

## **Comment 1 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Tom

Last Name: Ogren

Email Address: tloallergyfree@earthlink.net

Affiliation: www.safegardening.org

Subject: air quality

Comment:

Per: Climate

Pollutant Reduction Strategy: Right now, mid-April, there are huge numbers of Californians who are suffering from airborne allergens, in particular pollen. Nationwide we are in what is called an epidemic of allergy, and this phenomenon is urban, not rural. The allergy/asthma triggering pollen is mostly coming directly from the planted urban landscape. Trees are commonly still sold in California that are exceptionally allergenic...in areas with pollen-control ordinances, these would not be allowed to be sold or planted.

For each highly allergenic tree/shrub, there is another allergy-free or low-allergen choice. Climate change is resulting in more pollen production, making it ever more important that we make smarter choices in what we plant in our cities.

The Ca air quality board has pretty much just ignored urban pollen, but it is a perfectly real air quality problem, affects very large numbers of people, and as the board does nothing, the situation gets worse.

The time is well past that the board should become much more informed about allergy-friendly landscaping, and then start to do something, anything, to deal with this issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-04-12 08:18:17

No Duplicates.

**Comment 2 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Scott

Last Name: Slavensky

Email Address: scott@skatetown.biz

Affiliation: Skatetown ice Arena

Subject: Comments on SLCP2016

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-slcp2016-BWRVIQBjU19ROwNm.docx'

Original File Name: ARB letter 041216.docx

Date and Time Comment Was Submitted: 2016-04-12 14:43:15

No Duplicates.

### **Comment 3 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Houshang

Last Name: Esmaili

Email Address: houshang.esmaili@flysfo.com

Affiliation: San Francisco International Airport

Subject: Methane Gas Emission from Cows

Comment:

My comment is addressed to the control of methane gas emission from dairy and beef cattle. Recognizing the intractability of such emissions, I wonder if a more fundamental approach to modifying the digestive biology of cows might be feasible. Bioengineering could provide a possible approach for achieving this objective. We know that humans genetically vary and some generate CO<sub>2</sub>, while others generate methane in their digestive tract. So the research should focus on this genetic variation and investigate the feasibility of modifying the relevant genes in cows to achieve the desired outcome

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-04-13 09:42:58

No Duplicates.

## **Comment 4 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Thomas

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation:

Subject: Short-Lived Climate Pollutant Reduction

Comment:

Thank you for the opportunity for comments. I recommend California take the lead in adopting scientific parameters for SLCPs rather than wait on the US EPA. Such action would direct attention to the 2 substances which would have the most immediate impact on slowing global warming. Enclosed is a recent presentation from the Global Methane Forum that was held at Georgetown University Conference Center. Methane and black carbon were identified as the two most important substances to reduce to have an effect in the next 20 years. The next 20 years are more important than the next 100. Sooner we mitigate climate damage the less impact we will suffer in outer years. We can still act to reduce CO2 as a long term strategy but we need to focus on short term impacts to buy us more time to adapt.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-slcp2016-B2xUJ1IqV2gCYVU7.pdf'

Original File Name: Kuylenstierna\_Shindell\_What\_Science\_Tells\_Us.pdf

Date and Time Comment Was Submitted: 2016-04-21 10:49:12

No Duplicates.

**Comment 5 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Justin

Last Name: Koscher

Email Address: justin\_koscher@americanchemistry.com

Affiliation: American Chemistry Council

Subject: ACC Foam Industry Comments on Proposed SLCP Reduction Strategy

Comment:

Attached please find comments on behalf of ACC's Center for the Polyurethanes Industry and Spray Foam Coalition.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-slcp2016-AWBRNFAYAg4Lbgd3.pdf>'

Original File Name: ACC CPI SFC Letter re EPA Rule 21 04.06.2016.pdf

Date and Time Comment Was Submitted: 2016-04-22 07:50:14

No Duplicates.

## **Comment 6 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: John

Last Name: Harmon

Email Address: H5av5n@gmail.com

Affiliation:

Subject: Air quality

Comment:

Support keeping Diablo Canyon open because nuclear power plants play a major role in overall compliance with the Clean Air Act of 1970, which set standards to improve the nation's air quality. Because they generate heat from fission rather than burning fuel, they produce no greenhouse gases or emissions associated with acid rain or urban smog. Using more nuclear energy gives states additional flexibility in complying with clean-air requirements.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-04-27 21:21:02

No Duplicates.

## **Comment 7 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Dylan

Last Name: Ross

Email Address: dylanbross@gmail.com

Affiliation:

Subject: An Educated Public Comment on SLCP Reduction Strategy Proposal  
Comment:

Dear Sir or Madam,

Thank you California for taking the time and money to study such an important issue in our modern time. I read the proposed strategy and I see a great vision for positive change in our future. Yes, clean air and minimizing climate impact is quite a challenge in the world today. Nevertheless, with the multi-faceted approach set forth in your reduction strategy I can only hope we gain the financial and political support to push this through.

I have two comments. First, I understand the proposal defers to the many mature and ongoing clean energy programs with respect to emissions from industrial power plant sources. However, I believe the proposal should consider then the impact of losing California's single largest emission-free power source, Diablo Canyon Power Plant. There is no power source in California that even comes close to the zero-emission, high availability, low cost, and role-model safety record, than Diablo Canyon. The proposal goes as far to say "many of these facilities [biomass power plants] face expiring power contracts and are shutting down or in danger of doing so. In the near term, a priority is to keep existing facilities operating that receive woody biomass from high hazard areas, as called for in the Governor's Proclamation." Yet, the value gained by preserving these old, poorly maintained, biomass power plants is a drop in the ocean compared to the value gained from continuing to operate 2300 megawatts of clean energy. Why was Diablo Canyon not addressed in this proposal?

Second, did you know the State Lands Commission (SLC) has been reluctant to extend Diablo Canyon's ocean intake permits past 2018? Has California realized the dramatic increase in carbon emissions that will fall out from the premature retirement of Diablo Canyon? If the ARB has any ties with the SLC, I urge you to communicate to them the counter-productive dig to your proposal if Diablo's clean-air influence were lost. The SLCP reduction strategy proposal also suggests reducing methane by way of "transitioning away from its use of natural gas" or by "minimizing natural gas leaks". Did you know that when San Onofre Nuclear Generating Station (SONGS) shut-down the State & Utility together have decided to replace the power with over 1000 MW of natural gas burning plants? The same, or worse, will happen when we lose Diablo Canyon. More natural gas burning power plants requires more natural gas transmission pipelines and compressor stations, resulting in a higher risk of leaks and more carbon-emissions. Again, every day that Diablo Canyon is running is another day our state maintains the national

lead on clean air practices and mitigates unnecessary state program expenses on less impacting legislations.

I respectfully submit this comment with the hope that it will be seriously considered. I have worked as an engineer in the power industry for 10 years; from gas-fired, solar thermal, solar PV, to nuclear. I've worked on projects from concept to design and start-up to operation. Optimization in performance, cost, safety, reliability, and feasibility are required of my daily work. This should lend enough credibility for you to seriously consider my comment.

Respectfully,  
Dylan Ross  
Licensed Mechanical Engineer

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-04-27 21:32:58

No Duplicates.

## **Comment 8 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Todd

Last Name: Shuman

Email Address: tshublu@yahoo.com

Affiliation: Wasteful Unreasonable Methane Uprising

Subject: SLCP Reduction Strategy and Livestock Enteric Emissions

Comment:

To the CA Air Resources Board,

CARB has again largely ignored enteric emissions from livestock in the development of its SLCP Reduction Strategy and DEIS. Enteric emissions constitute about 30 percent of methane emissions in California in a normal year. It is unconscionable that this methane source (about a billion pounds of methane emission per year in California) continues to be severely neglected by CARB when there are reasonable measures that could be enacted to dramatically reduce methane emissions from this source.

I propose again that CARB, the legislature, and the Governor explore and consider enacting some or all of the following: measures to promote mandatory livestock herd size reduction; requirements that cattle shall wear plastic backpack technology that captures the emitted methane so it can be burnt rather than belched into the atmosphere while they graze in the pastures [<http://www.fastcoexist.com/.../these-backpacks-for-cows...>, <http://www.dailymail.co.uk/.../Now-THATS-wind-power-Cows...>, <http://grist.org/.../crazy-clip-shows-what-happens.../...>]; mandates that compel the development of enclosed barns-vented-to-biofilter treatment systems that capture emitted dairy-associated methane before it escapes into the atmosphere.

Enteric fermentation methane emissions from dispersed, pasture-based livestock should also be considered for incorporation within cap and trade (with pollution permit costs to ranchers based on a short-term interval methane Global Warming Potential [GWP] value). For dairy CAFOs, there should be meaningful, mandatory reduction targets established for enteric emissions from livestock.

Finally, and more generally, a stiff tax should be imposed on all other sources of uncaptured, unburnt methane emitted into the atmosphere that are not included in cap and trade. The tax should be based on the use of a short-term interval methane GWP. Since the best scientific estimate for the actual physical lifetime of methane in the atmosphere is a little over 12 years (12.4 years, IPCC AR5th 2013), a methane GWP of 100 should be used, as that is the approximate methane GWP associated with the 12.4 year interval.

On a planet that is rapidly heating and undergoing significant anthropogenic climate disruption, we can no longer remain passive in the face of livestock and dairy industries that continue to

externalize significant enteric-emission-related methane pollution costs onto the broader global environment.

Sincerely,

Todd Shuman, Wasteful Unreasonable Methane Uprising, Camarillo

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-03 08:51:20

No Duplicates.

## **Comment 9 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Kit

Last Name: Mann

Email Address: rzkm@suddenlink.net

Affiliation:

Subject: Biomass energy pollutants

Comment:

I live adjacent to the Blue Lake Power biomass power plant in Blue Lake CA, and have done so since it was originally built in 1982. This 11 Mw biomass power plant, like most others in the state, employs aging and out of date pollution control technologies and has not been maintained well over the years. Even when it was brand new, the Electrostatic Precipitator could not control the black micro-ash fallout from the plant, and here 30 years later, it still can't, subjecting all of us downwind from the plant to constant black ash fallout. The Blue Lake Power plant is currently the defendant in an DOJ action for failure to construct and receive approval for BACT when it restarted about six years ago. It is significant that the local AQMD failed in their responsibilities in this matter by allowing the plant to reopen on the basis of their original, 1980's permit. A Consent Decree has been proposed that would allow the plant to continue to pollute for another two years, and if unable to achieve pollution controls established by the CD, propose higher levels that they can achieve. Measurement of particulate pollution is required to be measured only ONCE A YEAR. It is hard to see how this situation and the Consent Decree negotiated largely by the local AQMD conforms to the intent of SLCP Strategy. In other words, the strategy is meaningless unless it extends to the local AQMD level.

The proposed SLCP strategy calls for significant support of biomass energy plants, including supporting "moderniz(ation)of existing biomass facilities". It is critically important that any biomass facility receiving support in any form be required to construct BACT PRIOR to operating, not at some point in the future, and be held to strict pollution control limits.

Further, the strategy does not address the enormous amounts of diesel fuel that is consumed in transporting woody biomass out of the forest and into the burner at the power plant. Blue Lake Power requires approximately 22 full chip trucks daily for fuel. Looking at the entire biomass production cycle, there will be a loader for logs and fuel in the forest, a truck to bring the fuel out of the forest, a chipper/grinder machine, chip truck transport from grinder location to power plant, and a loader operating constantly at the plant to mix fuels and bring them to the burner feed screw. If the source is only 30 miles away (and most fuel sources are further), the diesel use alone adds 3.5 TONS of CO<sub>2</sub> to the atmosphere PER DAY, plus the associated black carbon from diesel. This part of the cycle has not been adequately addressed in the EIR or Strategy. Calculations

Distance: 30 miles, round trip 60  
Chip/Logging truck mpg: 5  
Gallons per trip: 12  
Gallons for forest loader, chipper/grinder, yard loader per full  
load chip truck (conservative est.): 2  
Gallons per day: 22 full load chip trucks/day x 14 = 308  
Pds CO2 per gallon diesel: 22.5  
Pds CO2 per day: 6930

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-03 10:32:16

No Duplicates.

**Comment 10 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Graham

Last Name: Noyes

Email Address: gnoyes@kfwlaw.com

Affiliation: Keyes Fox Wiedman LLP

Subject: SLCP- Brief Comment Regarding Typographical Error in EA

Comment:

There appears to be a typographical error at page 2-12 of the Draft Environmental Analysis, in the Measure Summary Paragraph in the sentence below:

"i) Measure Summary  
(...) California will build on that intent and progress, with market and institutional support, and divert 90% of organics from landfills by 2015, effectively eliminating the disposal of organics in landfills."

Best Regards,

Graham Noyes

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-05 09:57:01

No Duplicates.

**Comment 11 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Peter

Last Name: Williams

Email Address: peter@neweragroupinc.com

Affiliation: New Era Group, Inc.

Subject: Comments on HFC Measures in SLCP

Comment:

See attached letter from New Era Group, Inc. for comments on HFC Measures in the SLCP.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-slcp2016-VTsHZFchVloGZVAi.pdf'

Original File Name: New Era Group HFC comments on SLCP April 23 2016.pdf

Date and Time Comment Was Submitted: 2016-05-06 15:23:31

No Duplicates.

**Comment 12 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Peter

Last Name: Williams

Email Address: peter@neweragroupinc.com

Affiliation: New Era Group, Inc.

Subject: Refrigerant Lifecycle comments on HFC Measures in SLCP

Comment:

Comment 2 of 2 from New Era Group, Inc. Consider the refrigerant lifecycle when developing HFC reduction measures, including the long life of refrigeration equipment and the need for readily available refrigerants to continue to service existing equipment. See attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-slcp2016-AW8AY1MlAg4BYlcl.pdf'

Original File Name: New Era Group HFC comments on SLCP May 2 2016 CARB\_Lifecycle letter.pdf

Date and Time Comment Was Submitted: 2016-05-06 15:30:48

No Duplicates.

**Comment 13 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Graham  
Last Name: Noyes  
Email Address: gnoyes@kfwlaw.com  
Affiliation: Keyes Fox & Wiedman LLP

Subject: Comment of Sierra Energy RE: SLC2016  
Comment:

Attached please find the comment of Sierra Energy regarding the Proposed Short-Lived Climate Pollutant Reduction Strategy (SLCP Strategy) and Draft Environmental Analysis (Draft EA). This comment is provided by the President and CEO of Sierra Energy, Michael Hart.

This comment is strongly supportive of the SLCP and Draft EA. The comment describes two specific actions that the State can take to begin executing the SLCP Strategy in the short term.

Please comment me if you have any questions regarding the comment or if there are any problems with submission. Thank you for this opportunity to comment.

Best Regards,

Graham

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@Graham Noyes

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-slcp2016-UiFdMIA0UHEHcwJj.pdf>'

Original File Name: Sierra Energy Comment RE SLCP 12 May 2016.pdf

Date and Time Comment Was Submitted: 2016-05-12 09:03:29

No Duplicates.



**Comment 14 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: (EIA)

Last Name: Environmental Invest

Email Address: cstarr@eia-global.org

Affiliation:

Subject: Comments on HFC Measures in Proposed SLCP Strategy

Comment:

Dear Colleagues,

Please find our comments attached on the Proposed SLCP Strategy to be discussed at the May 26th Board Meeting.

Overall, EIA commends CARB for outlining a strong and achievable plan to significantly curb use and emissions of HFCs.

We look forward to continued dialogue with ARB on the areas we mentioned for further enhancing the strategy and to seeing this plan move towards implementation.

Best Regards,  
EIA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-slcp2016-AWQGaVU1AAwGY1M8.pdf'

Original File Name: EIA Comments\_ARB Proposed Strategy\_May 13 2016.pdf

Date and Time Comment Was Submitted: 2016-05-13 15:45:52

No Duplicates.

**Comment 15 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jessica  
Last Name: Olson  
Email Address: olsonj@ayreslawgroup.com  
Affiliation: Ayres Law Group LLP

Subject: Honeywell Comments on ARB Proposed Strategy  
Comment:

To Whom It May Concern,

Please find attached comments from Honeywell International Inc. on the F-Gas Provisions of ARB's April 2016 Proposed "Short-Lived Climate Pollutant Reduction Strategy."

Sincerely,  
Jessica Olson  
Counsel to Honeywell International Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-slcp2016-BjdVZQcrWDsDMAIv.pdf'

Original File Name: 16-05-16 Honeywell Comments on Proposed ARB Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-16 12:56:53

No Duplicates.

**Comment 16 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Liz

Last Name: Whiteley

Email Address: liz.whiteley@nasrc.org

Affiliation: North American Sustainable Refrigeration

Subject: Comments on Proposed SLCP Reduction Strategy from NASRC

Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-slcp2016-VzIVMgFzBCUGYwZZ.pdf'

Original File Name: NASRC\_comments\_SLCPstrategy\_May2016.pdf

Date and Time Comment Was Submitted: 2016-05-17 09:11:04

No Duplicates.

**Comment 17 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: CJ  
Last Name: Public  
Email Address: N/A@yahoo.com  
Affiliation:

Subject: Natural Gas Dependency  
Comment:

Our reliance on natural gas generation is counter productive to meeting long term carbon and pollutant reduction. Please take this into account.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-17 14:33:10

No Duplicates.

**Comment 18 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Terry  
Last Name: Adamo  
Email Address: terryadamo@gmail.com  
Affiliation:

Subject: Request Your Mission Statement  
Comment:

I need some clarification. Is your organization's mission stated anywhere? I don't mean the mission you've put out for public consumption. I'm looking for your true mission statement. The one that refers to keeping small businesses from reaching their full potential. The one that makes many people decide not to even TRY opening a business or leaving our state all together. The one that won't allow me to buy a motor for my bicycle forcing me to drive my SUV to the market. If you people had any intention of helping Californians breathe easier, you wouldn't micro-manage things like motorized bikes. Your mission statement needs a full revision. May I suggest:

THE CARB vows to keep Californians in a state of poverty by prohibiting all low cost supplies of energy, by taxing and regulating all currently acceptable (by us) forms of energy and by regulating small businesses out of existence. If this fails, we will collapse the California economy completely with our proven techniques and draconian measures that no elected official has any control over.

It's got a nice ring, doesn't it? Feel free to contact me if you'd like my permission to use it. I caution you, however, I do expel CARBON DIOXIDE!!!  
T. ADAMO

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-18 18:38:25

No Duplicates.

## **Comment 19 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Sandra

Last Name: Lupien

Email Address: slupien@fwwatch.org

Affiliation: Food & Water Watch

Subject: Adenda Item 16-5-4 Short-lived Climate Pollutant Reduction Strategy

Comment:

My name is Sandra Lupien. I live in Oakland, where I work for Food & Water Watch, a national advocacy organization with about 170,000 supporters in California. Thank you for your work on the Short-Lived Climate Pollution Reduction Strategy and for the opportunity to comment on the draft.

First, we applaud the California Air Resources Board's move to make California the first state to require factory farms to reduce their emissions of methane and other short-lived climate pollutants. Mandating such reductions is an important first step toward making polluters accountable for protecting the climate and the health of Californians. Food & Water Watch and many other public health and social justice organizations asked the Air Board to include such mandated reductions in the short-lived climate pollution reduction strategy, and we are pleased you agree this approach is necessary. Thank you.

However, we are very concerned that the proposed strategy relies heavily on the use of methane digesters, which are not an effective long-term solution to methane emissions from factory dairies. This expensive technology frequently results in leaked methane and other greenhouse gases like carbon dioxide and nitrogen oxide, which cause smog and public health issues like asthma. Furthermore, methane digesters fail to address the root cause of methane pollution from factory dairies, which is, of course, too many animals producing an unmanageable quantity of manure-based and enteric methane. As the Air Board moves toward implementing the proposed strategy in 2017, we hope it will eliminate digesters as an approach to mitigating methane, and instead work collaboratively with appropriate state agencies to craft policies that reduce methane emissions by promoting sustainable dairy operations in California that emphasize pasture-based methods and appropriate herd sizes.

Finally, we are pleased that by mandating methane reductions by factory dairy farms, the strategy would, if implemented, ensure that such reductions are truly additional by eliminating new projects from eligibility as offsets to be sold in the state's cap-and-trade market. In order to ensure that the strategy achieves its targets, we urge the Air Board to also remove existing projects from the state's cap-and-trade program instead of allowing them to generate offsets for up to 10 years of operation. Likewise, we do not support any generation of Low Carbon Fuel Standard credits for any of these projects.

Again, thank you for the opportunity to weigh in on the Short-Lived Climate Pollution Reduction Strategy. Once the strategy is finalized, we look forward to working with you to develop and implement a regulation that will achieve the targets for methane reductions from dairies while protecting communities.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-slcp2016-WygBa1w+ByQBKQNg.pdf>'

Original File Name: SLCP.CommentstoARB.5.19.16.pdf

Date and Time Comment Was Submitted: 2016-05-19 10:02:34

No Duplicates.

**Comment 20 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Johannes  
Last Name: Escudero  
Email Address: info@rngcoalition.com  
Affiliation: Coalition for Renewable Natural Gas

Subject: SLCP 2016 - Draft  
Comment:

On behalf of the Coalition for Renewable Natural Gas, please find attached our comments in response to the revised Short-Lived Climate Pollutant Strategy draft.

Sincerely,

Johannes Escudero  
CEO / Executive Director  
Coalition for Renewable Natural Gas  
1017 L Street, #513  
Sacramento, CA 95814

916.588.3033  
johannes@rngcoalition.com

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-slcp2016-AXNcNAZgVVIVMAZp.pdf'

Original File Name: RNG Coalition Comments SLCP Draft 051916.pdf

Date and Time Comment Was Submitted: 2016-05-19 10:21:32

No Duplicates.

**Comment 21 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Nathan

Last Name: Bengtsson

Email Address: nathan.bengtsson@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on the ARB Proposed SLCP Strategy

Comment:

Comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-slcp2016-AHBQMVUxWFQLbgNs.pdf'

Original File Name: PGE Comments on Proposed SLCP Strategy 5.20.16.pdf

Date and Time Comment Was Submitted: 2016-05-20 18:03:42

No Duplicates.

**Comment 22 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Karen

Last Name: Spray

Email Address: kspray@sudoe.us

Affiliation: Southern Ute Indian Tribe

Subject: SLCP Comment Letter

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-slcp2016-BnVRIgdiVGgFZgRb.pdf'

Original File Name: SUDOE Letter to CA-ARB SLCP Strategy 20160524.pdf

Date and Time Comment Was Submitted: 2016-05-24 07:24:52

No Duplicates.

**Comment 23 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Michael  
Last Name: Wallace  
Email Address: mike.wallace@utc.com  
Affiliation:

Subject: SLCP 2016 Comments  
Comment:

Dear Mr. Corey,

Attached please find our comments to the 2016 Proposed Short Lived  
Climate Pollutant Reduction Strategy.

Thank you for considering our views,

Mike Wallace

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-slcp2016-  
VDIWMVMrAw9XY1Jk.pdf'

Original File Name: May 26 Comments.pdf

Date and Time Comment Was Submitted: 2016-05-24 09:35:46

No Duplicates.

**Comment 24 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Michael  
Last Name: Geller  
Email Address: mgeller@meca.org  
Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on ARB's Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

Please find attached a copy of MECA's comments on ARB's Proposed Short-Lived Climate Pollutant Reduction Strategy.

Please let me know if you have any questions or comments.

Best regards,

Michael Geller  
Deputy Director  
MECA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-slcp2016-VDIWNVc1WWsAWQRn.pdf>'

Original File Name: MECA Comments on ARB Short-lived Climate Pollutants Final 05262016.pdf

Date and Time Comment Was Submitted: 2016-05-25 11:11:30

No Duplicates.

**Comment 25 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kim  
Last Name: Trinchet  
Email Address: kim@urbanairinitiative.com  
Affiliation: Urban Air Initiative

Subject: Urban Air Initiative comments on proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

Hello,

Please find the attached comments regarding CARB's proposed Short-Lived Climate Pollutant Reduction Strategy.

These have been submitted by the Urban Air Initiative.

Thank you for your time.

Kim Trinchet

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-slcp2016-VzQGblI+BzkLaAZo.pdf'

Original File Name: Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy from UAI.pdf

Date and Time Comment Was Submitted: 2016-05-25 12:08:07

No Duplicates.

**Comment 26 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Stephen  
Last Name: Schaefer  
Email Address: stschaefer@hoshizaki.com  
Affiliation: Hoshizaki America

Subject: Comments to SLCP2016  
Comment:

Attached are Hoshizaki America's comments to Proposed Short-lived  
climate pllutant reduction strategy

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-slcp2016-  
Bm4AaVUnVW4Ab1ct.pdf'

Original File Name: HOSHIZAKI\_CARB\_COMMENTS\_052516.pdf

Date and Time Comment Was Submitted: 2016-05-25 13:27:02

No Duplicates.

**Comment 27 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Debra

Last Name: Taevs

Email Address: Debtaevs@gmail.com

Affiliation:

Subject: Please don't subsidize wood stoves!

Comment:

There's enough doubt about whether certified wood stoves eliminate particle pollution to stop this initiative and do a lot more research is done.

In our personal experience- when a neighbor changed their old wood stove to a EPA certified stove- we didn't even notice the difference in the amount of smoke.

Much better to subsidize gas stoves or another alternative to wood burning rather than institutionalizing wood-burning devices that will stay in use for many many years.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 14:21:34

No Duplicates.

**Comment 28 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Gerald  
Last Name: Hasselbrink  
Email Address: glwj@charter.net  
Affiliation:

Subject: wood smoke pollution  
Comment:

When I learned about this proposal, I knew I had to write and address what has become one of the worst problems my family faces when vacationing in California. It is the effect of wood smoke. If you are a person who likes wood smoke, or profits from it, then you are externalizing the real cost of the pollution and will want to continue to discharge your waste this way. But for most of us it is the clean healthy air that makes California the outstanding place that it is and worth the expense and effort of traveling there to visit and vacation. On our last trip, whenever we would encounter wood smoke we had to move on. It is just so offensive and unhealthy. If your proposal is to just lower the amount, then this is no answer. You should not allow anyone to pollute the clean air. There is no safe level of wood smoke, and it ruins the natural experience for residents and guests alike. California is outstanding and we want to visit there often, but we observed a clear degradation of the air during our last visit. Won't you take the lead and move to zero-tolerance for wood smoke pollution. As with the initial resistance by smokers to indoor clean air, everyone will benefit once they have had the opportunity to experience the beauty and healthfulness of the clean California air. Thank you. Gerald Hasselbrink

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 15:14:32

No Duplicates.

**Comment 29 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Bill  
Last Name: Lewin  
Email Address: belewin@telus.net  
Affiliation:

Subject: EPA Wood Stoves  
Comment:

Please do not subsidize EPA certified wood stoves our health and  
the climate is more important then a minority of people saving a  
few dollars at the expense of everyone else  
thank you  
Bill Lewin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 15:36:01

No Duplicates.

**Comment 30 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Barbara

Last Name: Peters

Email Address: barbaraAnnPeters@gmail.com

Affiliation: AirAdvocacy.org

Subject: EPA Certified wood stoves

Comment:

Please do not invest any money in EPA Certified wood stoves. Any endorsement of any wood burning device is harmful and no different than endorsing filtered cigarettes. Beyond the continued damage to public health and the environment, if you promote change outs to EPA devices you send the harmful message that wood burning is somehow acceptable. Please also consider the newly released 10-year study from University of Washington that shows the harm of PM and soot to cardiac health. Beyond lung disease and cancer, woodsmoke leads to increased risk of heart disease. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 15:48:26

No Duplicates.

**Comment 31 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Mike

Last Name: Mohajer

Email Address: MikeMohajer@yahoo.com

Affiliation: LA County Waste Management Task Force

Subject: Comments on Proposed SLCP Reduction Strategy and Draft EA

Comment:

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our appreciation to the California Air Resources Board (CARB) for providing the opportunity to comment on the Proposed Short-Lived Climate Pollutant Reduction Strategy (Proposed Strategy) and Draft Environmental Analysis (Draft EA). The Task Force would appreciate CARB's consideration of the attached comments as a part of the Proposed Strategy finalization process.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-slcp2016-UyBUPIIwU3ADWgNx.pdf'

Original File Name: SLCP\_Reduction Strategy 05-24-16.pdf

Date and Time Comment Was Submitted: 2016-05-25 16:16:33

No Duplicates.

**Comment 32 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Carol

Last Name: W

Email Address: nofirepitts@yahoo.com

Affiliation:

Subject: comment on short-lived climate pollutant reduction strategy

Comment:

Since woodsmoke is definitely a contributor to climate change, not to mention a health-hazardous neighborhood pollution nightmare, please do not use any funds to subsidize woodburning appliances. One neighbor victimizes another neighbor at human breathing level with residential woodburning. Changeout assistance should be only for alternative heating methods. New EPA-certified stoves and inserts are not clean to begin with; operator misuse and appliance deterioration rapidly makes them worse. Please don't subsidize the woodburning industry by pretending that any kind of woodburning appliance can be a viable solution to air pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 16:45:29

No Duplicates.

**Comment 33 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Matthew

Last Name: Ford

Email Address: fordograph@gmail.com

Affiliation:

Subject: Wood stove

Comment:

Burning wood is toxic and harms the environment. Certified wood stoves won't change that. Wood burning should be banned. This isn't the 1800's! My family and I are getting affixiated by our neighbors filtered wood stove in a residential neighborhood. You can't smoke cigarettes within 50' of a business yet burning wood 24/7 in a residential neighborhood is ok?

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-slcp2016-Vz5cN1Y2UGQDYAAu.jpeg'

Original File Name: image.jpeg

Date and Time Comment Was Submitted: 2016-05-25 16:37:41

No Duplicates.

**Comment 34 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Shirley  
Last Name: Brandie  
Email Address: s.brandie@hotmail.com  
Affiliation:

Subject: Change-outs  
Comment:

Please do not use any of that money to add more wood burning appliances of any kind.  
We are so close to the exceeding the 2 degrees centigrade and putting these appliances in the hands of those that burn might just push us over the line.  
I think climate change as it is already being seen should be enough to convince anyone in touch with what's going on to stop burning completely but there are those who refuse to believe the science because they don't want their 'so-called' freedoms reined in. This is not about taking someone's entertainment away. This is about continued life on this planet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 17:38:26

No Duplicates.

**Comment 35 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: comments on Proposed Short-Lived Climate Pollutant Reduction Strategy (Apr 2016)

Comment:

Please accept the attached comment letter on the Proposed Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-slcp2016-UDNUPVQ7U3NWPwd1.pdf'

Original File Name: CONSORT\_SLCPLtr\_2016\_05\_18.pdf

Date and Time Comment Was Submitted: 2016-05-25 17:50:34

No Duplicates.

**Comment 36 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Diana

Last Name: Madson

Email Address: dmadson@sierrabusiness.org

Affiliation: Sierra CAMP

Subject: Comments on Proposed Short-Lived Climate Pollutant Strategy (slcp2016)

Comment:

Please see attached comments from the Sierra Climate Adaptation & Mitigation Partnership (Sierra CAMP) on the Proposed Short-Lived Climate Pollutant Strategy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-slcp2016-VjVTNFU5UHMKUwZ1.pdf>'

Original File Name: CAMP\_SLCPStrategy\_Letter.pdf

Date and Time Comment Was Submitted: 2016-05-25 18:00:21

No Duplicates.

**Comment 37 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Mark

Last Name: Gladden

Email Address: markgladden@gmail.com

Affiliation:

Subject: Don't encourage wood burning by subsidizing wood burning stoves

Comment:

Don't encourage wood burning by subsidizing wood burning stoves.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 18:04:04

No Duplicates.

## **Comment 38 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Dr Dorothy L

Last Name: Robinson

Email Address: drd.robinson@gmail.com

Affiliation: Air Quality Researcher

Subject: Phasing out log-burning stoves recommended as a cost-effective way to reduce SLCP  
Comment:

The UN Environment Program and World Meteorological Organization (UNEP/WMO) recommends phasing out log-burning stoves in developed countries as part of a package of 16 measures to reduce the global temperature increase by 0.4-0.5 degrees in over the next 20 to 30 years and buy time to implement the measures needed to create a carbon-neutral planet - see <http://woodsmoke.3sc.net/greenhouse>  
The Sierra Club supports this action: -  
<http://theyodeler.org/?p=10428>

Over the critical period between now and when the global temperature rise is expected to exceed 2 degrees centigrade, emissions of methane, black carbon, carbon monoxide and ozone precursors from house with a wood stove (even an EPA-certified stove) will cause cause more global warming than several houses using non-polluting heating, such as an efficient electric heat pump - <http://woodsmoke.3sc.net/ghg>

CARB's concept paper notes that:

"ARB and local air districts have developed programs to comply with federal air quality standards for PM. These include mandatory and voluntary rules to restrict residential wood-burning in fireplaces and wood stoves, as well as incentive programs to switch to cleaner burning devices"

and "the Bay Area Air Quality Management District is considering a new rule to ban all wood burning devices in new construction and restrict the sale of buildings with old fireplaces, stoves or other wood-burning devices that fail to meet United States Environmental Protection Agency (U.S. EPA) emission standards."

Unfortunately, real-life PM2.5 and methane emissions from new wood stoves are only marginally less than from uncertified stoves. The estimated health costs of using a new wood stove in urban areas amount to several thousand dollars per year, far more than any possible benefits to the owner. This is on top of damaging the climate.

It is therefore vitally important that wood stove replacement programs support the UNEP/WMO recommendation to phase out all log-burning stoves. No subsidies should be available to replace old wood stoves with new log-burning stoves and subsidies should also be made available to replace EPA-certified wood stoves with non-polluting heating. Restrictions on the sale of buildings should apply to all buildings with a log-burning stove, irrespective of EPA-certification.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 18:43:41

No Duplicates.

**Comment 39 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Dan

Last Name: Noble

Email Address: danwyldernoble@gmail.com

Affiliation: Association of Compost Producers

Subject: Comment letter on the Proposed SLCP Reduction Strategy

Comment:

The Association of Compost Producers (ACP) is pleased to offer these specific recommendations and next steps on using compost to reduce CH<sub>4</sub>, N<sub>2</sub>O and carbon black pollutants for the Short-Lived Climate Pollutant Reduction Strategy ("Strategy").

Our goal with this letter is to suggest ways that the California compost industry (ACP) can use its capacity and markets to assist the ARB staff to implement the Strategy. Specifically, ACP desires to work with ARB and CalRecycle to engage directly and ongoing to ensure that any proposed incentive programs ("carrots") and new regulations ("sticks") are used to both enhance the economy, while lowering SLCP's. We propose five (5) specific steps, or elements, to a comprehensive collaboration.

We look forward to working together with ARB on implementing the SLCP Reduction Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-slcp2016-UTBTNI0sAAxQJVI+.docx'

Original File Name: ACP SLCP Letter -Final.docx

Date and Time Comment Was Submitted: 2016-05-25 19:19:11

No Duplicates.

**Comment 40 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Dan

Last Name: Noble

Email Address: danwyldernoble@gmail.com

Affiliation: Noble Resources Group

Subject: A Market Assessment Framework for Bioproducts

Comment:

Bioproducts, made from re-manufacturing organic residuals into marketable commodities, is the essence of renewable carbon management. The Proposed Short Lived Climate Pollutant Reduction Strategy is an important next step in establishing the renewable carbon economy in California.

This attached paper "Bioproducts - A Market Assessment Framework," provides a whole systems, market-based approach, to managing the renewable carbon contained within all categories of organic residuals. By not letting them rot (anaerobically) in manure piles and landfills and thereby creating fugitive methane, the direct re-manufacturing will reuse those carbon compounds beneficially, while enhancing the economy and protecting the environment.

To accomplish this strategy will require setting up a new market assessment process so that organics generators (local communities and agricultural businesses), technology developers, market developers and investors can all speak a common scientifically grounded, market data-based language. In this way, Californians can co-invest in developing a new renewable economy as a community-based sustainable alternative to the current wasting economy.

Noble Resources Group has already started building a database with its clients to begin implementing this approach throughout California, and beyond. We look forward to working with ARB to use it in collaboration with ARB to help support SLCP Strategy implementation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-slcp2016-B2ITJ1QyVVIXMwNq.pdf>'

Original File Name: NRG Bioproducts Paper - May 2016.pdf

Date and Time Comment Was Submitted: 2016-05-25 19:27:27

No Duplicates.

**Comment 41 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Barbara  
Last Name: Jenkins  
Email Address: wiljenbar@att.net  
Affiliation:

Subject: epa certified wood stoves  
Comment:

Please do NOT subsidize EPA certified wood stoves.  
Wood smoke is dangerous and smelly. I know that it is becoming more  
and more popular to burn wood for recreation, but its at the cost  
of clean air.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-25 20:12:13

No Duplicates.

**Comment 42 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: bruce  
Last Name: hierlmeier  
Email Address: bruce.hierlmeier@zero-zone.com  
Affiliation: Zero Zone

Subject: comments on Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please see our attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-slcp2016-VC4BfQZkUmBRJQJg.doc'

Original File Name: zzcarb.doc

Date and Time Comment Was Submitted: 2016-05-25 20:39:55

No Duplicates.

**Comment 43 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Keisten

Last Name: Kleps

Email Address: Kristenram@gmail.com

Affiliation:

Subject: Stove exchange

Comment:

Please do not invest in a swap out program for old wood stoves. New EPA stoves are tested in perfect conditions and results do not accurately reflect real use. Further, wood smoke contains some of the deadliest and most toxic chemicals known. These are in the form of gasses that can not be filtered out by our lungs. Even a so called clean burning stove is incredibly polluting and harmful to the environment and especially children, the elderly and people with pre existing conditions. New wood stoves deteriorate quite quickly and are very often not used properly. But even in the best conditions, huge amounts of cancer causing material and black carbon are being released into the air. The most efficient stove still produces exponentially more PM 2.5 for example than vehicle emissions. Money would be better spent educating the public about the harmful effects of wood smoke and investing in clean technologies like geothermal, solar or wind.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 06:55:47

No Duplicates.

**Comment 44 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jen

Last Name: Stuart

Email Address: jstuart89@yahoo.com

Affiliation:

Subject: wood stoves

Comment:

please do not subsidize wood burning stoves. Wood burning stoves and outdoor wood boilers should be banned and made illegal. They are the most polluting of all heat sources and they are the most hazardous to everyones health of all the heat sources. Wood smoke is way more toxic than cigarette smoke. Wood smoke increases the risk of heart attack, stroke, and death. It also makes COPD, asthma, and other health issues worse. This antiquated method of heat(wood burning) should not be used anymore when we have electric, gas, oil, geothermal, solar, wind, hydro, and nuclear to provide heat for homes and businesses. All of these other methods are less polluting and less harmful to health. The UN recommends that wood burning be phased out in all developed countries. I can cite many articles and papers on how bad wood burning is for the environment and health. Wood burning needs to be ended not only in this state by nation wide. We are not forced to breathe in cigarette smoke, so why are we being forced to breath in wood smoke when we do not want to be breathing that health hazard in. Please do not subsidize wood stoves. Please think of the health of the people and environment and ban the use of them instead.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 07:18:41

No Duplicates.

## **Comment 45 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: brian

Last Name: moench

Email Address: drmoench@yahoo.com

Affiliation: Doctors and Scientists Against Woodsmoke

Subject: Rules on Climate Pollution Reduction

Comment:

As the Board chairman of an international coalition, Doctors and Scientists Against Wood Smoke Pollution (DSAWSP), I urge the CARB to reject the concept of subsidizing any program to change out old wood stoves for "EPA certified" stoves. Much like the recent Volkswagen diesel emissions scandal, something comparable is taking place with wood stoves. EPA stoves do not perform in the real world like they do in the EPA lab for a long list of reasons. But their performance also degrades quickly over time, in fact in as little as two years.

<http://uphe.org/wp-content/uploads/2016/01/UPHE-wood-smoke-report-2016-update-PDF.pdf>

It is a common misconception that burning wood is carbon neutral. A 2010 study concluded that the amount of carbon released per unit of energy produced is actually greater for wood than it is for fossil fuels. Considering the entire carbon life cycle of wood, burning releases carbon now when we can least afford to do so—carbon that would otherwise have been stored for decades or perhaps centuries. While sustainable forestry practices can help repay that "carbon debt," those benefits do not accrue until the distant future, too late to be of much help. Furthermore, the overall impact of wood burning is that some of our forest mass is being cut down for wood burning, and the loss of trees as carbon reservoirs further aggravates the climate crisis. For purposes of climate considerations, CARB should be adopting policies to eliminate wood burning, not temporarily reducing wood burning through state subsidy.

Whatever CARB does for climate protection should also consider secondary benefits. In many cities, wood smoke is responsible for as much community particulate pollution as vehicle traffic. Therefore, eliminating wood burning would reap tremendous public health benefits. This consideration is amplified further because wood smoke is likely the most toxic type of pollution that the average person is ever exposed to, much more toxic than second hand cigarette smoke on an equal volume basis. But because residential wood smoke highly concentrates near its sources, neighbors of wood burners suffer extraordinarily high levels of particulate matter, PAHs, and dioxins, as documented by numerous studies, many of them from California. This is a greatly under appreciated issue of environmental justice—some members of the community are victimized far more disproportionately than others. In fact our organization, DSAWSP, has been besieged for help by such victims throughout the country.

We consider change out programs with "EPA certified stoves" essentially a misguided capitulation to the wood burning industry that only serves their interest, at the expense of the public interest.

Sincerely,

Dr. Brian Moench  
Board Chairman, Doctors and Scientists Against Wood Smoke Pollution

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 08:13:38

No Duplicates.

**Comment 46 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kevin

Last Name: Messner

Email Address: KMessner@PoliticalLogic.net

Affiliation:

Subject: AHAM Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please find attached the comments of the Association of Home Appliance Manufacturers (AHAM) to the Proposed Short-Lived Climate Pollutant Reduction Strategy. We look forward to discussing these matters further with the Air Resources Board.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-slcp2016-AGNcO1A9Bz1RMQlm.pdf>'

Original File Name: California CARB SLCP Proposed Strategy AHAM Comments (00049010).PDF

Date and Time Comment Was Submitted: 2016-05-26 08:47:08

No Duplicates.

**Comment 47 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Shelley

Last Name: Jiang

Email Address: [sjiang@airquality.org](mailto:sjiang@airquality.org)

Affiliation: Capital Region Climate Readiness Collabo

Subject: Capital Region Climate Readiness Collaborative Letter on the SLCP Reduction Strategy  
Comment:

Please find attached the Capital Region Climate Readiness  
Collaborative comment letter on the Draft Short-Lived Climate  
Pollutant Reduction Strategy.

Thank you!

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-slcp2016-AGNUIANhAAxVfgIW.pdf>'

Original File Name: CRC - 2016 05 - SLCP Reduction Strategy Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-05-26 09:04:36

No Duplicates.

**Comment 48 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jeffrey

Last Name: Fort

Email Address: jeffrey.fort@dentons.com

Affiliation:

Subject: Dentons' Comments on CARB's Proposed SLCP Reduction Strategy

Comment:

Attached are Dentons' Comments on CARB's Proposed SLCP Reduction Strategy on behalf of Foam Supplies, Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-slcp2016-UTUHZFU6UXYAaQFv.pdf'

Original File Name: Dentons Comments.pdf

Date and Time Comment Was Submitted: 2016-05-26 08:55:06

No Duplicates.

**Comment 49 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Stacey  
Last Name: Sullivan  
Email Address: ssullivan@suscon.org  
Affiliation: Sustainable Conservation

Subject: Sustainable Conservation SLCP comments  
Comment:

Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-slcp2016-VCdVJgNxUXYEY1M6.docx'

Original File Name: Sustainable Conservation comments on proposed SLCP Strategy.docx

Date and Time Comment Was Submitted: 2016-05-26 09:32:44

No Duplicates.

**Comment 50 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: W Caffey  
Last Name: Norman  
Email Address: [caffey.norman@squirepb.com](mailto:caffey.norman@squirepb.com)  
Affiliation:

Subject: SLCP2016  
Comment:

Please find comments of Bluon Energy attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-slcp2016-BWcGbAZyUW0LY1J8.pdf>'

Original File Name: Bluon.pdf

Date and Time Comment Was Submitted: 2016-05-26 09:36:26

No Duplicates.

**Comment 51 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Ronald  
Last Name: Shebik  
Email Address: ron.shebik@hussmann.com  
Affiliation: Hussmann Corporation

Subject: HFC's and High GWP Refrigerants  
Comment:

Please see the attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-slcp2016-AmoGdVwuACAAa1c2.doc'

Original File Name: Hussmann Corporation Comments - CARB Draft Strategy May 2016.doc

Date and Time Comment Was Submitted: 2016-05-26 09:33:58

No Duplicates.

**Comment 52 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Julia

Last Name: Kim

Email Address: jkim@lgc.org

Affiliation: Local Government Commission

Subject: Comments on the Proposed SLCP Reduction Strategy from ARCCA

Comment:

Please accept the attached comment letter on behalf of ARCCA, the Alliance of Regional Collaboratives for Climate Adaptation.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-slcp2016-VjcFcVIwBzcKbQdY.pdf'

Original File Name: ARCCA Comment Letter - SLCP Proposed Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 10:28:42

No Duplicates.

**Comment 53 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: michelle

Last Name: derviss

Email Address: dervissdesign@verizon.net

Affiliation:

Subject: No funds to support food burning stoves

Comment:

Please consider what the subsidy would do to the quality of our air.

The goal should be to phase out wood burning not encourage it.  
NO FUNDS to go to wood stove inserts.

Michelle Derviss

Marin county.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 11:00:01

No Duplicates.

**Comment 54 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Evan

Last Name: Edgar

Email Address: [evan@edgarinc.org](mailto:evan@edgarinc.org)

Affiliation:

Subject: Support 90% diversion by 2025 with The Plan before the Ban

Comment:

Edgar & Associates represent the California Compost Coalition, and is the engineer for many private independent compost and anaerobic digestion companies statewide. The compost industry supports the Draft Strategies in the SLCP Paper and is poised to assist in developing over 100 facilities over the five years to reach the 2020 goal, and another 100 facilities by 2025 to reach the 2025 goal.

The projected result of this diversion strategy to effectively eliminate 90% of the organics by 2025 is over 8 million tons in 2020 and 14.5 million tons in 2025, and when measured in avoided metric tons of carbon dioxide (MTCO<sub>2</sub>e) is 4.3 million MTCO<sub>2</sub>e by 2020 and 7.8 million MTCO<sub>2</sub>e by 2025.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-slcp2016-WygBa1MxUnEFXFcy.pdf>'

Original File Name: SLCP Edgar White Paper - Submitted 10-29-15.pdf

Date and Time Comment Was Submitted: 2016-05-26 11:18:08

No Duplicates.

**Comment 55 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Petria  
Last Name: MacDonnell  
Email Address: petriamacd@gmail.com  
Affiliation: none

Subject: EPA certified woodstoves  
Comment:

Please don't do this! For 15 years we tried to get a neighbor to stop bombarbing us with woodsmoke. Nothing helped until we helped get the Berkeley Woodsmoke Nuisance ordinance passed. But her landlord skipped the required discussion and had an EPA certified insert installed. The smoke is just as bad, and she burns year-round, using green wood. I now have largyneal neuropathy and a heart condition. I start coughing before I even smell the smoke. But I have no legal resource left. PLEASE, I ask you not to go through with this plan.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 11:18:29

No Duplicates.

## **Comment 56 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

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

Subject: CCA Comments on Proposed Short Lived Climate Pollutant Reduction Strategy and Draft EA

Comment:

May 26, 2016

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
Re: Comments on Proposed Short Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis

The Coalition for Clean Air urges the Air Resources Board to finalize and adopt the Proposed Short Lived Climate Pollutant Reduction Strategy and begin implementing it as soon as possible. Reducing these SLCPs, or "super-pollutants," is essential to slowing the rapid warming of the planet; in addition, many of the SLCPs are hazardous to human health at ground level, so curbing them provides significant benefits to public health. Action by California can help to spur other states, as well as other nations, to reduce super pollutants.

During legislative consideration of the California Global Warming Solutions Act (AB 32, Nuñez/Pavley, 2006) and during the early years of its implementation, some experts and advocates urged ARB to take quick and aggressive action, as warranted by scientific data, to reduce the generation of SLCPs; but, as former Board Chair Robert Sawyer testified at the May 26 Board Hearing, ARB staff at that time opposed taking such action. We commend ARB's change of course in recent years to a much more pro-active stance on curbing super-pollutants.

Our organization worked closely with Senators Lara and Pavley on the passage of SB 605 (2014), which requires ARB to develop a plan to reduce emissions of SLCPs no later than January 1, 2016. We believe the Proposed Strategy is a faithful implementation of that law, other than the fact that it is several months overdue - which only emphasizes how important it is to move quickly to put the plan into action.

The proposed target emission levels are crucial. The urgency of the climate crisis requires that SLCPs be brought down by substantial amounts by 2030. We believe the proposed science-based targets for black carbon, methane, and hydrofluorocarbons are achievable, and would represent significant progress in the battle against global warming.

Using a 20-year value for global warming potential is essential. We agree with the Proposed Strategy's use of 20-year values for GWP. Curbing SLCPs quickly offers the opportunity to buy some time while

carbon dioxide emissions are brought down. Time is short to prevent catastrophic climate change, so a horizon of 20 years - or fewer - must be the standard.

**Restrict Oil and Gas Methane Emissions.** ARB should adopt a final rule this year limiting greenhouse gas emissions from crude oil and natural gas facilities. These major methane sources have gone too long without this kind of regulation. ARB, The Division of Oil, Gas and Geothermal Resources and the other relevant regulatory agencies should take quick and aggressive action to assure that the disastrous methane leak at Aliso Canyon is never repeated.

**Continue Progress on Reducing Black Carbon.** Control measures by ARB and air districts have succeeded in reducing black carbon by 90 percent over the last 50 years; for the sake of human health and climate stabilization we must continue this progress, primarily be reducing particulate matter from diesel exhaust and wood burning. This progress will depend on successful implementation of the proposed Sustainable Freight Action Plan as well as the Mobile Source Strategy.

**Eliminate the Disposal of Organic Waste.** We strongly support the organic waste diversion goals proposed in the SLCP strategy, and we specifically support the commitment to adopt regulations to phase out the disposal of organic waste in landfills. The Proposed Strategy lays out an effective regulatory strategy to prevent the creation of these inherently avoidable emissions by virtually eliminating the landfill disposal of organic waste by 2025. We encourage ARB to continue its close collaboration with CalRecycle, which testified in favor of the Proposed Strategy. We support the more detailed comments filed by Californians Against Waste, including the call for more stringent limits on landfill emissions.

**Regulate Methane Emissions from Dairies.** We support the Proposed Strategy's call for developing and implementing mandatory regulations to reduce methane from manure management in the animal agriculture industry. The agriculture industry has been exempt from climate standards for too long, and dairies are by far the largest source of methane emissions in California. It is past time for dairies to take responsibility for their methane emissions through enforceable standards.

**ARB Should Move Quickly to Implement SLCP Reduction Measures.** While we support SB 1383 (Lara), we also note that ARB already has authority, under the Global Warming Solutions Act and the California Clean Air Act, to adopt measures to reduce these super pollutants. We urge ARB to adopt the Proposed Strategy and move quickly to implement these measures.

Respectfully,  
Bill Magavern  
Policy Director  
Coalition for Clean Air

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-slcp2016-VjUBaFY6AD5XNFQ6.docx>'

Original File Name: Comments on ARB SLCP Strategy 5.26.16.docx

Date and Time Comment Was Submitted: 2016-05-26 11:31:06

No Duplicates.



**Comment 57 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@crccnorth.org

Affiliation: California Refuse Recycling Council

Subject: CRRC Comments RE: Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Thank you for the opportunity to provide comments on the Proposed  
Short-Lived Climate Pollutant Reduction Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-slcp2016-  
UiECaFU3V3QEXQdk.pdf'

Original File Name: SLCP CRRC 05.25.16.pdf

Date and Time Comment Was Submitted: 2016-05-26 11:36:01

No Duplicates.

**Comment 58 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Abby  
Last Name: Young  
Email Address: [ayoung@baaqmd.gov](mailto:ayoung@baaqmd.gov)  
Affiliation: BAAQMD

Subject: Proposed SLCP Strategy comment letter  
Comment:

Attached is a comment letter from the Bay Area Air Quality  
Management District on ARB's Proposed Short-lived Climate Pollutant  
Strategy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-slcp2016-UTMCZQZmACILYAhs.pdf>'

Original File Name: BAAQMD SLCP comment letter 5-2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 11:49:38

No Duplicates.

**Comment 59 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jason

Last Name: Paquette

Email Address: jpaquette@structuralconcepts.com

Affiliation:

Subject: CARB Comments Draft Strategy SLCP

Comment:

Please see attached comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-slcp2016-AmMBdVc0UV0HYgdo.pdf'

Original File Name: ARB Comments on Proposed Short Lived Climate Pollutant Reduction Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 12:36:49

No Duplicates.

**Comment 60 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Alexander  
Last Name: Hillbrand  
Email Address: [ahillbrand@nrdc.org](mailto:ahillbrand@nrdc.org)  
Affiliation: Natural Resources Defense Council

Subject: NRDC & IGSD Comments on ARB's Proposed SLCP Reduction Strategy  
Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-slcp2016-BmgBdVM2BDQKUwBp.pdf>'

Original File Name: NRDC IGSD Proposed SLCP Reduction Strategy Comments.pdf

Date and Time Comment Was Submitted: 2016-05-26 12:36:50

No Duplicates.

**Comment 61 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Anne  
Last Name: Germain  
Email Address: agermain@wasterecycling.org  
Affiliation: NWRA

Subject: CARB Proposed SLCP Strategy  
Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-slcp2016-VzkAcQBzVmQGxwVa.pdf'

Original File Name: NWRA SWANA comments - CARB SLCP.pdf

Date and Time Comment Was Submitted: 2016-05-26 13:04:44

No Duplicates.

**Comment 62 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of Californ

Subject: Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

Rural County Representatives of California appreciates this  
opportunity to submit our comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-slcp2016-  
VCdSPFY4VXRWJFAP.pdf'

Original File Name: Short\_Lived\_Climate\_Pollutant\_Strategy\_Ltr\_to\_ARB\_05262016.pdf

Date and Time Comment Was Submitted: 2016-05-26 13:55:53

No Duplicates.

**Comment 63 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation:

Subject: SLCP Comments from Clean Energy

Comment:

On behalf of Clean Energy, we would appreciate consideration of our comments concerning the SLCP Draft. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-slcp2016-UDMCaFwzVmBRCAZl.pdf'

Original File Name: CLNE Comment Letter on SLCP Strategy May 2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 14:06:57

No Duplicates.

**Comment 64 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Stephen

Last Name: Van Maren

Email Address: vanmaren@alliancepolicy.org

Affiliation: Alliance for Responsible Atmospheric Pol

Subject: Alliance Comments on Proposed Short-Lived Climate Pollutant (SLCP) Reduction  
Strategy

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-slcp2016-  
UDEFb1wxUWsHYAVr.pdf'

Original File Name: Alliance Comments on Proposed CARB Draft SCLP Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 14:18:43

No Duplicates.

**Comment 65 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Patrick  
Last Name: Wood  
Email Address: patrick@agmethaneadvisors.com  
Affiliation: Ag Methane Advisors

Subject: SLCP Comments  
Comment:

Thank you for the opportunity to submit comments related to the Short Lived Climate Pollutants Strategy, please find detailed comments in the attached PDF

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-slcp2016-VjdSM1Y6AjRSIARs.pdf>'

Original File Name: AgMethane\_SLCP\_Strategy Comments\_5.23.16-signed.pdf

Date and Time Comment Was Submitted: 2016-05-26 14:37:10

No Duplicates.

**Comment 66 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Todd  
Last Name: Shuman  
Email Address: tshublu@yahoo.com  
Affiliation: WUMU

Subject: Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis  
Comment:

May 26, 2016

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
(Submitted via Internet Upload  
(<http://www.arb.ca.gov/lispub/comm/bclist.php>)

Re: Proposed Short-Lived Climate Pollutant Reduction Strategy and  
Draft Environmental Analysis

To Whom It May Concern:

Sequoia ForestKeeper, Wasteful Unreasonable Methane Uprising, Ara Marderosian, Todd Shuman, and Jan Dietrick submit (in the attached pdf) the following comments on the Proposed Short-Lived Climate Pollutant Strategy and accompanying Draft Environmental Analysis ("Draft EA") prepared by the California Air Resources Board ("CARB").

While our comments are extensive and substantive, we wish to emphasize one of our comments in this publicly-viewable message window:

In this recently proposed Short-lived Climate Pollutant (SLCP) Reduction Strategy, the California Air Resources Board (CARB) has again effectively ignored the single largest methane emission source in California: enteric emissions from California livestock. No "reasonably foreseeable compliance responses associated with the methane reduction measures" are projected concerning potential enteric emission reductions from California livestock in Appendix C, pages 4-16/17, Draft EA for Proposed SLCP Reduction Strategy (April 11, 2016). Enteric emissions constitute about 30 percent of methane emissions in California in a normal year. It is unconscionable that this atmospheric methane emission source (just under a billion pounds of methane emission per year in California, as of 2013) continues to be severely neglected by CARB, when there are reasonable measures that could be enacted to dramatically reduce methane emissions from this source.

Sincerely,

Todd Shuman, on behalf of SFK, WUMU, Ara Marderosian, Todd Shuman,  
and Jan Dietrick Camarillo CA 05/26/2016

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-slcp2016-  
VSYGZlQ+BAgH2m0d.zip'

Original File Name: SLCP PDFs.zip

Date and Time Comment Was Submitted: 2016-05-26 14:34:05

No Duplicates.

**Comment 67 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environ.

Subject: Comments on Proposed Short-Lived Climate Pollutant Strategy

Comment:

See attached comments dated May 26, 2016 with Exhibits 1 through 13.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-slcp2016-BTcBN1VIVzIGLIJi.pdf'

Original File Name: 2016.05.26 proposed SLCP strategy comments FINAL with exhibits.pdf

Date and Time Comment Was Submitted: 2016-05-26 14:34:01

No Duplicates.

**Comment 68 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: David  
Last Name: Winningham  
Email Address: dave.winningham@alliedair.com  
Affiliation: Lennox International

Subject: Lennox Comments on CARB SLCP Strategy  
Comment:

Please see the attached Lennox comments regarding the California  
ARB Reduction Strategy on SLCP.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-slcp2016-AW0FZIU6AD0HblUt.pdf'

Original File Name: Lennox Comment CARB SLCP Reduction Strategy 05262016.pdf

Date and Time Comment Was Submitted: 2016-05-26 14:56:17

No Duplicates.

**Comment 69 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Frank  
Last Name: Caponi  
Email Address: fcaponi@lacsds.org  
Affiliation: LACSD

Subject: Comment Letter  
Comment:

Los Angeles County Sanitation Districts comment letter regarding  
the Proposed Short-Lived Climate Pollutant Reduction Strategy and  
Draft Environmental Analysis Prepared for the Proposed Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-slcp2016-  
UjZVPFw+VDcAMm0d.pdf'

Original File Name: DOC052716-05272016080213.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:00:38

No Duplicates.

**Comment 70 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Require inspected manure lagoon covers

Comment:

Require inspected manure lagoon covers

We are pleased that on page 68 ARB proposes:

"In 2017, and in coordination with CDFA and local air quality and water quality agencies, ARB will initiate a rulemaking process to reduce manure methane emissions from the dairy industry in-line with the objectives in this Proposed Strategy." The target of a reduction from the current 2030 projections on page 63 of about 29 million tons, by 21 million tons, to 8 million tons, which is a 70% reduction.

However, the proposed strategy seems to imply that ARB is considering only financial incentives. We hope that is not true, we believe that this can only be achieved by requiring tight manure covers that are regularly checked for leaks and eliminated. We hope this is done at least annually for small lagoons, quarterly for large ones.

With strict regulations, inspections, and enforcement, we hope that more than a 70% reduction can be achieved.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 15:10:54

No Duplicates.

**Comment 71 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jim

Last Name: Stewart, PhD

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Require comparable reductions in enteric emissions

Comment:

Require comparable reductions in enteric emissions

The draft strategy of only 5 million tons reduction (about 15%) out of over 30 million tons for dairy and livestock enteric emissions is a black mark on ARB. Enteric emissions are the largest unregulated source of GHG in CA. It is time for enteric emissions reductions of at least 40% to be comparable with the overall reduction in methane emissions by 2030. To ignore enteric emissions puts more pressure on all GHG sources in CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 15:14:29

No Duplicates.

**Comment 72 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on SLCP Proposed Reduction Strategy  
Comment:

Dear Staff

Attached, please find IETA's comments on ARB's SLCP Proposed Reduction Strategy. We appreciate this opportunity to share feedback.

Sincerely,

Katie Sullivan

Director, Americas & Climate Finance  
IETA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-slcp2016-BWxdPlwpWWtVDFQ3.pdf'

Original File Name: IETA Comments\_ARB SLCP Proposed Strategy\_26May.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:23:34

No Duplicates.

**Comment 73 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

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

**Comment 74 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Randy  
Last Name: Wilson  
Email Address: randywilson@countyofplumas.com  
Affiliation: Plumas County

Subject: Comments on Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please see attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-slcp2016-UjEBaFU5UW8KaQhm.pdf'

Original File Name: Comments on Short-Lived Climate Pollutant Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:17:03

No Duplicates.

**Comment 75 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: sdeslauriers@carollo.com  
Affiliation: CWCCG and CASA

Subject: CWCCG-CASA Comments Regarding the Proposed SLCP Reduction Strategy  
Comment:

CWCCG and CASA appreciate the opportunity to comment on the Proposed SLCP Reduction Strategy. We largely support the conclusions and recommendations in the Proposed Strategy and appreciate the recognition articulated that the wastewater sector is part of the solution.

Our letter includes detailed comments on the Economic Analysis for your consideration. We look forward to working with staff to develop clear assumptions and accurate cost estimates.

Regards,  
Sarah Deslauriers  
CWCCG Program Manager

Greg Kester  
CASA Director of Renewable Resource Programs

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-slcp2016-VTZQIVQ2VmYKa1N+.pdf'

Original File Name: CWCCG-CASA\_Comment\_letter\_in\_support\_of\_CARB\_proposed\_SLCP\_Reduction\_Strategy\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:24:19

No Duplicates.

**Comment 76 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Helen

Last Name: Walter-Terrinoni

Email Address: helen.a.walter-terrini@chemours.com

Affiliation: The Chemours Company

Subject: SLCP2016 Proposed Strategy

Comment:

Please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-slcp2016-VDdXOVI2VmhVPAVw.pdf'

Original File Name: Chemours comments on the CARB Short Lived Climate Pollutant Proposed Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:42:56

No Duplicates.

**Comment 77 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: Comments on the SLCP

Comment:

Please see attached .pdf for Camco's comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-slcp2016-UTIBZlwwWGhWPwdY.pdf'

Original File Name: Camco Comments on SLCP May 26 2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:45:37

No Duplicates.

**Comment 78 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Marsha Campbell

Last Name: Mathews

Email Address: mcmathews@ucanr.edu

Affiliation: University of California Cooperative Ext

Subject: Flush vs scrape systems on dairies

Comment:

Please see attached letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-slcp2016-UzIGcgNgVloBZAZp.pdf'

Original File Name: ARB comments 5-26-16 UCCE MCM.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:52:28

No Duplicates.

**Comment 79 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Gerald  
Last Name: Secundy  
Email Address: jerrys@cceeb.org  
Affiliation: CCEEB

Subject: CCEEB's Comments Re: Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Good Afternoon:

Attached you will find the California Council for Environmental and Economic Balance ("CCEEB") comment letter regarding Proposed Short-Lived Climate Pollutant Reduction Strategy.

Please do not hesitate to contact us if you have any questions or need further information.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-slcp2016-WzhTNl05BTNVMQFe.pdf>'

Original File Name: CCEEB CCEEB SLCP Proposed Strategy Comment Letter\_5-26.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:54:21

No Duplicates.

**Comment 80 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Cathleen  
Last Name: Pieroni  
Email Address: cpieroni@sandiego.gov  
Affiliation: City of San Diego Public Utilities Dept.

Subject: San Diego Comments on SLCP Reduction Strategy  
Comment:

Dear Ms. Jensen,

Attached please find comments from the City of San Diego related to the Proposed Short Lived Climate Pollutant Reduction Strategy. Thank you for this opportunity to comment.

Sincerely,

Cathleen Pieroni  
External Water Policy Program Manager

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-slcp2016-VmRWYAMzUTdSeVdn.pdf>'

Original File Name: 2015-05-26 San Diego Comments on SLCP Reduction Strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:52:46

No Duplicates.

**Comment 81 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Abby

Last Name: Halperin

Email Address: ahalperin@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Pacific Forest Trust comments on the proposed SLCP strategy and Draft EA  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-slcp2016-B3dRNIEzUmhQMFA5.pdf'

Original File Name: Pacific Forest Trust comments on SLCP strategy.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:14:55

No Duplicates.

**Comment 82 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jerilyn

Last Name: Mendoza

Email Address: JMendoza5@semprautilities.com

Affiliation:

Subject: SoCalGas and SDG&E Comments on Proposed SLCP Strategy

Comment:

Please find SoCalGas and SDG&E Comments on the Proposed SLCP Strategy attached for your review. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-slcp2016-AHNXPgBiBDZROwlu.pdf>'

Original File Name: SoCalGas\_SDG&E Comments on Proposed SLCP Strategy 5-26-16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:05:01

No Duplicates.

**Comment 83 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Martha

Last Name: Davis

Email Address: mdavis@ieua.org

Affiliation: Inland Empire Utilities Agency

Subject: Comments on SLCP

Comment:

Attached are the comments of the Inland Empire Utilities Agency

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-slcp2016-BWRQJARnBAGCaAdi.docx'

Original File Name: ARB Letter.docx

Date and Time Comment Was Submitted: 2016-05-26 16:09:03

No Duplicates.

**Comment 84 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Claudia

Last Name: Arndt

Email Address: carndt@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF Comments on the Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please accept these updated comments on the Proposed Short-Lived Climate Pollutant Reduction Strategy. We noticed an inaccuracy in the previous version.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-slcp2016-Wj9VN1E2Ag5WM1c4.pdf'

Original File Name: EDF Comments on SLCP Plan\_052616\_.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:04:10

No Duplicates.

**Comment 85 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Abigail

Last Name: Ramirez

Email Address: aramirez@leadershipcounsel.org

Affiliation:

Subject: Resident comment letter on SLCP Strategy

Comment:

Attached is a comment letter from community residents regarding the  
SLCP Reduction Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-slcp2016-  
B3RcNIIwUXIDWII+.pdf'

Original File Name: SLCP letter from residents - Final.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:10:53

No Duplicates.

**Comment 86 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Jason  
Last Name: Schmelzer  
Email Address: jason@shawyoderantwih.com  
Affiliation: Shaw / Yoder / Antwih, Inc.

Subject: Coalition Comments re: ARB April 2016 Proposed SLCP Reduction Strategy  
Comment:

Please find attached a coalition letter from the following organizations:

Solid Waste Association of North America, California Chapters  
Western Placer Waste Management Authority  
Sanitation Districts of Los Angeles County  
Republic Services  
Rural County Representatives of California  
California State Association of Counties  
League of California Cities  
Waste Management of California, Inc.  
Waste Connections, Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-slcp2016-BnVRO1Y0UXJWD1Mw.pdf'

Original File Name: SLCP Coalition Letter to ARB Final Final.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:07:31

No Duplicates.

**Comment 87 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Michael  
Last Name: Van Brunt  
Email Address: mvanbrunt@covanta.com  
Affiliation: Covanta

Subject: Covanta comments on SLCP Strategy  
Comment:

Please see attached comments from Covanta on the SLCP Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-slcp2016-AjABN1JiUDVVfgIy.pdf'

Original File Name: 2016-05 Covanta SLCP Strategy Comments.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:13:20

No Duplicates.

**Comment 88 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Tiffany  
Last Name: Roberts  
Email Address: troberts@wspa.org  
Affiliation:

Subject: WSPA Comments on SLCP Reduction Strategy  
Comment:

Attached are WSPA's Comments on the SLCP Reduction Strategy. Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-slcp2016-AnUAdQd2BDYFXAZ1.pdf'

Original File Name: WSPA SLCP Comment Letter\_05.26.16 PDF.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:15:30

No Duplicates.

**Comment 89 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Matthew

Last Name: Evans

Email Address: MEvans@SmithBucklin.com

Affiliation:

Subject: Comments from NAFEM

Comment:

Comments from the North American Association of Food Equipment  
Manufacturers.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-slcp2016-  
B2lcO1M0UWdWPVUK.pdf'

Original File Name: NAFEM Public Comments on ARB Climate Pollutant Reduction Strategy-  
5.26.16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:17:49

No Duplicates.

**Comment 90 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Tracey

Last Name: Gant

Email Address: [tgant@familiesforcleanair.org](mailto:tgant@familiesforcleanair.org)

Affiliation: Families for Clean Air

Subject: FCA comments on CARB's proposed SLCP strategy

Comment:

Attached is a comment letter from Families for Clean Air on CARB's  
Proposed Short-lived Climate Pollutant Strategy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-slcp2016-UTdRNlwwU2kFb1c+.pdf>'

Original File Name: FamiliesForCleanAirCARBcomments.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:16:08

No Duplicates.

**Comment 91 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Eric  
Last Name: Potashner  
Email Address: epotashner@recology.com  
Affiliation:

Subject: Recology Comments RE: Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please find Recology's attached comments on the California Air Resources Board's Proposed Short-Lived Climate Pollutant Reduction Strategy.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-slcp2016-BTcBNwQ0A2YDWgQ0.pdf'

Original File Name: 2016 05 26 Recology SLCP Reduction Strategy Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:20:24

No Duplicates.

**Comment 92 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Ag Council

Subject: SLCP Proposed Strategy Comments  
Comment:

We appreciate your consideration and the opportunity to comment.  
Should you have any questions or need anything further from us,  
please contact either Rachael O'Brien at (916) 443-4887 /  
rachael@agcouncil.org or Cynthia Cory at (916) 446-4647 /  
ccory@cfbf.com.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-slcp2016-UzJdPFEzUm4Fdgd.pdf'

Original File Name: AgCouncil\_CFBF\_SLCPCComments\_May26.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:06:57

No Duplicates.

## **Comment 93 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: E.

Last Name: Golla

Email Address: egolla@zebracrossing.org

Affiliation:

Subject: Climate Reduction Strategy Recommendations

Comment:

Over twenty years ago, the North Coast Unified Air Quality Management District in Humboldt County published a draft report on particulate emissions in the district. It was reported that half of Eureka's wintertime particulate matter was from residential wood burning. For several years, the NCUAQMD has been running a wood stove exchange program, exchanging older stoves for newer ones.

Over the course of twenty years, the air has only become worse, depending upon the neighborhood one happens to live in. Some areas have pollution levels that literally must rival that of Beijing. The air is visible and even being outside for minutes is enough to cause an asthma attack. It is always a physical shock to drive up US 101 in the winter from the Bay Area. Almost as soon as one crosses the county line, the car fills with woodsmoke so noxious it is difficult to breathe, and it can remain that way as one travels the length of the county. Our local air management district's unwillingness to do anything about this situation for over twenty years is unconscionable.

The World Health Organization has recommended that log-burning stoves be phased out in developed countries in order to protect human health and our climate. Nothing short of eliminating log-burning stoves is going to improve our air and limit emissions. Humboldt County's current wood stove exchange program has been an absolute failure and has done nothing to improve our air.

Research from the well-known Libby, Montana wood stove exchange program, where most stoves were replaced with newer EPA-certified wood stoves, demonstrated that organic carbon levels decreased, but elemental carbon emissions did not. In fact, there was evidence that elemental carbon emissions might even have slightly increased after the wood stove changeout. (The paper is available here: <http://www.sciencedirect.com/science/article/pii/S1352231011004778>.)

The EPA estimates that the particulate emissions from a catalytic stove may reach the level of an older, uncertified conventional wood stove in as little as 2 to 5 years of use. In fact, Libby, Montana still violated the federal fine particulate matter standard at the end of the changeout program (<https://yosemite.epa.gov/opa/admpress.nsf/6427a6b7538955c585257359003f0230/1227df2e9a4c43d6852574aa00651283!OpenDocument&Start=1&Count=5&Expand=2>). Any changeout in California must not allow the exchange of wood stoves for newer wood-burning stoves. We must accept the WHO's recommendation and move away from this form of heat that is so

damaging to both our climate and our health.

Another serious issue in Humboldt County are current plans to increase woody biomass energy production, which would be seriously detrimental to our air and to our climate. One of the plants that may be restarted is the Blue Lake biomass plant. It is currently offline, and it should stay that way. The level of emissions from it when it went back online in 2010 were shocking – it blanketed the town of Blue Lake in thick brown smoke for days. It was so bad, it was the subject of an exposé in the Wall Street Journal. It is an old, highly polluting plant that has caused significant harm to the people of Blue Lake and beyond.

But it is not the only biomass polluter here. Even with it offline, by the California Air Resources Board's calculations (attached), wood/bark waste boilers emit more than 4 tons of CO a day, and more PM2.5 and PM10 than any other source of electric generation locally by orders of magnitude. Mr. Dan Noble of Noble Resources Group has submitted a slick packet promoting, in part, the increase of biomass incineration in Humboldt, but that is because his company is a subcontractor to a company that is about to be awarded a large contract by the Redwood Coast Energy Authority, who are planning to implement a new community choice aggregation program, which they've designed to support the local timber interests to the detriment of the rest of our community and our climate. Dan Noble has a serious financial stake in this.

The state of California could be a real leader in GHG reductions by promoting wind, wave and solar options, rather than encouraging an antiquated form of electric production that emits the most carbon of all. While carbon monoxide is itself a weak direct greenhouse gas, it has important indirect effects on global warming. It reacts with hydroxyl radicals in the atmosphere, reducing their abundance. OH radicals help to reduce the lifetimes of other GHGs such as methane. The presence of carbon monoxide indirectly increases the global warming potential of these other gases. Biomass burning is a major source of carbon monoxide and should not be promoted at the expense of other, non-emitting forms of energy production.

It should also be noted that residential wood combustion emits more CO and particulate matter than any other form of heating, by orders of magnitude. If wood-burning stoves were phased out, it would also have a tremendous benefit in reducing these emissions (see attached statistics for Humboldt County and the state of California).

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-slcp2016-UjdcNwRsWHgDdgVs.zip>'

Original File Name: emissions-data.zip

Date and Time Comment Was Submitted: 2016-05-26 16:09:14

No Duplicates.

**Comment 94 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kevin

Last Name: Bundy

Email Address: kbundy@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft EA

Comment:

Please see attached comment letter from the Center for Biological Diversity on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis. References were too large to include in one zip file. Some references are zipped with the attached letter; additional references will be uploaded separately. This is part 1 of 3.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/102-slcp2016-UDNWMII3WFRWIwBs.zip'

Original File Name: CBD SLCP Comments 1 of 3.zip

Date and Time Comment Was Submitted: 2016-05-26 16:16:35

No Duplicates.

**Comment 95 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: TNC comments on Proposed SLCP Strategy

Comment:

Please accept the attached comments from The Nature Conservancy.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-slcp2016-USIHbVU3U3AKUwh8.pdf>'

Original File Name: SLCP\_TNCCComments\_Final\_05\_26\_16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:34:06

No Duplicates.

**Comment 96 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kevin

Last Name: Bundy

Email Address: kbundy@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft EA

Comment:

Please see attached comment letter from the Center for Biological Diversity on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis. References were too large to include in one zip file. Part 2 of 3 references is attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-slcp2016-BWZQNFcyVloCdwZq.zip'

Original File Name: CBD SLCP Comments 2 of 3.zip

Date and Time Comment Was Submitted: 2016-05-26 16:16:35

No Duplicates.

**Comment 97 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Kevin

Last Name: Bundy

Email Address: kbundy@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft EA

Comment:

Please see attached comment letter from the Center for Biological Diversity on Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft Environmental Analysis. References were too large to include in one zip file. Part 3 of 3 references is attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-slcp2016-AWJcOAFkVlsDdgFt.zip'

Original File Name: CBD SLCP Comments 3 of 3.zip

Date and Time Comment Was Submitted: 2016-05-26 16:16:35

No Duplicates.

**Comment 98 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Coments on Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

Please see attached document.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/108-slcp2016-BWZTNANuBTUBbwFg.pdf'

Original File Name: CalChamber - SLCP Comments.pdf

Date and Time Comment Was Submitted: 2016-05-26 15:52:07

No Duplicates.

**Comment 99 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016)  
- Non-Reg.**

First Name: Nick

Last Name: Lapis

Email Address: [nicklapis@cawrecycles.org](mailto:nicklapis@cawrecycles.org)

Affiliation: Californians Against Waste

Subject: Waste Management in the Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

See attached file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-slcp2016-VSZUPgRmVnUEXVQz.pdf>'

Original File Name: SLCP Group Comments FINAL 5.26.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:36:59

No Duplicates.

**Comment 100 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Jack

Last Name: Macy

Email Address: jack.macy@sfgov.org

Affiliation: City & County of San Francisco

Subject: Comments in support of organics ban in SLCP

Comment:

Please see attached comments. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-slcp2016-VSZQMFQwVloKYFM2.pdf'

Original File Name: SFE Letter of Support for ARB SLCP Strategy to Ban Landfilling of Organics 5-26-16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:37:56

No Duplicates.

**Comment 101 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: Climate Change Policy Coalition

Subject: ARB's SLCP Strategy  
Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition with regard to the ARB Short-Lived Climate Pollutant Strategy.

If you have any questions or need anything further, please feel free to contact us.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/112-slcp2016-UzABZAZ3VGRRCFaj.pdf'

Original File Name: CCPC\_SLCP\_Comments\_5\_26\_2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:41:57

No Duplicates.

**Comment 102 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Neil  
Last Name: Black  
Email Address: nblack@calbioenergy.com  
Affiliation:

Subject: CalBio SLCP Comments  
Comment:

Thank you for the opportunity to submit these Comments.

Sincerely,

Neil Black

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-slcp2016-VDdTNFwxUWAGaQlm.pdf'

Original File Name: CalBio\_SLCP\_Comments\_5-26-2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:43:36

No Duplicates.

**Comment 103 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Carol

Last Name: Benecick

Email Address: cbenecick@gmail.com

Affiliation:

Subject: Subsidies for EPA woodstoves

Comment:

Please do not subsidize woodstoves!! Help us to keep our air clean & breathable & free from the carcinogenic properties found in the small particulates that comprise wood smoke.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 16:42:11

No Duplicates.

**Comment 104 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Adam

Last Name: Kotin

Email Address: adam@calclimateag.org

Affiliation: California Climate & Agriculture Network

Subject: Comments on the Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

Please find attached the comments of the California Climate &  
Agriculture Network (CalCAN).

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-slcp2016-BmUCZVQ5BzcFYgVr.pdf'

Original File Name: CalCAN SLCP Strategy Comments\_5\_26\_16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:43:07

No Duplicates.

**Comment 105 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Jenny

Last Name: Bard

Email Address: jenny.bard@lung.org

Affiliation:

Subject: Public Health Urges Strong SLCP Action

Comment:

Attached please find letter signed by 14 health and medical organizations regarding recommendations for the California Air Resources Board draft Short Lived Climate Pollution Reduction Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-slcp2016-WjJcKgZkWGoLUgJx.pdf'

Original File Name: HPCA SLCP letter Final 5-26-16.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:47:19

No Duplicates.

**Comment 106 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Kimberly

Last Name: Rivers

Email Address: ed@cfrog.org

Affiliation: Citizens for Responsible Oil and Gas - C

Subject: In Support of 10 Year Interval GWP

Comment:

Please see the attached letter with our comments.

Best,

Kimberly Rivers

Executive Director

Citizens For Responsible Oil and Gas, CFROG

ed@cfrog.org

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/117-slcp2016-AGNdPVEiADxQMZZ.pdf'

Original File Name: CFROG to CA ARB May 2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:49:49

No Duplicates.

## **Comment 107 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Juliette

Last Name: Bohn

Email Address: juliette@strategicsolutionsjbc.com

Affiliation: Juliette Bohn Consulting

Subject: Implement the SLCP Strategy ASAP

Comment:

In order to reduce the costs and effort required to adapt to a rapidly changing climate, we need to implement the SLCP strategy as soon as possible. The SLCP strategy is a key part of a multi-pronged approach to address both short-lived and long-term climate forcing agents and has the potential to reduce the impact of climate change in the next 10 to 20 years. We must not delay or deliberate - this is the time for bold action and measurable results - both of which will be accomplished with the implementation of the SLCP strategies.

I want to draw particular attention to the strategies to reduce methane emissions. I highly recommend eliminating organics from landfills as this is one of the easiest and "stupid" low hanging fruits in terms of emissions reduction and co-benefit generation potential. Further, the state's current plan of 75% diversion is too slow, and slowed the growth of the industry by slowly mandating smaller and smaller quantities of organic waste feedstocks - by eliminating organics from the landfill, the project developers can more easily obtain the off-take and financing agreements needed to build the next 100 organic waste processing facilities. This action cannot happen fast enough.

Finally, I also fully support the manure actions, black carbon reduction actions, and HFC reduction actions. I also strongly encourage a "phase 2" landfill regulation that requires use of best available control technologies and monitoring over 100 years post closure. This will help levelize the cost of waste management strategies, and encourage investment in diversion technologies.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-05-26 15:54:16

No Duplicates.

**Comment 108 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: J.P.

Last Name: Cativiela

Email Address: jcativiela@cogentcc.com

Affiliation: Dairy Cares

Subject: SLCP comments

Comment:

Resubmitting comments with a single combined, unsecured attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-slcp2016-UDQHYABoUnNRLIU2.pdf'

Original File Name: DairyCares.SLCP.comments.5.26.complete.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:50:42

No Duplicates.

**Comment 109 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Craig

Last Name: Thomas

Email Address: craig@sierraforestlegacy.org

Affiliation:

Subject: SLCP Strategy and DEA comment letter

Comment:

See File Attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-slcp2016-VyQBalQ2AiEFAh7.pdf'

Original File Name: SLCP Strategy and DEA Comment Letter May 26, 2016.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:54:24

No Duplicates.

**Comment 110 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: David S

Last Name: Baker

Email Address: GRASacramento@gmail.com

Affiliation: GRAS - Green Restaurants Alliance Sacram

Subject: Community Composting Programs

Comment:

GRAS supports the strategy to reduce SLCP's, and asks that you recognize Community Composting programs as valuable to these goals. Please consider the benefits of existing community composting programs, and programs that may arise with growing trends of urban agriculture and community gardening. Please do not to intentionally or unintentionally prohibit such small-scale local practices that utilize food-scrap resources within the communities and neighborhoods that they are produced.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-slcp2016-BXZTOVEzUnEHXgRj.pdf'

Original File Name: SLCP\_GRAScomment.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:47:57

No Duplicates.

**Comment 111 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Martha

Last Name: Arguello

Email Address: marguello@psr-la.org

Affiliation:

Subject: Comments on Proposed Short-Lived Climate Pollutant Strategy

Comment:

Please see attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-slcp2016-B3RSOABiACMDWgNg.doc'

Original File Name: SLCP Comment Letter Final.doc

Date and Time Comment Was Submitted: 2016-05-26 17:00:07

No Duplicates.

## **Comment 112 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016) - Non-Reg.**

First Name: Jonathan

Last Name: Gelbard

Email Address: jgelbard@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: Comments on Short Lived Climate Pollutant Strategy

Comment:

May 25, 2016

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

Re: Conversion to Pastured Dairy in the Proposed Short-Lived  
Climate Pollutant Reduction Strategy

Chairwoman Nichols:

The Natural Resource Defense Council and our partners in the Grasslands Alliance would like to commend the California Air Resources Board for taking a proactive approach to reducing the short-lived climate pollutant emissions from the livestock sector. The plan places a well-warranted focus on reducing manure methane emissions from our dairy sector, which is not only low-hanging fruit for California's methane emissions, but will also result in significant additional ecological (e.g., reduced surface and groundwater pollution) and economic (conversion of manure into renewable energy and fertilizer) co-benefits and help the state achieve multiple policy objectives.

Regarding the proposed strategy's support for conversion of small and mid-sized dairies to pasture-based management systems, we recommend that to achieve the intended methane-reduction benefits while minimizing the potential to increase other sources of heat-trapping emissions (and additional environmental impacts associated with poorly managed grazing), the policy should incentivize conversion to "well-managed" pasture-based systems. In the proposed strategy, your team did an excellent job of capturing several reasons for our recommendation, including the fact that pastured operations (especially if grazing management, feed selection and breed selection are not optimized explicitly to reduce and minimize ALL heat-trapping pollutants) can increase the amount of enteric methane emissions per unit of milk.

Two additional ways that conversion to pasture-based management can increase greenhouse gas emissions are:

- poor grazing management that does not evenly distribute deposited nutrients (from urine and dung) can create nitrogen hot spots characterized by high nitrous oxide emissions; and
- While well-managed grazing can sequester carbon in soils (with soil carbon sequestration potential also dependent on factors such

as climate, soil characteristics, and land use history), poorly managed grazing that increases erosion can oxidize significant amounts of soil carbon, releasing it into the air as heat-trapping CO2 emissions.

Fortunately, well-managed grazing operations - by optimizing grazing management, feed production and selection practices, and breed selection, can reduce and minimize the full suite of emissions from dairy and other livestock operations.

Opportunity to Pilot the new Grasslands Alliance Standard: A Practical Guide to Sustainability of Grazing Operations in the US. and Canada

In order to incentivize and enable California's dairy (and beef) producers to transition to verifiably "well-managed" pasture operations, we invite you to partner with the Grasslands Alliance by conducting pilot audits of our new sustainability standard for grazing operations in the U.S. and Canada (described in the attached PDF Standard overview). This new comprehensive standard includes "Climate-Smart Ranching and Farming" as one of its six principles. Specifically, the standard can be used as a tool to:

- Recognize livestock operations that have optimized grazing, herd, land, and nutrient management to reduce and minimize their carbon footprint and net emissions of greenhouse gases.
- Encourage well-managed grazing and other management activities that reduce emissions of carbon dioxide, enteric and manure methane, and nitrous oxide, while increasing carbon sequestration to the site's potential.
- Guide operations in optimizing feed and breed selection to reduce and minimize emissions of methane (enteric and manure) and nitrous oxide (emitted from manure and fertilizer management).
- Incentivize operations to reduce and minimize land use-related CO2 emissions, including by (a) avoiding conversion of natural ecosystems to croplands, pastures, and other forms of development; (b) restoring degraded lands and croplands to perennial pasture; and (c) utilizing conservation tillage, no-till, and other practices (where applicable, e.g., compost application) that increase carbon sequestration.
- Recognize operations that manage nutrients and manure in a manner that proactively reduces methane and nitrous oxide emissions.
- Recognize operations that achieve additional emissions reductions by improving energy and fuel efficiency, using renewable energy, and reducing use of petroleum-based inputs.

Since the above climate-smart ranching and farming strategies focus primarily on improving production efficiencies, management quality, and resilience to extreme weather, they offer economic opportunities to producers and help mitigate business risks.

Please contact us to learn more about how we can collaboratively pilot the new Grasslands Alliance standard for recognizing and incentivizing well-managed pasture operations.

Sincerely,

Jonathan Gelbard, Ph.D.  
Conservation Scientist & Sustainable Agriculture Specialist  
Natural Resources Defense Council  
jgelbard@nrdc.org

Attachment: "

Original File Name: GrasslandsAlliance\_StandardSummary\_05192016.pdf

Date and Time Comment Was Submitted: 2016-05-26 16:55:27

No Duplicates.

**Comment 113 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Karim

Last Name: Amrane

Email Address: Non-web submitted comment

Affiliation: AHRI

Subject: AHRI Comments - AHRI Short-Lived Climate Pollutant Strategy

Comment:

Late comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-slcp2016-VjcHaVMgVW8GX1Ix.pdf>'

Original File Name: AHRI Comment.pdf

Date and Time Comment Was Submitted: 2016-05-27 14:01:32

No Duplicates.

**Comment 114 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Steven A.

Last Name: Brink

Email Address: Non-web submitted comment

Affiliation: California Forestry Association

Subject: Comments on the final draft of the SLCP and the Draft Environmental Assessment  
Comment:

Late comment. See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-slcp2016-UDNTNAdqAjcGb1Qm.pdf'

Original File Name: CalForests Comment.pdf

Date and Time Comment Was Submitted: 2016-05-27 14:09:11

No Duplicates.

**Comment 115 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Jelena

Last Name: Hartman

Email Address: Non-web submitted comment

Affiliation: Central Valley Water Board's Dairy Progr

Subject: Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-slcp2016-UTsGZQFsUGYEBAZn.pdf'

Original File Name: Jelena Hartman Comment.pdf

Date and Time Comment Was Submitted: 2016-05-27 14:23:22

No Duplicates.

**Comment 116 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Jon

Last Name: Melchi

Email Address: Non-web submitted comment

Affiliation: HARDI

Subject: CARB Short-Lived Climate Pollutant Reduction Strategy (Proposal)

Comment:

Late comment. See Attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-slcp2016-VDwCZVckAjVRPIAP.pdf>'

Original File Name: HARDI SCLP reduction comments.pdf

Date and Time Comment Was Submitted: 2016-06-01 11:36:29

No Duplicates.

**Comment 117 for Proposed Short-Lived Climate Pollutant Strategy  
(slcp2016) - Non-Reg.**

First Name: Advisory Committee

Last Name: Environmental Justic

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Justice Advisory Committee Recommendations

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-slcp2016-UjYGclw8BDEHdQJd.pdf'

Original File Name: Draft EJAC Recommendations052516.pdf

Date and Time Comment Was Submitted: 2016-06-03 09:14:39

No Duplicates.

**Comment 1 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016).  
(At Hearing)**

First Name: Curtis

Last Name: Moore

Email Address: Non-web submitted comment

Affiliation:

Subject: Criticisms of the Draft SCLP Strategy

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-slcp2016-WmtUZAYqUjQHLAA0.pdf>

Original File Name: 16-5-4 Curtis Moore.pdf

Date and Time Comment Was Submitted: 2016-05-23 13:25:53

No Duplicates.

**Comment 2 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016).  
(At Hearing)**

First Name: Christina

Last Name: Benz

Email Address: Non-web submitted comment

Affiliation: Napa Climate NOW

Subject: Comments on Item 16-5-4

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-slcp2016-VmdSYgMvUTdRegQw.pdf>

Original File Name: 16-5-4 Christina Benz.pdf

Date and Time Comment Was Submitted: 2016-05-23 13:25:53

No Duplicates.

**Comment 3 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016).  
(At Hearing)**

First Name: Chuck

Last Name: White

Email Address: Non-web submitted comment

Affiliation: Solid Waste & Recycling Industry

Subject: Comments on Item 16-5-4

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-slcp2016-BTRTYwEtUzVVfgUx.pdf>

Original File Name: 16-5-4 Chuck White.pdf

Date and Time Comment Was Submitted: 2016-05-23 13:25:53

No Duplicates.

**Comment 4 for Proposed Short-Lived Climate Pollutant Strategy (slcp2016).  
(At Hearing)**

First Name: Linda

Last Name: Brown

Email Address: Non-web submitted comment

Affiliation: SCS Global Services

Subject: Comments to CARB Hearing on SLCP Strategy

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-slcp2016-VGUGNIR4VzFSeQQw.pdf>

Original File Name: 16-5-4 Linda Brown.pdf

Date and Time Comment Was Submitted: 2016-05-23 13:25:53

No Duplicates.