

**Environmental Justice Advisory Committee's (EJAC)**  
**Draft Initial Recommendations for Discussion Draft Version of 2030 Target Scoping Plan Update**  
**August 10, 2016**

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

Proposed changes by Mari Rose 8/10/16. [Note: Overarching recommendations are marked "O", Overarching economic "E", Industrial "I", and recommendations missing from 6/24 "M".]

<b>Overarching Issues, Economic Analysis, Short-Lived Climate Pollutant Reduction Strategy</b>	
<b>Communications</b>	
1	a1., M3., j. We need public engagement and a culture shift in California to step up the implementation of our climate plans. Develop a communications plan to get everyday people excited about our climate programs. Promote community-level climate projects to show people how they are done. Include in a communications plan, education, and engagement of communities on how pollution affects them.
2	h. Emphasize and demonstrate neighborhood-level solutions and draw on community ideas, rather than just taking a top-down approach.
<b>Metrics, Economy</b>	
3	g., M7. Equity must always be a primary consideration when examining issues in any sector. The Scoping Plan and each sector needs to have an equity analysis. Work with EJAC on the right questions to ask.
4	M4. All climate goals need to have metrics quantified so we know if we're meeting targets over time.
5	M9. Develop contingency plans if emissions increase in benchmark years (due to huge leaks like Aliso Canyon, or if certain programs fail). We can ramp up certain strategies to achieve larger and faster emissions reductions.
6	M1. ARB must better balance reducing greenhouse gases and reducing costs (cost compliance), with the other AB 32 goals of improving air quality in EJ communities and maximizing benefits to California. There has been too much emphasis on reducing costs to industry, and not enough attention on reducing emissions in EJ communities.
7	E-a. Ensure that AB 32 economic reviewers come from various areas around the state.
8	E-b. The Scoping Plan Economic Analysis should consider carbon tax, command and control regulation, and Cap-and-Dividend or Fee-and-Dividend.
9	E-c. Expand the definition of <i>economy</i> to include costs to the public (e.g., U.S. EPA social cost calculator). Conduct an economic analysis that would account for the cost to public health and environmental burdens from greenhouse gases. Include the Integrated Transport and Health

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<b>Overarching Issues, Economic Analysis, Short-Lived Climate Pollutant Reduction Strategy</b>	
	Impacts Model (ITHIM) in the analysis. Ensure that ARB coordinates with other state agencies in this effort.
10	E-d. Maximize job and economic benefits. Include a section in the Scoping Plan on jobs and economic benefits, especially targeted for EJ communities.
11	c., l. Develop climate and air quality programs that better connect the California/Mexico border region. Identify tools for gathering emissions data on both sides of the rural California/Mexico border, and how California's approaches interact with the Mexican framework of rules and regulations.
12	d., f., k., l-j. Expand and integrate real-time air quality monitoring, citizen science, and SEPs (Supplemental Environmental Projects) in disadvantaged regions. Account for air quality differences in the region. Geographic equity should be a part of the process, where air quality monitors are located where people are breathing. Rural areas like Huron (west side) need special attention.
<b>Coordination</b>	
13	i. Coordinate meetings between the interagency working groups (IWG) and EJAC, to encourage information sharing and mutual cooperation between the groups.  M2. Improve coordination between state and local implementation activities.  M6. ARB and other agency staff of the Scoping Plan implementation need to coordinate strategies. For example, if one sector is meeting its targets and another is not, there still needs to be a net reduction of emissions, so it has to come from some sector that staff needs to identify.
14	a2. Coordinate our strategies to prevent and address sprawl with equity at the center. Sprawl has negative environmental impacts on transportation, water, and more.

<b>Industry</b>	
<b>Emissions Reduction</b>	
1	M5., m. State in the Scoping Plan that it is a priority to reduce emissions in EJ communities, and to ensure no emissions increases happen there. Through standardized metrics, ensure that emission reductions from AB 32 activities are happening, especially in EJ communities.
2	g4. Use a loading order for Industry (like in the energy sector) where efficiency and low-carbon technologies come first before allowing high-polluting facilities or projects.
3	g5., l., O-b. Set a goal of 50% emissions reduction in the Oil and Gas sectors by 2030. Aggressively reduce emissions from this sector, including fugitive and methane emissions from extraction and production.

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<b>Industry</b>	
4	i. Do not exempt the burning of biomass in Cap-and-Trade. ARB and other state agencies (including the California Public Utilities Commission, California Energy Commission, Office of Environmental Health Hazard Assessment, Department of Toxic Substances Control, 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 greenhouse gas impacts of burning biomass material, and examine assumptions of health and environmental impacts from burning various materials considered to be biomass, including impacts of biomass ash. This is of growing importance as new Environmental Protection Agency 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.
5	e. Totally eliminate carbon capture and sequestration programs, especially in the San Joaquin Valley.
<b>Metrics, Economy</b>	
6	g1., o. Ensure we are measuring and creating emissions caps based on sectors and facilities, since one of the big design flaws of Cap-and-Trade is having an ambiguous economy-wide cap. Examine methods that could be used to reduce pollution from individual high-polluting entities.
7	k. Include an emissions profile analysis for both command-and-control and Cap-and-Trade options for the Scoping Plan, for comparison.
8	n. Conduct comprehensive analyses of costs to not just the industries participating in Cap-and-Trade, but also to the rest of California’s citizens, who pay in other ways for the effects of pollution. Conduct activities that minimize cost and maximize reductions.
9	p. Expand the definition of “health impact” to include health consequences other than cancer when looking at health effects of industrial emissions.
10	M8. Develop a path to using a carbon tax for reducing industrial emissions.
11	g2. Increase the floor price to the real price of carbon; use the highest price offered, not the lowest.
12	c1. Complete an adaptive management analysis for Kern County.
13	e. Add one more EJAC member to the Adaptive Management Work Group.
<b>Trading, Offsets</b>	
14	a., d. Do not commit California to continuing Cap-and-Trade through the Clean Power Plan. Since carbon trading cannot be verified, ensure that the Clean Power Plan power purchases are from sustainable, renewable power plants.
15	g3. Eliminate offsets.

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<b>Industry</b>	
16	b., c3. Do not pursue or include reducing emissions from deforestation and forest degradation (REDD) international offsets in the Scoping Plan.
17	c2., h., f. Keep offsets in California. Offsets need to happen where emissions occur. Consider offsets that can reduce pollution coming over from the Mexican border to reduce emissions in the border region. Benefits from greenhouse gas reduction measures should affect California first.

**Energy**

Proposed changes by Mari Rose 8/4/16, with additions from Tom Frantz and Sekita Grant. [Note “n” items are from 2014 EJAC recommendations.]

<b>Energy, Green Buildings, Water</b>	
<b>Generation</b>	
1	c., v. Develop aggressive energy goals toward 100% renewable energy by 2030 to reach emissions reduction sooner, especially if other sectors lag or increase emissions.
2	n1. California should fully practice the State’s energy loading order: prioritize all cost-effective energy efficiency, then demand response, and finally renewables and distributed generation. These priority strategies in combination with energy storage should be fully utilized prior to the use of natural gas power plants.
3	k. Expand rooftop solar in EJ communities, including in desert communities.
4	l. Employ innovative technologies in solar and weatherization, like low-cost solar cell stacking.
5	ad. If federal tax credits for residential solar installations are discontinued in the future, California should make up the difference with state tax credits and rebates.
6	ae. If federal tax credits for small business solar installations are discontinued in the future California should make up the difference with state tax credits and rebates.
7	n6. Protect low-income households from energy price spikes.
8	i. Remove special considerations or exemptions for investor-owned utilities, and instead require them to develop power that is the most clean and efficient.
9	o. Imported electricity should not be considered renewable beyond the percent of renewable energy production (the renewable portfolio) currently existing in the exporting state. There should be no double counting or incentives for other states to encourage burning fossil fuels.
10	n9. Carbon capture and sequestration power plant projects using captured carbon dioxide for enhanced oil recovery should not be certified as projects that sequester carbon for the purpose of

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<b>Energy, Green Buildings, Water</b>	
	carbon credits of any kind. Also, injection of carbon dioxide for sequestration purposes shall not take place without the express permission of all surface landowners above the zone of sequestration in order to qualify for carbon credits.
11	n10. Set a moratorium on new oil and gas operations (refineries, power plants, fracking wells, etc.).
12	n11. The California Energy Commission (CEC) should evaluate all renewable energy projects under the renewable portfolio standard (RPS) for life cycle emissions and co-pollutants to ensure they do not create new problems in overburdened communities. The CEC should render ineligible those technologies that increase local air quality burdens without direct and current 200% mitigation of all air quality impacts within ten miles of the project location. The CEC should ensure that imported renewable energy, including that from tribal lands, is consistent with California requirements.
13	Industry a., d. Do not use Cap-and-Trade (or carbon trading, offsets) for the Clean Power Plan. The Clean Power Plan should ensure power is generated from sustainable, renewable sources.
<b>Infrastructure, Buildings, Efficiency, Funding</b>	
14	d., n2. Prioritize the siting of renewable energy, grid storage, and microgrid projects within communities identified by CalEnviroScreen. Pilot 10–100 microgrid projects in EJ communities. The California Energy Commission should prioritize and maximize clean energy R&D (research and development) investments in disadvantaged communities through its Electric Program Investment Charge (EPIC) Program and actively engage those communities in developing the investment plan for that work.
15	n7. Develop incentives, rebates, and financing mechanisms to accelerate equitable access to clean energy technologies in low-income households, small businesses, and other community-serving facilities such as community centers, churches, health clinics, schools, and community-based organizations. transition in the electrification of the state's transportation system (freight, transit, personal vehicles, etc.).
16	a.,b. Upgrade residential building electrical systems to support clean energy upgrades. State funding for clean energy technologies in disadvantaged communities should allow for funding for maintenance and upgrades necessary for clean energy technologies.
17	f., s. Coordinate federal, state, and local agencies to create a one-stop shop for energy efficiency and renovation programs. Focus on the whole house rather than on one aspect at a time, so that multiple programs can be more easily accessed. Establish pilot projects to retrofit substandard low-income housing with federal Housing and Urban Development (HUD) funding.
18	r. Climate investments and energy solutions (building retrofits, weatherization, solar, microgrids, etc.) should also serve entire disadvantaged communities, rather than just individual buildings or homes.
19	n3. The California Energy Commission (CEC) should provide guidance to state and municipal energy agencies to lower the barriers to pursuing deep energy retrofits to upgrade homes, businesses, and public institutions in low-to-moderate income communities. This can happen through the CEC's SB 350 Barrier Studies and any related follow-up studies.

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<b>Energy, Green Buildings, Water</b>	
20	n4. Increase access to low and no-interest energy efficiency financing for the low-to-moderate income single and multifamily, and small business sectors. This includes credit enhancements, interest rate buy downs, and supporting the use of alternative measure of creditworthiness to provide greater access to affordable capital.
21	n5. Increase literacy about clean energy programs and services especially for people in geographically, linguistically, and/or economically isolated communities. Use trusted sources of information such as community-based organizations, outreach in-language and employ culturally appropriate messaging techniques.
22	p. Phase out natural gas-based appliances and technologies, and transition to electric and solar thermal technologies.
23	l. Employ innovative technologies in solar and weatherization, like low-cost solar cell stacking.
24	q. Support tree planting and green infrastructure in communities to reduce energy use for cooling buildings.
25	t., u. Identify, implement, and standardize metrics to track energy savings, quantify energy reductions, conduct post-project assessments to ensure accountability, and survey local activities if strategies are working (or not). Use EJ communities as a resource.
26	z., ab. Set greenhouse gas reduction targets for existing buildings. Broaden the definition of a “green building” to include retrofits of existing buildings in disadvantaged communities.
27	w., x., aa. Set goals for new and green buildings: all new constructions are zero net energy (ZNE) by 2020, none have natural gas or biogas.
28	y. Develop standards and support the construction of “living buildings” (regenerative buildings that more closely follow natural ecosystems, with features such as solar, water capture, efficient and affordable transportation options, etc.) within disadvantaged communities.
29	ac. Provide direction to industry on best practices for rapidly moving toward widespread design and construction of green buildings within disadvantaged and low-income communities, and incentivize developers to adopt the standards and implement them. Ensure that building or retrofit costs are not passed along to low- and moderate-income tenants by providing tax incentives, or adopting policies that prevent having those costs passed on to them.
<b>Water</b>	
30	h., af. Make pumping of water by the State Water Project in California 100% renewable by 2030, with consumers of the water paying for renewable energy installation and production along the project right-of-ways.
31	j. If geothermal energy is developed, ensure that it is benefiting, and not harming, the local community.
32	ag. Identify the energy use and reduction goals for the proposed California Water Fix and Eco Restore project (formerly the Bay Delta Conservation Plan), including the pumps at Tracy (single largest energy user in California).

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<b>Energy, Green Buildings, Water</b>	
<b>Green Economy</b>	
33	<p>g. Promote the development of community-driven clean energy projects that hire from disadvantaged communities, prioritize community ownership of clean energy technologies, maximize energy bill reductions for low- and moderate-income communities within disadvantaged communities, and prioritize anti-displacement strategies.</p> <p>n8a. ARB shall work with appropriate state agencies to identify and develop data and criteria for measuring economic and employment co-benefits resulting from AB 32-related public investments.</p>
34	n8b. In consultation with state workforce agencies, direct implementing agencies of climate programs to develop specific goals to train and facilitate employment of workers from disadvantaged communities. Use CalEnviroScreen, other robust screening tools, and local unemployment data to identify and prioritize communities for job creation programs.
35	n8c. For climate projects, employ project labor agreements, best-value contracting combined and local/targeted hire goals to provide access to career-track construction jobs for disadvantaged workers.
36	n8d. Implementing agencies should build training partnerships with local institutions that have a proven track record of placing disadvantaged workers in career-track jobs (such as community colleges, nonprofit organizations, labor management partnerships, state-certified apprenticeship programs, and high school career technical academies).
37	n8e. Maximize carbon reduction and energy savings by directing implementing agencies to promote the highest quality work, standards for participating contractors, and minimum training and skills for workers.

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**Transportation**

Proposed changes sent by Sekita Grant 7/7/16.

We envision a California where all communities breathe clean air and have access to affordable, clean transportation options. The following recommendations will help to achieve this vision.

<b>Transportation</b>	
<b>Overarching Principles for Transportation Programs and Investment Plans</b>	
1	Prioritize community needs and mobility assessments.
2	Require robust community participation.
3	Reduce vehicle miles traveled (VMTs) while increasing access to affordable, reliable, clean, and safe mobility options in disadvantaged communities.
4	Prioritize the advancement of economic benefits such as job and workforce training opportunities in disadvantaged communities.
5	Ground-truth the actual impacts of program implementation. Strategies include the following: <ul style="list-style-type: none"> <li>a. Conducting equity analyses when evaluating and implementing transportation options to prevent adverse secondary effects in disadvantaged communities (e.g., the Los Angeles FasTrak program which resulted in more vehicles on artery streets, creating even worse air quality problems for those communities)</li> <li>b. Conducting equity analyses in transportation projects to ensure that investments go to the most impacted by pollution and economic disparities</li> <li>c. Benchmarking and tracking where projects are implemented to measure emission reduction progress</li> <li>d. Measuring emissions reductions by per capita VMT</li> </ul>
<b>Regional Mobility and Local Government Action</b>	
6	Strengthen focus on reducing transportation emissions along the border with Mexico by focusing on cross-border commuting. Reduce the long border wait lines and idling by increasing lanes for walking and biking, providing zero-emission bus and shuttle options, and increasing transportation infrastructure to support traffic.
7	Sustainable Community Strategies (SCSs) must be improved in the following ways: <ul style="list-style-type: none"> <li>a. SCS compliance with ARB greenhouse gas reduction targets must only be based on documented land use and transportation changes.</li> <li>b. Metropolitan Planning Organizations must only be allowed to authorize implementation of projects that are included in the most recent SCS.</li> <li>c. Transit agencies must be required to adhere to projected routes and costs in the adopted SCS unless alternatives demonstrate increased emission reductions while maintaining or</li> </ul>

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<b>Transportation</b>	
	improving access to alternative transportation choices. d. Implementation of SCSs must prioritize investments in disadvantaged communities.
8	Expand transit services to provide neighborhood level access, use different vehicle sizes and types to ensure economies scale and ensure sustainability; ensure accessibility to disadvantaged communities.
9	State agencies give local transit authorities more direction about anti-discriminatory Title VI expectations to promote more equitable funding of transit options, especially regarding fare increases and route changes that may limit access to transit.
10	Financially support transit operations and restoration of transit service and routes and expansion of services where lacking in disadvantaged communities.
11	There should be a holistic approach for transit options to rectify disadvantaged communities' history of inequities, also shared mobility.
12	Look at mobility regionally, as there are different challenges in distinct areas of California.
<b>Infrastructure and Land Use</b>	
13	Define infrastructure as not just including highways, freeways, new fueling stations, and roads.
14	Ensure that there is sufficient infrastructure to support new vehicle types.
15	Ensure that clean transportation infrastructure is available in rural and small communities.
16	Improve existing transit resources such as bus stops (e.g., covered bus stops). There needs to be an inventory assessment and better interagency communication.
17	Design and implement new incentives, beyond tax credits, to encourage infill development over sprawl. Develop and implement land use, building code, and permitting changes to streamline planning. Increase funding for clean transportation infrastructure improvements in disadvantaged communities. Funding should prioritize the most urgent mobility and pollution needs of the community.
<b>Clean and Sustainable Freight</b>	
18	Target truck fleets and vehicle fleets to achieve the quickest, most significant reductions in emissions.
19	Actively support and implement the ARB "Sustainable Freight Movement Plan."
20	Develop strategies that ensure small independent trucking companies and concerns are incentivized to transition to zero or near-zero emission vehicles.
<b>Clean and Sustainable Fuels</b>	
21	Support sufficient charging and refueling stations along freight corridors.
22	Increase the required reduction of carbon intensity of fuels under the Low Carbon Fuel Standard from the current 10% to 30% by 2030.

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<b>Transportation</b>	
23	Eliminate the assumption in the Low Carbon Fuel Standard Life Cycle Analysis (LCFSLCA) that methane is a necessary by-product of dairies. This will eliminate the awarding of avoided methane emissions credits to dairies. Instead, the methane emissions must count as an emissions debit against the fuel. Conduct a new LCFSLCA using standard methodologies applied to all organic and artificial chemical energy sources.
24	Promote clean and renewable energy sources to power vehicles. Increase the coordination among energy and transportation agencies to help ensure the success of supporting initiatives.
25	Study the emissions reduction benefits from increasing gasoline prices.
<b>Access to Clean Transportation Technologies</b>	
26	In support of state electric vehicle goals, such as SB 1275, the state must develop and provide funding for a program that ensures deep penetration of electric vehicle use and charging capacity in disadvantaged communities. This must include a pilot program that does the following: <ul style="list-style-type: none"> <li>a. Funds demonstration program placing new and used electric vehicles, charging and maintenance infrastructure in at least seven low-income and disadvantaged communities at the residential level, to evaluate best practices and accelerate their integration in these communities statewide</li> <li>b. Ensures a proper diversity of population density - urban, suburban, and rural areas</li> <li>c. Prioritizes areas with aging infrastructure</li> </ul>
27	Accelerate ownership and access to zero-emission vehicle technologies, through the following strategies: <ul style="list-style-type: none"> <li>a. Universal application and point of sale rebates or vouchers for new and used electric vehicle and other clean energy programs in place by June 2017</li> <li>b. Rebates for used electric vehicles available (outside of EFMP Plus up) by June 2017</li> <li>c. A minimum of 20% of non-luxury multi-unit dwellings have electric vehicle charging stations (or stubs) by 2020</li> <li>d. Minimum 25% of state investments in electric vehicle charging station infrastructure occur within disadvantaged communities</li> <li>e. CARB "Electric Vehicle Car sharing Program" funds at least 50 projects by 2020</li> <li>f. Employment and Education Shuttle rebates to fund at least 20 ZEV or hybrid vanpooling and carpooling (including support for charging infrastructure) projects that support community-serving workforce training programs and employment by 2020</li> <li>g. At least 20 "last-mile" free electric shuttle/bus programs providing transportation to community-serving facilities (e.g., clinics, community colleges, community centers, hospitals, government facilities, job centers, shopping centers, etc.) in place by 2020</li> <li>h. All school districts in disadvantaged communities have electric school bus fleets by 2020</li> </ul>

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<b>Transportation</b>	
	<b>Capturing Economic Benefits</b> (The state must prioritize the advancement of economic benefits in disadvantaged communities while reducing pollution. As California transitions to a clean transportation economy, the following recommendations will help capture equitable economic benefits in disadvantaged communities.)
28	Technical Assistance and Marketing, Education, and Outreach – The state must dedicate funds toward helping less-resourced communities and small-businesses take advantage of clean transportation investment opportunities.
29	Job Placement and Training – The state must dedicate resources for community-based organizations that support clean energy career pathways for disadvantaged community members. These pathways must include but not be limited to: job placement, apprenticeship opportunities, and building skills that are transferable to a broad set of clean energy jobs.
30	Ownership and Access – The state must support the increased access to and ownership of, clean energy and clean transportation technologies and mobility options in disadvantaged communities (discussed in more detail above).
31	All SCSs and transportation project analyses, policies, and investments must include metrics around displacement and gentrification.

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**Natural and Working Lands, Agriculture, and Waste**

Proposed changes provided by Monica 6/6/16.

<b>Natural and Working Lands</b>	
1	a. Integrate urban forestry, work with local communities, 20%–30% reduction.
2	i. Increase urban garden goals and composting.
3	k. Market development for application of compost for environmental health protection of carbon sequestration.
4	p. Add urban tree and greenspace maintenance, not just planting/creation.
5	q. Add forest management for wild fire protection, and require tribal consultation.
6	t. Protect greenspace by better enforcement of SB 375/SCSs.
7	v. Develop and implement metrics to quantify the greenhouse gas benefits and co-benefits of managing natural and working lands, including urban spaces and trees. Achieve consensus on how to measure GHG emissions reductions from activities in natural systems.
8	w. Revise the goal of increasing tree canopy by 5% by 2030 to 10%, and conduct research to identify methods of achieving that increase given drought conditions.
9	x. Quantify potential jobs created from regenerating forests and jobs for maintenance of green spaces, and increase funding to support those activities.
10	y. Create green spaces within disadvantaged communities, rather than outside those communities.
11	aa. Expand the definition of “urban forestry” to include “rural desert urban forestry,” so those areas can qualify for funds to support tree planting.
12	ab. Support training, education, and incentives for planners to design and develop infill building projects rather than sprawling developments. Provide incentives such as guarantees for a more rapid planning and approval process for infill projects.
13	ac. Support life-cycle analyses of sprawling developments to determine long-term economic and societal costs versus infill projects, to identify actual costs.
14	ad. Identify, develop, and implement policy tools to prevent the current trend of gentrification in California pushing lower-income residents and people of color inland.
15	ae. Do not provide greenhouse gas reduction funds for improvement projects that will displace current residents.
16	aj. Determine if the supporting infrastructure is in place before making decisions on how to manage woody or organic waste. <b>[Is the point of this recommendation to ensure support for development of infrastructure, or to uncover community and environmental impacts of that new</b>

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	infrastructure development? We might need to be more clear about what this would lead to.]
17	an. Provide a baseline credit for applying carbon back to soils.

<b>Agriculture</b>	
1	l. If biogas from dairies is converted to biomethane, CARB should mandate that vehicles servicing digesters and converters utilize that gas as a primary fuel source. This is a better use of the fuel than building new pipelines and related infrastructure to transport the gas to other locations.
2	u. Ban agriculture burning.
3	z. Do not turn agricultural lands into land for solar and wind projects. Such projects produce only a few, short-term jobs, the electricity is sent to large population centers, and farmworkers are displaced, resulting a net job loss.
4	ao. Divert dairy waste before it can convert to methane.

<b>Waste</b>	
1	c. Waste from “renewable resources” like geothermal needs to be managed, and waste and other externalities must be considered in the determination of renewable energy sources
2	af. Do not use gasification and biofuels as qualifying renewable options, since those technologies have other pollution issues associated with them, and do not invest in these approaches.
3	ah. Communities should take full ownership of their waste so that it is not exported to disadvantaged communities. View it as a resource, maximize recycling and composting programs.
4	ai. Set composting as the primary goal for incentivizing waste diversion. Promote composting by providing education and assistance to implement composting in all communities. Support the expansion of infrastructure for composting where necessary, and map out the mechanisms for composting in each community. Share best practices between municipalities to ensure all residents have access to programs. Incentivize neighborhoods to compost food waste, from schools and at the community level. Establish communications plans that show Californians how to compost and that motivate people.
5	al. Do not count incineration of any material as a renewable energy source, and continue the enrollment of California’s three incinerators in the Cap-and-Trade program so that they have to pay for their emissions.
6	as. Identify effective methods for implementing food rescue programs with quality controls to avoid dumping inedible food on communities; identify strategies for getting edible food to those who need it. Incentivize these programs and promote communication plans for projects, so all communities have access to successful plans.

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<b>General</b>	
1	f. Better coordinate activities among ARB, CalRecycle, and the Department of Toxic Substances Control.
2	s. Disincentivize/discourage locating biomass/digesters in disadvantaged communities (close proximity to housing).
3	<ul style="list-style-type: none"> <li>• Build biomass, don't burn biomass: Instead of incineration of biomass from trees and municipal solid waste, which puts more carbon dioxide into air immediately, we recommend ARB expand its work to identify and support methods for returning that carbon to the soil, such as composting biomass together with manure. Investigate growing evidence of carbon sequestration benefits from applying compost to grasslands (resources include Marin Carbon Project, UC Berkeley Dept. of Environmental Science researchers). Additional benefits of such measures are the reduction of methane and oxides of nitrogen, reduced synthetic fertilizer imports, and reduced water use.</li> </ul>
4	v. Develop and implement metrics to quantify the greenhouse gas (GHG) benefits of managing natural and working lands. Achieve consensus on how to measure GHG emissions reductions from activities in natural systems. Discuss and agree upon these metrics with the interagency working group.
5	n. Repeat 2014 EJAC Waste Recommendation 2.(f): ARB and other state agencies (including the California Public Utilities Commission, California Energy Commission, Office of Environmental Health Hazard Assessment, Department of Toxic Substances Control, 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 greenhouse gas 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 Environmental Protection Agency 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 California's Cap-and-Trade program.
6	am. No credits should be given for greenhouse gas avoidance from landfill or for biodigesters.
7	ar. Research and identify alternatives for dumping biosolids (sewage sludge) in disadvantaged communities. Pilot a program to explore and demonstrate better options.