attachment: www.arb.ca.gov/lists/com-attach/34-2013-sp-update-ws-BmVVMANjVFgLbgBv.docx

Original File Name: CCA Comments on AB 32 Scoping Plan Update.docx

Date and Time Comment Was Submitted: 2013-08-02 18:02:18

No Duplicates.

Comment 31 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Ed
Last Name: Pike
Email Address: epike@energy-solution.com
Affiliation: Energy Solutions

Subject: Recommended Passenger Vehicle In-use Efficiency Measures
Comment:

Please note - we have attached our comments as a PDF and also included the text of these comments here.

August 2, 2013

Mike Tollstrup
Chief, Project Assessment Branch
1001 I Street
California Air Resources Board
Sacramento, California 95814

Subject: AB32 Scoping Plan Update – Passenger Vehicle In-Use Efficiency

Dear Mr. Tollstrup:

Thank you for the opportunity to provide suggestions for the AB32 Scoping Plan update. We encourage you to build on California's leadership reducing transportation emissions by including passenger vehicle in-use efficiency in the scoping plan update.

In particular, we recommend that the update include a pathway to improve deployment of fuel efficient passenger vehicle replacement tire and engine oil technology. The scoping plan update should include programs starting with tire incentives for a limited time period and ratings followed by standards to permanently shift the market. These programs would allow drivers of every income level to participate directly in the benefits of AB32. We also encourage evaluation of potential measures for improved engine oil technology.

The original scoping plan (measure T-4) set goals of over three million metric tons per year of GHG savings and $750 million in annual consumer savings from these technologies. These goals are achievable with a very high benefit/cost ratio and can leverage CEC research on low rolling resistance tires as well as precedents in Europe, Japan and South Korea.

We have attached suggested language for the scoping plan update and appreciate your consideration of our comments. Please contact me or have your staff contact me at epike@energy-solution.com or (510) 482-4420 x239 if you have any questions.

Sincerely,

Ed Pike, P.E.
Senior Project Manager

Attachment: Suggested language for scoping plan update

"Passenger Vehicle Efficiency Measures Update

Several passenger vehicle in-use efficiency measures would complement adopted AB32 policies for new vehicles, fuels and vehicle miles traveled. Two opportunities identified in the original scoping plan include low rolling resistance replacement tires and low viscosity engine oil. Implementing these measures will build on the adopted tire inflation early action measure and result in additional emission reductions of greater than 3 million metric tons per year and consumer cost savings of greater than $750 million per year. These programs would be an opportunity for drivers of every income level, including low income drivers, to participate directly in the fuel cost savings and other benefits of AB32.

Tires
Low rolling resistance replacement tire technology can reduce long-term GHG and fuel consumption by 4 percent or greater. This technology is expected to continue to advance for new vehicles due to California/federal GHG and fuel economy standards and vehicle labeling but no programs are in place for the replacement tire market. (Low rolling resistance tires are required for heavy duty vehicles under California’s Smartway regulation.)

A two-phased California approach is recommended to maximize the benefits of low rolling resistance replacement tires for passenger vehicles. First, a consumer incentive and education pilot program could be implemented on a regional basis, and potentially expanded state-wide (assuming that funding is available) to create consumer pull for the most energy efficient replacement tires. This program should be followed by the adoption of standards, leveraging existing CEC research, to permanently shift the market. California can also leverage experience from tire programs developed in the European Union, Japan and South Korea to develop programs and avoid the risk that low-quality replacement tires pushed out of international markets could be shifted to California.

Low Friction Engine Oils
Engine oil formulations can also impact a vehicle’s GHG emissions because reducing friction from the internal engine parts will improve the overall efficiently of the engine. This, in turn, reduces the engine load and fuel consumption. Use of low friction engine oils in passenger vehicles can result in up to 2 percent GHG reduction. Initial efforts could focus on a consumer incentive and education pilot program, potentially followed by implementation of a broader program and/or regulation.

Attachment: www.arb.ca.gov/lists/com-attach/35-2013-sp-update-ws-VzJROVE1UXABYFUs.pdf

Original File Name: Energy Solutions AB32_scoping plan comment.pdf

Date and Time Comment Was Submitted: 2013-08-02 18:18:24

No Duplicates.

Comment 32 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Michael
Last Name: Bullock
Email Address: mike_bullock@earthlink.net
Affiliation:

Subject: 2013 AB 32 Scoping Plan Update
Comment:

Cars and light-duty trucks must support climate stabilization. Based on Dr. James Hansen's latest writings, the stabilization trajectory must reach 80% below 1990 levels about 20 years sooner than S-3-05's year of 2050. In other words, this sector, like all other significant sectors, must reach 80% below 1990 levels by 2030, NOT 2050.

The attached work which is based on the best estimates back in 2008. More specifically, it is based on the work of Steve Winkelman and S-3-05. It shows a need to drop net driving by 15% and per-capita driving by 35.1%, by year 2035. The good news is that cars will be much more efficient by 2035 than Steve Winkelman's estimates. However, the bad news overwhelms the good news. The bad news is that S-3-05 is not even close to being sufficient. Doing the updated calculation, using the updated car efficiency and the updated stabilization trajectory, the driving reductions needed by 2035 will be even less than the old results, as stated above.

Please take an interest in human survival and science. Call me at 760-754-8025 and I will show you my latest calculations, which are based in CAFE standards from 2010 to 2025 and a generous assumption of how they will change from 2025 to 2035 (2.5 MPG per year improvement)to estimate the average efficiency of cars and light-duty trucks in California in 2035, compared to year 2005. I used a 15 year car wear out and therefore I divided vehicles into 15 different age categories, from first year to 15th year.

Given the steep reductions in driving that will be required, I have never-the-less had to come up with solutions that will meet the need.

There are two different 3-legged stools. The first is, as stated by Winkleman, clean cars, clean fuels, and less driving. The second is how to achieve the required amount of less driving: good transit, good development ("smart growth" and "complete streets"), and improving the way we pay for roads and car parking.

Please call me at 760-754-8025 so we can go over the solution and how these changes can be accomplished in time.

Doing less than what is needed, by having an insufficient Scoping Plan, will play a large role in destabilizing the climate. Destabilization is a significant negative environmental impact.

Therefore, the adoption of this Scoping Plan is a project, under CEQA law and therefore an EIR process is needed.

For the children,

Mike Bullock

Attachment: www.arb.ca.gov/lists/com-attach/36-2013-sp-update-ws-B2oHYFc4VHIBdFc0.doc

Original File Name: ManuscriptRTP2Court5.doc

Date and Time Comment Was Submitted: 2013-08-03 21:17:00

No Duplicates.

Comment 33 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Todd
Last Name: Jones
Email Address: todd@resource-solutions.org
Affiliation: Center for Resource Solutions

Subject: CRS Comments on 2013 Scoping Plan Update Workshop Series
Comment:

Dear Members of the Board,

Thank you for this opportunity to provide feedback on the regional public workshops for the 2013 Update to the AB 32 Scoping Plan. Our comments here are limited to the Energy Focus Area. We agree with the ARB that low-carbon generation, and specifically renewable generation should be prominent in the vision for 2050. Within this element of the vision and as a means to support the integration of renewable resources, we encourage the ARB to consider goals, objectives, and measures related to increasing voluntary demand for renewable energy in the state (where voluntary demand is renewable electricity use, voluntarily purchased and/or generated by residential, commercial and industrial customers, above and beyond what is required by the RPS). We encourage the ARB to think about what actions the state can take to incentivize voluntary action (for example, requiring utilities to offer green power options). We are happy to provide more thoughts.

Thank you,

Todd Jones
Center for Resource Solutions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 09:56:50

No Duplicates.

Comment 34 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Scott
Last Name: Elrod
Email Address: Scott.Elrod@parc.com
Affiliation: PARC

Subject: PARC Comments on Updated Scoping Plan
Comment:

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Attached are PARC's comments on the Updated Scoping Plan.
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Attachment: www.arb.ca.gov/lists/com-attach/38-2013-sp-update-ws-WjkGYVUmUGFRCAFy.pdf

Original File Name: CARB Scoping Plan Comment Letter_PARC.pdf

Date and Time Comment Was Submitted: 2013-08-05 10:06:15

No Duplicates.

Comment 35 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Edward
Last Name: Mainland
Email Address: emainland@comcast.net
Affiliation: Sierra Club California

Subject: Sierra Club's Questions on AB32 Scoping Plan Update
Comment:

Questions Sierra Club would like answered in the AB 32 Scoping Plan Update

Overview
1. Higher goals. Will CARB consider leading the call for higher and faster state greenhouse-gas (GHG) reduction goals and renewables targets in view of new science that shows global climate disruption moving much faster than expected? Sierra Club has urged, for example, a 50-percent RPS by 2030 and an 80-percent GHG reduction considerably sooner than 2050. See Sierra Club's letter to CARB July 12, 2013, making the case for new targets; the Governor has cited a need for a 40-percent RPS goal; leading climate scientists have called for an global 80-percent GHG reduction by 2030.
2. Near-term Threat. How will CARB give more urgent attention to reducing short-lived, non-CO2 greenhouse gases like methane, nitrous oxides, tropospheric ozone, black carbon and soot, CFCs and hydrofluorocarbons like HFC134A, which collectively have been shown to cause more near-term forcing than CO2. See UNEP's 2011 report, Near-term Climate Protection and Clean Air Benefits. Will CARB include these UNEP recomendations in the scoping plan update? (See www.unep.org/pdf/Near_Term_Climate_Protection_&_Air_Benefits.pdf.)
3. Target anomalies. How does CARB intend to deal with the fact that the state's targeted rate of GHG decline from 2010 to 2020 is slower than the rate needed from 2020 to 2050? How can CARB demonstrate 2035 GHG targets CARB set for SB 375 are consistent with meeting the state's 2050 GHG goal? When will CARB revise AB 375 GHG targets for all MPOs? How will CARB deal with 2035 SB 375 targets apparently being less than what would be needed for cars and light-duty trucks to support the GHG trajectory in Governor's Executive Order's S-3-05?
Energy
4. No More Excess Natural Gas. How does CARB justify the fact that investors expect natural gas plants to have a 40-year life, which means that plants coming on line in 2014 will be expected to be operational in 2055, when the state will have had to electricity GHG emissions to zero to meet S-3-05, since other sources, such as transportation, may still be producing GHGs? When will CARB stipulate that no more new natural gas plants need be approved or built in the state, given that CA already has a huge and growing natural-gas generation-plant surplus and that a variety of new alternatives now exist to sustainably integrate and back up coming intermittent renewable resources without more natural gas? How

will CARB highlight scoping-wise the loss of San Onofre low-carbon nuclear electricity as a major opportunity to get replacement power NOT from fossil fuels (which would be a serious setback to state GHG goals) but, utilizing a higher RPS target, from renewables, efficiency and conservation?

5. Fresh Look at Alternatives. How will CARB take the lead in calling for a fresh, in-depth look at new, rapidly developing alternatives to natural gas back-up, for example, through an ad hoc interagency task force combined with scientific and technical advice from appropriate independent experts? Particularly salient among a variety of newly economically competitive and interestingly sustainable technologies are fresh battery storage modalities, including battery storage with new distributed solar PV, retrofitting existing solar and wind energy with storage, implementing new smart inverter standards, bringing on-line more environmentally acceptable pumped hydro storage capacity, more baseload geothermal, better grid management, scaled-up demand response, and so forth.

6. Barriers and Blockages. How will CARB stipulate that the state's new renewables should be linked to regional and local capacity needs? Will CARB lend more momentum in its AB 32 scoping update to eliminating the current blockages and barriers to interconnectivity of distributed renewables? Will CARB highlight the need to reduce "soft costs" and especially permitting at the municipal level in distributed solar PV installation? Will CARB emphasize standardization and promptitude in permitting and interconnectivity? How will CARB's AB 32 scoping update act to help resolve bureaucratic and legal indecision over where jurisdictional and operational responsibility lies for implementing robust state demand response implementation?

7. Feed-in Tariffs. Will CARB recommend an integrated, comprehensive feed-in tariff (FiT) program for the state? FiTs have been demonstrated in many countries and localities as a main driver for accelerated penetration of solar power and other renewables. Much if not most of solar power growth abroad has been due to FiTs.

8. Zero-Net Energy. Will CARB help move up the dates by which all new residences and commercial buildings built are zero-net-energy? How will CARB help accelerate the state's efficiency retrofit program for existing structures? Will the AB 32 scoping update highlight the City of Lancaster's "all solar" requirement for new buildings and promote it for statewide adoption?

9. Methane Problems. Why are no DOGGR (Department of Conservation) representatives included in the list of agencies involved in the AB 32 scoping update? Is not methane leakage from natural gas fracking, production, transport and delivery a significant and under-documented GHG source? How does CARB intend to spur proper measurement and correction of fugitive methane leakage? What will CARB be doing to help address the problem of methane leakage "behind the meter" through home-performance testing and time-of-sale PACE-type programs? What about the carbon intensity of fracked oil, much higher than conventional oil, as a significant GHG problem as yet unaddressed? Should not CARB require that Air Districts measure, tabulate and publicize methane emissions?

Waste

10. Ban Landfill Organics. Why does the waste sector of the Scoping Plan only forecast 25% reduction by 2050 when technology exists now to divert almost all organics, plus using anaerobic digestion for the remainder, thus eliminating all future methane from landfills? Can CARB require elimination of legacy methane emissions from existing landfills by well-maintained synthetic covers?

11. Landfill Methane. When are CARB and other state regulators going to include fugitive methane emissions from landfills in the carbon footprint of landfill gas for LCFS standard and other rules? Why should landfill gas-to-energy be qualified for renewable credits when, as Sierra Club analysis and research contends, most LFGTE operations are likely to cause more rather than fewer net methane emissions?

Agriculture

12. Organic Farming. Why does the agriculture section of CARB's scoping not indicate the value of organic farming for reducing climate change compared to conventional agriculture? Can the AB 32 scoping update highlight Marin Carbon Project's findings that composting agricultural lands materially increases carbon storage there (while also keeping organics out of methane-producing landfills and enriching depleted soils)?

Transportation

13. Soot. Does CARB's scoping properly highlight the huge climate and health co-benefits of eliminating diesel soot immediately by eliminating all older diesels, both on and off road?

14. Pricing. What will CARB be doing to remove barriers to emphasize the need for appropriate pricing mechanisms for parking and road use, increased investment in mass transit, and electrification of transportation?

15. Diesel versus CNG. What will CARB do to bring more clarity and scientific veracity to the debate about the comparative virtues or drawbacks of advanced diesel versus CNG vehicles? The recent 2012 report by MJB&A Strategic Environmental Consulting indicates, using the latest methane GWP, CNG vehicles have equivalent GHG emissions over 100 years and 31% higher GHG emissions over the next crucial 20 years. (See "Clean Diesel vs. CNG Buses: Cost, Air Quality and Climate Impacts", February 22, 2012, MJB&A, Concord, MA, 603-647-5746.)

16. Electrification. Will the AB 32 scoping update re-emphasize the broadly supported GHG strategy and benefits of electrifying (beyond fossil fuels) most transportation modes as soon as possible?

17. Highways. Can CARB underline the GHG reasons why highway widening must stop and CALTRANS' endemic preference for highway expansion give way to GHG-sustainable modes including mass transit and others? Can CARB help force CALTRANS to actually use it "smart planning framework", heretofore neglected, such as the Highway 5 widening included in the San Diego RTP, which was litigated by California's Attorney General, and which has been rejected by the court as inconsistent with S-3-05?

Water

18. On-bill Financing. Can CARB's Scoping Plan's specific recommendations include on-bill financing for end-use water efficiency? Studies in Sonoma Country have documented the sizeable impact on water conservation and related GHG reduction when new quantities of modern, water-saving appliances are financed in a PACE-like equivalent.

Natural Lands

19. Natural Lands GHG Capture. Sierra Club applauds CARB's inclusion of the role of natural landscapes, vegetation and ecosystems as an asset in carbon reduction. What can CARB do more to ensure existing data are properly aggregated and tabulated to properly document carbon sequestration of natural lands and the value of conserving them? As a basis for offsets, however, considerable caution should of course be exercised.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 10:28:07

No Duplicates.

Comment 36 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jody
Last Name: London
Email Address: jody_london_consulting@earthlink.net
Affiliation: Local Gov't Sustainable Energy Coalition

Subject: LGSEC Comments RE AB 32 Scoping Plan Update
Comment:

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Attached please find the comments of the Local Government
Sustainable Energy Coalition to the Air Resources Board Regarding
the AB 32 Scoping Plan update.
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Attachment: www.arb.ca.gov/lists/com-attach/40-2013-sp-update-ws-VmRUYldnWTkGXwU1.pdf

Original File Name: 2013_08_05 LGSEC Comments re CARB Scoping Plan Update - final.pdf

Date and Time Comment Was Submitted: 2013-08-05 10:22:42

No Duplicates.

Comment 37 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Kenneth
Last Name: Berlin
Email Address: kenneth.berlin@skadden.com
Affiliation: The Coalition for Green Capital

Subject: Comments on the 2013 Scoping Plan Update
Comment:

```
On behalf of the Coalition for Green Capital, please accept the
attached comments on the Air Resources Board's 2013 Scoping Plan
Update.

Respectfully submitted,
Kenneth Berlin
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Attachment: www.arb.ca.gov/lists/com-attach/41-2013-sp-update-ws-BmUCY1U3BQkAZQhn.pdf

Original File Name: CGC Comments on 2013 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-08-05 11:21:05

No Duplicates.

Comment 38 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Tito
Last Name: Sasaki
Email Address: tito@att.net
Affiliation: Sonoma County Farm Bureau

Subject: Agriculture: Net GHG Emissions and Incentives for Negative Emissions
Comment:

For the 2013 Update, ARB has chosen six focused sectors: Energy, Transportation, Agriculture, Water, Waste, and Natural Lands. Attention is focused on reducing the source emissions in each sector. It acknowledges, though, the carbon sequestration functions of Natural Lands and grazing lands as the sequestrations on these lands occur as natural phenomena.

The marginal cost of reducing the source emissions will escalate as we come closer to achieving the AB32 goal. Instead of throwing money to the diminishing returns, we should redirect some of our resources to increasing "negative emissions" (i.e., sequestration or conversion of GHG) so that the NET emission may be reduced to the goal values without weakening the economy. The current Offsets system is not aggressive enough for this purpose.

The Agriculture sector is uniquely fit for innovative "negative emissions" particularly on croplands. Known examples are biochar and cover crops. Even just growing plants, as farmers have always been doing, is already providing a substantial amount of negative emissions. In order for Agriculture to play a pivotal role in AB32, farmers need proper incentives.

The first step would be that the ARB refines the techniques of measuring or estimating the source emissions and negative emissions in Agriculture. ARB could also develop, in collaboration with the Farm Bureau and UC, new methods of GHG capturing or conversion, and help farmers to adopt them.

If a farmer knows how he is faring on his emissions, and also if he knows all available options for source emission reduction and negative emission enhancement, he can then make his own best investment decisions to further reduce his net emission. This is a much preferred approach than the ARB coming with heavy-handed mandates on source emissions as if there were no offsetting negative emissions.

We farmers will continue improving the efficiency of producing food and fiber and contributing to a healthier environment. Our contribution to the net reduction of GHG will depend on ARB's providing us with more comprehensive and accurate scientific data, and giving us incentives to mobilize our resources for further reducing the net emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 11:12:07

No Duplicates.

Comment 39 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Amber
Last Name: Riesenhuber
Email Address: amber@iepa.com
Affiliation: IEP

Subject: IEP Comments on AB 32 Update to Scoping Plan
Comment:

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IEP Comments on AB 32 Update to Scoping Plan
```

Attachment: www.arb.ca.gov/lists/com-attach/43-2013-sp-update-ws-Bm8HZFQlAg4GYwhn.pdf

Original File Name: IEP Comments on the Update to the AB 32 Scoping Plan August 2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 12:07:01

No Duplicates.

Comment 40 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Mike
Last Name: Hart
Email Address: info@sierraenergycorp.com
Affiliation: Sierra Enegy

Subject: Scoping Plan Update Comments from Sierra Energy
Comment:

```
Attached are comments from Sierra Energy regarding the
2013 Scoping Plan Update.
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Attachment: www.arb.ca.gov/lists/com-attach/44-2013-sp-update-ws-UiFWOVE1VncKflU0.pdf

Original File Name: SierraEnergyComments.pdf

Date and Time Comment Was Submitted: 2013-08-05 12:20:26

No Duplicates.

Comment 41 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Sarah
Last Name: Deslauriers
Email Address: SDeslauriers@carollo.com
Affiliation: CA Wastewater Climate Change Group

Subject: Comments on the 2013 Update to the Scoping Plan Kickoff Workshop
Comment:

```
The California Wastewater Climate Change Group (CWCCG) appreciates
the opportunity to comment on the 2013 Update to the AB 32 Scoping
Plan Kickoff Workshop presentation. We have attached a letter
summarizing our comments for your consideration. Please contact me
if you have any questions at (925) 705-6404 or
sdeslauriers@carollo.com. We welcome the opportunity to further
discuss the wastewater community’s position.

Regards,

Sarah A. Deslauriers
Program Manager
California Wastewater Climate Change Group
```

Attachment: www.arb.ca.gov/lists/com-attach/45-2013-sp-update-ws-WzhQIVAyBzcAYVIN.pdf

Original File Name: CWCCG_AB 32 2013 Scoping Plan Update Kickoff Workshop Comments FINAL.pdf

Date and Time Comment Was Submitted: 2013-08-05 12:25:13

No Duplicates.

Comment 42 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Catherine
Last Name: Reheis Boyd
Email Address: joey@wspa.org
Affiliation: WSPA

Subject: WSPA Update to AB 32 Scoping Plan
Comment:

```
Please see attached Western States Petroleum Association Update to
AB 32 Scoping Plan.

Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/46-2013-sp-update-ws-UyRXIgd2UmAGX1Qh.pdf

Original File Name: WSPA Update to AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-08-05 12:58:04

No Duplicates.

Comment 43 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: David
Last Name: McCoard
Email Address: dmccoard@hotmail.com
Affiliation:

Subject: Energy: lack of need for new natural gas-fueled generation
Comment:

Regarding energy: There is no need for new natural gas-fueled power plants. CAISO's capacity curves are constistently far above demand now. As sources of renewable energy continue to quickly be added to the state's energy supply, existing natural gas plants will be less and less needed.

As an example, at 1:30 p.m. this afternoon (August 5, 2013), CAISO's real-time supply and demand display http://www.caiso.com/outlook/SystemStatus.html shows actual demand of 3,300 MW and a peak forecast for later this afternoon of 3,500 MW. This while the forecast high temperatures for Fresno and Bakersfield are 98 degrees farenheit. Available resources at 1:30 are 4,300 MW. This shows a huge excess of resources without building new natural gas plants.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 13:24:10

No Duplicates.

Comment 44 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Shalini
Last Name: Swaroop
Email Address: sswaroop@marinenergy.com
Affiliation: Marin Energy Authority

Subject: MEA Comments on AB 32 Scoping Plan Update
Comment:

```
Attached are MEA's comments on the Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/48-2013-sp-update-ws-UGAAPlZ6VzQBMgAt.pdf

Original File Name: 08-05-13 MEA Comments on CARB Scoping Plan Update FINAL.pdf

Date and Time Comment Was Submitted: 2013-08-05 14:04:19

No Duplicates.

Comment 45 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Neil
Last Name: Edgar
Email Address: neil@edgarinc.org
Affiliation: California Compost Coalition

Subject: Comments on Waste Management Sector Technical Papers
Comment:

```
Please find our comments attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/51-2013-sp-update-ws-WzoGYgBeUTEDN1IN.zip

Original File Name: AB 32 Scoping Plan.zip

Date and Time Comment Was Submitted: 2013-08-05 15:22:35

No Duplicates.

Comment 46 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jim
Last Name: Branham
Email Address: jbranham@sierranevada.ca.gov
Affiliation: Sierra Nevada Conservancy

Subject: Comments on AB32 Scoping Plan Update for 2013
Comment:

```
Attached please find Sierra Nevada Conservancy comments on the AB32
Scoping Plan Update for 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/52-2013-sp-update-ws-UmpQewczVihVYVBg.pdf

Original File Name: 8-5-2013-SNCCommentson2013UpdatetoAB32ScopingPlan.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:00:10

No Duplicates.

Comment 47 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: David
Last Name: McCoard
Email Address: dmccoard@hotmail.com
Affiliation:

Subject: Energy: lack of need for new natural gas-fueled generation - corrected
Comment:

```
Regarding energy: There is no need for new natural gas-fueled
power
plants. CAISO's capacity curves are consistently far above demand
now. As sources of renewable energy continue to quickly be added to
the state's energy supply, existing natural gas plants will be less
and less needed.

As an example, at 1:30 p.m. this afternoon (August 5, 2013),
CAISO's real-time supply and demand display
http://www.caiso.com/outlook/SystemStatus.html shows actual demand
of 33,000 MW and a peak forecast for later this afternoon of 35,000
MW. This while the forecast high temperatures for Fresno and
Bakersfield are 98 degrees farenheit. Available resources at 1:30
are 43,000 MW. This shows a huge excess of resources without
building new natural gas plants.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 15:23:11

No Duplicates.

Comment 48 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Claire
Last Name: Halbrook
Email Address: cehu@pge.com
Affiliation: PG&E

Subject: PG&E Comments on Scoping Plan Workshop
Comment:

```
Attached are PG&E's comments on the Scoping Plan workshops.
```

Attachment: www.arb.ca.gov/lists/com-attach/55-2013-sp-update-ws-VSUAYVYIADYBWFUm.pdf

Original File Name: PG&E Scoping Plan Workshop Comments.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:31:08

No Duplicates.

Comment 49 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Evan
Last Name: Edgar
Email Address: evan@edgarinc.org
Affiliation: California Refuse Recycling Council

Subject: Comments on the 2013 Scoping Plan Update and Waste Management Sector Technical Papers
Comment:

```
Please find our comments attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/56-2013-sp-update-ws-VTRTNwRaWTkANFQL.zip

Original File Name: AB 32 Scoping Plan.zip

Date and Time Comment Was Submitted: 2013-08-05 15:26:06

No Duplicates.

Comment 50 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jim
Last Name: Croyle
Email Address: JCroyle@scsenergyllc.com
Affiliation: Hydrogen Energy California

Subject: HECA Comments on CCUS in the 2013 Scoping Plan
Comment:

```
Attached is HECA's comments on the Update Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/57-2013-sp-update-ws-WzNWNQFjAzFQCVQh.pdf

Original File Name: HECA Updated Scoping Plan Comments 8-5-13.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:31:12

No Duplicates.

Comment 51 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Robert
Last Name: Lucas
Email Address: bob.lucas@calobby.com
Affiliation: CCEEB

Subject: Comments to 2013 Scoping Plan Update
Comment:

```
CCEEB comments to Scoping Plan
```

Attachment: www.arb.ca.gov/lists/com-attach/58-2013-sp-update-ws-BmVVMFM3VGJSNgNc.pdf

Original File Name: CCEEB Comments to 2013 Update to Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:32:04

No Duplicates.

Comment 52 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Amy
Last Name: Mmagu
Email Address: amy.mmagu@calchamber.com
Affiliation: CalChamber

Subject: 2013 Scoping Plan Update Comments
Comment:

```
Attached are the CalChamber's comments for the 2013 Scoping Plan
update.
```

Attachment: www.arb.ca.gov/lists/com-attach/59-2013-sp-update-ws-VDdcOwFsAzNWOANi.pdf

Original File Name: CalChamber CARB Scoping Plan Update Comments Aug 2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:42:06

No Duplicates.

Comment 53 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Randy
Last Name: Moore
Email Address: rmoore@fs.fed.us
Affiliation: US Forest Service

Subject: 2013 Update, AB 32 Scoping Plan (2013-SP-UPDATE-WS)
Comment:

```
Please accept the attached comment letter from the Regional
Forester, Pacific Southwest Region, US Forest Service.
```

Attachment: www.arb.ca.gov/lists/com-attach/60-2013-sp-update-ws-ViMAdQBnUnICWwFt.doc

Original File Name: usfs_letter_8-5-13.doc

Date and Time Comment Was Submitted: 2013-08-05 15:42:22

No Duplicates.

Comment 54 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Mark
Last Name: Fenstermaker
Email Address: mark@csgcalifornia.com
Affiliation: Conservation Strategy Group

Subject: The Role of Local Governments in Meeting our 2050 Climate Goals
Comment:

```
Please see the attached Local Government Coalition's comment letter
on the AB 32 Scoping Plan update.
```

Attachment: www.arb.ca.gov/lists/com-attach/61-2013-sp-update-ws-VDgGbwdlUWMKYFAP.pdf

Original File Name: Local Gov Scoping Plan Update Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:55:10

No Duplicates.

Comment 55 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Julie
Last Name: Allingham
Email Address: julie.allingham@gmail.com
Affiliation: Environmental Entrepreneurs (E2)

Subject: E2 Comments on Updated Scoping Plan
Comment:

```
Attached please find the comments of Environmental Entrepreneurs
(E2) to the Air Resources Board regarding the 2013 AB 32 Scoping
Plan update.
```

Attachment: www.arb.ca.gov/lists/com-attach/62-2013-sp-update-ws-UTQBNV0DADBROFQ5.pdf

Original File Name: E2 Comments - AB 32 2013 Scoping.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:00:44

No Duplicates.

Comment 56 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Catherine
Last Name: Dunwoody
Email Address: cdunwoody@cafcp.org
Affiliation: California Fuel Cell Partnership

Subject: Zero-emission fuel cell electric buses in California
Comment:

```
Please consider the CaFCP's fuel cell electric bus roadmap document
in the scoping plan.

http://cafcp.org/carsandbuses/busroadmap for general information

http://cafcp.org/sites/default/modules/pubdlcnt/pubdlcnt.php?file=/sites/files
/A_Roadmap_for_Fuel_Cell_Electric_Buses_in_California_FINAL.pdf&nid=2248
for the roadmap
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 16:04:24

No Duplicates.

Comment 57 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jeffrey
Last Name: Creque
Email Address: jacreque@sonic.net
Affiliation: Carbon Cycle Institute

Subject: Comments on Scoping Plan
Comment:

```
Folder attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/64-2013-sp-update-ws-AWxTNl0sWCYBZFdh.zip

Original File Name: MCP-C6 Scoping Comments.zip

Date and Time Comment Was Submitted: 2013-08-05 16:05:21

No Duplicates.

Comment 58 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Casey
Last Name: Creamer
Email Address: casey@ccgga.org
Affiliation: Ag Coalition

Subject: Update to Scoping Plan
Comment:

```
Please accept the attached comments submitted by a consortium of
agriculture interests and thank you for the opportunity to comment
on this important issue.
```

Attachment: www.arb.ca.gov/lists/com-attach/65-2013-sp-update-ws-ViUAZVI8BCdWOQRq.pdf

Original File Name: Scoping Plan Comments 8.5.13.pdf

Date and Time Comment Was Submitted: 2013-08-05 15:54:32

No Duplicates.

Comment 59 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Alexandria
Last Name: Shahabian
Email Address: alexandria@vjohnwhite.com
Affiliation: CEERT

Subject: CEERT comments to ARB Scoping Plan 8 5 2013
Comment:

August 5, 2013

Mr. Mike Tollstrup
California Air Resources Board
State Environmental Protection Agency
Sacramento, CA 95814

RE: Comments on the California Air Resources Board (CARB) 2013 Update to AB 32 Scoping Plan

Dear Mr. Tollstrup:
The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to provide these comments regarding the California Air Resources Board's (ARB) 2013 Update to the AB 32 Scoping Plan. The 2013 AB 32 Scoping Plan begins to set the stage for the post-2020 greenhouse gas (GHG) reduction plan for California.
In order to accelerate the implementation of strategies to achieve targets of the previous scoping plan, and to set California on a course to achieve the much deeper reductions in GHG emissions needed by 2050, CEERT recommends the following six actions:

1) Methane, black carbon and other short-lived pollutants. AB 32 called for CARB to develop a plan to reduce black carbon and other short-lived climate pollutants (SLCPs). These actions, which could have an immediate effect in reducing global warming and improving air quality, have not been developed or publicly presented. CARB should work with local air pollution districts to define and implement a regulatory plan to reduce emissions of SLCPs, which would complement the state's plan for reducing emissions of CO2. This plan should include:
a. Appointing a scientific advisory panel on SLCPs to ensure accurate metrics and assumptions upon which to base SLCP-reducing measures. Independent scientific experts from Scripps, Stanford, the University of California , and around the world are conducting crucial scientific research and applied studies, which should guide CARB in developing its regulatory strategy for SLCPs.

b. Work with air pollution control districts to develop, adopt, and enforce rules on stationary and fugitive sources of methane and

black carbon, and enforce control measures and monitoring practices to reduce SLCPs, including the following:

i. Designating methane as an ozone precursor and measuring emissions at oil and gas operations.

ii. Installing methane digesters and capture systems and collecting slash and other debris from forest and agricultural waste.

iii. Further reducing emissions from existing on and off road diesels; requiring pellet- or catalyst-equipped burning on stoves and fireplaces; and accelerate the phase out of agricultural burning, diverting these wastes to cleaner biomass energy plants.

iv. Working with CalRecycle to implement regulations to greatly reduce landfill methane emissions by limiting leakage, capturing and converting methane into near zero distributed clean energy uses, and reducing the amount of organic material entering landfills.

v. Prohibiting HCF-134a leaks, requiring reprocessing, switching refrigerants, and capturing “banked” gases from automotive and appliance air conditioning and refrigeration.

The following graph from the UNEP 2011 Assessment (Drew Shindell et al) shows the importance of SCLP reductions for lessening global warming in the near term.

2) The need to minimize GHG emission when replacing electric energy previously provided by San Onofre Nuclear Generating Station (SONGS). The permanent shut down of SONGS, when combined with the pending retirement of once through cooling plants on the coast, will result in substantial need for replacement power. There is also significant uncertainty regarding the long term operation of Diablo Canyon nuclear plant near San Luis Obispo, and contingency planning for its possible retirement should begin now.

In these circumstances, every effort should be made to ensure that any “replacement resources” procured by the utilities minimize or reduce GHG emissions. An important distinction should be made between replacement of local capacity needs and energy previously provided by retiring power plants. Local capacity provides the ability to provide local grid support during rare emergencies. Facilities providing replacement energy need not all be local and, when producing energy, should have low GHG emissions (from zero and near-zero to significant GHG emissions). For example, to replace SONGS, the local capacity requirements are likely to be in the 300 MW range, which requires quick start-up in key locations. SONGS energy replacement would likely be in the 2,000 MW range from any location.

It is important that the portfolio of sources of replacement power not result in significant increases in GHG emissions or a substantial increase in California’s already significant dependence on natural gas, which currently provides more than 60% of the state’s electricity in net dependable capacity. This is essential, given the wide range of uncertainty regarding the actual life cycle emissions of natural gas, and the climate forcing potential of methane.

Demand response, energy efficiency, clean distributed generation, renewables, transmission expansions, and sharing resources with municipal utilities should be the primary sources of replacement power. Advanced, high efficiency, quick start, fast ramp natural gas plants should provide needed capacity but be designed and allowed to operate only when preferred resources are not available.

3) Setting Medium and Long Term Clean Energy Targets. California is well on its way to producing 33% of its energy from wind, solar thermal, photovoltaic, and geothermal renewable energy by 2020. However, California must not lose momentum in reducing dependence on fossil fuels after the 2020 deadline of AB 32. We must evaluate the successes and failures of the RPS procurement system and determine what changes are needed to move toward greater reliance on energy efficiency, renewables, and other low-carbon resources and technologies. Recent analyses by grid operators and energy agencies suggest that increasing penetration of renewables must be undertaken with greater attention to load balancing, geographic diversity, and a diverse renewable portfolio. Out of state wind and solar and Imperial Valley geothermal can make large contributions to system balancing, given the geographic diversity of their output. California must look regionally in order to balance the system with least emissions.

AB 177 by Assembly Member Manuel Perez is currently pending before the State Legislature and would establish an integrated planning and procurement policy for the electric sector, based on the simultaneous achievement of renewables, reliability, and GHG goals, with an interim renewables target of 51% by 2030 and a long term GHG target for 2050, as determined by the ARB.

In order to provide long term direction to California's energy infrastructure toward sustained, orderly reductions in GHG emissions, utilities should be required to achieve a target of 51% of its electricity from renewable or zero carbon energy sources by 2030. CARB, working with the CEC, CPUC, and CAISO, should conduct analyses to determine appropriate goals for 2040 and 2050. These goals must be in place soon in order to plan for and achieve them.

4) Energy efficiency and Demand Response. We must greatly expand targeted energy efficiency, demand response, and clean distributed generation as the core strategy for meeting the load balancing needs of California's electric grid. If California is to successfully achieve greater reductions in greenhouse gas emissions and sustained, orderly expansion of clean energy, we must tear down the silos of energy planning and procurement and recognize the linkages between greenhouse gas emissions, renewables, reliability, and affordability, and adopt policies and planning to achieve these goals simultaneously.

5) Extending energy efficiency measures through building/appliance programs.. California should consider setting up an Energy Efficiency Utility as a state-chartered, non-profit corporation, as Vermont and Delaware have done, in order to achieve higher levels of energy savings in every region of the state at lower cost. This corporation could be organized by county, building on new/existing Regional Energy Efficiency Networks such as CCSE in San Diego. Similarly, Sonoma County is actively considering setting up a non-profit corporation to pursue EE savings in the region.

Zero or near-zero carbon distributed generation needs a policy framework to guide evolution of intelligent local networks. Such a framework could start with: a) principles for Open Access to the distribution system; and b) rate restructuring and time of use pricing, with a distribution charge to pay for upgrading and maintaining more capable local grids. An all-technology feed-in tariff tied to GHG reductions should also be considered.

6) Reducing Existing CO2. California should begin developing plans and mechanisms for reducing and ultimately eliminating carbon dioxide from the ambient air and water.

Attachment: www.arb.ca.gov/lists/com-attach/66-2013-sp-update-ws-AGZQP1U6VmQEbgVa.doc

Original File Name: Final draft ARB Scoping Plan Comments 320 pm 8 5 2013 DrF final SONGS.doc

Date and Time Comment Was Submitted: 2013-08-05 15:26:30

No Duplicates.

Comment 60 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Michelle
Last Name: Passero
Email Address: mpassero@tnc.org
Affiliation:

Subject: Joint comments on natural and working lands section
Comment:

```
Please accept the following recommendations for the Scoping Plan
update from The Nature Conservancy, The Pacific Forest Trust,
California ReLeaf, Trust for Public Land and California Climate and
Agriculture Network.
```

Attachment: www.arb.ca.gov/lists/com-attach/67-2013-sp-update-ws-AW9WJ1c6AyMBZARr.pdf

Original File Name: NWLScopingPlanGroupCommentsfinal08_05_13.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:08:25

No Duplicates.

Comment 61 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Christopher
Last Name: Busch
Email Address: chrisb@energyinnovation.org
Affiliation: Energy Innovation LLC

Subject: comments for Scoping Plan Update
Comment:

```
Please find attached the comments submitted by Energy Innovation:
Policy and Technology LLC for consideration in the drafting of the
Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/68-2013-sp-update-ws-VDEAaFw4U3JQMQF4.pdf

Original File Name: Energy_Innovation_ScopingPlanUpdate_5_Aug_2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:27:05

No Duplicates.

Comment 62 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Joyce
Last Name: Dillard
Email Address: dillardjoyce@yahoo.com
Affiliation:

Subject: Comments to AB 32 Scoping Plan Update due 8.5.2013
Comment:

Attached

Attachment: www.arb.ca.gov/lists/com-attach/69-2013-sp-update-ws-WzhUPVQ4VmgEZ1c5.pdf

Original File Name: Comments to AB 32 Scoping Plan Update due 8.5.2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:26:49

No Duplicates.

Comment 63 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Pat
Last Name: Proano
Email Address: pproano@dpw.lacounty.gov
Affiliation: Los Angeles County Public Works Dept.

Subject: Conversion Technologies and the Scoping Plan
Comment:

```
Thank you for the opportunity to provide feedback. Attached are our
comments regarding 2013 Update to the AB 32 Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/70-2013-sp-update-ws-VyRXMgZoAiFSPQVr.pdf

Original File Name: Scoping Plan Comments_LA County.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:27:13

No Duplicates.

Comment 64 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Patrick
Last Name: Doherty
Email Address: pdoherty@pacificforest.org
Affiliation:

Subject: Scoping Plan Comment
Comment:

```
Please find PFT's written comments in the attached file.
```

Attachment: www.arb.ca.gov/lists/com-attach/71-2013-sp-update-ws-UCNUMVU7UHNWOVc5.pdf

Original File Name: Scoping Plan - PFT Only Comments.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:33:01

No Duplicates.

Comment 65 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Connie
Last Name: Gallippi
Email Address: cmgallippi@caufc.org
Affiliation: California Urban Forests Council

Subject: CaUFC Comments on AB 32 Scoping Plan 2013 Update
Comment:

```
Please see attached letter re: CaUFC Comments on AB 32 Scoping Plan
2013 Update, August 5, 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/72-2013-sp-update-ws-VyRWMwZoByQCbQNt.pdf

Original File Name: Scoping Plan Update Comment Letter CaUFC 8 5 13.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:27:07

No Duplicates.

Comment 66 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Susie
Last Name: Berlin
Email Address: berlin@susieberlinlaw.com
Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on Update to the Scoping Plan
Comment:

```
Attached please find comments from the Northern California Power
Agency (NCPA) on the 2013 Scoping Plan Update Workshop.
```

Attachment: www.arb.ca.gov/lists/com-attach/73-2013-sp-update-ws-Uz0CZwNyUWNSCwZl.pdf

Original File Name: NCPA comments re scoping plan update workshop (final 8-5-13).pdf

Date and Time Comment Was Submitted: 2013-08-05 16:37:00

No Duplicates.

Comment 67 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Theodore
Last Name: Hadzi-Antich
Email Address: tha@pacificlegal.org
Affiliation: Pacific Legal Foundation

Subject: Legal Requirements
Comment:

The 2013 Amendments to the 2008 Scoping Plan must comply with all applicable provisions of the California APA, including, but not by way of limitation, statutory progvisions governing assessment of economic impacts. These include Gov't Code Sections 11346.2(b)(6)(A), 11346.5(a0(8),11350(b)(2), 11346.5(a)(9), and 11346.3 (a). The Court of Appeal, in the case of California Assn. of Medicals Product Suppliers v. Maxwell-Jolly, 199 Cal. App. 4th 286 (2011) recently addressed those and related requirements, stating, among other things, that "[m]ere speculative belief is not sufficient to support an agency declaration of its initial detarmination about economic impact . . . ." Id at 305-306. Rather, "the agency must provide in the record any '"facts, evidence, documents, testimony, or other evidence"' upon which it relies for its initial determination." Id at 306. Moreover, "an agency specifcally must assess the potential adverse economic impact on California businesses and individuals of a proposed regulation and declare in the notice of proposed action any 'initial detarmination'" of the economic impact. Id.

It is abudantly clear that the post-2020 aspects of the 2013 Scoping Plan Amendments will have an enormnous adverse economic impact on California, its people, and its businesses. Accordingly, the proposed amendments must contain details and specifics regarding costs to California of the post 2020 goals, so that the public is provided a full opportunity to evaluate and comment on such impacts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 16:23:37

No Duplicates.

Comment 68 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: H. E. Christian (Chr
Last Name: Peeples
Email Address: cpeeples@actransit.org
Affiliation: Alameda-Contra Costa Transit District

Subject: 2013 Scoping Plan Update — Heavy Duty Fuel Cell Fleet Vehicles
Comment:

H. E. Christian (Chris) Peeples

At-Large Director
Alameda Contra-Costa Transit District

4037 Howe Street
Oakland, CA 94611-5211

(510) 851-0968, Fax: 658-1425
E-mail: chris_peeples@yahoo.com

5 August 2013

VIA E-MAI. TO: www.arb.ca.gov/cc/scopingplan/2013comments.htm

Chair Nichols and Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
P.O. Box 2815
Sacramento, CA 95812

Re.: 2013 Scoping Plan Update – Heavy Duty Fuel Cell Fleet Vehicles

Chair Nichols and Members Of The Board:

I am an elected at–large member of the Alameda–Contra Costa Transit District Board of Directors and am a member of the Sierra Club’s Energy and Climate Change subcommittee. These comments are, however, my own.

In your scoping plan update I urge you to take seriously the potential of heavy duty fuel cell fleet vehicles to dramatically reduce emissions of both criteria pollutants and GHGs in that segment.

As you know, at AC transit we have an extremely successful program operating 12 full-size 40 foot fuel-cell buses in daily revenue service. These are 24,000 pound vehicles that can operate 18 or 20 hours a day and be refueled in 15 min. They produce virtually zero emissions at the bus (a small amount of water vapor only) and dramatically lower emissions "well to wheel." We produce about 65 kg a day of hydrogen using solar cells (enough to fuel approximately 2 ½ buses) which generates zero GHGs. Even when producing hydrogen in the "dirtiest" fashion – high temperature steam reformation of natural gas – we produce 40% less GHG's then if we used the natural gas in an internal combustion engine.

Thus far, our fuel cell buses have proven to be quite reliable and dependable. Our longest – lasting fuel-cell has more than 13,000 hours on it and none of them, as of yet, have failed and needed to be rebuilt.

As you know, our numbers have been verified by the Department of Energy's National Renewable Energy laboratory ("NREL") (Links to the NREL reports and other information regarding our program are at:
http://www.actransit.org/environment/the-hyroad/archives-and-links/

During the joint Transportation and Energy Ministerial Conference held by the Asia-Pacific Economic Cooperation (APEC) in San Francisco in September of 2011 our fuel cell buses were pressed into service to take the ministers and their staffs from the ferry terminal in Alameda to a demonstration at FedEx at the Oakland airport. As part of that exhibition, there was a class 8 fuel cell drayage truck tractor from a small group of such tractors that are being used in the ports of Los Angeles and Long Beach. Although I have not read any reports that were verified by NREL, what I was told by the people at that demonstration was that they, also, had been quite successful.

The issue is high capital costs. All of these vehicles are produced in very small quantities with no benefit of mass production. The cost curve is, however, moving in the right direction. Our first 40 foot buses were approximately $3.2 million. The buses we have been running for the past four years were about $2.5 million. I am told that the latest equivalent buses that were delivered in Europe were about €900,000 (about $1.2 million). Both European and American manufacturers have said that $900,000-$1 million per vehicle is possible in quantity 100 (our last "buy" was from a quantity 16 production). I assume, without detailed knowledge, that the cost factors for trucks are in the same ballpark. That is moving in the right direction, but is still substantially more than the equivalent diesel bus.

Obviously, it will be a long time before there is infrastructure for either heavy duty or light duty hydrogen vehicles roaming America's highways. Nevertheless, there are a substantial number of vehicles that operate in fleets that come to a central fueling location regularly (urban buses, delivery trucks, port drayage trucks, etc.). In many cases, particularly with urban buses and delivery trucks and port drayage trucks, those vehicles operate in areas where there are high rates of criteria pollutants and thus there is a dual benefit of reduced criteria pollutants along with reduced GHG's. If appropriate funding can be found, those fuel cell fleet vehicles could begin to be used in significant numbers in the 2020 time-frame rather then later.

It would be important for your scoping plan to both mandate the increased use of the fuel-cell technology and to find a funding source for the additional capital expense that they represent.

If I can provide you with any further comments or information, please do not hesitate to contact me.

Very truly yours,

/ S /

H. E. Christian Peeples

Cc AC Transit Board Of Directors
AC Transit General Manager David J. Armijo
California Fuel Cell Partnership
Jaimie Levin, Senior Project Manager, Director West Coast Office, Center for Transportation and the Environment

HECP/win
[G: ip_Non_LglActCLN-FULH2_Fuel_Cellac-carb_scop_5Aug13.wpd]

[Not printed or mailed at District Expense. Statements not necessarily Board policy.]

Attachment: www.arb.ca.gov/lists/com-attach/75-2013-sp-update-ws-AmNRNF1xWWlRNgZ0.pdf

Original File Name: ac-carb_scop_5Aug13.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:36:46

No Duplicates.

Comment 69 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Lauren
Last Name: Michele
Email Address: lauren.michele@policyinmotion.com
Affiliation:

Subject: TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES COMMENTS AND PROPOSAL
Comment:

August 5, 2013

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Transportation Coalition Comments on AB 32 Scoping Plan Update

Dear Chairperson Nichols:

The Transportation Coalition for Livable Communities is a diverse coalition of agencies and institutions responsible for operating, maintaining, and advancing a sustainable transportation system in California. Our primary interest in this Scoping Plan Update is to ensure that transportation-related strategies contribute to significant and long-term greenhouse gas emission reductions. Building off key elements of the 2009 Scoping Plan, we strongly encourage the Board to consider the use of cap and trade revenues for regional transportation projects and programs that are coordinated with land use policies in order to achieve regional greenhouse gas emission reduction targets and to meet the state’s 2035 and 2050 goals.

Transportation is a key emitter of greenhouse gases, but no single strategy in this sector will achieve AB 32 goals. To reach the long-term goals of this Scoping Plan Update, the state will need to implement projects that improve the efficiency and connectivity of regional transportation systems. The best research indicates that investments in transportation infrastructure lead to greater emission reductions when coordinated with surrounding land use policies and services.

SB 375 has already created the framework from which we can work. Regional agencies have developed Sustainable Community Strategies to leverage coordinated transportation and land use strategies and meet long-term GHG reduction goals. Thus, investing auction revenues in regional strategies that link land use to improved transportation infrastructure will generate the long-term GHG reductions critical to meeting the Scoping Plan goals. By linking costs likely to be imposed on the motoring public to improvements

in the transportation system, our proposal aligns with broad public sentiment: the Public Policy Institute of California's July 2013 annual survey on the environment reports that over 70% of voters favor spending cap and trade revenues on public transit, repaving roads, and encouraging local governments to change land use and transportation planning so that people could drive less.

This approach is supported by members of the Transportation Coalition for Livable Communities, which includes the California Transit Association, League of California Cities, California State Association of Counties, Sacramento Metropolitan Air Quality Management District, CALCOG, and major Metropolitan Planning Organizations including SACOG, MTC, SCAG, SANDAG and San Joaquin Valley Policy Council, as well as the Natural Resources Defense Council, California Alliance for Jobs, and Transportation California.

Our uniting principle is that auction revenues derived from vehicle fuels should be used to fund emission reductions from the transportation sector. This should include integrated transportation investments that implement the AB 32 regulatory program and build on the framework of SB 375 and other GHG reduction strategies. The approach incentivizes combinations of transportation investments, including transit service and operating costs, road and bridge maintenance, retrofits for complete streets and urban greening, and clean technology infrastructure – all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

We believe an integrated strategy most equitably and effectively meets the transportation and greenhouse gas emission reduction goals of the state and local communities. Furthermore, this approach achieves the most cost-effective results and supports a range of community benefits including public health, resource protection, affordable housing, equity, air quality, safe routes to schools, and other community services.

In this Scoping Plan Update, we strongly support your consideration of cap and trade revenues as a key greenhouse gas emission reduction strategy for the transportation sector. Implementing strategies that integrate transportation and land use investments will be key in both meeting the state's 2050 goals and creating efficient and well-maintained transportation networks statewide. We urge you to consider the Transportation Coalition's proposal (attached) that was developed for the Investment Plan as part of your update to the Scoping Plan.

Sincerely,

TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES

STEERING COMMITTEE MEMBERS
- California Alliance for Jobs
- California Transit Association
- California State Association of Counties
- League of California Cities
- California Association of Councils of Governments

COALITION SUPPORT LIST
- Natural Resources Defense Council

- Sacramento Area Council of Governments
- Southern California Association of Governments
- Metropolitan Transportation Commission
- San Diego Association of Governments
- San Joaquin Valley Regional Policy Council
- Sacramento Metropolitan Air Quality Management District
- Environmental Defense Fund
- Transportation California
- Self-Help Counties Coalition
- American Lung Association in California
- American Planning Association - California Chapter
- American Council of Engineering Companies of California
- Alameda County Transportation Commission
- Association of Monterey Bay Area Governments
- Bay Area Council
- California Center for Sustainable Energy
- California Urban Forests Council
- Capitol Corridor Joint Powers Authority
- Central Coast Coalition
- City of Davis
- City of Sacramento
- Cobblestone Placemaking
- Council of San Benito County Governments
- County of Marin
- County of Monterey
- County of Napa
- County of Sacramento
- County of San Bernardino
- County of Santa Clara
- County of Stanislaus
- El Dorado County Transportation Commission
- Humboldt County Association of Governments
- Kern Council of Governments
- Livermore Amador Valley Transit Authority
- Local Government Commission
- Madera County Transportation Commission
- Marlon Boarnet, Director of Graduate Programs in Planning and Development, USC
- Merced County Association of Governments
- Met Sacramento High School
- Napa County Transportation and Planning Agency
- Napa Valley Transportation Authority
- OmniTrans - San Bernardino Valley
- Placer County Transportation Planning Agency
- Sonoma County Transportation Authority/Regional Climate Protection Authority
- Richmond SPOKES
- Sacramento 350
- Sacramento Tree Foundation
- San Francisco Bay Area Rapid Transit District
- San Francisco Municipal Transportation Authority
- San Luis Obispo Council of Governments
- San Mateo County Transit District
- Santa Barbara County Association of Governments
- Santa Clara Valley Transportation Authority
- Santa Cruz County Regional Transportation Commission
- Santa Cruz Metropolitan Transit District
- Santa Monica Big Blue Bus
- Shasta Regional Transportation Agency
- Sonoma County Bicycle Coalition
- Sustainable Napa County
- Teichert

- Transportation Agency for Monterey County
- United Contractors
- Urban Counties Caucus
- Victor Valley Transit Authority
- WALKSacramento
- Western Riverside Council of Governments

ELECTED OFFICIALS SUPPORT
- Steve Cohn, Councilmember, City of Sacramento
- Don Saylor, Supervisor, County of Yolo
- Joe Krovoza, Mayor, City of Davis

Attachment: www.arb.ca.gov/lists/com-attach/76-2013-sp-update-ws-WjtWIgRmVm0KZQRy.zip

Original File Name: Archive.zip

Date and Time Comment Was Submitted: 2013-08-05 16:13:46

No Duplicates.

Comment 70 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Kevin
Last Name: Bundy
Email Address: kbundy@biologicaldiversity.org
Affiliation: Center for Biological Diversity

Subject: 2013 Scoping Plan Update: Initial Comments
Comment:

```
Attached please find initial comments from the Center for
Biological Diversity regarding the 2013 AB 32 Scoping Plan Update.

Kevin Bundy
Center for Biological Diversity
```

Attachment: www.arb.ca.gov/lists/com-attach/77-2013-sp-update-ws-AmFTIVIhUV0GYgVs.pdf

Original File Name: Ctr Biological Diversity Scoping Plan Update Comments 20130805.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:43:44

No Duplicates.

Comment 71 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Reina
Last Name: Pereira
Email Address: reina.pereira@lacity.org
Affiliation:

Subject: Comments to 2013 AB 32 Scoping Plan Update
Comment:

```
Please find attached a comment letter from Mr. Javier Polanco,
Division Manager of Solid Resources Support Services Division,
Bureau of Sanitation, City of Los Angeles, regarding the 2013
Scoping Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/78-2013-sp-update-ws-WmhQZlBgVjZVDFIz.pdf

Original File Name: 2013 AB 32 Update_City of LA Comment Letter_080513.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:15:39

No Duplicates.

Comment 72 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Margaret
Last Name: Clark
Email Address: tsanders@dpw.lacounty.gov.
Affiliation: LA County Solid Waste Task Force

Subject: Comments on Proposed 2013 Update to AB 32 Scoping Plan
Comment:

```
Please see our comments in the attachment. Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/79-2013-sp-update-ws-UjMCZlYIUjJXYwZZ.pdf

Original File Name: AB 32 Scoping Plan 08-05-13.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:47:18

No Duplicates.

Comment 73 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Timothy
Last Name: OConnor
Email Address: toconnor@edf.org
Affiliation: Environmental Defense Fund

Subject: EDF Comments on AB 32 Scoping Plan Update
Comment:

```
Please see attached letter from EDF
```

Attachment: www.arb.ca.gov/lists/com-attach/80-2013-sp-update-ws-VDFRM1UyBAhXIghr.pdf

Original File Name: EDF Scoping Plan Comments - August 5 2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:52:09

No Duplicates.

Comment 74 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Harvey
Last Name: Eder
Email Address: harveyederpspc@yahoo.com
Affiliation: self and PSPC Public Solar Power Coaliti

Subject: 2005 Methane DC Buses Life of Vehicle/GHG Eder v.SCD Et. al. SC 119641,42,57 Jan 2013 see
Comment:

The record entire of Jan 4 and 7 2013 Eder v. SCAQMD et. al. SC 119641,41,57 cases are incorporated herein this SCoping Plan 5 year review by refer

From: Livingston, Cody@ARB
Sent: Thursday, August 12, 2010 11:18 AM
To: Harvey Eder
Subject: RE: Cody/Long Time No Talk HE

Hi Harvey:

My phone number: 916 324-0585

I believe the study you are referring to is at the following link, but let me know if it is not the right one:

http://www.nrel.gov/docs/fy06osti/36355.pdf

Cody

--

From: Harvey Eder [mailto:harveyederpspc@yahoo.com]
Sent: Wednesday, August 11, 2010 4:30 PM
To: Livingston, Cody@ARB
Cc: harveyederpspc@yahoo.com
Subject: Cody/Long Time No Talk HE

Cody,

I hope this is your email. Please send me your phone number and the link for the 2006 Washington D.C. Bus Natural Gas Methane Study.

Thanks, take care-Harvey

harveyederpspc@yahoo.com

(310)3932589

ence as a comment(s) in the record as well as all of Eders and PSPC and the Sierra Clubs submissions in the record for 2012 SCD AQMP as well as
http://www.nrel.gov/docs/fy06osfi/36355.pdf

Harvey Eder for self and for Pspc Public Solar Power Coalition
see ch4 page multiplier 33 , 72,105 8/5/13

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 16:44:17

No Duplicates.

Comment 75 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Charles
Last Name: Davidson
Email Address: charlesdavidson@me.com
Affiliation:

Subject: Hydrogen and GHG production Increases
Comment:

I believe that AB32 does not adequately address the increase in petroleum refinery GHGs that will increasingly be required, in the near future, to de-sulfur and lighten greater amounts of heavy/low API grade refinery feedstock.

The refinery-produced GHGs to needed to produce low sulfur fuels, transportation or refinery-destined, will be increased in refinery communities.

Much of the increase in GHGs will be for hydrogen production needed for de-sulfuration, hydro-cracking, et cetera.

A chronic or acute lack of ethanol will cause an significant increase in refinery GHGs in order to comply with AB32.

We need to more closely monitor refinery hydrogen production increases needed to meet clean fuel and clean air standards.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-05 16:41:45

No Duplicates.

Comment 76 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: William
Last Name: Westerfield
Email Address: WWester@smud.org
Affiliation: SMUD

Subject: SMUD Comments on 2013 Update to AB 32 Scoping Plan
Comment:

```
Attached please find Sacramento Municipal Utility District's
Comments on 2013 Update to AB 32 Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/85-2013-sp-update-ws-WzdXNFA2VihWYlNj.pdf

Original File Name: LEG-2013-0675-SMUD-Scoping-Comments.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:57:04

No Duplicates.

Comment 77 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Paige
Last Name: Brokaw
Email Address: paige@csgcalifornia.com
Affiliation: CALCC

Subject: California Association of Local Conservation Corps comments
Comment:

```
Please find attached comment from the California Association of
Local Conservation Corps for consideration of the 2013 Update of
the Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/86-2013-sp-update-ws-BWZRNgdqUmJSNwdY.pdf

Original File Name: CALCC 2013 Scoping Plan comments 8-5-13.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:47:59

No Duplicates.

Comment 78 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Nadine
Last Name: Peterson
Email Address: npeterson@scc.ca.gov
Affiliation: Coastal Conservancy

Subject: Comments on Scoping plan update
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/87-2013-sp-update-ws-WjkAaQNjWXkCcABh.pdf

Original File Name: COASTAL CONSERVANCY ab32 update.pdf

Date and Time Comment Was Submitted: 2013-08-05 17:01:16

No Duplicates.

Comment 79 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Scoping Plan Update Workshop
Comment:

```
Attached please find comments from the AB 32 Implementation Group
regarding the CARB Scoping Plan Update Workshop.
```

Attachment: www.arb.ca.gov/lists/com-attach/88-2013-sp-update-ws-UjRQPwdoVmQAagdY.pdf

Original File Name: FINAL SP COMMENTS -- AB 32 IG.pdf

Date and Time Comment Was Submitted: 2013-08-05 16:47:43

No Duplicates.

Comment 80 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Paige
Last Name: Brokaw
Email Address: paige@csgcalifornia.com
Affiliation:

Subject: Ocean Conservancy, NRDC, California Coastkeeper Alliance comments
Comment:

```
Please accept the attached comments on behalf of Ocean Conservancy,
Natural Resources Defense Council, and California Coastkeeper
Alliance regarding inclusion of coasts and oceans in the 2013
Update to the Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/90-2013-sp-update-ws-WjwGaQZpWGoKYFIN.pdf

Original File Name: FINAL ARB Scoping Plan Coast Ocean comments 8-5-13.pdf

Date and Time Comment Was Submitted: 2013-08-05 17:03:06

No Duplicates.

Comment 81 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Scoping Plan Update Workshop
Comment:

```
Attached please find comments from the AB 32 Implementation Group
regarding CARB's Scoping Plan Update Workshop(s).

Should you have any questions or need anything further, please feel
free to contact Shelly Sullivan at (916) 858-8686
```

Attachment: www.arb.ca.gov/lists/com-attach/92-2013-sp-update-ws-UzJTNwBeWTkEMFI7.pdf

Original File Name: AB 32IG SP Update Comments Packet_8_5_2013.pdf

Date and Time Comment Was Submitted: 2013-08-05 20:07:58

No Duplicates.

Comment 82 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Dan
Last Name: Noble
Email Address: danwyldernoble@gmail.com
Affiliation: Association of Compost Producers

Subject: AB 32 Scoping Plan Update Comment Letter
Comment:

```
Attached please find a comment letter from the Association of
Compost Producers.
Sincerely,
Dan Noble,
Executive Director
```

Attachment: www.arb.ca.gov/lists/com-attach/94-2013-sp-update-ws-AmFVPANvV2kKaVc5.pdf

Original File Name: Comment Ltr AB 32 Scoping Plan - ACP 8.8.13.pdf

Date and Time Comment Was Submitted: 2013-08-08 14:06:40

No Duplicates.

Comment 83 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Gary
Last Name: Gero
Email Address: gary@climateactionreserve.org
Affiliation: Climate Action Reserve

Subject: Comments on the 2013 Scoping Plan Update
Comment:

```
Thank you for this opportunity to submits comments on the Scoping
Plan Update.
```

Attachment: www.arb.ca.gov/lists/com-attach/95-2013-sp-update-ws-B2QGbAdvBzkFYgF1.pdf

Original File Name: Climate Action Reserve Comments on the 2013 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-08-08 15:33:47

No Duplicates.

Comment 84 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Harvey
Last Name: Eder
Email Address: harveyederpspc@yahoo.com
Affiliation: self & Public Solar Power Coalition

Subject: my/our timely subbmitted comments on 2013 Scoping Plan Review was Purged !
8/5/13 1650 h
Comment:

```
Howdy staliniskys !

My/Our timely submitted comments in this 2013 Scoping Plan Review
was purged ! This pattern is CARBs pattern of practice.

The entire record of Eder v. SCAQMD et. al. January 4 & 7 2013 is
hereby herein incorporated into this record once again. This
litagation demands the Immediate Total Solar Conversion of the SCD
and it's AQMP must be(2012) and now as testified commented last
week in Diamond Bar to SCD & FedEPA & CARB staff twice  must be
included into the record now as well as the  entire proceedings of
me/Harvey Eder &  the Public Solar Power Coalition record over the
past few decades (since 1985 and CEC and CPUC back to the mid 1970s
are incorporated into the record by reference here !

It is my (Harvey Eder) and our  the Public Solar PowerCoalitions
intent  now in draft to litigate the 5 & 10 year Immendatye
```

total Solar Conversio been Purged again .Will am litigating the Immediate Total Solar Conversion of the State in the court SC 119641,SVC119642, & SC 119657 Eder V. SCAQMD et. al. to include CARB EPA State and Federal , CEC,CPUC etc for Immediate Total Solar Conversion over the next 5&10 years and in the 12/20012 plan of SCD and SJD and the entire state implentation [plan as cited 2 times on the record for the new 2015 scd Plan and implemented thru rules and regulations etc. . (this was cited twice 2 weeks ago to the SCD with CARB and Fed EPA on the phone that litigation now in draft is nedcessary to be implemented. This includes implementing and incorporating be reference into this 2013 Scoping Plan Review the entire record of the above cited cases in the State Court as well as the entire recore of me and the Coalition at SCD and CARB going back to 1985 as well as cases filed BC (2 cases) filed in 1992 and all comments and correspondence or a actions with SCD CARB State and Federal EPA, CEC, and Cpuc going back to the mid 1970s are hereby hereing incorporated into the record in this proceeding.

The litigation calls for Immediate Total Solar Conversion of the SCD and will include the State of Ca. withing the next 5 or 10 years (while the federAL TAX CREDITS AND WREITE OFFS ARE IN TILL 2016. Being pourged from the record is an old practice for the District and its enabling CARB body. damned stalinskys...

Things have got to change Harvey Eder 8/8/13 noticed you took comments today from a party after the 5th so this better get in as well.....or are you still purging me/us ???
I/we intend to continue this tomarrow if this is or is not put in the record. got to send it or it will be purged....!!!$$$#@&

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-08 20:12:36

No Duplicates.

Comment 85 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Harvey
Last Name: eder
Email Address: harveyederpspc@yahoo.com
Affiliation: Self & Public Solar Power Coalition

Subject: 3rd submittal no responce(purged)2013 Scoping Plan Review H. Eder & PSPC ITSCP Immediate
Comment:

Howdy Staniliskies, 8-11-13 2:52 pm

This is my/our third 3rd time submittina comments/testimony this week (1st 8/5/13 1650 hrs ,2nd 8/8/13 apx 2000 hrs and now 8/11/13 1425 hrs !)This matter will go to the Governor etc and the OAL Office of Admininstrative Law.

What is needed now/here is a 5 and 10 year Immediate Total Solar Conversion Plan and Implementation (rules & regs for the state/California. I/we herein hereby incorporate the 3 submittals cited herein this past week on the 2013 Scoping Plan Review, as well the the entire record in Eder V. SCAQMD SC 119641, SC 119642, and SC 119657 filed in LA County Jan 4 & 7, 2013, as well as the entire record of the planning process for the 2012 SCD AQMP and all interaction testiomny comments etc. made to the SCD and CARB over the past 30 years as well as the 2 BC cases filed by me/us in July 1992 into the record herein, hereby by reference.

This is to inform you that in above cited Eder V. SCAQMD et. al. CARB etc, and CEC, and CPUC and the Governor are being replaced for does 1-1000. This is to propose the Immediate Total Solar Conversion of theSCAQMD and the State of California in 5 to 10 years as cited in the cases above or in other litigation as needed. This also calls for the SCD and the CARB, CEC, and CPUC to implement the Immediate Total Solar Conversion of The State/ SCD and to implement this through its their rules and regulations as applicable. The Sun makes the Wind Blow, The Water Flow, and The Plants Grop it's the way the world works its the engine of our eco system !

Inxcluded in the 8/5 and 8/8 2013 submittals is that the state must used the legal gwp global warming potentail of at least 33 but prefereably 72 but really 105 as used by IPCC and Howarth Et Al. 2012-2013 Cornell University as is in the record cited above. 88% of the natural gas used in California is imported from other staqated and is 95% Fracked justifyibng Howzarth 105 multiplier . Also all of the Sierra Clubs comments on record before thesee agencies comissions etc are incorp[orated here in. Eder being a member of the SC Climate Change
State4 Comittee and contributing at least half of the testimony /comments before SCD 2012 Plan. This includes rewriting District Air Plans and the state SIP. This wha brought up at the 2015 SCD planning meeting less than 2 weeks ago where boout Fed EPA and State CARB Participated (it is under advisment whether the Feds

will be part of this litigation.

Alsoin the Reacord the the 2006 Washingrton DC Natural Gas Buses methnae numbers for the multipliers cited about x105 as well (Done by NREL/UWV etc) and the 2010 April LA City SCD Trash truct that uses from 40-150 grams ch4 per mile in the trach trucks as is on the record wilth this giver by Dr, Pasek 2 years ago to Eder/PSPC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-11 14:17:18

No Duplicates.

Comment 86 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Scott
Last Name: Hauge
Email Address: ombcomm@arb.ca.gov
Affiliation: Small Business California

Subject: RE: Small Business California Comments on the 2013 AB 32 Scoping Plan Update
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/98-2013-sp-update-ws-AmFTNANdVGIKfANi.doc

Original File Name: CA EPA ARB Scoping Plan Comments 081213.doc

Date and Time Comment Was Submitted: 2013-08-12 14:01:46

No Duplicates.

Comment 87 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Nancy
Last Name: Steele
Email Address: nancy@watershedhealth.org
Affiliation: Council for Watershed Health

Subject: 2013 Scoping Plan Update Comments
Comment:

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Please see the attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/99-2013-sp-update-ws-BWZWP1UhVWhSN1A5.docx

Original File Name: CouncilforWatershedHealth_ScopingPlanUpdateComments_2013.docx

Date and Time Comment Was Submitted: 2013-08-12 16:44:51

No Duplicates.

Comment 88 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Gary
Last Name: Stafford
Email Address: garysterra@earthlink.net
Affiliation: CFMA, CSBA

Subject: AB 32 will increase costs to small business
Comment:

```
To date no cost analysis has been done on the effects on small
business.  The only cost analysis that have been done appear to be
after the fact to justify decisions already made.  Small business
is going to see large increases in the cost of utilities,
transportation and materials which will severely affect their
competitive position in relation to out of state and foreign
producers.  If increased costs force business to relocate out of
California the GHG emissions will just be relocated with them and
nothing will have been gained.  CARB should be required by the
legislature to perform a detailed third party analysis of both the
direct and indirect costs of AB 32 on small business and to adopt
programs to minimize those costs.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-12 16:48:08

No Duplicates.

Comment 89 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Jay
Last Name: McKeeman
Email Address: Jaymck@cioma.com
Affiliation: CIOMA

Subject: AB 32 & small business impacts
Comment:

Talking points are:· AB 32 regulation is reaching deep into our small business membership with very negative impacts.·
The looming AB 32 premiums on fuel will significantly affect fuel distributors by decreasing margins and increasing business costs.·
AB 32 fuels programs have the significant potential to decrease fuels market competition (starting to see that with the Tesoro acquisition) by running our members out of various segments of the fuels industry (members participating above the rack, fuel blending). CARB has never looked at the consequences to the consumer through elimination of competition.· Late 2014 and early 2015 we believe will see convergence of fuels under the cap and LCFS program impacts. Several studies have indicated that this may create a $1-$2/gallon CA premium on fuel costs – having ripple effects to other small businesses in the state.· CARB needs to look at their programs through the eyes of existing small businesses and consumers, not try and protect new entrants to the marketplace at the expense of fuel consumers and ordinary citizens.
- CARB needs to have exit ramps for their fuels programs in case unintended consequences create significant fuel price increases and/or supply impacts.
- The level of complexity in the new GHG fuels regulations is unprecedented creating new, unique and unusual reporting and economic burdens on small companies who do not have the staff, resources or sophistication to manage their new involvement.
- CARB needs to take advantage of the recent law suit on LCFS to completely re-evaluate that program and its operation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-13 08:14:54

No Duplicates.

Comment 90 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Chris
Last Name: Shimoda
Email Address: cshimoda@caltrux.org
Affiliation: California Trucking Association

Subject: Scoping Plan Update
Comment:

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Please see attached file.
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Attachment: www.arb.ca.gov/lists/com-attach/102-2013-sp-update-ws-UzJQNFxuVzYEXQBz.pdf

Original File Name: ab32 scoping plan update.pdf

Date and Time Comment Was Submitted: 2013-08-13 13:42:55

No Duplicates.

Comment 91 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: John
Last Name: DeWitt
Email Address: ombcomm@arb.ca.gov
Affiliation:

Subject: Comments on the Scoping Plan Update
Comment:

Our farmer customers in Ventura-Santa Barbara are struggling to reduce higher inputs against lower revenues. The competitive pressure from China, Chile, Mexico and other states not impacted by California's stringent water, labor and environmental rules is a major force in their long term decisions. Should they remain in California with a problematic financial future? We have seen the dairy industry movement out of state as regulatory compliance pressures are added to the financial risks all business face in California.

Our small business customers are replacing their fleets per CARB mandates at the present time diminishing their ability to absorb AB32 increased costs.

As diesel is still the most efficient and cost effective transport fuel,(even with taxpayer subsidies to competitive fuels) the competitive position of small businesses in California is contemplating the increase of transportation costs that will be carried by everyone.

Will Carb continue to avoid cost benefit analysis of their programs? Is it appropriate for CARB match up past program cost estimates to the actual costs incurred by our businesses, our customers, and the public?

Respectively,

John DeWitt

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-13 14:07:55

No Duplicates.

Comment 92 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Tom
Last Name: Ward
Email Address: ombcomm@arb.ca.gov
Affiliation:

Subject: Comments on the Scoping Plan update
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/105-2013-sp-update-ws-VDgBYlQhWX4GZVIg.docx

Original File Name: Letter to LaRonda AB32.docx

Date and Time Comment Was Submitted: 2013-08-16 07:52:34

No Duplicates.

Comment 93 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: David
Last Name: Schonbrunn
Email Address: David@Schonbrunn.org
Affiliation: TRANSDEF

Subject: Complete Comments
Comment:

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The attached file contains our comment letter just submitted, along
with Attachment E.
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Attachment: www.arb.ca.gov/lists/com-attach/106-2013-sp-update-ws-AjpWaV1xUTABN1Jj.pdf

Original File Name: 89-2013-sp-update-ws-UTABdQdkVFgFcARn.pdf

Date and Time Comment Was Submitted: 2013-08-16 13:51:33

No Duplicates.

Comment 94 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: David
Last Name: Schonbrunn
Email Address: David@Schonbrunn.org
Affiliation: TRANSDEF

Subject: Repaired Links for Comments
Comment:

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I found last night that some kind of incompatibility between MS
Word and Adobe Acrobat made some of the links on page 7 (especially
the ARB links) of our comment letter inoperable.

If possible, please substitute the attached page of links for page
7.
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Attachment: www.arb.ca.gov/lists/com-attach/108-2013-sp-update-ws-V24GMwcrBGVVYwg5.pdf

Original File Name: 93-2013-sp-update-ws-BXFXI1Y2UWwHcgBk.pdf

Date and Time Comment Was Submitted: 2013-08-16 14:09:31

No Duplicates.

Comment 95 for Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) - 1st Workshop.

First Name: Kenny
Last Name: Key
Email Address: kenny@interraenergy.us
Affiliation: Interra Energy, Inc.

Subject: Comments on the 2013 Scoping Plan Update Workshop
Comment:

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Please see attachment for comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/109-2013-sp-update-ws-BWxcNFQhV2FXI1Ig.pdf

Original File Name: Interra Energy -Comments on AB 32 Scoping Plan Update - 082613.pdf

Date and Time Comment Was Submitted: 2013-08-26 16:01:01

No Duplicates.

There are no comments posted to Provides the public and stakeholders opportunities to provide "informal" public comments as part of ARB's 2013 Scoping Plan Update Workshop Series (2013-sp-update-ws) that were presented during the Workshop at this time.