

## **Comment 1 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: 2030 Target Scoping Plan Concept Paper

Comment:

Comments on 2030 Target Scoping Plan Concept Paper

Endangered Habitats League (EHL) appreciates the opportunity to comment. For your reference, EHL is Southern California's only regional conservation group. First, we commend the Board for progress to date on Natural and Working Lands.

Our focus is the section, Protecting, Enhancing, Innovating, and Increasing Sequestration in the Natural Environment. We support of these well-stated concepts and objectives. More specifically, we urge that the potential for carbon storage in all habitat types be pursued, including habitats that predominantly store carbon in the soil, a location secure from wildfire. We also note the many indirect benefits of Natural and Working Lands preservation, such as climate resiliency for wildlife and recreation for urban populations. We concur with the task of inventory to establish baselines and also urge the establishment of scientific methodologies for measuring carbon storage in soils.

Thank you for considering our comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-06-29 10:54:17

No Duplicates.

## **Comment 2 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Robert

Last Name: Kirkwood

Email Address: kirkwoodr@mindspring.com

Affiliation: Bella Vista Foundation and SNC

Subject: Forestry and the scoping plan

Comment:

I am very pleased to see some indications that you will be attempting to measure the carbon output of such phenomena as wildfire. My understanding is it has annually exceeded carbon storage in our forests. To me that places a premium on supporting programs such as the Sierra Nevada Conservancy' Watershed improvement Program which is trying to take a strategic approach to reducing the risk of fire ignitions in the Sierra and the amount of carbon risk from catastrophic -as distinguished from normal less intensive-fire.

You mention sustaining local economies and I realize that most of that was focused on Environmental justice situations. I think it is necessary to point out that in many rural areas of the Sierra the communities have very high levels of poverty and some ethnic diversity. You do not need to change the EJ definition but please when considering areas like the Sierra outside the tourist destinations be aware that new jobs in the woods or related facilities would be a godsend.

On page 13 there is mention of short term cost vs long term gain in the forests. I am sure you are aware that removing flammable material from the forest and burning it in gasification plants would reduce carbon release by 97% compared with field burning (and a long term release from just leaving the material there. Thus the short term price is very low. and BioChar and heat are byproducts which may have added value as offsets.

Finally in every concept you limit the forest land to "non Federal" land. I am a member of and supporter of the Pacific Forest Trust but they are dead wrong on this point. Perhaps private land owners do need to benefit more but the Federal lands are much too important to the fire picture in the Sierra and throughout the State to be summarily dismissed. There is no way we are going to see the levels of Federal funding required to get ahead of this problem any time soon. There needs to be a willingness to consider supporting work on Federal Lands if the maintenance of that work is assured to a degree similar to that on private lands. It takes more than a conservation easement and one time thinning to really solve this problem. We desperately need funds for ongoing maintenance of restored lands and the ARB should be part of that process. Robert C Kirkwood 1221 Waverley St Palo alto Calif 94301.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-06-29 19:03:18

No Duplicates.

## **Comment 3 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Don

Last Name: Rivenes

Email Address: rivenes@sbcglobal.net

Affiliation: Forest Issues Group

Subject: Comments on the Concept Paper

Comment:

I understand you are interested in comments on the high level concepts presented or alternative concepts, while keeping in mind that some of these are statutory requirements or existing and draft plans that have been under development for a while with a public process.

All of the four concepts contain elements for reaching the 2020 GHG Statewide limit mandated by AB 32. Concepts one and four are the ones that attempt to capture the externalities from use of fossil fuels that is causing the catastrophic problem of climate change. Too often environmental costs of production and use of materials is passed on to society and is not reflected in the price of the good. Clean water, soil erosion, and clean air all suffer from pollution. The only solution is to capture these costs in to the price of the goods to society, so that alternatives without these costs will compete fairly.

I prefer concept 4, since these costs are reflected in a carbon tax. Concept 1 of cap and trade has partially worked in California, but it still allows the polluter to continue to pollute if they just buy credits from someone who has less pollution. The proceeds from the tax would be best spent on mitigating past degradation of the environment such as low-income areas directly impacted by the fossil fuel plants or building an infrastructure to support a national electric vehicle network, or a short-term subsidy to increase the development of electric cars and buses.

The ultimate goal of transportation has to be the elimination of all gas-powered vehicles, not just 1.5 million by a certain year.

The State must work with Federal agencies so that all working lands and federal lands are able to employ prescribed burns on a large scale to sequester carbon on an ecological basis restoring large trees rather than encouraging stem trees. This means the ARB has to allow more prescribed burning to reduce the wildfires that cause greater total pollution.

It seems that the most important goal at the present time is to get Gov. Brown's executive order seeking to reduce greenhouse gas emissions in California to 40 percent below 1990 levels by 2030 enacted by the legislature, so that this scoping paper will be meaningful.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-01 11:09:00

No Duplicates.

## **Comment 4 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Emily

Last Name: Burns

Email Address: eburns@savetheredwoods.org

Affiliation: Save the Redwoods League

Subject: Comments in support of California's forests

Comment:

To: California Air Resources Board

Re: 2030 Target Scoping Plan Update Concept Paper

Date: July 1, 2016

Save the Redwoods League applauds the California Air Resources Board for integrating the forestry sector and natural environment into the goals for achieving GHG reduction targets by 2030. The forests of California are a critical carbon storage asset and iconic symbol of California's heritage, yet without public investment in their further protection and restoration, forest condition and their associated ecosystem services will decline over time. By increasing the State's commitment to forest health, not only will our natural landscapes sequester and store more carbon, but Californians will benefit from increased water quality and yield, enhanced habitat for endangered species, and access to spectacular recreational resources.

All four of the concepts identified in the concept paper includes goals for natural and working lands that, if achieved, will significantly improve the conditions of California's forests while contributing to the State's 2030 GHG reduction targets. We strongly encourage the Scoping Plan to prioritize natural landscape investments with a science-based framework to protect and restore ecosystems with the highest likelihood of carbon capture and storage:

- Each year, 500,000 acres of nonfederal forest lands included in restoration plans oriented towards forest health and carbon storage – We recommend investing in restoration implementation, not simply restoration plans. Restoration forestry has high potential to significantly accelerate carbon sequestration in young and degraded forests. Research clearly shows that larger trees sequester carbon faster than younger trees (Sillett et al. 2010), so stimulating the growth of small trees now will produce higher carbon stocks faster and help the State achieve its GHG reduction goals sooner. There is urgency to increasing the pace of forest growth for carbon storage and for the numerous other benefits associated with forest restoration including expanding habitat for endangered species and improving water quality. We recommend that the Scoping Plan include policies to encourage restoration on private land and financing mechanisms to pay for restoration on the state's public lands. Within the land owned by the state and thus within direct state control, there is a critical need and opportunity to restore the coast redwood forest and increase carbon storage capacity. California State Parks owns more than 100,000 hectares of the coast

redwood ecosystem and more than 70% of this forestland was once harvested and is in need of restoration.

- Ambitious land preservation policies - We recommend prioritizing the protection of forests to prevent conversion and loss of associated ecosystem carbon storage. There is urgency to protect the forests with the highest carbon sequestration potential because more than 70% of the coast redwood ecosystem is privately owned and conversion threats from development, vineyards, and marijuana agriculture are increasing.

- Increase habitat acreage protected or restored - We recommend setting not only high goals for acreage of habitat to protect and restore, but prioritizing acres with the highest potential to store carbon for the long term. A growing body of scientific evidence shows that the coast redwood forest ecosystem continues to sequester carbon rapidly even as climate changes (Sillett et al. 2015), stores more carbon aboveground than any other forest on Earth (Van Pelt et al. 2016), and can store significantly more carbon if restored (Madej et al. 2013).

The concept paper points out that the "Scoping Plan will require us to consider what policies are needed for the mid-term and long-term, knowing that some policies for the long-term must begin implementation now." It also acknowledges that "the approach we take must balance risk, reward, longevity and timing." In that context, it asks the question: For the forest sector, are we comfortable with policies that may result in some near-term carbon loss, but ultimately support more resilient and healthier forests in the longer timeframe? The near-term risk of carbon loss through ecological forest management to improve forest conditions is scaled to the treatment applied (Madej et al. 2013; van Mantgem et al. 2013), but studies show that biomass loss can be quickly ameliorated by the resulting enhanced forest growth (van Mantgem and Das 2014). For example, in the iconic and treasured coast redwood and giant sequoia forests, there are phenomenal carbon storage opportunities that can only be realized through improved forest management techniques that by necessity lower carbon stocks temporarily:

- Giant sequoia groves in the Sierra Nevada boast remarkable aboveground carbon stocks of more than 1,500 metric tons in live trees per hectare (Robert Van Pelt, Redwoods and Climate Change Initiative). More than 80% of this carbon resides in giant sequoia wood and bark alone. Yet, decades of fire exclusion threaten the regeneration of giant sequoia and growth of the largest trees on Earth. In the absence of fire, dense stands of other conifers (primarily white fir) thicken beneath the canopy of ancient giant sequoia, increasing risk of crown fires and reducing giant sequoia access to water and nutrients through belowground competition. Mechanical thinning of sub-canopy trees or prescribed burning removes some forest carbon temporarily, but stimulates giant sequoia growth and seedling establishment which results in more vigorous and resilient forest stands (York et al. 2010; York et al. 2011).

- Old-growth coast redwood forests in Northern California contain more than 2,000 metric tons of carbon per hectare which is more than twice the carbon stocks found in other forests world-wide (Van Pelt et al. 2016). Individual large coast redwood trees can contain more than 200 metric tons of carbon per tree and sequester carbon faster than smaller trees (Sillett et al. 2015), but unfortunately

more than 95% of the coast redwood range (600,000 hectares) has been cut at least once and most of the large redwoods are gone. Today young, dense stands of harvested coast redwood forest face impediments to recovery (e.g. stagnated growth from competition) that limit their ability to realize their carbon storage potential. Restoration forestry reduces tree competition and accelerates stand growth (Lindquist 2004; O'Hara et al. 2010; Oliver et al. 1994), setting carbon-limited young forests on a trajectory to more quickly sequester carbon and enhance habitat quality for numerous species. The ecological gains from such restoration forestry significantly outweighs the temporary carbon losses associated with its implementation.

We greatly appreciate the opportunity to provide comments on the concept paper and support robust policies and funding for forest protection and restoration as a critical strategy for reaching the state's ambitious 2030 GHG reduction goals.

Sincerely,  
Emily Burns, PhD  
Director of Science and Education

#### Literature Cited

Lindquist, J. L. 2004. Growth & yield report for Whiskey Springs redwood commercial thinning study: a twenty-nine year status report (1970-1999). California Department of Forestry & Fire Protection, California Forestry Report No. 3.

Madej, M. A., J. Seney, and P. van Mantgem. 2013. Effects of road decommissioning on carbon stocks, losses, and emissions in North Coastal California. *Restoration Ecology*, 21, 439-446.

O'Hara, K. L., J. C. B. Nesmith, L. Leonard, and D. J. Porter. 2010. Restoration of old forest features in coast redwood forests using early-stage variable-density thinning. *Restoration Ecology*, 18, 125-135.

Oliver, W. W., J. L. Lindquist, and R. O. Strothmann. 1994. Young-growth redwood stands respond well to various thinning intensities. *Western Journal of Applied Forestry*, 94, 106-102.

Sillett, S. C., R. Van Pelt, A. L. Carroll, R. D. Kramer, A. R. Ambrose, and D. Trask. 2015. How do tree structure and old age affect growth potential of California redwoods? *Ecological Monographs*, 85: 181-212.

Sillett, S. C., R. Van Pelt, G. W. Koch, A. R. Ambrose, A. L. Carroll, M. E. Antoine, and B. M Mifsud. Increasing wood production through old age in tall trees. *Forest Ecology and Management*, 259, 976-994.

van Mantgem, P. and A. Das. An individual-based growth and competition model for coastal redwood forest restoration. *Can. J. For. Res.*, 44, 1051-1057.

van Mantgem, P., M. A. Madej, J. Seney, and J. Deshais. Estimating ecosystem carbon stocks at Redwood National and State Parks. *Park Science*, 30, 20-36.

Van Pelt, R., S. C. Sillett, W. A. Kruse, J. A. Freund, and R. D. Kramer. 2016. Emergent crowns and light-use complementarity lead to



global maximum biomass and leaf area in *Sequoia sempervirens* forests. *Forest Ecology and Management*, 375, 279-308.

York, R. A., D. Fuchs, J. J. Battles, and S. L. Stephens. 2010. Radial growth responses to gap creation in large, old *Sequoiadendron giganteum*. *Applied Vegetation Science*, 13, 498-509.

York, R. A., J. J. Battles, A. K. Eschtruth, and F. G. Schurr. 2011. Giant sequoia (*Sequoiadendron giganteum*) regeneration in experimental canopy gaps. *Restoration Ecology*, 19, 14-23.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-sp-concept-paper-  
ws-WjlUPQFtBTtSMQVr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-sp-concept-paper-ws-WjlUPQFtBTtSMQVr.pdf)

Original File Name: Comment letter to ARB 7.1.2016.pdf

Date and Time Comment Was Submitted: 2016-07-01 12:38:54

No Duplicates.

**Comment 5 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: RCRC Comments on 2030 Target Scoping Plan Concept Paper

Comment:

Attached please find RCRC's comments on the 2030 Target Scoping  
Plan Concept Paper.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-sp-concept-paper-  
ws-ADJUYldlVTZXDgRw.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-sp-concept-paper-<br/>ws-ADJUYldlVTZXDgRw.pdf)

Original File Name: 2030\_Target\_Scoping\_Plan\_Ltr\_to\_ARB\_07062016.pdf

Date and Time Comment Was Submitted: 2016-07-06 14:24:44

No Duplicates.

**Comment 6 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Rico

Last Name: Mastrodonato

Email Address: rico.mastrodonato@tpl.org

Affiliation: The Trust for Public Land

Subject: Comments on Draft Scoping Plan

Comment:

Please see attached comment letter.

Thank you,

Rico Mastrodonato

Senior Government Relations Manager

The Trust for Public Land

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-sp-concept-paper-  
ws-UzBTOgFtAz1XNAhm.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-sp-concept-paper-<br/>ws-UzBTOgFtAz1XNAhm.docx)

Original File Name: Comment Letter ARB 2030 Target Scoping Plan Concept Paper July  
6.docx

Date and Time Comment Was Submitted: 2016-07-06 16:20:10

No Duplicates.

**Comment 7 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Mike

Last Name: Mohajer

Email Address: MikeMohajer@Yahoo.com

Affiliation: LA County Waste Management Task Force

Subject: Comments on 2030 Target Scoping Plan Update Concept Paper

Comment:

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force would like to express our appreciation to the California Air Resources Board for providing the 2030 Target Scoping Plan Update Concept Paper for public comment. Please see the attached comment letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-sp-concept-paper-  
ws-VzYAZFVnVTRVIFc0.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-sp-concept-paper-<br/>ws-VzYAZFVnVTRVIFc0.pdf)

Original File Name: AB32ScopingPlan.pdf

Date and Time Comment Was Submitted: 2016-07-07 12:53:14

No Duplicates.

**Comment 8 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: EDF

Subject: EDF Comment # 1 on Scoping Plan Concept Paper

Comment:

Please see attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-sp-concept-paper-ws-VzIBY1M0Ag5XIghr.pdf>

Original File Name: EDF Scoping Plan Concept Paper Comments- EM.pdf

Date and Time Comment Was Submitted: 2016-07-07 15:38:48

No Duplicates.

**Comment 9 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Timothy  
Last Name: O'Connor  
Email Address: toconnor@edf.org  
Affiliation: EDF

Subject: EDF Comment # 2 on Scoping Plan Concept Paper  
Comment:

Please see attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-sp-concept-paper-ws-VjNSMFA3WVWVW11Mw.pdf>

Original File Name: EDF Scoping Plan Concept Paper Comments- TO.pdf

Date and Time Comment Was Submitted: 2016-07-07 15:40:55

No Duplicates.

**Comment 10 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

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

Subject: California Compost Coalition Comments  
Comment:

Our comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-sp-concept-paper-ws-UDMCZ1MxWFQDNwEx.pdf>

Original File Name: CCC 2030 Target Scoping Plan Update Comments.pdf

Date and Time Comment Was Submitted: 2016-07-07 15:59:55

No Duplicates.

## **Comment 11 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Alberto

Last Name: Saldamando

Email Address: [saldamando@sbcglobal.net](mailto:saldamando@sbcglobal.net)

Affiliation: Indigenous Environmental Network (IEN)

Subject: IEN Comments on CARB's 2030 Target Scoping Plan Concept Paper of June 17, 2016  
Comment:

The Indigenous Environmental Network is pleased to comment on the 2030 Target Scoping Plan of June 17, 2016. If we read it correctly, it appears that our concerns about California's Jurisdictional REDD Program have been taken into account, as Jurisdictional REDDs is not mentioned in California's long term target scoping. Although we have heard anecdotal evidence that CARB intends to continue the development of REDD Jurisdictional programs, we hope that this paper, targeting real emissions from transportation, building efficiency and heating fuels, among other domestic and international programs, is the path that California will follow. We earnestly hope that we are not being led into some garden path. We take CARB's statements on transparency at face value.

We continue to have some concerns as to the market approach to reducing Greenhouse gas emissions but we note that the Concept Paper cites the California Environmental Justice Advisory Committee as an important party to these discussions. Human rights and Indigenous rights are not inimical to real reductions in emissions and in fact are part and parcel of not only climate change but the solutions to this very real threat to the survival of humanity. As the Concept Paper states:

"It is important to note that both climate change and the health inequities we see in our communities share similar root causes: the inequitable distribution of social, political and economic power. These power imbalances result in systems (i.e. economic, transportation, land use, etc.) and conditions that drive both health inequities and GHG emissions. As a result, we see communities with inequitable living conditions, such as low-income communities of color living in more polluted areas, facing climate change impacts that compound and exacerbate existing sensitivities and vulnerabilities. Fair and healthy climate action requires addressing the inequities that create and intensify community vulnerabilities."

The same can be said of forest dwelling communities. We continue to believe, hope and work to the end that the world's tropical forests can and should be restored. But not at the expense of those Indigenous Peoples who have given their lives in their care and protection. They have been the caretakers of this precious resource and must be allowed to continue that role unencumbered by the billions of dollars projected by some from carbon trading. Unfortunately some, including the larger "environmental" NGOs see REDD as a new "forest development paradigm" that would relegate indigenous peoples to the vast army of the urban unemployed while



not achieving real GHG reductions. It is an established fact that carbon markets have not worked in any real reduction of GHG emissions. And putting a price on nature has invariably led to its destruction.

We also continue to have concerns as to the urgency of offering real solutions. The 1.5° Celsius goal of the Paris Accords will not be met unless real and abiding reductions are achieved in the next three or four years. The difference between 1.5° and 2° is millions more lives affected, trillions of additional dollars in damage, an unacceptable loss of life and an even greater destruction of the world's biodiversity. We also fear that the United States, as other developed nations, will use any real reductions achieved by California and others as offsets for their Nationally Determined Contributions. The world is already at the 2° and leading to a 4-6° rise in the temperature of the Earth. Real emissions reduction must be achieved.

In this respect we wish CARB success in your proposed "complimentary policies."

With regard to California's forests, we also take heart in the Concept Paper's discussion on California's forests. California, by some studies, is shown to lose 100 acres a day of forest, making California forests a net contributor of GHGs. We hope that CARB will address this problem in the near future.

Again, IEN is somewhat more at ease that CARB's Concept Paper does not mention Jurisdictional REDD and thus is apparently willing to forego it. We hope that transparency is valued by CARB and the State of California and that this is not an unintended omission. We also will continue to be involved in the discussions on the battle against global warming and appreciate CARB's apparent transparency and willingness to receive comments.

Respectfully Submitted,

Alberto Saldamando  
Indigenous Environmental Network  
alberto@sbcglobal.net  
1(415) 656-9198

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-07 16:38:15

No Duplicates.

**Comment 12 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Schuchard

Email Address: rschuchard@calstart.org

Affiliation: CALSTART

Subject: CALSTART Comments on Scoping Plan Concept Paper

Comment:

CALSTART appreciates this opportunity to comment on the Scoping Plan Concept Paper. Our comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-sp-concept-paper-ws-UjFSNQdqU3MAcghp.pdf>

Original File Name: CALSTART Comments on ARB Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 09:50:12

No Duplicates.

**Comment 13 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Peter  
Last Name: Imhof  
Email Address: pimhof@sbcag.org  
Affiliation: SBCAG

Subject: SBCAG Comments Re: Scoping Plan Concept Paper  
Comment:

Please find the Santa Barbara County Association of Governments' comments on the 2030 Target Scoping Plan Concept Paper attached.

Best regards,  
Peter Imhof

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-sp-concept-paper-ws-BTcFM11tUjdSeQAw.pdf>

Original File Name: 2016-07-08 SBCAG Comments on ARB 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-07-08 10:03:01

No Duplicates.

**Comment 14 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Vermilion

Email Address: nvermilion@placeworks.com

Affiliation: AEP Climate Change Committee

Subject: AEP Climate Change Committee 2030 Target Scoping Plan Concept Paper Comments  
Comment:

On behalf of the Association of Environmental Professionals (AEP), Climate Change Committee, we appreciate the opportunity to provide comments on the June 17, 2016, 2030 Target Scoping Plan Update Concept Paper. Attached our are comments on the Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-sp-concept-paper-ws-VzZUNwR1BwtXMgJu.zip>

Original File Name: AEP\_ClimateChangeCommitteeComments.zip

Date and Time Comment Was Submitted: 2016-07-08 10:10:15

No Duplicates.

**Comment 15 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Marc

Last Name: Landgraf

Email Address: mlandgraf@openspaceauthority.org

Affiliation: SCVOSA

Subject: Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

Comments on the 2030 Target Scoping Plan Concept Paper attached below.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-sp-concept-paper-ws-U2FcalBiUjFXDIQn.pdf>

Original File Name: 2030 scoping plan comments OSA 2016 07 08.pdf

Date and Time Comment Was Submitted: 2016-07-08 11:15:06

No Duplicates.

**Comment 16 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on 2030 Scoping Plan Concepts

Comment:

Please find attached comments of WPTF on the 2030 Target Scoping Plan Concept.

Thank you,  
Clare Breidenich  
GHG Committee Director  
Western Power Trading Forum

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-sp-concept-paper-ws-ADdXfAM6BXtQZ1Nl.pdf>

Original File Name: 7-8-16 WPTF Comments to the Board on Scoping Plan Concepts.pdf

Date and Time Comment Was Submitted: 2016-07-08 12:18:53

No Duplicates.

**Comment 17 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Arjun

Last Name: Patney

Email Address: arjun.patney@winrock.org

Affiliation: American Carbon Registry

Subject: 2030 Scoping Plan Concept Paper

Comment:

Attached are ACR's comments on the 2030 Scoping Plan Concept Paper.

Thank you for the opportunity to provide input.

Kind regards,

Arjun Patney

Policy Director

American Carbon Registry

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-sp-concept-paper-ws-UjNUMQR3VVkDaQht.pdf>

Original File Name: ACR letter to ARB on 2030 Scoping Plan Concept Paper FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 12:30:47

No Duplicates.

**Comment 18 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council/Sierra CAMP

Subject: 2030 Scoping Plan concept paper comments

Comment:

Please accept the following comment letter and additional attachment in response to the draft 2030 Target Scoping Plan Concept Paper release.

All best,  
Kerri Timmer  
Government Affairs Director  
Sierra Business Council

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-sp-concept-paper-ws-UDNSNVI+VnUHXgk7.zip>

Original File Name: CAMP\_2030 Scoping Plan Concept Paper\_CommentLtr\_2016\_07\_07.zip

Date and Time Comment Was Submitted: 2016-07-08 12:33:51

No Duplicates.



**Comment 19 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

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

Subject: IETA Comments on 2030 Target Scoping Plan Concept Paper  
Comment:

Dear Staff

On behalf of IETA, attached find comments on ARB's 2030 Target Scoping Plan Concept Paper, published on 17 June.

We appreciate this opportunity to submit feedback.

Sincerely,

Katie Sullivan

Director of Americas, IETA  
www.ieta.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-sp-concept-paper-ws-WzIFZgRxBzVWD1Mw.pdf>

Original File Name: IETA Comments\_ARB 2030 Scoping Plan Concept Paper\_8July2016.pdf

Date and Time Comment Was Submitted: 2016-07-08 12:40:21

No Duplicates.

## **Comment 20 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Mona

Last Name: Sheth

Email Address: msheth@ajw-inc.com

Affiliation: AJW, Inc.

Subject: Scoping Plan Concept Materials for Third-Party Delivered EE

Comment:

California has developed a comprehensive statewide program to reduce greenhouse gas (GHG) emissions. The state is rightly recognized as global leader in the effort to combat climate change. As the Scoping Plan Concept Paper recognizes, however, greater effort and innovation is needed to meet future GHG reduction goals to avoid the worst impacts of climate change. Governor Brown has identified the built environment as one of the key "pillars" for additional action ([http://www.arb.ca.gov/html/fact\\_sheets/2030\\_energyefficiency.pdf](http://www.arb.ca.gov/html/fact_sheets/2030_energyefficiency.pdf)). A doubling of energy savings from efficiency measures in buildings is called for over the next fifteen years. While challenging, these savings can be realized if California adopts new or modifies existing policies that more fully incentivize deployment of energy efficiency in the built environment.

Third-Party Delivered Energy Efficiency (TPDEE) is a key tool that California can more broadly utilize as part of these efforts. TPDEE includes all forms of energy efficiency projects other than utility- or ratepayer-funded projects. TPDEE projects comprise the majority of efficiency projects conducted in non-residential buildings. Government facilities, schools, universities, hospitals, public housing, industrial facilities and commercial buildings are generally better addressed through TPDEE strategies, and are most often implemented either by an energy service company (ESCO) or by the facility owner or operator.

TPDEE approaches and projects deliver customized, turnkey energy conservation solutions financed by cost savings. These private sector-financed projects complement traditional utility-led EE programs and ensure quantifiable GHG reductions. These projects require no ratepayer or taxpayer funding; strengthen state industrial competitiveness; and create quality jobs in the construction and energy sectors. Many states are effectively utilizing TPDEE projects to achieve significant energy efficiency savings. Under the Bush and Obama Administrations, the federal government has pursued significant TPDEE investment in its own facilities. Additionally, the Final Clean Power Plan included TPDEE approaches as a clear option for states to employ to achieve compliance with the rule.

While California is a usually a leader in energy efficiency efforts, it has not capitalized on maximizing efficiency in non-residential buildings as other states have done. For example, nationwide, efficiency investments made through the TPDEE tool known as Performance Contracts (PC) are roughly equal to the

efficiency investments made through utility- or ratepayer-funded projects. Yet, in California, the only PC projects implemented are on federal sites such as military facilities. In fact, California ranks 35th, trailing states such as Alabama and Rhode Island, in terms of PC-driven efficiency.

Additional information is attached regarding the role additional TPDEE could play in California's efforts maximize savings from energy efficiency and to achieve significant reductions in GHG emissions. Our coalition looks forward to working with policymakers in California and at the Air Resources Board to maximize these opportunities.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-sp-concept-paper-ws-AHMBclMiByQAaQBy.zip>

Original File Name: Supporting Reference Materials CARB Submission.zip

Date and Time Comment Was Submitted: 2016-07-08 12:49:47

No Duplicates.

**Comment 21 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Joshua

Last Name: Hanthorn

Email Address: jhanthorn@defenders.org

Affiliation: DoW, TNC, CA Releaf, Audubon CA

Subject: 2030 Target Scoping Plan Update Concept Paper

Comment:

Please see attached PDF

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-sp-concept-paper-ws-UzdUN1I1WG5WPgJm.pdf>

Original File Name: Defenders Comment Letter on ARB Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 13:12:37

No Duplicates.

## **Comment 22 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CASA Climate Change Program Manager

Subject: CASA Climate Change Group Comments

Comment:

CASA appreciates the opportunity to provide comments on the Concept Paper. We want to emphasize that POTWs have opportunities to be significant renewable energy providers, suppliers of a marketable renewable fertilizer/soil amendment product, suppliers of a low carbon fuel, suppliers of a sustainable (drought-proof) water supply, and environmental stewards of our natural and working lands - all of which can significantly contribute toward each of the four proposed concepts for meeting 2030 targets. In many cases, all that is lacking is the funding to develop the additional appropriate infrastructure and new markets to make these projects a reality.

Thank you for your consideration of these comments. Please contact me if you have any questions at (925) 705-6404 or via email at sdeslauriers@carollo.com. We look forward to working together as proactive partners on our multitude of shared objectives.

Sincerely,

Sarah Deslauriers

CASA Climate Change Program Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-sp-concept-paper-ws-VWICKVBpUy0CNQcx.pdf>

Original File Name: 7-8-16 CASA Climate Change Comments on 2030 Scoping Plan Concept Paper\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 13:12:59

No Duplicates.

**Comment 23 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Randal

Last Name: Friedman

Email Address: randalfriedman@gmail.com

Affiliation:

Subject: SCOPING PLAN CONCEPT PAPER COMMENTS

Comment:

See attached letter from a wide range of EV policy advocates.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-sp-concept-paper-ws-BWJUOlcxAAwLP1dn.pdf>

Original File Name: GHG 2030 SCOPING PLAN CONCEPT PAPER FINAL  
SUBMITTAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 13:26:55

No Duplicates.

**Comment 24 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Julia

Last Name: Rege

Email Address: jrege@globalautomakers.org

Affiliation: Association of Global Automakers, Inc.

Subject: Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

The attached comments are submitted on behalf of the Association of Global Automakers regarding the 2030 Scoping Plan Concept Paper.  
Thank you for considering our comment.s

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-sp-concept-paper-ws-V2VUYldnVjNWfVNj.pdf>

Original File Name: 2016-07-08 Global Automakers Comments on Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 13:29:41

No Duplicates.

**Comment 25 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Lung/PHI Scoping Plan Concept Paper comments

Comment:

Please see attached comments on behalf of the American Lung Association in California and the Center for Climate Change and Health at the Public Health Institute.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-sp-concept-paper-ws-Am4CcVY5V2MAWQNi.pdf>

Original File Name: Lung Assn\_PHI comments on Concept Paper 7.8.2016.pdf

Date and Time Comment Was Submitted: 2016-07-08 13:42:45

No Duplicates.



## **Comment 26 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Pamela Tau  
Last Name: Lee  
Email Address: ptlee14@gmail.com  
Affiliation: Chinese Progressive Association

Subject: 2030 Target Scoping Plan  
Comment:

July 7, 2016

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

RE: Comments on 2030 Target Scoping Plan Concept Paper

On behalf of the Chinese Progressive Association - San Francisco, we appreciate the opportunity to provide comments regarding the 2030 Target Scoping Plan. We support combatting climate change through an aggressive program that emphasizes reducing GHG at the source and not through market based strategies such as Cap-and-Trade.

Our comments support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, we urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. We also urge CARB to cancel the process of including REDD in California's cap and trade program.

We urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which proposes that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included in the Scoping Plan.

Sincerely,  
Pamela Tau Lee  
Chairperson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 13:48:36

No Duplicates.

**Comment 27 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: CalETC

Subject: CalETC Comments on 2030 Target Scoping Plan Concept Paper

Comment:

Please consider CalETC's comments, attached. Thank You, Eileen

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-sp-concept-paper-ws-VDddOl0wAzUKeFIx.pdf>

Original File Name: CALETC Comments Re 2030 Target Scoping Plan Update Concept Paper FINAL(Binder).pdf

Date and Time Comment Was Submitted: 2016-07-08 13:53:01

No Duplicates.

**Comment 28 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Jamesine

Last Name: Rogers Gibson

Email Address: jvrogers@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

Attached are the Union of Concerned Scientists' comments on the 2030 Target Scoping Plan Concept Paper. We look forward to continued engagement with ARB as details of the Scoping Plan are fleshed out and evaluated. Please feel free to contact us if you'd like to discuss our comments further.

Thank you,  
Jamesine Rogers Gibson

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-sp-concept-paper-ws-VWcCNFJgWToDdlAz.pdf>

Original File Name: 2030ScopingPlanConceptPaperUCS Comments\_final.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:04:26

No Duplicates.

**Comment 29 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Nussbaumer

Email Address: enussbaumer@fwwatch.org

Affiliation:

Subject: FWW Comment on 2030 Target Scoping Plan Update Concept Paper

Comment:

Please see attached for comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-sp-concept-paper-ws-AWdXJlIkAw8GYwRr.pdf>

Original File Name: FWW Comment 2030 Target Scoping Plan Update Concept Paper  
070816.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:11:50

No Duplicates.

**Comment 30 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Cory  
Last Name: Bullis  
Email Address: cory@caleec.com  
Affiliation:

Subject: CALCC Comments for AB 32 2030 Scoping Plan Concept Paper  
Comment:

Hello,

Please see attached comments from the California Association of  
Local Conservation Corps for the AB 32 2030 Scoping Plan Concept  
Paper.

Thank you.

Cory

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-sp-concept-paper-ws-VTZSNVc6VmZSNwdY.pdf>

Original File Name: CALCC Comments for Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:27:37

No Duplicates.

**Comment 31 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: NRDC Comments on 2030 Target Scoping Plan Concept Paper

Comment:

Please find attached NRDC's comments on the 2030 Target Scoping Plan Concept Paper

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-sp-concept-paper-ws-VzIRJVQxBzdRCFMw.pdf>

Original File Name: NRDC Comments on 2030 Target Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:37:40

No Duplicates.

## **Comment 32 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: John

Last Name: Zhao

Email Address: jzhao098@stanford.edu

Affiliation: Students for a Sustainable Stanford

Subject: RE: Comments on 2030 Target Scoping Plan Concept Paper

Comment:

July 8, 2016

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

RE: Comments on 2030 Target Scoping Plan Concept Paper

On behalf of Students for a Sustainable Stanford we appreciate the opportunity to provide comments regarding the 2030 Target Scoping Plan. We support combatting climate change through an aggressive program that emphasizes reducing GHG at the source and not through market based strategies such as Cap-and-Trade.

Our comments support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, we urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. We also urge CARB to cancel the process of including REDD in California's cap and trade program.

We urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which propose that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included in the Scoping Plan.

Sincerely,

John Zhao

Co-Director, Students for a Sustainable Stanford

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-sp-concept-paper-ws-VzRdOIUnBDRVPFMj.pdf>

Original File Name: CAscopingSSS.pdf



Date and Time Comment Was Submitted: 2016-07-08 14:27:56

No Duplicates.

**Comment 33 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Reeves

Email Address: mreeves@panna.org

Affiliation: Pesticide Action Network

Subject: PAN/CPR Scoping Plan Comments

Comment:

Second try with correct syntax

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-sp-concept-paper-ws-WyhSNwNtVnVRPIU7.pdf>

Original File Name: Scoping plan\_PAN,CPR\_Jul2016.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:46:57

No Duplicates.

**Comment 34 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Josiah

Last Name: Young

Email Address: Josiah@weidemangroup.com

Affiliation:

Subject: BYD Comments in Response to the 2030 Target Scoping Plan Concept Paper  
Comment:

On behalf of BYD, we appreciate the opportunity to provide comments on the June 17, 2016, 2030 Target Scoping Plan Update Concept Paper. Attached are our comments on the Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-sp-concept-paper-ws-VjQCfV04BQkLbgVq.pdf>

Original File Name: BYD Comments in Response to the 2030 Target Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:22:56

No Duplicates.

**Comment 35 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Barbara

Last Name: McBride

Email Address: barbara.mcbride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on 2030 Scoping Plan Concept Paper

Comment:

Please find attached the comments of Calpine Corporation on the Air Resources Board's Concept Paper concerning the Draft Scoping Plan. Please feel free to contact me with any questions regarding these comments. Thank you for the opportunity to provide these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-sp-concept-paper-ws-UTJWMQZrVHdSPQhm.pdf>

Original File Name: Calpine Comments on 2030 Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:49:27

No Duplicates.

## **Comment 36 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: George

Last Name: Leonard

Email Address: gleonard@oceanconservancy.org

Affiliation: Ocean Conservancy

Subject: Ocean Conservancy comments on 2030 Target Scoping Plan Concept Paper  
Comment:

Dear California Air Resources Board Members;

Thank you for the opportunity to comment on the 2030 Draft Scoping Plan Update (Plan). We applaud the Board for including in the Plan a focus on Natural and Working Lands, including wetland, riparian, estuarine, coastal, and ocean habitats. Investments in California's coast and ocean can play a critical role in reducing the state's greenhouse gas (GHG) emissions and combating climate change, and can also produce a range of co-benefits that will help ensure oceans continue to provide the services upon which all Californians depend.

The Plan, along with the associated Discussion Paper on California's Climate Change Vision and Goals for Natural and Working Lands (Discussion Paper) released for the March 23rd 2016 public workshop, recognizes the importance of ocean and coastal habitat to California's climate change strategy. In this letter, we offer additional support for the importance of this focal area, and provide several recommendations and comments on the Plan.

We greatly appreciate the state's efforts on climate change, and support the most ambitious actions recommended in the concepts in an effort to limit global warming below 2 degrees C. We note, however, that even this goal is increasingly considered inadequate, as evidenced by the aspirational limit of 1.5 degrees C at the Paris climate talks. For the ocean in particular, a lower limit is critical to preventing the worst consequences of climate change, including sea level rise and storm surges, species shifts due to increasing temperatures, habitat loss, and synergistic effects among them. We urge the ARB to include reference to this aspirational limit and to encourage the most stringent, efficient, and fastest means of achieving greenhouse gas reductions.

For this reason, Ocean Conservancy commends the current inclusion of ocean and coastal habitats in the Plan, and recommends even greater recognition of their importance in the overall strategy for using the inherent capacities of natural and working lands to increase carbon storage and mitigation and provide economic and environmental co-benefits. For example, we recommend that the ARB specify "coastal habitats" whenever different habitat types are mentioned. We also recommend four key strategies for better incorporating natural and working lands, and in particular, coastal and ocean ecosystems, into the State's climate change strategy through the Plan.

These are:

1. Protect and restore near-shore habitat and ecosystems;
2. Restore offshore marine food webs to utilize food web dynamics as a carbon management tool;
3. Advance seaweed aquaculture as a mechanism to remove CO2 from the ocean, while providing jobs and biofuels to benefit all Californians; and
4. Create an "Ocean Carbon Strategy Workgroup" to identify, advance and test new, science-based ocean initiatives to mitigate and adapt to climate change.

Ocean Conservancy concludes that there are a number of investments the State can make in our coast and ocean to reduce, mitigate and/or sequester carbon that advances California's AB 32 goals, positions the State to combat climate change more broadly, and maximize co-benefits to our natural resources.

Please see our detailed comments attached. Thank you very much.

Very truly yours,  
George H. Leonard and Anna M. Zivian

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-sp-concept-paper-ws-VzgFYANnBTcGbgNc.pdf>

Original File Name: Ocean\_Conservancy\_ARB\_Plan\_Comments.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:52:37

No Duplicates.

## **Comment 37 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Coalition for Clean Air Comments to Air Resources Board on Update to AB 32  
Scoping Plan

Comment:

The Coalition for Clean Air was an early supporter of the Global Warming Solutions Act of 2006 (AB 32, Nuñez-Pavley) and has been actively involved in its implementation. We continue to strongly support the law as a meaningful response by the largest state in the U.S. to the grave threat of rapid changes in our planet's climate. We believe that AB 32 has been mostly successful so far, and we're pleased to hear ARB's projection that the state is on target to meet the 2020 requirement. We need to continue that progress in order to meet the 2030 and 2050 goals.

The Scoping Plan Update should continue policies that have been successful and strengthen them. SB 350 (de León, 2015) requires strengthening of renewable electricity and building efficiency standards and promotes transportation electrification. ARB should also establish more aggressive standards in other areas.

The SPU should promote the rapid transformation of California's transportation sector to zero emission technologies. As noted in the Vision for Clean Air document in 2012 - California's transportation sector needs to move rapidly toward zero and near-zero emission technologies to achieve federal health-protective clean air standards and California's climate change goals. This transition needs to encompass passenger vehicles, the freight sector, and low carbon fuels as well as smarter growth strategies to reduce pollution, improve air quality and provide Californians with healthier mobility options.

Elements of transportation sector planning should include:

- Increasing transit ridership and reducing GHG emissions by targeting funds to operate increased levels of transit service and implementing fare reduction strategies that incentivize greater transit utilization.

- Strengthening the LCFS, which is proving successful in diversifying California's transportation fuel mix.

- Maintaining momentum in vehicle efficiency improvements beyond 2025 and achieving the Zero Emission Vehicle program targets.

- Providing clear direction on the rapid development and deployment of advanced zero- and near-zero emission technologies in the medium and heavy duty sectors. Zero emission buses and the Sustainable Freight Action Plan are critical to cutting greenhouse gases, black carbon and local diesel particulate pollution impacts.

A critical element of transitioning the transportation sector must be to provide clean air benefits to communities most disadvantaged

by air pollution and toxic hot spots such as freeways, port traffic, rail yards and distribution centers. ARB should also adopt regulatory standards to reduce emissions from industrial sources, including refineries.

ARB should seriously consider Concepts 2 and 3, as clear and firm regulatory standards have been the most effective tool for reducing emissions and driving technological innovation, the two most important results of AB 32. In fact, we would support a combination of Concepts 2 and 3 which embraces emission-reducing standards for both the transportation and industrial sectors. The choice of an alternative should include consideration of which concept better advances environmental justice by reducing pollution in the communities that are most burdened by it.

If ARB decides to continue the cap-and-trade program, virtually all of the pollution allowances should be auctioned off, as recommended by the expert economists who advised ARB on establishing the program, rather than given away to big polluters. Instead of rewarding early action on the part of industry to plan, invest, and innovate to reduce its pollution, free allocation only rewards stalling, delay, and obstruction of necessary cleanup. ARB should ensure allowance value is put to use where it can be certain it will benefit all Californians and help achieve the goals of AB 32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 15:03:15

No Duplicates.



**Comment 38 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments for the 2030 Target Scoping Plan Concept Paper

Comment:

Please see attached document.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-sp-concept-paper-ws-VGZda1FjB2QHxIUh.pdf>

Original File Name: 2030 Target Scoping Plan Concept Paper - 7-8-16.pdf

Date and Time Comment Was Submitted: 2016-07-08 15:04:41

No Duplicates.

## **Comment 39 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Courtney

Last Name: Pal

Email Address: cpal18@stanford.edu

Affiliation:

Subject: RE: Comments on 2030 Target Scoping Plan Concept Paper

Comment:

I support combatting climate change through an aggressive program that emphasizes reducing GHG at the source and not through market based strategies such as Cap-and-Trade.

I support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, I urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. I also urge CARB to cancel the process of including REDD in California's cap and trade program.

I urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which propose that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included in the Scoping Plan.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 15:06:17

No Duplicates.

## **Comment 40 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Miranda

Last Name: Vogt

Email Address: mvogt1@stanford.edu

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Concept Paper

Comment:

July 8, 2016

Mary Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: Comments on 2030 Target Scoping Plan Concept Paper

As a member of Students for a Sustainable Stanford, I appreciate the opportunity to provide comments regarding the 2030 Target Scoping Plan. I support combating climate change through an aggressive program that emphasizes reducing GHG at the source and not through market based strategies such as Cap-and-Trade.

I support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, I urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. I also urge CARB to cancel the process of including REDD in California's cap and trade program.

I urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which propose that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included

in the Scoping Plan.

Sincerely,

Miranda Vogt

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 15:11:54

No Duplicates.

## **Comment 41 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: Monica

Last Name: Chan

Email Address: monica.ninette.chan@gmail.com

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Concept Paper

Comment:

As a fellow with Asian Pacific Environmental Network, we appreciate the opportunity to provide comments regarding the 2030 Target Scoping Plan. We support combatting climate change through an aggressive program that emphasizes reducing GHG at the source and not through market based strategies such as Cap-and-Trade.

Our comments support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, we urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. We also urge CARB to cancel the process of including REDD in California's cap and trade program.

We urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which propose that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included in the Scoping Plan.

Sincerely,

Monica Chan

Asian Pacific Environmental Network

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 15:16:38

1 Duplicates.

**Comment 42 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Francesca

Last Name: Wahl

Email Address: fwahl@solarcity.com

Affiliation:

Subject: 2030 Target Scoping Plan Concept Paper - SCTY Comment

Comment:

Please find attached SolarCity's comments on the 2030 target scoping plan update concept paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-sp-concept-paper-ws-USJSN1YjWXNVDAk.pdf>

Original File Name: SCTY Comments ARB 2030 Scoping Plan Update 7 8 16.pdf

Date and Time Comment Was Submitted: 2016-07-08 14:38:24

No Duplicates.

**Comment 43 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Julia  
Last Name: Kim  
Email Address: jkim@lgc.org  
Affiliation: ARCCA

Subject: ARCCA Comments to the 2030 Target Scoping Plan Concept Paper  
Comment:

Dear Chairman Nichols and ARB Staff:

Please find attached comments from the Alliance of Regional Collaboratives for Climate Adaptation on the 2030 Target Scoping Plan Concept Paper.

If you have any questions, please don't hesitate to reach out to us.

Sincerely,

Julia Kim  
Coordinator  
Alliance of Regional Collaboratives for Climate Adaptation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-sp-concept-paper-ws-UTAFcQFjBzdXMAhX.docx>

Original File Name: ARCCA Comments - 2030 Scoping Plan Concept Paper.docx

Date and Time Comment Was Submitted: 2016-07-08 15:27:13

No Duplicates.

## **Comment 44 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: John

Last Name: Ribeiro-Broomhead

Email Address: johnsrb3@stanford.edu

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Concept Paper

Comment:

As a native Californian, climate activist, and aspiring climate scientist (pursuing a masters degree in environmental sciences at Stanford), I offer my opinion on international carbon offset programs like REDD, as well as a concise summary of asks from the Asian Pacific Environmental Network.

International offsets programs allow for us to feel accomplished and secure in our efforts to reduce GHG emissions, but without strong guarantees that the communities directly impacted by such programs will be protected from disenfranchisement and abuse, I cannot support such programs, as well-intentioned as they may be. I had the great privilege of attending COP21, and it was painfully apparent that given the current state of geopolitics and oversight infrastructure in many participating countries, such guarantees cannot currently be made. California is a leader; if the rest of the world has agreed that mechanisms like REDD are acceptable, we need to go one step further to create more equitable programs that safeguard the rights of people while also reducing our emissions.

I support and affirm the Principles of Environmental Justice, the Principles of Climate Justice with a human rights framework that includes the American Declaration on the Rights & Duties of Man, the United Nations Declaration on the Rights of Indigenous Peoples. While the inclusion of the Reducing Emissions from Deforestation and Forest Degradation (REDD) is not specifically addressed in the Scoping plan, I urge the CARB to not include international sector-based offsets programs such as REDD into future plans to meet 2030 climate goals. I also urge CARB to cancel the process of including REDD in California's cap and trade program.

I urge your committee to refer to comments submitted by the Environmental Justice Advisory Committee April 4, 2016 which propose that:

- California not commit to continuing Cap-and-Trade. Trades cannot be accurately verified and can be subject to fraud. Market based proposals perpetuates disproportionate negative impact exposures to EJ communities.
- REDD and other market-based proposals should not be included in the Scoping Plan.

Thank you



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 15:14:04

No Duplicates.

**Comment 45 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Steve

Last Name: Brink

Email Address: steveb@calforests.org

Affiliation: California Forestry Association

Subject: 2030 Target Scoping Plan Update Concept Paper, June 17, 2016

Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-sp-concept-paper-ws-WmtcbFZnUDQANgk8.docx>

Original File Name: 160705\_CFA\_to\_ARB\_draft 2030 Target Scoping Plan Concept Paper.docx

Date and Time Comment Was Submitted: 2016-07-08 15:32:18

No Duplicates.

**Comment 46 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: J Stacey

Last Name: Sullivan

Email Address: ssullivan@suscon.org

Affiliation: Sustainable Conservation

Subject: Sustainable Conservation comments on Scoping Plan Concept Paper

Comment:

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-sp-concept-paper-ws-BjRSZAAyA2AHXllh.docx>

Original File Name: 2030 Scoping Plan Concept Paper comments2 (1).docx

Date and Time Comment Was Submitted: 2016-07-08 15:36:02

No Duplicates.

**Comment 47 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern CA Public Power Authority

Subject: SCPPA Comments on 2030 Target Scoping Plan Concept Paper

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-sp-concept-paper-ws-WyhXMIQIWxoEYwRb.pdf>

Original File Name: SCPPA Comments on 2030 Scoping Plan Concept Paper FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 15:46:30

No Duplicates.

**Comment 48 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Jerilyn Lopez

Last Name: Mendoza

Email Address: jmendoza5@semprautilities.com

Affiliation: SoCalGas and SDG&E

Subject: Written Comments on AB 32 Scoping Plan Concept Paper (June 17,2016)

Comment:

On behalf of SoCalGas and SDG&E, please see the attached written comments on the California Air Resources Board AB 32 Scoping Plan Concept Paper released for public comment on June 17, 2016. Please contact me with any questions or concerns. Thank you.

Jerilyn López Mendoza  
SoCalGas and on behalf of SDG&E  
Environmental Affairs Program Manager - CARB  
Energy and Environmental Affairs  
555 W 5th St., GCT 17E5  
Los Angeles, CA 90013  
Jmendoza5@semprautilities.com  
(desk) 213-244-5235  
(cell) 213-700-0095  
(fax) 213-244-8257

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-sp-concept-paper-ws-AXIAZQFnAAxXIgJm.pdf>

Original File Name: SCG\_SDGE Comments on SPU Concept Paper 7-8-16 FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 15:46:00

No Duplicates.

**Comment 49 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on 2030 Target Scoping Plan Update Concept Paper

Comment:

Northern California Power Agency Comments on 2030 Target Scoping  
Plan Update Concept Paper

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-sp-concept-paper-ws-AmxTNiMiVmRRCABj.pdf>

Original File Name: NCPA comments - Scoping plan 2030 concept paper (7-8-16).pdf

Date and Time Comment Was Submitted: 2016-07-08 15:56:28

No Duplicates.

**Comment 50 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Sekita

Last Name: Grant

Email Address: sekitag@greenlining.org

Affiliation: The Greenlining Institute

Subject: Greenlining Comments to the 2030 Target Scoping Plan Update Concept Paper  
Comment:

Comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-sp-concept-paper-ws-ADJRZ1VnUTIGXwNw.pdf>

Original File Name: 2030 Scoping Plan Comments\_July 2016\_Greenlining\_Final.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:10:37

No Duplicates.

**Comment 51 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Ken

Last Name: Nold

Email Address: krnold@TID.org

Affiliation: Turlock Irrigation District ("TID")

Subject: TID's Comments on June 17th 2030 Target Scoping Plan Update Concept Paper  
Comment:

Dear California Air Resources Board,

Turlock Irrigation District ("TID") respectfully submits the following comments on the 2030 Target Scoping Plan Update Concept Paper, dated June 17, 2016. Thank you.

Sincerely,

Ken R. Nold

Turlock Irrigation District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-sp-concept-paper-ws-V2ZRYQQ1A2cDNQgw.pdf>

Original File Name: 160708\_TID\_AB 32 Scoping Plan Concept Paper Comments (00365296xBA8E1).pdf

Date and Time Comment Was Submitted: 2016-07-08 16:10:23

No Duplicates.



**Comment 52 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: william.westerfield@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: Comments of the 2030 Target Scoping Plan Concept Paper

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-sp-concept-paper-ws-AHNXPfcjU2QCWwlq.pdf>

Original File Name: SMUD Comments on 2030 Scoping Plan Update Concept - LEG 2016-0485.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:11:52

No Duplicates.

## **Comment 53 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper- ws) - 1st Workshop.**

First Name: John

Last Name: Amodio

Email Address: jamodio@msn.com

Affiliation: Yosemite-Stanislaus Solutions (YSS)

Subject: Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

On behalf of Yosemite-Stanislaus Solutions, a community based collaborative of diverse interests in tuolumne County, I am submitting the following comments.

First, thank you for your continued effort and engagement of us and other interests. Our comments are in two sections: 1) Comments on specific text; 2) General and Overarching Comments.

Comments on specific text

"As shown in Figure 1, in 2014, total GHG emissions decreased by 2.8 million metric tons of CO2 equivalents (MMTCO2e) compared to 2013, representing an overall decrease of 9.4% since peak levels in 2004."

We strongly urge that GHG emissions from natural lands be included in the inventory. As Lucy Blake, President of the Northern Sierra Partnership commented at a joint State-federal public forum on Sierra forest health, the current inventory is both incomplete and inaccurate by excluding the significant emissions associated with the increasing trend of megafires throughout California and particularly the Sierra. Contrast wildfire emissions to High-Speed Rail. This is essential to enable that AB 32 funds are allocated to sectors that are most significant in terms of existing and potential emissions. By any objective measure, GHG funds are now grossly under invested in restoring forest health and resiliency.

Page 4

We applaud that you recognize "increasing trend in the severity of wildfires in California due to climate change, and understand how best to increase carbon sequestration in forests and other identify targets for natural and working lands, such as through the Forest Carbon. We must also address the natural lands over time. The Draft Scoping Plan will build off of ongoing efforts to Plan,1 and identify policies that directionally set us on the path towards achieving the vision for the sector even in the face of scientific and methodological uncertainty.

A Draft Scoping Plan workshop held on March 23, 2016, focused on the natural working lands sector.<sup>2</sup> As described at the March 2016 workshop, the high-level objectives for the State's strategy for natural and working lands include:

- Manage and restore land to increase carbon storage and minimize GHG emissions in a sustainable manner so that the carbon bank is resilient and grows over time.

Pages 19 - 20

"It is also important to understand the sources of emissions when considering opportunities for policies and programs to reduce GHGs. Figure 3 provides the percent contribution to statewide emissions from the main economic sectors as reflected in the 2014 GHG Emission Inventory (2016 Edition).<sup>11</sup>

Climate change mitigation policies must be considered in the context of the sector's contribution to the State's total GHGs. The transportation, electricity (in-state and imported), and industrial sectors are the largest sectors for GHGs in the inventory and present the largest opportunities for GHG reductions. However, to ensure decarbonization across the entire economy, policies must be considered for all sectors."

We seriously challenge the accuracy of this statement since forest and the vast amount of GHG emissions caused by wildfire, which are on steady increasing trend, are not even represented on this chart.

This omission not only misrepresents current reality, it also will justify continuing the under-investment in forest health and resiliency when compared to their importance in achieving AB 32 goals.

Pages 22 - 27

"• Natural and Working Lands - by 2030

o Each year, 500,000 acres of nonfederal forest lands included in restoration plans oriented towards forest health and carbon storage"

While we applaud the modest increase in the annual goal for forest health and carbon storage, restricting this goal to non-federal lands makes no sense and runs contrary to the reality that federal lands pose the greatest risks to achieving AB 32 goals. While they may be under federal management, they constitute the majority of forest land in California, form the headwaters from which 60% of California's developed water supply originates, and by any objective measure represent one of the largest potential sources of GHG in coming decades.

#### General Comments

Accomplishments and progress can be measured in a number of ways. We think first and foremost it will be useful to have a way to track NET changes in both stored carbon (above and below ground) and Fire Regime Condition Class (FRCC) across the landscape over time. These are the two most important factors in our view. Forests are dynamic environments and both carbon stored and FRCC can change from year to year. So we advocate an accurate way of doing both on a periodic basis (some kind of statistical sampling schema). We also think that it would be helpful to partition the state into bio geographic regions to accommodate different rates of change in these conditions that depend on different forest types and geography. This all is being done to some degree now, different organizations doing different parts of this, but could be improved upon.

Policies that influence the utilization of forest biomass for energy production have been largely ineffective for a long time; basically it is too expensive to haul forest biomass to processing stations. This dilemma will persist until we innovate a means for

making it economically viable to invest in biomass electricity generation plants and/or other sources of energy become more expensive. We also have to account for full life cycle of energy inputs and outputs from forest biomass. This is a complex issue but it is not viable at the moment and won't be until policies and innovations evolve.

It will be important to carefully consider the tradeoffs between emissions from prescribed fire and uncontrolled wildfire. Currently air regulations restrict prescribed and managed fire resulting in larger and more severe wildfires that emit larger volumes of GHG. This has to be thought through carefully and compromises reached to enable more management of fire. On the face of it this can be perceived as being in conflict with public health, an obvious goal of the overall concept paper. But careful thought will reveal that we will be better off enduring some smoke from managed fires than suppressing all but the very worst fires.

Of course, as said many times, we want to shift forest structure to less dense and more variable and composition to more fire tolerant species (more pine and oak, less fir and cedar) in most places in the Sierra. Creating a more heterogeneous landscape will lead to a more disturbance resilient landscape; thus maintaining more carbon for longer periods of time. More carbon, for longer periods of time, in more areas results in carbon sequestration increases. (page 9 of concept paper)

It is essential to support local/regional collaborations as much as possible. Reaching agreement on what and how to manage forests is challenging and only through skilled collaboration will difficult decision making stick. The plan should do everything in its power to enable these efforts to proceed and conclude.

Relying on sound science (page 12 of the concept paper) is wise. Keep a standing committee of credible scientists who can guide this effort. And support additional research on targeted topics.

We agree with the intergovernmental collaboration (page 13). This is the only way we can effectively manage firescapes (large watersheds/landscapes). We have to do everything we can to make these collaborations work.

Beginning on Page 22 of the Concept Paper, all four Concepts address Natural Working Lands by aiming for 500,000 of non-federal lands included in reforestation plans annually. First, why is this goal the same for all four concepts? This means that there is not difference in any concept for the role of forests. Seems like at least one should be somehow different. Second, again we should not distinguish between federal and non-federal lands. Third, we need to define what we mean by restoration. It must be based on ecological health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-08 16:28:52

No Duplicates.



**Comment 54 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Ag Council

Subject: Comments on 2030 Target Scoping Plan Update Concept Paper

Comment:

These comments are sent on behalf of the Agricultural Council and the California Farm Bureau. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-sp-concept-paper-ws-B2EHaAZpUWMGbAlW.pdf>

Original File Name: Final Ag Council and CFBF Scoping Plan Concept Paper Comments.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:25:23

No Duplicates.

**Comment 55 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments -- ARB's 2030 Scoping Plan Concept Paper

Comment:

Attached please find comments being submitted on behalf of the Climate Change Policy Coalition regarding ARB's 2030 Scoping Plan Concept paper.

Should 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/59-sp-concept-paper-ws-BmVRNFcmWGgKU1Bi.pdf>

Original File Name: CCPC\_2030 SP Concept Paper Update\_7\_8\_16.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:51:25

No Duplicates.

**Comment 56 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Martha

Last Name: Arguello

Email Address: marguello@psr-la.org

Affiliation:

Subject: PSR-LA Comments to the 2030 Target Scoping Plan Update Concept Paper

Comment:

Comments Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-sp-concept-paper-ws-AnJWI1EiA31WPFIZ.doc>

Original File Name: PSR-LA Scoping Plan Concept Paper Comment Letter.doc

Date and Time Comment Was Submitted: 2016-07-08 16:52:48

No Duplicates.



**Comment 57 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation: California EJ Alliance

Subject: Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

Please find the attached comments on the 2030 Scoping Plan from the California Environmental Justice Alliance.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-sp-concept-paper-ws-UzJXMwc1BGUFcAVm.pdf>

Original File Name: AB32ScopingPlanConceptPaperCommentsFINAL.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:49:01

No Duplicates.

**Comment 58 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Abby

Last Name: Halperin

Email Address: ahalperin@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Pacific Forest Trust Comments on the 2030 Target Scoping Plan Concept Paper  
Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-sp-concept-paper-ws-BXVWMQRmAjgEZFc+.pdf>

Original File Name: Pacific Forest Trust comments on 2030 Target Scoping Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-07-08 16:57:37

No Duplicates.

**Comment 59 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Comment Letter on Scoping Plan Update Concept Paper

Comment:

Attached is a comment letter on the Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-sp-concept-paper-ws-BWNROFQwAnxVJgNw.pdf>

Original File Name: FOE-US\_carb\_commentltrscopingplanconceptpaper.pdf

Date and Time Comment Was Submitted: 2016-07-08 17:00:35

No Duplicates.

**Comment 60 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Michael

Last Name: Shaw

Email Address: mshaw@cmta.net

Affiliation: CMTA

Subject: CMTA Comments on the 2030 Target Scoping Plan Concept Paper

Comment:

The attached document contains CMTA's Comments on the 2030 Target  
Scoping Plan Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-sp-concept-paper-ws-AmEHbARxVWcKU1Vn.pdf>

Original File Name: CMTA 2030 Scoping Plan Concept Paper Comments 7-8-2016.pdf

Date and Time Comment Was Submitted: 2016-07-08 17:04:08

No Duplicates.

**Comment 61 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on 2030 Scoping Plan Concept Paper

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-sp-concept-paper-ws-WzlWMVw+WVUDZgZp.pdf>

Original File Name: BAC Comments on 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-07-11 08:50:47

No Duplicates.

**Comment 62 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Kim

Last Name: Anderson

Email Address: anderson@sjcog.org

Affiliation: San Joaquin Council of Governments

Subject: 2030 Target Scoping Plan Concept Paper

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-sp-concept-paper-ws-VGYBNwEzWDsHXgh8.pdf>

Original File Name: 2030 Target Scoping Plan Concept Paper Comments SJCOG.pdf

Date and Time Comment Was Submitted: 2016-07-11 09:01:16

No Duplicates.

**Comment 63 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Bill

Last Name: La Marr

Email Address: billlamarr@msn.com

Affiliation: CA Small Business Alliance

Subject: omments on Draft Scoping Plan Concept Paper:

Comment:

Attached are the Comments of the California Small Business Alliance  
on the Draft Scoping Plan Concept Paper.

Date and Time Comment Was Submitted: 2016-07-10 17:30:00

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-sp-concept-paper-ws-AmECdwZIU2EFXAJh.pdf>

Original File Name: CSBA Comment Ltr-Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-07-11 13:02:09

No Duplicates.

**Comment 64 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBz@pge.com

Affiliation: PG&E

Subject: PG&E Comments on the 2030 Scoping Plan Update Concept Paper

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-sp-concept-paper-ws-ViZXNgBkBQkAZQRr.pdf>

Original File Name: PGE Comments - 2030 Target Scoping Plan Concept Paper 7.8.16.pdf

Date and Time Comment Was Submitted: 2016-07-11 14:11:49

No Duplicates.



**Comment 65 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-  
ws) - 1st Workshop.**

First Name: Jerard

Last Name: Wright

Email Address: Jerard@movela.org

Affiliation: Move LA

Subject: Move LA Scoping Plan comment letter

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-sp-concept-paper-ws-AGECdNgAw8EcQhr.pdf>

Original File Name: ARB Scoping Comments.pdf

Date and Time Comment Was Submitted: 2016-07-18 13:32:56

No Duplicates.

**Comment 66 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

First Name: Michael

Last Name: Shaw

Email Address: mshaw@cmta.net

Affiliation: CMTA

Subject: 2030 Scoping Plan Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-sp-concept-paper-ws-VzFTPArUWNsoAdY.zip>

Original File Name: FINAL\_NERA\_Economic\_Impacts.zip

Date and Time Comment Was Submitted: 2016-08-10 14:11:20

No Duplicates.

**Comment 67 for 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) - 1st Workshop.**

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

Subject: WSPA comments AB 32 2030 Target Scoping Plan Update Concept Paper  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-sp-concept-paper-ws-UyRSJ1IjVmRQCQZl.pdf>

Original File Name: WSPA comments AB 32 2030 Target Scoping Plan Update Concept Paper.pdf

Date and Time Comment Was Submitted: 2016-08-19 07:41:02

No Duplicates.

**There are no comments posted to 2030 Target Scoping Plan Concept Paper (sp-concept-paper-ws) that were presented during the Workshop at this time.**