

**Comment 1 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Tia

Last Name: Strong

Email Address: tstron5@wgu.edu

Affiliation:

Subject: GHG compliance

Comment:

Are hospitals subject to GHG compliance?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-01-15 09:35:02

No Duplicates.

**Comment 2 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: Central California Asthma Collaborative

Subject: Quantifying methane emissions from Agriculture including dairies.

Comment:

In the morning presentation on inventory methods both transportation and agriculture were listed and their source contributions quantified in both table and graph. I would like to understand your methodology for differentiating the transportation emissions associated with Ag from the on-field/dairy contributions.

An example: Significant freight transportation is required to support large animal operations as feed is transported daily from silo's to operations with trucks returning empty each day. This cycle is repeated across the industry for different types of crops and activities.

Thanks,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-01-15 10:34:32

No Duplicates.

**Comment 3 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Rascon

Email Address: srascon@lachamber.com

Affiliation: LA Area Chamber of Commerce

Subject: Proposed Advanced Clean Transit Regulation

Comment:

January 20, 2016

Mary D. Nichols  
Chair, California Air Resources Board  
Chairman's Office  
P.O. Box 2815  
Sacramento, CA 95812

RE: Proposed Advanced Clean Transit Regulation

Dear Chairwoman Nichols:

On behalf of the Los Angeles Area Chamber of Commerce, I would like to thank you for the opportunity to provide comment on the development of the proposed Advanced Clean Transit (ACT) regulation. As you know, California's public transit agencies have been ardent supporters of advancing zero emission bus (ZEB) technology, and continue to be enthusiastic partners in the state's efforts to achieve the state's greenhouse gas (GHG) emissions reductions and air quality goals. Southern California's transportation agencies have proactively taken steps to introduce ever-cleaner technologies. However, the primary objective of Southern California's public transit agencies is to provide safe, reliable and efficient mobility options to the region. We are concerned that, if allowed to move forward in its current form, the expensive ACT regulation may result in cuts in transit service. Therefore, I am writing to you to express our concerns with the current framework of the proposed ACT regulation, and to respectfully request that you slow the advancement of the proposed regulation and call for a meaningful study of alternatives. Moving forward, we commit to working with you to ensure that encouraging ZEB implementation does not compromise our ability to accomplish our service objectives.

As proposed, the ACT regulation would mandate that a "modest" fraction of bus purchases be ZEB technology, beginning 2018, and transition all transit fleets to ZEB technology by 2040. From our experience, ZEB technology neither offers the range, nor the reliability to be operated in all conditions across our state's varied transit systems. Most critically, ZEB technology often imposes significantly higher upfront capital costs than conventional technologies, and unknown, but possibly higher ongoing operating costs, which could strain our capital and operating

budgets. Therefore, without a robust lifecycle cost analysis, we hold that any assertion by California Air Resources Board (CARB) staff that the total cost of ownership of ZEB technology (inclusive of the upfront capital costs of bus purchase and infrastructure construction, bus operation and maintenance, workforce development and training, midlife rebuild and bus disposal) may be less than the total cost of ownership of conventional technologies is purely speculative.

In addition, CARB staff has failed to identify funding options, beyond a few small discretionary programs, which could adequately support and sustain the long-term goals of the proposed ACT regulation. The state funding options that have been identified to-date, particularly those that rely on Greenhouse Gas Reduction Fund (GGRF) dollars, are already oversubscribed; these funding options are intended, per their enacting statutes and existing guidelines, to support various forms of infrastructure development, capital replacement and technology incubation that achieve prescribed policy objectives – not just a ZEB purchase requirement. Federal funding options, while bettered by the recent enactment of the Fixing America's Surface Transportation Act, are similarly limited and often dedicated to critical operations and maintenance purposes. Additionally, CARB staff's assumptions regarding the Federal Transit Administration (FTA) contributions to initial bus capital expenditures remain deeply flawed, as they assume Urbanized Area Formula program funding will be available to cover 82 percent of the costs of a bus no matter the costs of the bus; in fact, this program's funding disbursements are actually fixed relative to bus capital costs. Without adequate dedicated funding, the costs of the proposed regulation will likely divert already limited state and federal funds from other critical transit uses.

The Chamber believes the costs of the proposed regulation may result in service reductions that limit mobility, particularly for transit-dependent and disadvantaged communities, increase traffic congestion, and degrade our community's economic competitiveness. These service reductions may also reduce or negate the regulation's purported GHG and air quality benefits. On a statewide-level, this regulation may limit the state's ability to fund other projects and programs that may net far greater near-term and long-term environmental benefits, and conflict with current or pending legislative guidance.

With these concerns in mind, we implore you to slow the advancement of the proposed regulation to work through our concerns, and to consider other regulatory frameworks for achieving our shared long-term environmental objectives. We support, and urge you to consider an alternative approach, recently endorsed by the California Transit Association's Executive Committee – the "Proposed Framework for Incentivizing the Adoption of Zero Emission Transit Fleets." This proposed framework seeks to maintain transit's leadership in adopting and incubating clean technologies to achieve even greater GHG emission reductions and air quality improvements, while seriously taking into account the operational limitation and financial constraints that transit agencies face. Put broadly, the proposed framework is premised on the establishment of technology neutral and performance-based emission and petroleum targets, instead of the technology-forcing approach of the proposed ACT regulation, which provide transit agencies with the flexibility to implement the commercially viable, zero or near-zero emission technologies best-suited to meet their operational needs. As funding is a key impediment to the robust

implementation of zero and near-zero emission technologies, the framework calls for CARB to identify and secure, for the sole purpose of facilitating the transition to zero emission fleets, new and ongoing state and federal funding. We believe that this approach is prudent, and may lead to a more cost-effective use of limited GGRT dollars.

In the coming months, we along with our stakeholder partners, will continue to work with you to advance our common goal of cleaner air for Californians. We believe we can find a collaborative way to increase ZEB adoption in the state without placing undue burden on public transit agencies

Thank you for your leadership and for your consideration of our position.

Sincerely,

Gary Toebben  
President & CEO

Attachment: [www.arb.ca.gov/lists/com-attach/3-scopplan2030econ-ws-UWAFLQAwBW8ELFNi.pdf](http://www.arb.ca.gov/lists/com-attach/3-scopplan2030econ-ws-UWAFLQAwBW8ELFNi.pdf)

Original File Name: 1.19.16\_CARB\_ Proposed Advanced Clean Transit Regulation.pdf

Date and Time Comment Was Submitted: 2016-01-20 10:14:25

No Duplicates.

**Comment 4 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Crum

Email Address: tcrumenterprises@aol.com

Affiliation: central valley steel distributor

Subject: Failure of the container barging program

Comment:

This program was to remove 200 highway tractor trailers per day from the congested 580 and 205 between Stockton and Oakland, CA. This program was given \$35,000,000.00 of which 1/2 was given to each of the two ports: Stockton and Sacramento. Removal of the 200 trucks would also have a secondary effect by a slight increase in the time the remaining vehicles spend on the highway. This could be an even greater emissions savings.

This program should be removed from the hands of the two port managements and a new management team established and this program re established. It should be funded by payments from the two ports to pay back this loss of \$35,000,000.00 plus an additional grant of \$400,000.00 from the San Joaquin Air Quality Board.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-01-26 06:16:14

No Duplicates.

**Comment 5 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Pacific Forest Trust Comments on the 2030 Target Scoping Plan Economic Analysis  
Comment:

Please find the comments from the Pacific Forest Trust attached.

Attachment: [www.arb.ca.gov/lists/com-attach/5-scopplan2030econ-ws-AHAHZwF0VVkGYwFu.pdf](http://www.arb.ca.gov/lists/com-attach/5-scopplan2030econ-ws-AHAHZwF0VVkGYwFu.pdf)

Original File Name: PFT Comments on Economic Analysis for 2030 Target Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-01-29 13:02:51

No Duplicates.

**Comment 6 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

Email Address: tderivi@scppa.org

Affiliation: SCPPA

Subject: SCPPA Comments on 2030 Scoping Plan Economic Analysis Workshop  
Comment:

Please find attached the referenced comments.

Attachment: [www.arb.ca.gov/lists/com-attach/6-scopplan2030econ-ws-UCNWM1MiUXIKbQIW.pdf](http://www.arb.ca.gov/lists/com-attach/6-scopplan2030econ-ws-UCNWM1MiUXIKbQIW.pdf)

Original File Name: SCPPA Comments 1-15-2016 Scoping Plan Economic Analysis Workshop.pdf

Date and Time Comment Was Submitted: 2016-01-29 13:16:47

No Duplicates.



**Comment 7 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Katie

Last Name: Sullivan

Email Address: sullivan@ieta.org

Affiliation: IETA

Subject: IETA Comments on 2030 Scoping Plan Economic Analysis Workshop  
Comment:

Attached, find IETA's comments on the 15 January "2030 Target Scoping Plan Economic Analysis Workshop". We appreciate the opportunity to share comments with ARB.

Attachment: [www.arb.ca.gov/lists/com-attach/7-scopplan2030econ-ws-Vz5SMVAIV2UAWQdk.pdf](http://www.arb.ca.gov/lists/com-attach/7-scopplan2030econ-ws-Vz5SMVAIV2UAWQdk.pdf)

Original File Name: IETA Comments\_ARB 2030 Scoping Plan Workshop\_29Jan2016.pdf

Date and Time Comment Was Submitted: 2016-01-29 13:19:55

No Duplicates.

**Comment 8 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Chris

Last Name: Busch

Email Address: chrisb@energyinnovation.org

Affiliation: Energy Innovation

Subject: Energy Innovation comments on January 15th workshop

Comment:

We appreciate your consideration of our comments, delivered in the attached letter.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8-scopplan2030econ-ws-BWBXP1I2UHEKawlw.pdf](http://www.arb.ca.gov/lists/com-attach/8-scopplan2030econ-ws-BWBXP1I2UHEKawlw.pdf)

Original File Name: Energy Innovation Comments on Scoping Plan Analysis workshop.pdf

Date and Time Comment Was Submitted: 2016-01-29 14:06:37

No Duplicates.

**Comment 9 for Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: David

Last Name: Puze

Email Address: dpuzey@nrdc.org

Affiliation:

Subject: NRDC Comments on January 15 Scoping Plan Economic Analysis Workshop  
Comment:

Thank you for your consideration of our comments in the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/9-scopplan2030econ-ws-AW8BdVw5ADBRCFIx.pdf](http://www.arb.ca.gov/lists/com-attach/9-scopplan2030econ-ws-AW8BdVw5ADBRCFIx.pdf)

Original File Name: NRDC Comments on January 15 Scoping Plan Update Economic Analysis Workshop.pdf

Date and Time Comment Was Submitted: 2016-01-29 16:08:28

No Duplicates.

**Comment 10 for Public Workshop on the 2030 Target Scoping Plan  
Economic Analysis and Potential Updates to GHG Emissions Inventory  
Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Phillips

Email Address: tjp835@sbcglobal.net

Affiliation: Healthy Building Research

Subject: Comment on the economic analysis plan for updating the AB 32 Scoping Plan.  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/11-scopplan2030econ-ws-VCABaANvVFgBdwhg.pdf](http://www.arb.ca.gov/lists/com-attach/11-scopplan2030econ-ws-VCABaANvVFgBdwhg.pdf)

Original File Name: Tom Phillips Comments.pdf

Date and Time Comment Was Submitted: 2016-02-02 08:20:17

No Duplicates.

**Comment 11 for Public Workshop on the 2030 Target Scoping Plan  
Economic Analysis and Potential Updates to GHG Emissions Inventory  
Methods (scopplan2030econ-ws) - 1st Workshop.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: ombcomm@arb.ca.gov

Affiliation: WSPA

Subject: WSPA comments on ARB's January 15, 2016 Workshop Presentations  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/12-scopplan2030econ-ws-VzZTJ10+BAhWIwZl.pdf](http://www.arb.ca.gov/lists/com-attach/12-scopplan2030econ-ws-VzZTJ10+BAhWIwZl.pdf)

Original File Name: ARB Scoping Plan Workshop WSPA Final Comments.pdf

Date and Time Comment Was Submitted: 2016-03-01 08:24:28

No Duplicates.

**There are no comments posted to Public Workshop on the 2030 Target Scoping Plan Economic Analysis and Potential Updates to GHG Emissions Inventory Methods (scopplan2030econ-ws) that were presented during the Workshop at this time.**