

**Environmental Justice Advisory Committee's (EJAC)
Draft Initial Recommendations for Discussion Draft Version of
2030 Target Scoping Plan Update**

Drafted by EJAC at April 4, 2016 Meeting

Overarching questions for each sector to respond to in write-up

- a. Break down how current recommendations are different from 2014 scoping plan and why
- b. Clearly identify data gaps in analysis (i.e. RPS considerations)
- c. Identify clear metrics for each recommendation; data should start to be collected now, with first check-in in 2020 and every two years thereafter
- d. What are the consequences/conflicts of requirements on the ground (e.g., cheap gas can lead to excess emissions)?

EJAC Initial Recommendation

Overarching Issues, Economic Analysis, Short-Lived Climate Pollutant Reduction Strategy

- a. We need public engagement and a culture shift in California.
- b. More aggressive emissions reduction plan and target Oil and Gas sector to reduce emissions.
- c. Interconnectivity between the California/Baja California border regions.
- d. Consider real-time monitoring, citizen science, and SEPs.
- e. Carbon Capture and Sequestration – totally eliminated for reducing GHGs (SJV concerns).
- f. Geographic equity should be a part of the process, need air quality monitors where people are breathing, need meeting in Huron (west side), rural areas need special attention.

Economic Analysis

- a. Add Manuel Pastor, Jim Sadd, or Jonathan London to Scoping Plan Economic Reviewers.
- b. The Scoping Plan Economic Analysis should consider carbon tax, straight up regulation, and Cap-and-Dividend or Fee and Dividend.
- c. Expand definition of economy to include costs to public (e.g., U.S. EPA social cost calculator).
- d. Maximize job & economic benefits, want to see section in Scoping Plan around jobs and economic benefits, target environmental justice communities.

Short-Lived Climate Pollutant Reduction Strategy

- a. The EJAC hereby makes a recommendation to CARB to mandate a 40% methane reduction from dairies and CAFOs by the year 2030 and require community consultation and approval of the implementation plan for the 40% methane mandate; all additional ancillary emissions generated through achieving this goal must be mitigated.
- b. The Strategy should explicitly state no disposal of food waste to landfills or incinerators; and explore synergies with methane reductions from dairies and the management of organic waste, such as wood waste.

Transportation

- a. SCSs be based on land use & transportation changes, further increased enforcement how implementation matches the plan, strengthen transit planning components of SCSs, prioritize investments in disadvantaged communities.
- b. Expand transit services to provide neighborhood level access, use different vehicle sizes and types to ensure economies scale & ensure sustainability; ensure accessibility to disadvantaged communities.
- c. Community needs mobility assessments that inform equitable investments, regulations, & implementation strategies. Increase access to clean mobility technologies. Just transition for communities, individuals, and small businesses reliant on fossil fuel based transportation. Research:

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infuse environmental justice considerations into pre-policy research.
d. Define infrastructure; not just highways & freeways (new fueling stations, roads); support new vehicle types, reach neighborhoods and small communities. New technologies: CNG, electric. Improve existing transit resources such as bus stops (e.g., covered bus stops). Need inventory assessment – COGs have this inventory; interagency communication.
e. Battery refueling stations within corridor of freight operations, community participation, ground truth.
f. Financially support transit operations and restoration of transit service and routes and expansion of services where lacking in disadvantaged communities.
g. There should be a holistic approach for transit options to rectify disadvantaged communities' history of inequities, also shared mobility.
h. Look at mobility regionally as there are different challenges in distinct areas of California.
i. An increase from the current 10% to 30% by 2030 for LCFS should be put in place.
j. Methane isn't a necessary byproduct of dairies and the Life Cycle Analysis shouldn't have assumed that it is was. It's that mistaken assumption that allows the methane emissions credit to be awarded. Instead, the (unnecessary) methane emissions should be accounted for as an emissions debit against the fuel.
k. Include metrics around displacement and gentrification.
Energy, Energy Efficiency, Green Buildings, Water
a. Include considerations for electrical upgrades that need to happen to support electric vehicles or other energy improvements. Conduct community-level assessment of needs for additional infrastructure improvements.
b. Green roofs in Southern California, only one city funded in Southern California for affordable housing.
c. Electric vehicle charging capacity – CAISO conduct assessment at local level, not just Statewide.
d. Develop aggressive Renewable energy targets, bring back 2014 EJAC Energy Recommendations.
e. Create micro-grids, self-sufficient for electricity. Pilot 10-100 in environmental justice communities.
f. Don't dilute California's progress in electricity emissions reductions.
g. Do a pilot project with substandard low-income housing, how retrofit, if HUD has funding ..., if weatherization funding, how that gets done.
h. Include community driven power that promotes jobs.
i. Make pumping of water in California 100% renewable by 2030.
j. Remove special considerations for investor-owned utilities, require them to develop power that is the most efficient.
k. Desert native tree forestation, tree canopy. Caution use of water as energy source, such as geothermal, are there benefits going back into community?
l. Solar not on rooftops in desert communities, why?
m. Need low-cost stacking, weatherization technologies, solar.
n. Avenal doesn't qualify for electric vehicles, Huron does. Low-income community bracket, need to approach holistically (multiple factors).
o. Incorporate EJAC recommendations from 2014.
Industry
a. California shouldn't commit to continuing Cap-and-Trade through the Clean Power Plan.
b. Do not include REDD in Scoping Plan.

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c.	Complete adaptive management analysis for Kern County, keep offsets in California, don't pursue REDD offsets.
d.	Trades cannot be verified, Clean Power Plan should ensure power purchases are from sustainable, renewable power plants.
e.	One more EJAC member on Adaptive Management Work Group, benefits in California first (no REDD program).
f.	Make sure we are measuring and creating caps to emissions based on sectors and facilities. Design fixes to Cap-and-Trade, increase floor price to real price of carbon, highest price offered not lowest, make sure offsets are limited or eliminated. Energy loading order (renewables first, etc.) could be same for Cap-and-Trade (disadvantaged communities, California, etc.). Consultation with tribes and affected communities. 50% reduction in Oil and Gas sector.
g.	Offsets need to happen where emissions occur.
h.	ARB and other state agencies (including PUC, CEC, OEHHA, DTSC, and CalRecycle) should undertake a process to examine the growing evidence that biomass and biogenic carbon have real and significant climate impacts, examine long distance transport contribution to overall GHG impacts of burning biomass material, and examine assumptions health and environmental impacts from burning various materials considered to be biomass, including impacts of biomass ash. This is of growing importance as new EPA regulations allow for the increased burning of waste and biomass at industrial facilities (i.e. industrial boilers, cement kilns), and as material deemed to be biomass are exempt from compliance obligations under Cap-and-Trade.
i.	Need more real time monitoring.
Natural and Working Lands, Agriculture, Waste	
a.	Integrate urban forestry, work with local communities, 20-30% reduction.
b.	Increase tree canopy.
c.	Define what food rescue means, in terms of waste mgmt., geothermal waste needs to be managed.
d.	Establish more refined metrics to determine benefits in trees.
e.	Protect greenspace.
f.	Need better coordination between ARB, CalRecycle, and DTSC.
g.	Increase urban canopy goals.
h.	Compost manure with biomass (wood chips). Co-benefits are methane and N2O reductions, reduced synthetic fertilizer imports, reduced water use.
i.	Increase urban garden goals and composting.
j.	Funding and permitting of increased compost operations, particularly in Southern California.
k.	Market development for application of compost for environmental health protection of carbon sequestration.
l.	Biogas converted to biomethane. Mandate vehicles servicing digesters and converters utilize that gas as a primary fuel source.
m.	Build biomass, not burn biomass (i.e., use compost to increase plant matter growth in grasslands, etc., instead of burning biomass and putting more carbon dioxide into air immediately.
n.	Repeat 2014 EJAC Waste Recommendation 2.(f): ARB and other State agencies...
o.	Investigate growing evidence of carbon sequestration benefits from applying compost to grasslands (Marin Carbon Project, UC Berkeley Dept. of Environmental Science Researchers).
p.	Add urban tree and greenspace maintenance, not just planting/creation.
q.	Add forest management for wild fire protection, require tribal consultation.
r.	Include urban agriculture.
s.	Disincentivize/discourage locating biomass/digesters in disadvantaged communities (close proximity to housing).

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t. Protect greenspace by better enforcement of SB375/SCSs.

u. Ban agriculture burning.

California Climate Investments

a. GGRF projects should be transformative for disadvantaged communities.

b. Need regional investment equity, look at plans/developments in disadvantaged communities to get type of models funded and developed (separate from the grid).

c. Emphasize technology forcing regulations, understand pipeline of technology to identify near-term wins to create markets for technologies further out.

d. Outreach, accountability, and helping agencies prioritize, informing guidelines and investment plan.

e. Continuous involvement, additional GHG reductions, prioritize disadvantaged communities when GHG emissions increase despite implementation of AB32 programs.

f. EJAC play key role in oversight and accountability.

g. Play stronger advisory role, review investments plan, assist in outreach, engage local networks (ground-truth), develop guidance, defining what transformative means, assist with setting priorities.

h. Bring projects to communities that are able and should receive funding, define community benefits.

i. Geographic equity – formula for funding; geographic – density – equity.

j. Increase accountability of local government with regard to reductions claimed for their GGRF funded activities.