

## **Comment 1 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16- ws) - 1st Workshop.**

First Name: Michael

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation: California Democratic Party Central C's

Subject: Need for Car Parking Reform

Comment:

I am a systems engineer and I have written and presented, at the 2016 Air and Waste Management Association Conference, the following paper:

The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving

Therefore I know that if cars and light-duty trucks (Light-Duty Vehicles, or LDVs) are going to achieve climate-stabilizing targets, we must improve the way we pay for the use of parking. This is said by many to be one of the quickest and cheapest ways to get a significant (10% or more) reduction in driving. It also increases economic fairness and choice.

Currently, we often pay for the use of parking, whether we use the parking or not, with lower wages and (if that's not bad enough) higher costs for many things, from rent to groceries.

I have also written a paper describing a system to mitigate the harm of all types of "free" or under-priced parking. The paper was peer reviewed and presented at the Air and Waste Management Association Conference in 2010. The system described would work in all cases, meaning at stores, at office buildings, at train stations, or at mixed-use developments. The paper is hosted at this website:

<http://sierraclub.typepad.com/files/mike-bullock-parking-paper.pdf>.

However, first we need a demonstration project. This is an opportunity for CARB. CARB could make history.

I could send you an unpublished report that describes in some detail how the demonstration project would work; also, a file showing how I present this same demonstration project, very briefly, for Climate Action Plans.

Here is the closest thing I have to a "one-page info sheet":

Demonstration Project to Mitigate the Harm of Bundled-Cost Or Bundled-Benefit Parking at a Government Agency or Municipality

The municipality (or agency) would develop a Demonstration Project to, in effect, Unbundle the Cost of Parking ("Demonstration Project") at a city (or agency) employee location ("Proposed

Location").

The municipality (or agency) would (assuming the demonstration project was successful) then, install this parking system at all of their buildings.

BACKGROUND: Currently, municipal (agency) employees do not have the ability to choose between earnings and driving - employees effectively pay for parking out of their salary, whether or not they use the parking. The Demonstration Project will provide the opportunity for the employees to choose between earnings and driving. This, in effect, implements the California Air Pollution Control Officers Association (CAPCOA) measure of unbundling the cost of parking.

PROJECT: Parking would be charged at a given rate (for example \$0.02/min - roughly \$9.60/day). Funds generated from these parking charges would be distributed as earnings to all employees working at the proposed location in proportion to each employee's time spent at work, at the proposed location. Those who decide not to drive will not be charged for parking but will still make earnings based on time spent at work at the location. Implemented correctly, this free market approach will substantially reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, by reducing the drive-alone mode.

For employees whose parking charges are greater than parking lot earnings, an "add-in" may be included so that no employee loses money, compared to "free parking". With such "add-in" payments, there could be an "Opt in" or "Opt out" choice, meaning that those that "Opt out" will see no changes on their pay check, relative to "free parking".

This project may be helped by receiving a grant to pay the development and installation cost, as well as the "add in" payments, for some specified number of years. The municipality (agency) would need to apply for such a grant.

Let me know how I can help further. I would certainly be willing to travel to meet with you on this issue.

Note that this is in conformance with the latest additions to the CDP Platform, which can be viewed here:

[\(http://www.cadem.org/our-california/platform/2016-platform-energy-and-environment\)](http://www.cadem.org/our-california/platform/2016-platform-energy-and-environment). (Scroll down to "Transportation.")

Note finally that the work of the Road-Use Charge Technical Advisory Committee (RUC TAC), under SB 1077, is also very important to your work regarding LDVs. I have also submitted to them and would love to share that with you.

Mike  
760-754-8025

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-02 15:35:07

No Duplicates.

## **Comment 2 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16- ws) - 1st Workshop.**

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: none

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Urgent Decarbonization Now. Holding GHG emissions in check purportedly enough to "stabilize" climate warming at 450 degrees won't "stabilize" anything. CARB should recognize that latest climate science tells us that previous projections have been too conservative, that "climate stabilization" will require prompt and radical decarbonization of the entire energy economy. Half-measures are no longer sufficient to overcome the existential gravity of the climate disruption threat, and CARB should be in the forefront of those who speak scientific truth about this challenge.

Fix Transportation Gap. There is a legislation gap for transportation GHG reduction. It is of great significance to the Scoping Plan. The gap was created by push-back from the oil industry in SB 350 last year. CARB now has a chance to address this legislation gap. Gov. Brown promised that regulatory/administrative authority would do so. What particularly needs fixing is how to 1) greatly accelerate electric vehicles (which seems to be lagging compared to state policy goals up to 2025, and needs a new higher target for 2030), 2) greatly improve local public transit service so it can compete with the functionality of cars, 3) build infrastructure for safe walking and bicycles, which need separated roads not just "bike lanes" that are inches from racing metal vehicles weighing a ton or more, 4) implement alternatives that reduce the need to travel, including higher density development and arcologies, and telecommuting.

Phase Down Natural Gas. Also critically needed is a comprehensive strategy--a policy "loading order"-- for phasing down domestic natural gas which includes 1) conservation, 2) efficiency, 3) zero net energy buildings, 4) non-electric energy technologies (solar -hot water, -space heat, -cooking, -air conditioning, and -lighting; geothermal heat; waste heat recovery, etc.), and 5) using low carbon grid electricity to replace the balance of gas use. This strategic approach should aim to reduce the cost, delay, risk, and environmental burden of domestic natural gas reduction, by using a diverse portfolio of tools rather than dumping all the weight on the electric grid.

Get More Energy Efficiency Faster. It would be very helpful to set policy goals, regulations, and implementation strategies for energy efficiency for the large segment of residential and commercial buildings, especially in a serious manner to address the split incentive between landlord and tenant. One of these measures might be to give renters the right to access energy efficiency

technologies, which they are often denied today--similar to California's right for renters to install electric vehicle charging equipment if they choose.

Push Zero Waste. It is also important to look at non-energy systems, such as providing support for radical reduction of waste--we should be looking toward up to 90% diversion from landfills by 2030 (the current policy is reportedly 75% reduction by 2020). And we need better systems of verification and implementation that draw in single family homes, multifamily apartments and condos, and businesses as well as transforming "waste management" companies into recycling systems. Agriculture, industry, concrete, high global warming gases, all need similar attention.

No Relying on Feds. A particularly urgent factor to examine is that we may not be able to continue to rely on the federal government to pick up their responsibilities in the context of climate policy. The recent election puts many things at risk, based upon public statements and ideological extremism of the Republican Party and president-elect Trump. CARB needs to consider even contingencies that many people may consider "unthinkable", such as what responsibilities California can and should assume if the US EPA no longer enforces regulations or is eliminated, or if federal climate research and data collection is scaled back or eliminated, the diminished role of other federal agencies such as NASA, DOE, USFS, DOI and DOD in climate and renewable energy, the risk to objective data collection and information, and how policy changes such as federal efficiency standards and subsidies could affect the trajectory of GHG reductions in California, and how we can address all of these.

Get Consumption Estimates Right. The Energy Commission has been consistently over-estimating growth in electricity demand for at least the past decade. They have made important changes in the past few years to help correct some of the worst errors, especially by placing "additional achievable energy efficiency" into the official forecast. In the first iteration this was significantly underestimated, because it only included data from the three large investor-owned utilities, but gradually this is being corrected also. The next phase will need to incorporate the requirement in SB 350 to double additional achievable energy efficiency by 2030, although this process will probably take a year or two. As a consumer of forecasts, CARB should do what it can to push CEC toward more accurate forecasting.

CEC Forecasts Lead to Gas Over-Procurement. This process time lag, and lack of information and process feedback to planning, has been a major factor in the gross over-procurement of natural gas generation in California. A great example is Carlsbad, where the "need" for a 600 megawatt power plant was established using the 2012 demand forecast. Well, guess what? The next two forecasts reduced projected demand in SDG&E's service territory by at least 800 megawatts, more than canceling out the need for that \$2 billion plus power plant. However, there is no required review or information feedback loop in California to correct this very serious planning error, so--without intervention--billions of dollars are on automatic pilot to get flushed down the toilet. The thin ray of hope is continued efforts to block this plant in courts, but this just shows how dysfunctional the planning process really is.

These comments were prepared with input from Robert Freehling.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-03 14:52:18

No Duplicates.

**Comment 3 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-  
ws) - 1st Workshop.**

First Name: Stephen

Last Name: Hansen

Email Address: hansens2@pacbell.net

Affiliation: Physician

Subject: Carbon pollution tax

Comment:

Use the Citizen's Climate Lobby plan for a  
carbon-fee-and-revenue-neutral-dividend plan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-04 00:36:20

No Duplicates.

**Comment 4 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Scott

Last Name: Edwards

Email Address: sedwards@fwwatch.org

Affiliation: Food & Water Watch

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please find attached FWW's comments on the 2030 Target Scoping Plan Discussion Draft. Our comments consist of a short comment letter and a recent report we did on the British Columbia carbon tax - both items are included in a zip file.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/5-sp2030disc-dec16-ws-WjtVIQFjVG9WOQZw.zip](http://www.arb.ca.gov/lists/com-attach/5-sp2030disc-dec16-ws-WjtVIQFjVG9WOQZw.zip)

Original File Name: Archive.zip

Date and Time Comment Was Submitted: 2016-12-09 13:52:01

No Duplicates.



## **Comment 5 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16- ws) - 1st Workshop.**

First Name: Regina

Last Name: Chichizola

Email Address: regina@ifrfish.org

Affiliation: Pacific Coast Federation of Fishermen

Subject: Comments from Fishing Industry

Comment:

Please use PDF as official comment.

2030 Scoping Plan Update

12/12/16

California Air Resources Board

Thank you for the opportunity to comment on the 2030 Scoping Plan Update for the California Global Warming Solutions Act of 2006 (AB 32) and for presenting on this process in Orleans, which we understand is one of the first meetings on this issue north of Sacramento. We hope that the state continues to reach out to coastal communities in Northern California, as they are already suffering from the serious impacts of climate change and drought through lack of water supply, and food, and the loss of fishing industry jobs.

The Pacific Coast Federation of Fishermen's Association (PCFFA) is the largest organization of commercial fishing men and women on the West Coast. For 40 years, PCFFA has led the industry in assuring the rights of individual fishermen and fighting for the long-term survival of commercial fishing as a productive livelihood and way of life. The Institute for Fisheries Resources (IFR) is dedicated to the protection and restoration of fish resources and the human economies that depend on them. By establishing alliances among fishing men and women, government agencies, and concerned citizens, IFR unites resource stakeholders, protects fish populations, and restores aquatic habitats. A critical component of both organizations' missions is robust protections for surface water quality that supports salmon and the protection of California's ocean fisheries and fishing jobs.

PCFFA and IFR appreciate the opportunity to engage on the Scoping Plan Update, and are specifically concerned about the following

issues with regard to climate change resiliency: water management and savings; economic impacts from climate change; cold water supply for salmon; short lived pollutants such as methane; ocean warming and acidification; dam management; agricultural pollution; toxic algae in water supplies; fossil fuel development; water rights; and mitigations that deal with the current impacts of climate change.

The California industry is already suffering from the impacts of climate change. Fisheries and fishery-dependent California coastal communities are suffering through back-to-back-to-back resource crises, with a poor salmon season in 2015, loss of half of the crab season, and another poor salmon season in 2016. California's Chinook salmon resource has been on a downward abundance trend since at least the year 2000, with rapid acceleration of that trend in the last few years. While much of this decline can be attributed to the state's historic drought, whose persistence and severity may have been influenced by climate change, more specifically, the California Central Valley Chinook abundance decline is due to drops in river productivity, which in turn has been directly caused or exacerbated by the politicization and over-allocation of finite water resources coupled with increasing water pollution, both factors which are likely to be exacerbated by climate change.

In 2014-15, commercial crab vessels landed 17 million pounds of Dungeness crab in California, worth nearly \$60 million. Dungeness crab is now the main driver of the state's fishing economy. In 2015-16, this important fishery was shut down for over half of the season because of a biotoxin in crabs that is related to warm ocean temperatures, which are likely to have been strongly driven by climate change. Fishing communities already suffering from the impact of drought will have a hard time surviving if both salmon and crab are in rotating crises.

Given these scenarios, and the increasing likelihood that similar and more severe versions of the same could result from changing climate conditions, PCFFA and IFR urge the Board to add fisheries as a "key sector" in the scoping plan, and to address the socioeconomic impacts to seafood harvesters and the ecological impacts to fishery and habitat resources in the scoping plan. Fisheries are a critical "canary in the coalmine" for climate change, existing at the confluence of water and habitat resources, food security policy, and coastal community resiliency. Specifically, our organizations ask that the Board analyze the impacts of climate change on:

Changing ocean temperatures on existing and future fishery viability and productivity, including discussion of temperature-driven species migration changes and the need to manage new or different fisheries;  
Increasing demand for an increasingly limited water supply on the future availability and productivity of anadromous fishery aquatic habitat resources, with specific discussion of prospective changes to the cold water supply for fisheries, changes necessary to dam management, and the need for statewide water conservation;  
Ocean acidification vis-a-vis both mariculture operations and wild-catch fisheries;  
The need for sea-level rise mitigation measures for

fishery-dependent coastal communities, including infrastructure such as harbors, hoists and fuel docks, and economic or physical displacement; The need for land and water right retirement of heavily polluting agricultural lands which do not have reliable water supplies or soils that can continue to support farming without public subsidization.

Despite the economic impacts to this industry and coastal communities, fisheries impacts are rarely included in economic analyses done by the state of California, nor are mitigation measures employed in EIRs created by California to protect the fisheries and clean water on which we depend. We ask that our issues be addressed in this process and that it be clarified that some of the economic impacts to other industries from this process can be offset by the benefits of restored fisheries and the restoration of fishery-dependent communities. California's fishing industry provides a significant economic benefit to the state and has survived without the subsidies and pollution impacts that characterize the agriculture industry. It is important as we look forward that we promote sustainable food systems and phase out unsustainable farms and farming practices.

We applaud many of the state's efforts to fight climate change. We welcome the fact that this process looks beyond CO2 and includes short-term environmental pollutants such as methane. We also support the fact that this effort addresses water supply issues and includes polluters such as the agriculture industry, timberland holders, frackers, and reservoirs which have been not been held accountable for their actions until this point.

We are concerned that a presenter at the Orleans scoping meeting expressed the belief that we cannot impact the agricultural industry with this plan. The assumption that agriculture is "untouchable" is not only false, but deeply insulting to rural communities that are suffering from the lack of fish due to excessive river water diversions which all too often go to arid and unproductive lands. California's agricultural industry uses an estimated 80% of the state's developed water supply and is also heavily subsidized. It also pollutes our limited supply of clean water and air, and then sends many of their crops to countries like China, thus causing much more pollution, in addition to exporting what could be many American jobs. Not only is the reduction of agricultural lands and wasteful water use key to securing clean water supplies within the state, it would greatly help reduce and mitigate the impacts of climate change, and these lands could be used for solar and wind generation in the same way that other retired lands in the Western San Joaquin Valley have been.

Along with protections to fisheries and our water supply we request that this plan address divestiture from fossil fuel production and transportation in California to protect air and water resources. The fracking boom in California has not only released a huge amount of methane gas into the atmosphere, but has also in many places polluted the state's groundwater, surface water and oceans. Natural gas is mostly methane (CH4), a super-potent greenhouse gas, which traps 86 times as much heat as CO2 over a 20-year period. Fracking is not only polluting our air and water but it also is a huge water

waster, and fracking near communities has caused huge environmental disasters in places such as Porter Ranch in Southern California, where over 100,000 tons of methane was released into the environment, and situations where whole aquifers were rendered unusable through illegal fracking waste injection.

Over 70 million gallons of water was used in California in 2014 for fracking, which was the worst year of the drought, and over 9 million gallons of fracking wastewater is dumped into California's oceans every year. Various proposed LNG pipelines also threaten our water supply and fisheries. California's recent fracking controversies and disasters have undone years of effort to protect our water and climate. We see no place for expanded oil exploration, development and transport in a state that is committing to fighting climate change.

PCFFA and IFR suggest that that National, State and private forests within the California be managed to not only offset global climate change but also to protect our dwindling water supplies from sedimentation and pesticide run-off. The Air Resources Board should work with Regional Water Boards to create Waste Discharge Requirements that protect older carbon sequestering forests and riparian areas. Permits issued by these agencies should require regular review to ensure that they continue to serve the purposes of water and air quality protections in light of complications from climate change on ambient conditions.

We reiterate the need to work with the Water Rights Diversion of the State Water Resources Control Board to prioritize public trust responsibilities such as water for mitigation to protect instream flows and to protect water quality and drinking water. We encourage your agency to work with Regional Water Boards to protect water quality, and to work with the the U.S. Bureau of Reclamation, the Federal Energy Regulatory Commission and the State Water Resources Control Board to manage dams in a way that pollutes less and provides benefits to rivers and anadromous fish.

We also support air quality permits that allow for prescribed burning to protect forests from out of control stand-replacing fire. Using controlled fire selectively to better protect water supplies in the long run, and avoid more heavily impacting major fires is often a sound air and water quality protection strategy.

Thank you for the opportunity to comment,  
Regina Chichizola  
Pacific Coast Federation of Fishermen's Association and Institute  
for Fisheries Resources.

Attachment: [www.arb.ca.gov/lists/com-attach/6-sp2030disc-dec16-ws-ADIFMwc1AGNXMgJu.pdf](http://www.arb.ca.gov/lists/com-attach/6-sp2030disc-dec16-ws-ADIFMwc1AGNXMgJu.pdf)

Original File Name: 2030ClimateChangeScopingPlanUpdate-GHS112-12-16.docx.pdf

Date and Time Comment Was Submitted: 2016-12-13 09:52:52

No Duplicates.

**Comment 6 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Ulmer

Email Address: [sulmer@placer.ca.gov](mailto:sulmer@placer.ca.gov)

Affiliation: Western Placer Waste Mgmt Authority

Subject: WPWMA Comments on 2030 Scoping Plan Draft

Comment:

Please find attached the Western Placer Waste Management Authority's comments on the 2030 Target Scoping Plan Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/7-sp2030disc-dec16-ws-BjRSZAAwVjMCKQIz.pdf](http://www.arb.ca.gov/lists/com-attach/7-sp2030disc-dec16-ws-BjRSZAAwVjMCKQIz.pdf)

Original File Name: 2016-12-12 WPWMA Scoping Plan Letter.pdf

Date and Time Comment Was Submitted: 2016-12-13 10:51:23

No Duplicates.

## **Comment 7 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Nick

Last Name: Despota

Email Address: [nick@lumina-media.com](mailto:nick@lumina-media.com)

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Discussion

Comment:

Given that:

1. Achieving the 2030 target will be significantly more difficult than achieving the 2020 target;
2. Large emitters of GHGs were more likely to use offset credits for projects outside the state of California to meet their obligations under cap-and-trade. (See, A Preliminary Environmental Equity Assessment of California's Cap-andTrade Program; Cushing, Wander, Morello-Frosch, et al.; USC, UC Berkeley. 2016. Attached.)
3. Cap-and-trade allows sources to achieve compliance without necessarily reducing actual physical emissions.
4. Consequent to 2 and 3 above, while overall, GHG emissions in the state have continued to drop, many industry sectors covered under cap-and-trade report increases in localized in-state GHG since the program came into effect in 2013.
5. Emission of GHG gasses co-vary with those of other toxic air contaminants and particulate matter.
6. AB 197, Section 5, authorizes direct regulation to protect the state's disadvantaged communities, which have been shown to suffer disproportionately from refinery emissions.

Therefore, I urge that the Scoping Plan incorporate provisions for regional air districts to enact direct caps on refinery and other large stationary sources, to prohibit exceedances beyond an average of emissions of recent years for each facility.

The facility limit should ramp down sharply in subsequent years as national dependence on fossil fuels for transportation and other purposes decline, and as required to insure achievement of the 2030 target.

I appreciate this opportunity to comment on the 2030 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/8-sp2030disc-dec16-ws-BWZcNIM7WWcKbQF1.pdf](http://www.arb.ca.gov/lists/com-attach/8-sp2030disc-dec16-ws-BWZcNIM7WWcKbQF1.pdf)

Original File Name: Climate\_Equity\_Brief\_CA\_Cap\_and\_Trade\_Sept2016\_FINAL2.pdf

Date and Time Comment Was Submitted: 2016-12-13 19:04:31

No Duplicates.



**Comment 8 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-  
ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

Email Address: evan@edgarinc.org

Affiliation: California Compost Coalition

Subject: Progress on AB 1826 and SB 1383 into Scoping Plan

Comment:

CalRecycle has stated that they will be doing another landfill waste characterization in 2018 to determine progress to divert 50% of commercial organic wastes to implement AB 1826.

CalRecycle on or after 2020 needs to determine if commercial organic waste has been reduce by 50%, and if it has not, CalRecycle will move the phased in collection down to 2 CYD of MSW after 2020.

So CalRecycle plans to do the 2018 study, with a 2019 fact finding on progress prior to 2020. This plan should be expanded to include all organics including residential and industrial to address SB 1383 and be part of the AB 32 Scoping Plan update to 2030.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-13 19:57:15

No Duplicates.

**Comment 9 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-  
ws) - 1st Workshop.**

First Name: Steve

Last Name: Birdlebough

Email Address: AFFIRM@FRIENDSHOUSE.ORG

Affiliation: Transportation & Land-Use Coalition

Subject: VMT-Reducing Benefits of Compact, Walkable Neighborhoods

Comment:

Attached is a 2-page comment letter on behalf of the Sonoma County Transportation and Land Use Coalition urging CARB to issue clear guidelines now for policy makers to begin reducing the growth of VMT.

Attachment: [www.arb.ca.gov/lists/com-attach/10-sp2030disc-dec16-ws-VyRQNVYjBzhRNFIN.doc](http://www.arb.ca.gov/lists/com-attach/10-sp2030disc-dec16-ws-VyRQNVYjBzhRNFIN.doc)

Original File Name: SCTLCLtr to ARB on 2030 draft scoping plan-Final 2016-12-13.doc

Date and Time Comment Was Submitted: 2016-12-14 05:47:01

No Duplicates.

**Comment 10 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Mark

Last Name: Tabbert

Email Address: mtabbert15@gmail.com

Affiliation: Banning Ranch Conservancy

Subject: scoping plan for meeting Ca.'s emission reduction target

Comment:

Thanks CARBs for your work and for California being a leader on climate change.

I am requesting that CARB undertake a more comprehensive analysis and comparison of a carbon tax. I believe that a carbon tax can be a positive policy alternative for California. A carbon tax is a more predictable price on carbon, it's economy-wide emissions coverage and it means greater revenue certainty It's portability to other states and countries is better and it is more equatable across all our different communities. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 10:46:03

No Duplicates.

**Comment 11 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Pam

Last Name: Brennan

Email Address: pam@beachmailing.com

Affiliation: Citizens Climate Lobby

Subject: Carbon Fee and Dividend Legislation

Comment:

It is imperative that any scoping plan to meet the targets laid out in AB32 include a Carbon Fee and Dividend. California is a strong resourceful economy. As the 8th largest economy, we could beat Trudeau to the punch and have the first significant price on Carbon. There is no other way to realistically compete with fossil fuels in the market.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 11:39:59

No Duplicates.

**Comment 12 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Katherine

Last Name: Stainken

Email Address: [kstainken@pluginamerica.org](mailto:kstainken@pluginamerica.org)

Affiliation:

Subject: Plug In America Comments to the 2030 Target Scoping Plan Discussion Draft  
Comment:

To Whom it May Concern:

Attached please find our comments on the 2030 Target Scoping Plan Discussion draft. We look forward to working with you!

Thanks.

Best,  
Katherine Stainken  
Policy Director  
Plug In America

Attachment: [www.arb.ca.gov/lists/com-attach/13-sp2030disc-dec16-ws-UyNTOVImAjYEXVc+.pdf](http://www.arb.ca.gov/lists/com-attach/13-sp2030disc-dec16-ws-UyNTOVImAjYEXVc+.pdf)

Original File Name: Plug In America Comments on 2030 Draft Scoping Plans\_161213v1.pdf

Date and Time Comment Was Submitted: 2016-12-14 13:41:35

No Duplicates.

**Comment 13 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Craig

Last Name: Preston

Email Address: craigp4444@gmail.com

Affiliation: Citizens Climate Lobby

Subject: Carbon Tax

Comment:

Thank you for your part in California being a leader on climate change. My hope is that you review the incredible merits of a CARBON TAX.

A carbon tax is a Win Win for many of the stakeholders.

More predictable price on carbon and revenue stream.

Fair playing field for all forms of energy so renewable can compete.

I am a volunteer with Citizens climate Lobby.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 13:52:12

No Duplicates.

**Comment 14 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Breene

Last Name: Murphy

Email Address: breenemurphy@gmail.com

Affiliation:

Subject: Thank you and please consider a carbon fee and dividend

Comment:

Thank you, CARB for all your efforts. I'm glad that you're doing the target scoping plan, and I would like for you to consider a carbon fee and dividend plan like Elon Musk and Citizens' Climate Lobby recommends. I think it's easier to regulate than pollutions credits and would help spur the economy even more with citizens getting a dividend check.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 14:24:56

No Duplicates.

**Comment 15 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Comments from the California Transit Association's Executive Director Joshua W. Shaw on the the 2030 Target Scoping Plan Discussion Draft are attached here as a PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/16-sp2030disc-dec16-ws-WzgCcFQ0BQlXYwc3.pdf](http://www.arb.ca.gov/lists/com-attach/16-sp2030disc-dec16-ws-WzgCcFQ0BQlXYwc3.pdf)

Original File Name: CTA 2030 Target Scoping Plan Discussion Letter 12-14-16.pdf

Date and Time Comment Was Submitted: 2016-12-14 15:49:54

No Duplicates.



**Comment 16 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Molly

Last Name: Wright

Email Address: mwright@airquality.org

Affiliation: Sacramento Metropolitan AQMD

Subject: Draft 2030 Target Scoping Plan Update

Comment:

Please see attachment

Attachment: [www.arb.ca.gov/lists/com-attach/17-sp2030disc-dec16-ws-WygAawdnUHJXPAVh.pdf](http://www.arb.ca.gov/lists/com-attach/17-sp2030disc-dec16-ws-WygAawdnUHJXPAVh.pdf)

Original File Name: SMAQMD\_Draft 2030 Target Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2016-12-14 15:54:20

No Duplicates.

**Comment 17 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jason

Last Name: Schmelzer

Email Address: jason@shawyoderantwih.com

Affiliation:

Subject: SWANA LTF Comments re: 2030 Target Scoping Plan Discussion Draft

Comment:

Good Afternoon,

Please find attached a comment letter from the Solid Waste Association of North America, California Chapters, Legislative Task Force (SWANA LTF) regarding the 2030 Target Scoping Plan Discussion Draft. Please let us know if you have any questions.

Thanks!

Attachment: [www.arb.ca.gov/lists/com-attach/18-sp2030disc-dec16-ws-AXJUJVIyWGVWMVIN.pdf](http://www.arb.ca.gov/lists/com-attach/18-sp2030disc-dec16-ws-AXJUJVIyWGVWMVIN.pdf)

Original File Name: SWANA LTF Comments on ARB Draft Scoping Plan December 2016 - Final.pdf

Date and Time Comment Was Submitted: 2016-12-14 15:52:07

No Duplicates.

**Comment 18 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: David

Last Name: Schonbrunn

Email Address: David@Schonbrunn.org

Affiliation: TRANSDEF

Subject: Discussion Draft of 2030 Target Scoping Plan

Comment:

See attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/19-sp2030disc-dec16-ws-WmhTZVNjA2YCW1A0.pdf](http://www.arb.ca.gov/lists/com-attach/19-sp2030disc-dec16-ws-WmhTZVNjA2YCW1A0.pdf)

Original File Name: 2016 Draft Update comment letter set.pdf

Date and Time Comment Was Submitted: 2016-12-14 16:20:36

No Duplicates.

**Comment 19 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Christopher

Last Name: Hilger

Email Address: antonchh@gmail.com

Affiliation:

Subject: comment on 2030 target scoping plan

Comment:

Thank you for leading in the fight to mitigate climate change.

Please consider engaging in greater analysis of employing a carbon tax (Section E Alternative 2 Carbon Tax, pages 95-7 of the draft.) It is true that there would be difficulties, but there may be more benefits than difficulties. British Columbia's carbon tax worked quite well during the years that it went up, incrementally, from 2008 to 2012. Inflation as well as the relatively small amount of the tax are factors that go a long way towards explaining British Columbia's present ineffectiveness. A carbon tax can be imposed upstream and would therefore be felt throughout the entire economy.

A carbon tax would be better for business, since it would lead to greater price predictability than a cap and trade system. Although I don't know how a carbon tax rather than cap and trade would affect California's affiliation with Quebec's cap and trade system, there is greater potential for partnering with far more jurisdictions since a carbon tax is so much easier and cheaper to employ than cap and trade systems are. The revenue from the tax would be so much more predictable than the revenue from cap and trade. Possibly most important, carbon tax revenue could be returned to households, thereby affording household the means to adjust to higher energy prices resulting from the tax. This last benefit of a carbon tax can be done transparently and without any corruption.

Most Respectfully,

Chris Hilger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 20:01:57

No Duplicates.

**Comment 20 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Ratcliffe

Email Address: ehsratcliffe@sbcglobal.net

Affiliation: Citizens Climate Lobby

Subject: proposed foci

Comment:

Thank you for CARBs work and for California being a leader on climate change!

I would like to suggest that CARB undertake a more comprehensive analysis and comparison of a carbon tax, as a carbon tax is an EVEN BETTER way to confront climate change than cap and trade can hope to be.

I believe this is true because carbon fee will create:

- ~ A more predictable price on carbon
- ~ a system that can be more easily upscaled to other states and nations
- ~ Less uncertainty for businesses
- ~ Greater financial advantage for the majority of consumers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-14 20:57:42

No Duplicates.

**Comment 21 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ruth

Last Name: Afifi

Email Address: ruth37@gmail.com

Affiliation:

Subject: carbon tax

Comment:

Thank you for the excellent work which CARB has done. I suggest CARB look more closely at recommending a carbon tax for California in addition to cap and trade. A carbon tax would allow for more certainty re revenue. In addition, if some or all of the tax were returned monthly to households, as is done in British Columbia, this would be a gain for the economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 09:31:49

No Duplicates.

**Comment 22 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Murtey

Email Address: kjmurtey@aol.com

Affiliation: Citizen's Climate Lobby

Subject: Meeting California's emission reduction targets.

Comment:

I live in Laguna Niguel, CA 92677.

I request that CARB undertake a more comprehensive analysis and comparison of a carbon tax.

I believe a carbon tax to be a positive policy alternative for CA because it provides for a predictable price on carbon. It provides greater revenue certainty and it allows for greater equity across all CA communities.

Thank you for all you do for the citizens of our state.

Sincerely,  
Kathie Murtey

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 09:36:56

No Duplicates.

**Comment 23 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Dennis

Last Name: Rodriguez

Email Address: dennis.rodriguez@siemens.com

Affiliation: Siemens

Subject: Siemens Comments on the Draft California Sustainable Freight Action Plan  
Comment:

Please see attached file.

Thank you,

Dennis Rodriguez

Attachment: [www.arb.ca.gov/lists/com-attach/24-sp2030disc-dec16-ws-U2FVY1JiUDUGMQEz.doc](http://www.arb.ca.gov/lists/com-attach/24-sp2030disc-dec16-ws-U2FVY1JiUDUGMQEz.doc)

Original File Name: 20161215\_CSFAP\_Siemens Comments.doc

Date and Time Comment Was Submitted: 2016-12-15 10:10:01

No Duplicates.



**Comment 24 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Edward  
Last Name: Costello  
Email Address: arbormed@aol.com  
Affiliation: .

Subject: Carbon emissions plan  
Comment:

Thank you for CARB's work leading to our State being a leader on climate change

Please undertake a more comprehensive analysis and comparison of a carbon tax. I believe a carbon tax can be a positive policy alternative for California because, if properly thought through and implemented, it will produce economy-wide emissions coverage, as well as a more predictable "price" on carbon. In addition, such a price will provide our State with greater revenue predictability and a more equitable distribution of the burden among all our California communities.

Thank you for your attention to this comment.

Ed Costello

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 11:18:47

No Duplicates.

**Comment 25 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: John

Last Name: McNamee

Email Address: mcjohnwcheese@gmail.com

Affiliation: Citizen's Climate Lobby

Subject: Thank You

Comment:

I'd like to thank you all for your hard work in helping CA stay at the forefront in the fight against climate change. I would also like to ask that you implement a more comprehensive analysis and comparison of the carbon tax. I think this is the key to our leadership of the country on this front, and that the better we can demonstrate, and fine-tune our success, the easier it will be to convince the rest of the country to join us.

Thank you again.

-John

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 11:29:01

No Duplicates.

**Comment 26 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Marjorie

Last Name: Engel

Email Address: marjette@earthlink.net

Affiliation: Ms.

Subject: Carbon emissions plan

Comment:

Comment:

Thank you for all CARB's work helping our state to be a leader on addressing climate change

Please undertake a more comprehensive analysis and comparison of a carbon tax. I believe a carbon tax can be a positive policy alternative for California because, if properly thought through and implemented, it will produce economy-wide emissions coverage, as well as a more predictable "price" on carbon. In addition, such a price will provide our State with greater revenue predictability and a more equitable distribution of the burden among all our California communities.

Thank you for your attention to this comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 12:02:20

No Duplicates.

**Comment 27 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Burdick

Email Address: brucenburdick@icloud.com

Affiliation:

Subject: Recommendation to report "pounds of CO2 e per day" to electricity, gas and water customer

Comment:

AB32 Environmental Justice Advisory Committee (EJAC) Initial Recommendations for Discussion Draft Version of 2030 Target Scoping Plan Update August 26, 2016

As part of Section 22 Page 13 of 21 "The state must support research on the following topics:"

Please consider adding the following Part e. "Some Counties will experiment with having their electricity,. water and gas companies report the "pounds of CO2 e emitted per day" in supplying their customers with electricity, water and natural gas. The customer's monthly bill will report the "pounds of CO2 equivalents emitted per day" in supplying the customer with their electricity, water and natural gas for the month.

The monthly bill will also include various statements such as the following:

- to meet SB32's requirement to cut greenhouse gas emissions 40% from 1990 levels, Californian's will need to decrease their "pounds of CO2 e emitted per day" from 73 pounds of CO2 equivalents per day in 2013 to 32 pounds of CO2 equivalents in 2030.

- to avoid 1.5 degrees of global warming, Californians must decrease their 73 pounds of CO2 equivalents in 2013 to 1.75 pounds of CO2 equivalents per day in 2030.

The following graph shows the pounds of CO2 equivalents per day of Californians avoiding 1.5 degrees of global warming.

Please e mail me if you would like to see the graph.

&#65532;

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 12:44:26

No Duplicates.

**Comment 28 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation:

Subject: RCRC Comments on the 2030 Target Scoping Plan Update

Comment:

Attached please find RCRC's comments on the 2030 Target Scoping Plan Update discussion draft. Please contact me if you have any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/29-sp2030disc-dec16-ws-UWNdawQ2AGNVDAh8.pdf](http://www.arb.ca.gov/lists/com-attach/29-sp2030disc-dec16-ws-UWNdawQ2AGNVDAh8.pdf)

Original File Name: 2030\_Target\_Scoping\_Plan\_DD\_Ltr\_to\_ARB\_12152016.pdf

Date and Time Comment Was Submitted: 2016-12-15 13:48:13

No Duplicates.

**Comment 29 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/30-sp2030disc-dec16-ws-WzcHYARhUXUCdFQL.pdf](http://www.arb.ca.gov/lists/com-attach/30-sp2030disc-dec16-ws-WzcHYARhUXUCdFQL.pdf)

Original File Name: LADWP Comments on 2030 Target Scoping Plan Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-15 14:12:48

No Duplicates.

**Comment 30 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Roger

Last Name: Iles

Email Address: rogniris@msn.com

Affiliation:

Subject: Fee and Dividend Not Too Late?

Comment:

To CARB,

Thank you for your fantastic work in California and I am so proud that California is the world leader in controlling pollution and greenhouse gas emissions.

I came across your comments on the new scoping plan and request for input. Recently, I have read more and more about the carbon fee and dividend approach to control greenhouse gas emissions especially in light of Exxon Mobil's recognition of man's role in global warming and recommending this solution. And, the fee is returned to households to offset any rising electricity costs from new renewable energy sources.

I have tried to understand the intricacies and implementation of the AB32 Cap and Trade but it is just so complex. It appears easy to cheat the system and third party carbon trading seems open to manipulation and corruption.

The fee and dividend, taxing carbon at its source, just seems so simple in comparison. It also looks to be easier to be able to work together with other states and countries. Reducing government regulations and encouraging industry to create their own solutions, should make Washington's Republicans more receptive to a carbon tax.

Roger Iles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 14:41:27

No Duplicates.



## **Comment 31 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Tasha

Last Name: Reddy

Email Address: tasha.reddy@citizensclimate.org

Affiliation: Citizens' Climate Lobby - California

Subject: Considerations for a Carbon Tax or Fee in California

Comment:

Dear CARB and stakeholders,

Thank you for the opportunity to comment on the CARB 2030 Target Scoping Plan.

For context, Citizens' Climate Lobby is a non-partisan national and international organization of more than 45,000 citizen lobbyist volunteers dedicated to building the political will in Congress for a livable planet. In California, CCL has over 9,000 members who are active in 39 chapters across the entire state.

Last December, over 50 members of CCL from around the world participated in the civic engagement sessions at the UN COP21 talks in Paris. We carried with us our advocacy for guiding principles for carbon pricing that underlie all of CCL's policy development and lobbying efforts. We promote carbon pricing that is:

Effective: reduces economy-wide absolute greenhouse gas emissions while supporting domestic economic growth across all sectors.

Efficient: minimizes the cost of implementation while maximizing environmental, economic, and social co-benefits.

Equitable: avoids disproportionate burdens while protecting vulnerable populations from unjust or negative economic or environmental impacts.

These principles reflect those that underpin the international Carbon Pricing Leadership Coalition, of which California is an official member.

CCL's principal focus is on lobbying the US Congress to pass a fully-rebated fee on carbon. However, in recognition of the huge role that California plays worldwide in innovative and effective climate action, over the past year we have also reached out to our state legislators in California, as well as selected environmental and environmental justice organizations in the state. Our purpose has been to educate them about the CCL proposal and how a national carbon fee and dividend could co-exist with the state's current Cap-and-Trade program. In August 2016, the State Assembly and Senate passed Assembly Joint Resolution 43, calling on the US Congress to enact a national carbon-fee-and-dividend program.

In the spirit of strengthening California's effective programs to reduce GHG emissions statewide while providing a model for other

states and nations, we offer these comments on the Draft Scoping Plan.

Overall, we are happy to see that CARB has committed to analyzing carbon pricing mechanisms in addition to the current Cap-and-Trade program. However, we believe that the Scoping Plan stills lacks critical information necessary for your board, as well as other interested stakeholders, to be able to accurately and comprehensively assess the carbon pricing scenarios contained in the plan, and to evaluate their efficacy in reaching the new 2030 emissions reductions targets.

Specifically, we respectfully request that CARB undertake a much more comprehensive analysis and comparison of a carbon tax—with a variety of rebate options and/or reinvestment options—along with reforms to the existing Cap-and-Trade Program. We all need to understand how effective each of these scenarios can be in achieving California's aggressive 2030 GHG emissions targets.

In the attached, we include some information we hope you will consider as you revise the Scoping Plan.

Thank you again for this opportunity to comment on your work. Citizens' Climate Lobby is happy to provide any resources or information we can to support California in developing its climate plans. Please don't hesitate to contact us.

Thank you for doing this critical work for the health and well-being of all Californians and the world.

Sincerely,

Tasha Reddy, PhD  
CCL California State Coordinator  
tasha.reddy@citizensclimate.org

Attachment: [www.arb.ca.gov/lists/com-attach/32-sp2030disc-dec16-ws-UTIAZV0wUFwLfwls.pdf](http://www.arb.ca.gov/lists/com-attach/32-sp2030disc-dec16-ws-UTIAZV0wUFwLfwls.pdf)

Original File Name: CCL Response to CARB Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-12-15 15:04:17

No Duplicates.

**Comment 32 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Toby

Last Name: Roy

Email Address: troy@sdewa.org

Affiliation: San Diego County Water Authority

Subject: San Diego CWA Comments-Dec2016 Discussion Draft 2030 Target Scoping Plan  
Comment:

Attached please find correspondence from Toby Roy, Water Resources Manager, San Diego County Water Authority, with comments on December 2016 Discussion Draft of the 2030 Target Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/33-sp2030disc-dec16-ws-ADEANFQKWDpSYQJd.pdf](http://www.arb.ca.gov/lists/com-attach/33-sp2030disc-dec16-ws-ADEANFQKWDpSYQJd.pdf)

Original File Name: 12\_15\_2016\_SDCWA\_Roy\_CARB\_2030TargetScopingPlan.pdf

Date and Time Comment Was Submitted: 2016-12-15 15:39:29

No Duplicates.

**Comment 33 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: john

Last Name: leslie

Email Address: john.leslie@dentons.com

Affiliation: Shell Energy North America (US), L.P.

Subject: Shell Energy Comments on 2030 Target Scoping Plan Discussion Draft  
Comment:

Attached are the comments of Shell Energy North America (US), L.P. ("Shell Energy") on the Discussion Draft of the "2030 Target Scoping Plan Update."

Attachment: [www.arb.ca.gov/lists/com-attach/34-sp2030disc-dec16-ws-AHNXOVI2AD9WPFIN.pdf](http://www.arb.ca.gov/lists/com-attach/34-sp2030disc-dec16-ws-AHNXOVI2AD9WPFIN.pdf)

Original File Name: Shell Energy Comments on 2030 Target Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-12-15 15:38:27

No Duplicates.

**Comment 34 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Connie

Last Name: Young

Email Address: cyoungn@sbcglobal.net

Affiliation:

Subject: 2030 Target Scoping Plan Discussion Draft

Comment:

Thank you for being a national leader on climate change and for providing this opportunity to comment on your work. I would ask that you conduct a more thorough analysis of a steadily rising revenue-neutral carbon tax. Such a tax would offer several advantages over other regulatory and pricing mechanisms, including predictability, transparency, and effectiveness. A blueprint for such a tax can be found in CA Assembly Joint Resolution 43. Given that California has been a "test kitchen" for cap and trade, it is significant that with this resolution our legislature calls on Congress to enact a national carbon tax. Let's learn from the problems we've had with cap and trade and give serious consideration to an alternative which will reduce emissions, save lives and strengthen the economy. Thanks again for your tireless and groundbreaking work on behalf of California and, indeed, the entire country.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 16:06:39

No Duplicates.

**Comment 35 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ann

Last Name: Rushton

Email Address: annrushton@hotmail.com

Affiliation: Citizens Climate Lobby volunteer

Subject: Comprehensive Study of a Carbon Fee and Dividend Program

Comment:

CARB has a record of very meaningful work in the area of reducing carbon emissions. Limiting the harmful, and potentially disastrous, impacts of continued exploitation of fossil fuels is likely to become even more challenging and critical under the new federal administration.

Please consider a careful and comprehensive study of the carbon fee and dividend plan, as compared to other possible ways of addressing the problem.

The carbon fee and dividend program advocated by Citizens Climate Lobby does not depend on new regulations, or the creation of a full-scale bureaucracy for oversight. It is a market-based solution putting an escalating fee on carbon at the source and then distributing the money collected to individual households. This type of plan may be the only way to obtain truly bipartisan support.

The CA legislature has already endorsed this concept in its Assembly Joint Resolution 43.

Thank you for your consideration.

Ann Rushton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 16:23:49

No Duplicates.

## **Comment 36 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Liza

Last Name: White

Email Address: lizacwhite@gmail.com

Affiliation: Citizens' Climate Lobby

Subject: comment to sp2030disc-dec16-ws

Comment:

Thank you for the opportunity to comment on the future policies to control California's carbon emissions. I commend the CARB and California's legislators for the thoughtful and consistent attention they have brought to mitigating the causes of climate change, not just adapting to its inevitable repercussions. This is truly a great and forward-looking state that has put a price on carbon earlier than any. However, because there is great urgency to mitigating carbon emissions, I urge you to evaluate the modeling of a revenue neutral carbon fee and dividend pricing scenario and compare and contrast the benefits of the cap and trade versus the carbon fee and dividend systems for a swifter reduction in carbon emissions

Please consider that in the last 9 years since AB 32 went into effect, by your diagram on page 19 of the 2030 Scoping Plan Update the reduction in GHG emissions has lowered by about 50 MMTCO<sub>2e</sub>. We are 5 years away from 2020's limit of 260 that is (by projection) about 170 MMTCO<sub>2e</sub> of hoped for reduction - in 5 years! This is so very complicated but the big picture seems to indicate that a cap and trade pricing of carbon emissions may not be up to the even steeper rate of decline that this Scoping Plan is seeking.

Clearly California is a leader in science based and political thinking about climate change and what is to be done at the state level. Its people support this effort. As Governor Brown has said recently, California is up to this challenge.

I urge you to consider the carbon fee and dividend method of pricing carbon emissions in a way that predicts direct monetary and health advantage to all but most importantly to those most disadvantaged by those emissions. It can be implemented quickly and with pricing that acknowledges the market factors it aims to influence: the competitiveness of non-fossil fuel energy sources and the rapid decline of fossil fuel usage.

Urgency is the silent factor in this equation that is easily forgotten.

Please keep urgency in your sites as you engage with this Scoping Plan and ask: how quickly can we reach our goals? not just what should those goals be.

A revenue neutral carbon fee and dividend is worth studying as an alternative to our cap and trade system.

Thank you for your work.

Liza C. White  
Member, Citizens' Climate Lobby

C: 310 709 2101  
LizaCWhite@gmail.com  
908 Malcolm Ave.  
Los Angeles, CA 90024

"We can ignore reality, but we can't ignore the consequences of  
ignoring reality."  
- Ayn Rand

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 17:00:48

No Duplicates.



**Comment 37 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Update (Dec 2, 2016)

Comment:

Comments from CLFP on the 2030 Target Scoping Plan Update released  
December 2, 2016

Attachment: [www.arb.ca.gov/lists/com-attach/38-sp2030disc-dec16-ws-VjUCaAZhVnVQCQhr.pdf](http://www.arb.ca.gov/lists/com-attach/38-sp2030disc-dec16-ws-VjUCaAZhVnVQCQhr.pdf)

Original File Name: CLFP Comments on 2030 TSPU.pdf

Date and Time Comment Was Submitted: 2016-12-15 17:06:48

No Duplicates.

**Comment 38 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: 2030 Target Scoping Plan Discussion Draft

Comment:

Endangered Habitats League (EHL) supports the Draft's identification of Natural and Working Lands as a "central" to meeting California's 2030 targets. Preservation and management of Natural and Working Lands can not only sequester carbon but--particularly for Natural Lands--provide extraordinary co-benefits, such as recreation, ecological resilience to climate change, and "smart growth" patterns of development.

In this context, we commend the development of an ARB Natural and Working Lands (NWL) Inventory along with the Spring Proposed 2030 Target Scoping Plan. This inventory and evaluation of carbon stock changes that come with land preservation or conversion can provide the basis for realizing the GHG benefits inherent in these lands. The analysis should fully exploit the capacity of soil to store carbon (which occurs even after wildfire consumes above ground storage). Information on soil carbon sequestration is available from UC Riverside (Dr. Mike Allen).

We request that the Spring Proposed 2030 Target Scoping Plan include alternatives to realize these carbon benefits, so as to expedite implementation. Ready-to-go options include allocating Cap and Trade revenues to acquiring land for California's Natural Community Conservation Plans (NCCPs) and extending to habitat lands the existing program for avoiding conversion of agricultural lands to developed uses.

We concur with the goal of reducing greenfield development and achieving "smart growth" outcomes, but believe that this will require the development of new state-level guidance for local land use.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 17:15:43

No Duplicates.

**Comment 39 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Nick

Last Name: Facciola

Email Address: [nick@OriginClimate.com](mailto:nick@OriginClimate.com)

Affiliation: Origin Climate Inc.

Subject: Inclusion of Cap-and-Trade

Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/40-sp2030disc-dec16-ws-ADJTZQExUTRWfgY3.pdf](http://www.arb.ca.gov/lists/com-attach/40-sp2030disc-dec16-ws-ADJTZQExUTRWfgY3.pdf)

Original File Name: 2016.12.15 Comments on 2030 Scoping Plan Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-15 17:33:06

No Duplicates.

**Comment 40 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: Los Angeles County Dept of Public Works

Subject: Comments on 2030 Target Scoping Plan Update Discussion Draft

Comment:

See attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/41-sp2030disc-dec16-ws-VTFUIgF3BwtXMgFu.pdf](http://www.arb.ca.gov/lists/com-attach/41-sp2030disc-dec16-ws-VTFUIgF3BwtXMgFu.pdf)

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

Date and Time Comment Was Submitted: 2016-12-15 17:26:47

No Duplicates.

**Comment 41 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Mary

Last Name: Creasman

Email Address: mary.creasman@tpl.org

Affiliation: The Trust for Public Land

Subject: The Trust for Public Land's comments

Comment:

Dear Chair Mary Nichols and Members of the Board,

Please find attached The Trust for Public Land's Comments on the 2030 Target Scoping Plan Update Discussion Draft.

Sincerely,

Mary Creasman

California Director of Government Affairs  
The Trust for Public Land

Attachment: [www.arb.ca.gov/lists/com-attach/42-sp2030disc-dec16-ws-Wz8Ab1IgAjIAcwFy.pdf](http://www.arb.ca.gov/lists/com-attach/42-sp2030disc-dec16-ws-Wz8Ab1IgAjIAcwFy.pdf)

Original File Name: Discussion Draft 2030 scoping plan update TPL comments 12.15.16.pdf

Date and Time Comment Was Submitted: 2016-12-15 17:58:46

No Duplicates.

**Comment 42 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kathy

Last Name: Seal

Email Address: kathyseal@gmail.com

Affiliation:

Subject: Examine the Carbon Tax

Comment:

Dear CARB,

I've been following your work for quite a few years now and am impressed by and grateful for your wonderful work on slowing down global warming, the most important issue of our time.

I'd like to ask that CARB examine closely the possibility of a carbon tax for our state. What would be its effects, economically and environmentally? How does it compare to other measures such as cap and trade?

I believe a carbon tax is relatively simple and could be extremely effective. It will cover emissions on a broad scale while bringing immediate relief to poor and minority communities who are most affected by air pollution. It can be readily tweaked, and readily copied by other jurisdictions nationally and internationally. And it will create jobs and help our economy overall.

Thanks for your longstanding hard work for our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-15 21:22:33

No Duplicates.

**Comment 43 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Janet  
Last Name: Murphy  
Email Address: raven8jm@yahoo.com  
Affiliation:

Subject: Scoping Plan  
Comment:

Dear Board members,

Respectfully, We, and all those that breathe, need comprehensive analysis of air policy. Do not just push through and rubber stamp the continuation of cap and trade in California.

Thank you, Janet Murphy

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 07:50:49

No Duplicates.

**Comment 44 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Chris

Last Name: McGlothlin

Email Address: [chris@agprocessors.org](mailto:chris@agprocessors.org)

Affiliation:

Subject: 2030 Scoping Plan Draft Comments

Comment:

Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/45-sp2030disc-dec16-ws-VCNUMwZ3U2EEXQl6.pdf](http://www.arb.ca.gov/lists/com-attach/45-sp2030disc-dec16-ws-VCNUMwZ3U2EEXQl6.pdf)

Original File Name: WAPA Scoping Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-12-16 09:39:34

No Duplicates.



**Comment 45 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: David

Last Name: Townley

Email Address: dtownley@ctcglobal.com

Affiliation: CTC Global Corporation

Subject: CTC Global Comments on DRAFT 2030 Scoping Plan

Comment:

Attached are the comments of CTC Global, a California company headquartered in Irvine, on this DISCUSSION DRAFT of the 2030 Target Scoping Plan Update (DRAFT Update).

Key Point: ARB should charge agencies reviewing electric grid activities to: "Increase the efficiency of the electric transmission and distribution system". This is an effective GHG emissions reduction measure. Attached comments provide more details.

Attachment: [www.arb.ca.gov/lists/com-attach/46-sp2030disc-dec16-ws-UDNcNQFtUW9XNFQ6.pdf](http://www.arb.ca.gov/lists/com-attach/46-sp2030disc-dec16-ws-UDNcNQFtUW9XNFQ6.pdf)

Original File Name: Comments on AB32 Scoping Plan 2016 Update-Dec Workshop-Final.pdf

Date and Time Comment Was Submitted: 2016-12-16 09:36:12

No Duplicates.

## **Comment 46 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ed

Last Name: Pike

Email Address: epike@energy-solution.com

Affiliation: Energy Solutions

Subject: Fuel Efficient Passenger Vehicle Replacement Tires

Comment:

Thank you for the opportunity to provide comments on the Discussion Draft 2030 Target Scoping Plan Update. Energy Solutions is a professional and engineering services firm whose mission is to create large-scale environmental impacts by providing market-based, cost-effective energy, carbon, and water management solutions to our utility, government and commercial customers. We strongly support ARB's innovative and critical work to reduce greenhouse gas (GHG) emissions.

As noted in our attached letter, we recommend explicitly including the benefits of fuel efficient passenger vehicle replacement tires in the discussion draft list of measures and in the upcoming appendix detailing the emissions calculations. Currently, replacement tires offered on the market are generally substantially less efficient than tires factory-installed on new passenger vehicles. Therefore, a significant portion of the expected emissions and economic benefits of GHG standards for passenger vehicles would be undermined as factory-installed tires are replaced with less efficient tires. Fortunately, ARB has found that "fuel efficient passenger vehicle tires can be utilized by both new and in-use vehicles in the near-term to achieve GHG emission reductions. Deployment of fuel efficient vehicle tires for in-use vehicles could include limited incentives, followed by ratings and then standard setting to permanently shift the market" (May 2014 AB32 Scoping Plan Update).

A 10% improvement in replacement tire efficiency would reduce GHG by 2.7 million metric tons and save consumers \$882 million annually according to the California Energy Commission. A study for the South Coast Air Quality Management District demonstrates that 20% or greater improvement is feasible and will especially benefit air quality in disadvantaged communities where used vehicles operating on replacement tires are more common. We also estimate that the average driver will save up to \$1000 in fuel costs.

We recommend the following specific revision to the transportation section of the discussion draft:

"Known commitments:

...

Implement the original scoping plan light duty passenger vehicle replacement tire rolling resistance measure (page C-62) and meet AB 844 'Replacement Tire Efficiency Program' goals."

We also recommend addressing fuel efficient replacement tires for

light duty vehicles in the upcoming appendix detailing GHG emission calculations. Without fuel efficient replacement tires, new light duty vehicle GHG emissions will increase by several million metric tons annually when tires are replaced.

We appreciate your consideration of our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/47-sp2030disc-dec16-ws-B2JTOwRgU3JSM1Mq.pdf](http://www.arb.ca.gov/lists/com-attach/47-sp2030disc-dec16-ws-B2JTOwRgU3JSM1Mq.pdf)

Original File Name: Energy Solutions 2030 GHG scoping plan letter 12-16-2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 09:50:43

No Duplicates.

**Comment 47 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Frary

Email Address: mfrary@dpw.lacounty.gov

Affiliation: County of Los Angeles DPW

Subject: Incorporation of low-carbon stormwater solutions

Comment:

To whom it may concern,

The Los Angeles County Department of Public Works (Public Works) thanks you for the opportunity to review the 2030 Target Scoping Plan Discussion Draft (Discussion Draft).

Public Works operates and maintains numerous water conservation facilities within the Los Angeles region including dams, spreading grounds, and open channels. These facilities capture, store, and convey stormwater to support our local water supply. Public Works understands the importance of locally-derived water resources and has been conserving local stormwater for nearly a century. On average, Public Works recharges 200,000 acre-feet of stormwater each year, which is enough to meet the annual water needs of approximately 1.6 million residents. Public Works is leading the way to increase regional stormwater capture and create a more sustainable future by promoting this low energy-intensive source of water.

We are concerned that the Discussion Draft does not currently identify low-carbon stormwater as a potential piece of the solution for the State to meet its GHG reduction goals. In Section II.F (Water), the discussion leaves out any mention of stormwater as a valuable and local water resource. We are recommending that the Discussion Draft clarify that the future is dependent on low-carbon water systems that are less energy intensive and utilize local water supplies. For example, an increase of stormwater capture projects – which primarily use gravity to convey flows – could result in an increased net reduction of water-related GHG emissions. We are requesting that the Discussion Draft and future versions of the Scoping Plan include and consider local stormwater capture as a critical part of California's water supply portfolio.

We welcome the opportunity to discuss our comments with you in more detail. If you have any other questions or require additional information, please contact Mr. Lee Alexanderson at (626) 458-4370 or lalexanderson@dpw.lacounty.gov.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 09:52:43

No Duplicates.

**Comment 48 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ken

Last Name: Payne

Email Address: ken.payne@edcgov.us

Affiliation: El Dorado County Water Agency

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please see attached comment letter from the El Dorado County Water Agency.

Attachment: [www.arb.ca.gov/lists/com-attach/49-sp2030disc-dec16-ws-ATNXYVFjBGcBWAVx.pdf](http://www.arb.ca.gov/lists/com-attach/49-sp2030disc-dec16-ws-ATNXYVFjBGcBWAVx.pdf)

Original File Name: 2030 TSP DD Comment letter draft 12-15-16\_to\_CARB\_final.pdf

Date and Time Comment Was Submitted: 2016-12-16 09:59:02

No Duplicates.

**Comment 49 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Suzy

Last Name: Hong

Email Address: shong@goodinmacbride.com

Affiliation: USS-POSCO Industries

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please find attached USS-POSCO Industries Comments on the 2030 Target Scoping Plan Discussion Draft. If you have any questions concerning the document or any difficulty with the attachment, please contact me at shong@goodinmacbride.com or (415) 392-7900.

Regards,  
Suzy Hong

Attachment: [www.arb.ca.gov/lists/com-attach/50-sp2030disc-dec16-ws-Wi9RJwNrUV1SN1U6.pdf](http://www.arb.ca.gov/lists/com-attach/50-sp2030disc-dec16-ws-Wi9RJwNrUV1SN1U6.pdf)

Original File Name: UPI Comments on 2030 Target Scoping Plan Discussion Draft (X187330).PDF

Date and Time Comment Was Submitted: 2016-12-16 10:00:51

No Duplicates.

**Comment 50 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-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 Update

Comment:

Attached please find the Bioenergy Association of California's comments on the 2030 Scoping Plan Update - December 2016 Discussion Draft, and an attachment related to BAC's comments

Attachment: [www.arb.ca.gov/lists/com-attach/51-sp2030disc-dec16-ws-BWcBZgNhWFQLblc4.pdf](http://www.arb.ca.gov/lists/com-attach/51-sp2030disc-dec16-ws-BWcBZgNhWFQLblc4.pdf)

Original File Name: BAC Comments on 2030 Scoping Plan Update (Dec 2016).pdf

Date and Time Comment Was Submitted: 2016-12-16 10:23:22

No Duplicates.



**Comment 51 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Vespa

Email Address: matt.vespa@sierraclub.org

Affiliation: Sierra Club

Subject: Sierra Club Comments on ARB 2030 Discussion Draft Scoping Plan

Comment:

Attached please finds comments by the Sierra Club on the ARB 2030  
Scoping Plan Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/52-sp2030disc-dec16-ws-VyRRPIE1UXABdVU0.pdf](http://www.arb.ca.gov/lists/com-attach/52-sp2030disc-dec16-ws-VyRRPIE1UXABdVU0.pdf)

Original File Name: Sierra Club Comments ARB 2030 Scoping Plan Discussion Draft 12 16  
16.pdf

Date and Time Comment Was Submitted: 2016-12-16 10:26:32

No Duplicates.

**Comment 52 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Diana

Last Name: Madson

Email Address: dmadson@sierrabusiness.org

Affiliation: Sierra CAMP

Subject: Sierra CAMP\_2030ScopingPlan Comment\_2016\_12\_16

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/53-sp2030disc-dec16-ws-USJWOQZiU3IGclIz.pdf](http://www.arb.ca.gov/lists/com-attach/53-sp2030disc-dec16-ws-USJWOQZiU3IGclIz.pdf)

Original File Name: Sierra CAMP\_2030ScopingPlan Comment\_2016\_12\_16.pdf

Date and Time Comment Was Submitted: 2016-12-16 10:39:04

No Duplicates.

**Comment 53 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: William

Last Name: Stewart

Email Address: billstewart@berkeley.edu

Affiliation: University of California Berkeley

Subject: Comments on the forest and forest products aspects

Comment:

See attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/54-sp2030disc-dec16-ws-VyAFXABYV3ACYVMk.pdf](http://www.arb.ca.gov/lists/com-attach/54-sp2030disc-dec16-ws-VyAFXABYV3ACYVMk.pdf)

Original File Name: W Stewart comments on ARB Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-12-16 10:36:58

No Duplicates.

**Comment 54 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: LA County Waste Management Task Force

Subject: Comments on 2030 Scoping Plan Discussion Draft

Comment:

See attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/55-sp2030disc-dec16-ws-AnZRMVQKVVWULYIQ5.pdf](http://www.arb.ca.gov/lists/com-attach/55-sp2030disc-dec16-ws-AnZRMVQKVVWULYIQ5.pdf)

Original File Name: TF Comments on 2030 Scoping Plan 12-16-16.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:22:19

No Duplicates.

## **Comment 55 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Torri

Last Name: Estrada

Email Address: [testrada@carboncycle.org](mailto:testrada@carboncycle.org)

Affiliation: Carbon Cycle Institute

Subject: Comments on the December Discussion Draft of the 2030 Target Scoping Plan Update  
Comment:

On behalf of the Carbon Cycle Institute, we are writing to offer comments, suggestions, and amendments to the Discussion Draft of the 2030 Target Scoping Plan Update, with emphasis on agriculture and working lands (see attached comment letter). We will provide additional comments and thoughts in response to "Carbon Sequestration Modeling Methods and Initial Results for the Natural and Working Lands Sectors", as that effort has direct import to the scope and content of this Scoping Plan Update.

The Carbon Cycle Institute's mission is to stop and reverse climate change by advancing natural, science-verified solutions that remove atmospheric carbon while promoting environmental stewardship, social equity and economic sustainability. To that end, we support projects that promote climate-beneficial management practices on working lands throughout California, work to build the technical capacity of land managers and producers to plan and implement impactful projects that reduce GHGs and sequester carbon in the lands base, and are heavily engaged in gathering scientific data on the important role these practices can play in sequestering carbon from the atmosphere.

California's working lands and rangelands naturally capture carbon from the atmosphere through photosynthesis and transfer it to the soil, where it provides important ecological services, including the enhancement of soil water holding capacity. Land managers can dramatically increase carbon storage in California's soils by employing a number of practices recognized by the Natural Resources Conservation Service (NRCS) as climate beneficial, including compost application, riparian restoration, no-till farming, windbreaks, agroforestry and other practices. Along with increasing long-term carbon sequestration in soils and plant material, these practices also offer additional water, habitat, and economic viability benefits for farmers and working land managers.

We would like to see increased emphasis on the potential role of soils in helping the state meet its 2030 GHG reduction goal of 40 percent below 1990, in light of both the tremendous demand from producers to implement carbon-beneficial practices and the robust infrastructure and leadership at the regional and local level ready and able to move projects forward at scale. The State's GHG and carbon reductions targets for 2030 and 2050 are extremely ambitious, which we applaud, but they are deeper than what has been accomplished to date. Without the natural and working lands sector, in general, and carbon sequestration and soils, specifically, it is difficult to see how the State will meet its

2030 and 2050 climate goals. As detailed below in our comments, the IPCC and leading climate experts agree that we must engage our soils in agricultural and working lands in a significant manner to address climate change, and we need to take significant steps now to scale our efforts in this arena if we want to reap the benefits in the 2030 and 2050 timeframe.

Attachment: [www.arb.ca.gov/lists/com-attach/56-sp2030disc-dec16-ws-BmVcOVE5BQIXMIU6.pdf](http://www.arb.ca.gov/lists/com-attach/56-sp2030disc-dec16-ws-BmVcOVE5BQIXMIU6.pdf)

Original File Name: CCI Comments on ARB Scoping Plan December 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:31:31

No Duplicates.

**Comment 56 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Rcok

Last Name: Zierman

Email Address: rock@cipa.org

Affiliation: CIPA

Subject: CIPA's 2030 Discussion Draft Comments

Comment:

Please find CIPA's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/57-sp2030disc-dec16-ws-B2QCbQd2VmQBWFdl.pdf](http://www.arb.ca.gov/lists/com-attach/57-sp2030disc-dec16-ws-B2QCbQd2VmQBWFdl.pdf)

Original File Name: CIPA 2030 SP Comment Letter 12-16-16.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:33:16

No Duplicates.

**Comment 57 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jamesine

Last Name: Rogers Gibson

Email Address: jvrogers@ucsusa.org

Affiliation:

Subject: UCS comments on 2030 Target Scoping Plan Discussion Draft

Comment:

The Union of Concerned Scientists is pleased to provide our attached comments on the 2030 Target Scoping Plan Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/58-sp2030disc-dec16-ws-VyJXMIlgAAxSNwdo.pdf](http://www.arb.ca.gov/lists/com-attach/58-sp2030disc-dec16-ws-VyJXMIlgAAxSNwdo.pdf)

Original File Name: UCS comments on 2030 Target Scoping Plan Update Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:33:56

No Duplicates.



**Comment 58 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments ARB 2030 Scoping Plan Concept Paper II

Comment:

Attached please find the comments being submitted on behalf of the Climate Change Policy Coalition with regard to the 2030 Scoping Plan Concept Paper II -- released on December 2, 2016.

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

Attachment: [www.arb.ca.gov/lists/com-attach/59-sp2030disc-dec16-ws-UTIGY1cmVGRXDgg6.pdf](http://www.arb.ca.gov/lists/com-attach/59-sp2030disc-dec16-ws-UTIGY1cmVGRXDgg6.pdf)

Original File Name: CCPC\_2030SP\_12\_16\_16.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:52:21

No Duplicates.

**Comment 59 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation: Ad Hoc Offsets Group

Subject: Offset Usage Limit Considerations

Comment:

Please find attached the Ad Hoc Offsets Group comments in support of the Cap and Trade program, including Offsets.

Attachment: [www.arb.ca.gov/lists/com-attach/60-sp2030disc-dec16-ws-WmsFMVZ6B2UBMQcq.pdf](http://www.arb.ca.gov/lists/com-attach/60-sp2030disc-dec16-ws-WmsFMVZ6B2UBMQcq.pdf)

Original File Name: 12-16-16 Ad Hoc Offsets Group Comments on 2030 SP Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:48:15

No Duplicates.

**Comment 60 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels Coal Gas, Inc.

Subject: Cap and Trade Scoping Plan to 2030 comments

Comment:

Respectully to the Board and Staff of ARB,

To: ARB

Generally we believe updated reports on climate change and the effects of offsets on that climate change should be made more public in a manner accessible to general public.

We believe that a report should be made on the progress of global warming so the Board and the state government have up to date information on the current state of global warming and what the most effective ways are to slow it.

ARB should solicit input from the Climate and Clean Air Coalition, on the subject of Climate Change.

The future effect on California has probably been predicted. That report should be included in the scoping program records.

All policy decisions and initiatives in the scoping plan should be evaluated as to their effect on climate change.

The benefits of methane emission reduction should be reported from the standpoint of realistic current GWP.

The GWP of methane in the cap and trade system should be the same as that used in ARB enforcement. Most likely a 20 year period based on 5th assessment report of 84.

Offset approval should be streamlined to leave out any work, reporting or review of matters that are outside of the project and preferably outside of destruction of GHG.

If an activity is regulated by another jurisdiction, local, state or federal ARB should withdraw from any review or enforcement of that activity. Remove double jeopardy project verification.

Finally offsets that have been approved should be publicly compared to their equivalent reduction of other common emissions such as automobile emissions, CO2 from coal fired power plants, natural gas fired power plants, etc. to make the effect of offsets more meaningful.

Tom Vessels

Attachment: [www.arb.ca.gov/lists/com-attach/61-sp2030disc-dec16-ws-WjdWPQFjUGBWMQBj.pptx](http://www.arb.ca.gov/lists/com-attach/61-sp2030disc-dec16-ws-WjdWPQFjUGBWMQBj.pptx)

Original File Name: MMCCACAPTRADEGMIDC2016.pptx

Date and Time Comment Was Submitted: 2016-12-16 12:03:19

No Duplicates.

**Comment 61 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Jacob

Email Address: thomas.r.jacob@gmail.com

Affiliation: Chemical Industry Council of California

Subject: Draft 2030 Scoping Plan - CICC Comments

Comment:

Attached please find comments of the Chemical Industry Council of California (CICC) on the Discussion Draft 2030 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/62-sp2030disc-dec16-ws-UzBcOwNwAjNRCARg.pdf](http://www.arb.ca.gov/lists/com-attach/62-sp2030disc-dec16-ws-UzBcOwNwAjNRCARg.pdf)

Original File Name: CARB Draft 2030 Scoping Plan - CICC Comments - Final.pdf

Date and Time Comment Was Submitted: 2016-12-16 11:27:31

No Duplicates.

**Comment 62 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/63-sp2030disc-dec16-ws-BzZUYAQoAGIGNgAt.pdf](http://www.arb.ca.gov/lists/com-attach/63-sp2030disc-dec16-ws-BzZUYAQoAGIGNgAt.pdf)

Original File Name: 12-16-16 SCPPA Comments on 2030 Scoping Plan Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 12:42:39

No Duplicates.

**Comment 63 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Tanisha

Last Name: Taylor

Email Address: taylor@calcog.org

Affiliation:

Subject: CALCOG Comments December Discussion Draft Scoping Plan

Comment:

Please find attached CALCOG comments on the December Discussion Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/64-sp2030disc-dec16-ws-VjVQNwBtWWkFbFcw.pdf](http://www.arb.ca.gov/lists/com-attach/64-sp2030disc-dec16-ws-VjVQNwBtWWkFbFcw.pdf)

Original File Name: CALCOG 12.15.16 Discussion Draft Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2016-12-16 12:35:07

No Duplicates.

**Comment 64 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Amber

Last Name: Blixt

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP's Comments on CARB Discussion Draft 2030 Target Scoping Plan Update  
Comment:

IEP's Comments on CARB Discussion Draft 2030 Target Scoping Plan  
Update

Attachment: [www.arb.ca.gov/lists/com-attach/65-sp2030disc-dec16-ws-Vz5UNwFwBwtWMwRr.pdf](http://www.arb.ca.gov/lists/com-attach/65-sp2030disc-dec16-ws-Vz5UNwFwBwtWMwRr.pdf)

Original File Name: IEP comments on CARB Discussion Draft 2030 Target Scoping Plan  
Update FINAL 12.16.16.pdf

Date and Time Comment Was Submitted: 2016-12-16 12:54:15

No Duplicates.



**Comment 65 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Suzanne

Last Name: Smith

Email Address: [suzanne.smith@rcpa.ca.gov](mailto:suzanne.smith@rcpa.ca.gov)

Affiliation: Regional Climate Protection Authority

Subject: Comments on 2030 Target Scoping Plan Draft

Comment:

Please find the comments of the Sonoma County Regional Climate Protection Authority attached.

Attachment: [www.arb.ca.gov/lists/com-attach/66-sp2030disc-dec16-ws-UiABZFUKVGYFXFU2.pdf](http://www.arb.ca.gov/lists/com-attach/66-sp2030disc-dec16-ws-UiABZFUKVGYFXFU2.pdf)

Original File Name: RCPA Comments on 2030 Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 13:05:37

No Duplicates.

**Comment 66 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Mark

Last Name: Fenstermaker

Email Address: mark@csgcalifornia.com

Affiliation:

Subject: SCVOSA Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Please find attached comments to the 2030 Target Scoping Plan Discussion Draft submitted on behalf of the Santa Clara Valley Open Space Authority.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/67-sp2030disc-dec16-ws-BnVSNwZxVWkFcFU0.pdf](http://www.arb.ca.gov/lists/com-attach/67-sp2030disc-dec16-ws-BnVSNwZxVWkFcFU0.pdf)

Original File Name: SCVOSA Scoping Plan Discussion Draft Comments - Final.pdf

Date and Time Comment Was Submitted: 2016-12-16 13:15:07

No Duplicates.

**Comment 67 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Arjun

Last Name: Patney

Email Address: arjun.patney@winrock.org

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

To Whom It May Concern:

Attached are comments from the American Carbon Registry. Thank you for the opportunity to provide feedback.

Kind regards,  
Arjun Patney  
Policy Director  
American Carbon Registry

Attachment: [www.arb.ca.gov/lists/com-attach/68-sp2030disc-dec16-ws-  
UDEGY1ckUFxXPVM2.pdf](http://www.arb.ca.gov/lists/com-attach/68-sp2030disc-dec16-ws-UDEGY1ckUFxXPVM2.pdf)

Original File Name: ACR letter to ARB on 2030 Scoping Plan Discussion Draft FINAL.pdf

Date and Time Comment Was Submitted: 2016-12-16 13:20:14

No Duplicates.

**Comment 68 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Robert

Last Name: Beggs

Email Address: rabeggs@cal.net

Affiliation:

Subject: Evaluation of Carbon Tax Alternative

Comment:

See attached comments regarding the apparent inadequacy of evaluation for the carbon tax alternative.

Attachment: [www.arb.ca.gov/lists/com-attach/69-sp2030disc-dec16-ws-UyAFYARqWXoLZAdp.docx](http://www.arb.ca.gov/lists/com-attach/69-sp2030disc-dec16-ws-UyAFYARqWXoLZAdp.docx)

Original File Name: ScopingPlanReviewComments\_Robert\_Beggs.docx

Date and Time Comment Was Submitted: 2016-12-16 13:15:57

No Duplicates.

**Comment 69 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ara

Last Name: Marderosian

Email Address: ara@sequoiaforestkeeper.org

Affiliation: Sequoia ForestKeeper

Subject: 2030 SCOPING PLAN UPDATE Scoping Plan Discussion Draft

Comment:

Dear Chairperson Nichols, Members of the Board, and Staff;  
Please accept the attached comments, on CARB 2030 SCOPING PLAN UPDATE Scoping Plan Discussion Draft. Comments due December 16, 2016, 5 PM and CARB's 2030 Target Revised Draft Strategy (posted November 28, 2016), submitted on behalf of Sequoia ForestKeeper (SFK), Wasteful Unreasonable Methane Uprising, and Ventura County Climate Hub.

Attachment: [www.arb.ca.gov/lists/com-attach/70-sp2030disc-dec16-ws-ADEGNIBgBGUCNQcx.zip](http://www.arb.ca.gov/lists/com-attach/70-sp2030disc-dec16-ws-ADEGNIBgBGUCNQcx.zip)

Original File Name: 161216-3.SFK-CARB-Plan-revised-Strategy-Update-Attachments.zip

Date and Time Comment Was Submitted: 2016-12-16 13:27:57

No Duplicates.

**Comment 70 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Joshua

Last Name: Hanthorn

Email Address: jhanthorn@defenders.org

Affiliation: Defenders of Wildlife

Subject: Defenders of Wildlife Comment 2030 Scoping Plan Target  
Comment:

Please attached Defenders of Wildlife comments. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/71-sp2030disc-dec16-ws-B2NQM1M0VWNROQRg.pdf](http://www.arb.ca.gov/lists/com-attach/71-sp2030disc-dec16-ws-B2NQM1M0VWNROQRg.pdf)

Original File Name: Defenders of Wildlife Discussion Draft Comments Target 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-12-16 13:38:50

No Duplicates.

**Comment 71 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ann  
Last Name: Trowbridge  
Email Address: atrowbridge@daycartermurphy.com  
Affiliation: Day Carter & Murphy LLP

Subject: CCDC Comments Re: Discussion Draft 2030 Target Scoping Plan Update  
Comment:

The California Clean DG Coalition appreciates the opportunity to submit the attached comments regarding Discussion Draft 2030 Target Scoping Plan Update.

If you have any problems with the attachment, please contact Teena Lambos. Thank you.

Teena Lambos  
Day Carter & Murphy LLP  
3620 American River Drive, Suite 205  
Sacramento, CA 95864  
916-246-7300  
tlambos@daycartermurphy.com

Attachment: [www.arb.ca.gov/lists/com-attach/72-sp2030disc-dec16-ws-WjlRNARhVGRSCwlq.pdf](http://www.arb.ca.gov/lists/com-attach/72-sp2030disc-dec16-ws-WjlRNARhVGRSCwlq.pdf)

Original File Name: CCDC Comments Re Discussion Draft 2030 Target Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2016-12-16 13:43:19

No Duplicates.

**Comment 72 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ara

Last Name: Marderosian

Email Address: ara@sequoiaforestkeeper.org

Affiliation: Sequoia ForestKeeper

Subject: 2030 SCOPING PLAN UPDATE Scoping Plan Discussion Draft

Comment:

Dear Chairperson Nichols, Members of the Board, and Staff;

Please accept the attached comments, on CARB 2030 SCOPING PLAN UPDATE Scoping Plan Discussion Draft. Comments due December 16, 2016, 5 PM and CARB's 2030 Target Revised Draft Strategy (posted November 28, 2016), submitted on behalf of Sequoia ForestKeeper (SFK), Wasteful Unreasonable Methane Uprising, and Ventura County Climate Hub.

Unfortunately the previous attachment only contained the attachments. This file contains the comment letter and the attachments.

Attachment: [www.arb.ca.gov/lists/com-attach/73-sp2030disc-dec16-ws-W2oFNQExBGUBNgYw.zip](http://www.arb.ca.gov/lists/com-attach/73-sp2030disc-dec16-ws-W2oFNQExBGUBNgYw.zip)

Original File Name: 161216-7.SFK-CARB-Plan-revised-Strategy-Update-Attachments.zip

Date and Time Comment Was Submitted: 2016-12-16 13:47:06

No Duplicates.



**Comment 73 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Sheldon

Last Name: Zakreski

Email Address: [szakreski@climatetrust.org](mailto:szakreski@climatetrust.org)

Affiliation:

Subject: Climate Trust Comments on 2030 Target Scoping Plan Discussion Draft  
Comment:

Attached please find The Climate Trust's comments on the 2030  
Target Scoping Plan Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/75-sp2030disc-dec16-ws-AHQHYgRxVVkAZwZ0.pdf](http://www.arb.ca.gov/lists/com-attach/75-sp2030disc-dec16-ws-AHQHYgRxVVkAZwZ0.pdf)

Original File Name: TCT ARB Scoping Plan Comments-161216-CAM.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:08:36

No Duplicates.

## **Comment 74 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Cher

Last Name: Gilmore

Email Address: chergilmore@sbcglobal.net

Affiliation: Citizens' Climate Lobby

Subject: 2030 Target Scoping Plan Draft

Comment:

Dear CARB members,

Thank you for soliciting public comments on the 2030 Target Scoping Plan, and thank you for your hard work in outlining an updated plan to address California's emission reduction goals.

I am proud to be living in a state that leads in addressing climate change by taking specific actions to effectively reduce carbon emissions. What has been, and is still being done is to be commended, AND I believe we can do even better.

My primary suggestion for the updated plan is that you take a closer look at Carbon Fee and Dividend (CFD) as a simpler, easier to implement, and more comprehensive solution for runaway emissions, with a built-in mechanism for protecting the most vulnerable from negative economic impacts (the dividend provided to all households). CFD would not necessarily have to replace the Cap and Trade program now in effect, but could provide additional elements to improve the effectiveness of the current effort.

A study commissioned by Citizens' Climate Lobby (CCL) and done by Regional Economic Models, Inc. (REMI) shows that a national carbon price starting now and rising to \$150/ton would reduce emissions by 40% from current levels by 2030. At the same time it would increase GDP and add millions of jobs. It shows unequivocally that we can reduce emissions and improve the economy at the same time.

Another study by Kevin Ummel shows that in a CFD scenario, low income, minority, and elderly households would all come out ahead, in terms of having their rising energy costs covered or exceeded by the dividend. The fact of receiving a dividend would also virtually guarantee continued public support, as has been the case with the British Columbia CFD program. Clearly, to be able to continue the program long enough for the warming problem to be solved will require public support.

A CFD program would also be more acceptable and easy for other, perhaps less developed, economies to adopt, and this also is a good reason for choosing that solution. Ultimately, addressing climate change will require a worldwide response, and a simpler solution is more likely to be widely implemented than a more complex one.

Another advantages of CFD over Cap and Trade is that CFD provides a clear and steady price signal, needed by businesses and individuals to plan effectively. CFD also covers fossil fuel use throughout the

economy, since the fee would be assessed upstream where the fuels first enter the economy. Therefore, it's more comprehensive.

Again, my primary request is for you to study and analyze Carbon Fee and Dividend much more thoroughly as you compare the various carbon pricing options. And I thank you for your work in addressing the critical and urgent issue of climate change, for the benefit of all humanity and the natural world.

Sincerely,

Cher Gilmore

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 13:18:32

No Duplicates.

**Comment 75 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Danny

Last Name: Cullenward

Email Address: [dcullenward@nearzero.org](mailto:dcullenward@nearzero.org)

Affiliation: Near Zero / Carnegie Inst. for Science

Subject: Comments from Michael Wara and Danny Cullenward

Comment:

Please find our comments in the attached PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/77-sp2030disc-dec16-ws-W2kANgExAGUAKwQ1.pdf](http://www.arb.ca.gov/lists/com-attach/77-sp2030disc-dec16-ws-W2kANgExAGUAKwQ1.pdf)

Original File Name: 2016-12-16 2030 Wara & Cullenward.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:15:31

No Duplicates.

**Comment 76 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Betsy

Last Name: Hammer

Email Address: bhammer@counties.org

Affiliation:

Subject: CSAC Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Good afternoon. CSAC's comments on the 2030 Target Scoping Plan Discussion Draft are attached. Please don't hesitate to contact us with questions.

Attachment: [www.arb.ca.gov/lists/com-attach/78-sp2030disc-dec16-ws-VDcCdwFhAjJSC1Mw.pdf](http://www.arb.ca.gov/lists/com-attach/78-sp2030disc-dec16-ws-VDcCdwFhAjJSC1Mw.pdf)

Original File Name: CSAC Comments on 2030 Target Scoping Plan Update - Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:10:44

No Duplicates.

**Comment 77 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Will

Last Name: Decker

Email Address: wd@nfcrc.uci.edu

Affiliation: National Fuel Cell Research Center

Subject: National Fuel Cell Research Center Comments on the Scoping Plan Discussion Draft  
Comment:

Attached are the comments of the National Fuel Cell Research Center  
on the 2030 Target Scoping Plan Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/79-sp2030disc-dec16-ws-UiFXMlc5BSYFall8.pdf](http://www.arb.ca.gov/lists/com-attach/79-sp2030disc-dec16-ws-UiFXMlc5BSYFall8.pdf)

Original File Name: Scoping Plan Update Comments NFCRC 12\_16\_16.SG.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:14:38

No Duplicates.

**Comment 78 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Comment on 2030 Target Scoping Plan Discussion Draft

Comment:

Attached is our comment letter thank you for your attention to this letter.

Attachment: [www.arb.ca.gov/lists/com-attach/80-sp2030disc-dec16-ws-UzVT0lcZUixQIwFy.pdf](http://www.arb.ca.gov/lists/com-attach/80-sp2030disc-dec16-ws-UzVT0lcZUixQIwFy.pdf)

Original File Name: FOE-US\_carb\_commentltr\_scopingplandiscussiondraft.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:23:07

No Duplicates.

**Comment 79 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: Comments from The Nature Conservancy on Dec. 2 2030 Target Scoping Plan Draft  
Comment:

Please accept our comments on the latest 2030 Target Scoping Plan  
Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/81-sp2030disc-dec16-ws-USVQOFMxUFwCYFA1.pdf](http://www.arb.ca.gov/lists/com-attach/81-sp2030disc-dec16-ws-USVQOFMxUFwCYFA1.pdf)

Original File Name: TNC\_Dec2\_2016TargetScoping\_CommentsFinal.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:24:42

No Duplicates.



**Comment 80 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Peter

Last Name: Martin

Email Address: martinpc@cdmsmith.com

Affiliation: CDM Smith

Subject: local transit missing from strategies

Comment:

I reviewing the transportation strategies, no mention is made of local bus service role in helping to reduce VMT and support compact development patterns. Mention is only made of connections to rail, but most transit trips are by bus. The move towards battery electric buses should make buses a stronger means of GHG reductions. Bottom line local bus services can play a big role in reducing VMT, particularly in compact growth areas. Investment in local buses should be part of the plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 14:35:19

No Duplicates.

**Comment 81 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Blacet

Email Address: dblacet@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: 2030 Target Scoping Plan Discussion Draft

Comment:

Please accept the attached comments from CMUA regarding the 2030 Target Scoping Plan Discussion Draft. Feel free to contact me at 916-326-5800 or dblacet@cmua.org with any questions. Thank you.

Danielle Blacet

Attachment: [www.arb.ca.gov/lists/com-attach/83-sp2030disc-dec16-ws-UjMAdF0+Ag4KPldn.pdf](http://www.arb.ca.gov/lists/com-attach/83-sp2030disc-dec16-ws-UjMAdF0+Ag4KPldn.pdf)

Original File Name: ARB 2030 Target Scoping Plan Update-CMUA Comments.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:01:40

No Duplicates.

**Comment 82 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Lee

Last Name: Ballance

Email Address: leeballance@gmail.com

Affiliation:

Subject: In Support of Carbon Tax

Comment:

First I would like to thank the Air Resources Board for their hard and extremely valuable work in making our state a world leader in climate change action.

I would like to encourage the Air Resources Board to take a deep and serious look at the option of a carbon tax (or fee), imposed as far upstream as possible, as a way to manage fossil fuel emissions going forward. Such a tax spreads the price of carbon throughout the economy in the most efficient way possible. It also minimizes the cost of administration and monitoring. By avoiding offsets the immediate benefits of reduced emissions, especially air quality benefits, are realized by the citizens of CA rather than elsewhere.

Finally carbon fees or taxes can be easily integrated across states and nations and can serve as a model for Federal action. The CA legislature called on the US government to institute such a plan earlier this year when it passed AJR 43. Instituting a carbon tax at the State level would add impetus to Federal action.

Thank you for your attention,

Lee C. Ballance MD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 14:03:53

No Duplicates.

**Comment 83 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: sdeslauriers@carollo.com  
Affiliation: Carollo Engineers

Subject: CASA Comments on the 2030 Target Scoping Plan Update Discussion Draft  
Comment:

The California Association of Sanitation Agencies appreciates the opportunity to comment on the 2030 Target Scoping Plan Update Discussion Draft.

We want to emphasize that the wastewater community has opportunities to provide cross-sector benefits and to be:

- Significant renewable energy providers
- Suppliers of a marketable renewable fertilizer/soil amendment product in the form of biosolids
- Suppliers of a low carbon fuel
- Suppliers of a sustainable (drought-proof) water supply
- Environmental stewards of our natural and working lands

All of these can significantly contribute toward each of the scenarios for meeting the 2030 GHG emission reduction target.

Thank you for your consideration of the attached comments and we look forward to reviewing and commenting on the additional material in the January Proposed Scoping Plan. 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 A. Deslauriers, P.E.  
CASA Climate Change Program Manager

Attachment: [www.arb.ca.gov/lists/com-attach/85-sp2030disc-dec16-ws-VmdUYF1xUTMFNVV4.pdf](http://www.arb.ca.gov/lists/com-attach/85-sp2030disc-dec16-ws-VmdUYF1xUTMFNVV4.pdf)

Original File Name: 12-16-16 CASA Comments on 2030 Scoping Plan\_DiscussionDraft\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:20:07

No Duplicates.

**Comment 84 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Armstrong

Email Address: afarensis16@yahoo.com

Affiliation:

Subject: Scoping Plan

Comment:

I thank you for the effort to further California's efforts to ensure clean air for our citizens. I am writing to ask that, as you examine these efforts, you look closely at the potential to price greenhouse gas emissions such as carbon dioxide and methane. Plans to price them, whether through a tax or through a revenue-neutral fee, are advocated by most economists as the most efficient and effective way to reduce greenhouse gas emissions while maintaining a predictable economic environment.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 14:44:03

No Duplicates.

**Comment 85 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Discussion Draft of the 2030 Target Scoping Plan Update

Comment:

The Center for Biological Diversity offers the following comments on the Discussion Draft of the 2030 Target Scoping Plan Update, released for public review on December 2, 2016. The Center very strongly supports California's continuing commitment to statewide reductions in greenhouse gas emissions beyond 2020. These comments focus on a few specific issues in the Discussion Draft that we strongly recommend that ARB consider more closely before issuing a proposed scoping plan.

Attachment: [www.arb.ca.gov/lists/com-attach/87-sp2030disc-dec16-ws-VzQAY1I9ACcBYgJw.pdf](http://www.arb.ca.gov/lists/com-attach/87-sp2030disc-dec16-ws-VzQAY1I9ACcBYgJw.pdf)

Original File Name: Center for Biological Diversity Comments on Discussion Draft 12 16 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:58:40

No Duplicates.

**Comment 86 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Richard

Last Name: Lyon

Email Address: [astinson@cbia.org](mailto:astinson@cbia.org)

Affiliation: California Building Industry Association

Subject: CBIA Comments on 2030 Target Scoping Plan Discussion Draft - December 16, 2016  
Comment:

Comments on 2030 Target Scoping Plan Discussion Draft attached on behalf of the California Building Industry Association.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/88-sp2030disc-dec16-ws-B2QAaQRoBzkLaFM9.pdf](http://www.arb.ca.gov/lists/com-attach/88-sp2030disc-dec16-ws-B2QAaQRoBzkLaFM9.pdf)

Original File Name: Comment Letter - CARB 2030 Scoping Plan - With Attachments - December 16, 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:56:51

No Duplicates.

## **Comment 87 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: J

Last Name: Lang

Email Address: jlang11@sbcglobal.net

Affiliation:

Subject: Comments on Scoping Plan's Carbon Tax Program

Comment:

The discussion on a carbon tax would benefit from a more in-depth analysis. To that end, I've attached a REMI report: Environmental Tax Reform in California: Economic and Climate Impact of a Carbon Tax Swap, prepared by Regional Economic Models, Inc. (REMI), March 3, 2014.

A carbon fee and dividend program designed for revenue neutrality has multiple benefits. A carbon fee is assessed in the energy supply-chain, e.g., at the point of extraction or retail sale, with the fee being based on the carbon content and associated carbon dioxide emissions resulting from combustion of said carbon. The fee increases at a fixed amount over time, which provides price/fee certainty for investors as well as incentives and time for adjusting to the increasing cost of carbon emissions.

The revenue from the assessed fee is then paid out to households, resulting in revenue neutrality. By distributing the same, set dividend to each household, the repressive nature of the fee is offset. This method of addressing environmental justice reaches all impacted households in contrast to the current program, where only households in the areas covered by the selected environmental justice programs benefit directly.

Finally, the REMI report notes that a fee and dividend program "... could mean 300,000 more jobs in the state and an extra \$18 billion in annual GDP by 2035, \$16 billion more in annual income, and a reduction of emissions by 31% from the "no-tax" baseline." [REMI report as noted above, p. 2]

Many of the disadvantages noted for a carbon fee also apply to a cap-and-trade program. For example, additional measures are already included under our cap-and-trade program, yet additional measures are considered a disadvantage of a carbon tax program as listed in the first presentation of the Scoping Plan Workshop (12/16/16).

A useful source to get more information on a carbon fee and dividend program including ways to address disadvantages is Citizens Climate Lobby:

<https://citizensclimatelobby.org>

This group has spent significant amounts of time working through the mechanics of a carbon fee and dividend program and may be helpful to the Scoping Plan authors.



Because of the above, a more serious look at a carbon fee and dividend program in California is warranted. This more detailed analysis should be included in the scoping plan.

Attachment: [www.arb.ca.gov/lists/com-attach/89-sp2030disc-dec16-ws-UiBQM1Y6UGoCKQBj.pdf](http://www.arb.ca.gov/lists/com-attach/89-sp2030disc-dec16-ws-UiBQM1Y6UGoCKQBj.pdf)

Original File Name: REMI-CA-1.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:02:31

No Duplicates.

**Comment 88 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cbbf.com

Affiliation: CA Farm Bureau Federation

Subject: 2030 Scoping Plan Discussion Draft

Comment:

PLEASE FIND OUR COMMENTS ATTACHED

Attachment: [www.arb.ca.gov/lists/com-attach/90-sp2030disc-dec16-ws-VyQGYwNtVHdXOAZo.pdf](http://www.arb.ca.gov/lists/com-attach/90-sp2030disc-dec16-ws-VyQGYwNtVHdXOAZo.pdf)

Original File Name: Scoping plan comments dec2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:10:04

No Duplicates.

**Comment 89 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Beth

Last Name: Olhasso

Email Address: bolhasso@westcoastadvisors.com

Affiliation:

Subject: AECA Comments

Comment:

AECA Comments

Attachment: [www.arb.ca.gov/lists/com-attach/91-sp2030disc-dec16-ws-VTRdPIMxAzEAWQRn.pdf](http://www.arb.ca.gov/lists/com-attach/91-sp2030disc-dec16-ws-VTRdPIMxAzEAWQRn.pdf)

Original File Name: AECA Comments on Scoping Discussion Draft 12\_15\_16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:08:09

No Duplicates.

**Comment 90 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

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

Subject: IETA Comments on 2030 Target SP Discussion Draft  
Comment:

Dear Staff,

Attached, please find comments on the 2030 Target Scoping Plan Update - Discussion Draft & Workshop. On behalf of IETA, we appreciate this opportunity to share input with Staff.

Best Regards,

Katie Sullivan

Attachment: [www.arb.ca.gov/lists/com-attach/92-sp2030disc-dec16-ws-WjNVNl0oV2UFXFM.pdf](http://www.arb.ca.gov/lists/com-attach/92-sp2030disc-dec16-ws-WjNVNl0oV2UFXFM.pdf)

Original File Name: IETA ARB Comments\_2030 Target SP Discussion Draft\_16Dec2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:04:37

No Duplicates.

**Comment 91 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Lynne

Last Name: Girdlestone

Email Address: lynne3095@att.net

Affiliation:

Subject: Scoping Plan Discussion Draft

Comment:

Nobody said tackling climate change was going to be easy. But if the world's 6th largest economy can knuckle down to some serious changes and meet these goals, it will set a standard for the rest of the country/world. Things must change drastically for everybody if we're going to survive on this planet, but that's not all bad. Maybe we have been going too fast and too far in the wrong direction, and now we must use our brains and our resources to creatively redesign our world - together. Putting a price on carbon nationally would be a huge step and drive investment in renewables - while offering financial relief to households. There are innumerable ways already on the table to ease the 'pain'.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:14:46

No Duplicates.

**Comment 92 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Elyce  
Last Name: Klein  
Email Address: elyceklein@gmail.com  
Affiliation: Citizens Climate Lobby

Subject: 2030 Target Draft Scoping Plan  
Comment:

December 15, 2016  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
RE: 2030 Target Draft Scoping Plan

Dear CARB and Stakeholders,

Thank you for the opportunity to comment on the CARB 2030 Target Scoping Plan.

Thank you for CARBs work and for California being a leader on climate change.

I am writting to request that CARB undertake a more comprehensive analysis and comparison of a carbon tax.

I believe a carbon tax can be a positive policy alternative for California because a tax will be

- A more predictable price on carbon
- Would cover all emissions economy-wide
- Will have greater portability to other states and countries
- Will have greater revenue certainty
- Will result in greater equity across all California communities.

Thank you for your consideration and for your great work.

Elyce Klein  
Citizens Climate Lobby

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:14:19

No Duplicates.

**Comment 93 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ted  
Last Name: Obbard  
Email Address: ted.obbard@gmail.com  
Affiliation:

Subject: Please consider carbon tax  
Comment:

Thank you for your stewardship of California's stewardship of California's continued leadership, nationally and internationally, in reducing greenhouse gases.

As you look to the future, please consider both major mechanisms for carbon pricing, namely a carbon tax or a cap and trade system.

Thank you for your consideration, and for all your good work.

Best,

Ted

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:14:33

No Duplicates.

**Comment 94 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Denise

Last Name: Grab

Email Address: denise.grab@nyu.edu

Affiliation: Institute for Policy Integrity, NYU Law

Subject: Policy Integrity Comments on 2030 Scoping Plan Discussion Draft

Comment:

Please see attached comments from the Institute for Policy Integrity at New York University School of Law.

Attachment: [www.arb.ca.gov/lists/com-attach/96-sp2030disc-dec16-ws-WioCa1Y7BT8AZQV8.pdf](http://www.arb.ca.gov/lists/com-attach/96-sp2030disc-dec16-ws-WioCa1Y7BT8AZQV8.pdf)

Original File Name: Policy Integrity\_ARB 2030 Scoping Plan Comments Dec 16\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:16:03

No Duplicates.



**Comment 95 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jeanne

Last Name: Merrill

Email Address: jmerrill@calclimateag.org

Affiliation: CA Climate & Agriculture Network (CalCAN)

Subject: Bolder Goals, Actions

Comment:

I write on behalf of the California Climate and Agriculture Network (CalCAN), a coalition of the state's leading sustainable and organic agriculture organizations. California agriculture has a great diversity of climate change solutions to offer, as highlighted in the Scoping Plan Discussion Draft, and discussed below.

Many of these climate solutions not only reduce potent greenhouse gas (GHG) emissions and increase carbon sequestration, but also make our farms and ranches more resilient to increasing weather extremes brought on by rising temperatures. We cannot achieve a climate resilient and smart agriculture without bold goals and actions. We must also provide the resources necessary to achieve those goals: research, education, technical assistance and financial incentives to make climate change mitigation and adaptation accessible for our 76,000 farms and ranches.

The Discussion Draft highlights the urgent need for action, but offers a tempered vision for agricultural solutions to climate change—one that we do not think will meet the Governor's call for bold climate change actions or adequately meet the state's ambitious, but necessary GHG reduction goals. Below we suggest an alternative vision that is ambitious, practical and necessary for California to remain a leader in agricultural production and in climate change action.

Attachment: [www.arb.ca.gov/lists/com-attach/97-sp2030disc-dec16-ws-WygFYFA+BSYAbwNt.docx](http://www.arb.ca.gov/lists/com-attach/97-sp2030disc-dec16-ws-WygFYFA+BSYAbwNt.docx)

Original File Name: Scoping Plan Dis. Draft - CalCAN Comments - 12-16-16 - FINAL.docx

Date and Time Comment Was Submitted: 2016-12-16 15:02:43

No Duplicates.

**Comment 96 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: F Kent  
Last Name: Leacock  
Email Address: kleacock@proterra.com  
Affiliation:

Subject: Scoping Plan  
Comment:

Proterra comments attached in PDF file.

Attachment: [www.arb.ca.gov/lists/com-attach/98-sp2030disc-dec16-ws-BXVTJwBuUHdWNQZ0.pdf](http://www.arb.ca.gov/lists/com-attach/98-sp2030disc-dec16-ws-BXVTJwBuUHdWNQZ0.pdf)

Original File Name: Proterra Comments Scoping Plan 12.15.2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:19:50

No Duplicates.

**Comment 97 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Julee

Last Name: Malinowski Ball

Email Address: julee@ppallc.com

Affiliation:

Subject: CBEA Comments Re Discussion Draft 2030 Target Scoping Plan Update (12/02/2016)

Comment:

California Biomass Energy Alliance comments re Discussion Draft  
2030 Target Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/99-sp2030disc-dec16-ws-UDEGclY1BwtVIFc0.pdf](http://www.arb.ca.gov/lists/com-attach/99-sp2030disc-dec16-ws-UDEGclY1BwtVIFc0.pdf)

Original File Name: ARB Scoping Plan Disucssion-CBEA Comments 12-16-2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:31:17

No Duplicates.

**Comment 98 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the 2030 Target Scoping Plan Discussion Draft

Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/100-sp2030disc-dec16-ws-U2FcalVnUDNSCwVx.pdf](http://www.arb.ca.gov/lists/com-attach/100-sp2030disc-dec16-ws-U2FcalVnUDNSCwVx.pdf)

Original File Name: 2030 Target Scoping Plan Discussion draft - 12-16-16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:34:55

No Duplicates.

**Comment 99 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: David

Last Name: Fink

Email Address: dfink@climateresolve.org

Affiliation: Climate Resolve

Subject: Comments: 2030 Target Scoping Plan Discussion Draft

Comment:

To Whom it May Concern,

Attached is a joint letter from Climate Resolve and Grid Alternatives of Greater Los Angeles regarding the 2030 Target Scoping Plan Draft. Please let us know if you have any questions and thank you for the opportunity to provide feedback.

Sincerely,

David Fink

Climate Resolve

Attachment: [www.arb.ca.gov/lists/com-attach/101-sp2030disc-dec16-ws-VDdWMQZ1U2IGXwBz.pdf](http://www.arb.ca.gov/lists/com-attach/101-sp2030disc-dec16-ws-VDdWMQZ1U2IGXwBz.pdf)

Original File Name: CARB Scoping Plan Comments- GA & CR .pdf

Date and Time Comment Was Submitted: 2016-12-16 15:08:40

No Duplicates.

**Comment 100 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Todd

Last Name: Shuman

Email Address: tshublu@yahoo.com

Affiliation: WUMU - Wasteful Unreasonable Methane Upr

Subject: 203 Target Scoping Plan Discussion Draft

Comment:

To the CA ARB,

I concur with other comments submitted today (by CRPE and its allies) that the CA ARB has inadequately analyzed and considered a carbon tax in this CEQA proceeding/CEQA process/CEQA document.

I too insist that the ARB Board engage in a good faith and reasoned analysis of the benefits that a carbon tax offers.

Moreover, I insist that ARB go further and engage in a good faith and reasoned analysis of a broader Greenhouse Gas (GHG) Emissions tax that would apply to all the GHG emissions that flow from the Agriculture economic sector -- and include GHGs that are not carbon-based (such as nitrous oxide, N<sub>2</sub>O), as well as GHGs that are both long-lived (e.g. CO<sub>2</sub> and N<sub>2</sub>O) and short-lived (e.g., methane).

The model for this particular unified GHG "Ag" taxation approach was recently published in "Mitigation potential and global health impacts from emissions pricing of food commodities", Marco Springmann, Daniel Mason-D'Croz, Sherman Robinson, Keith Wiebe, H. Charles J. Godfray, Mike Rayner and Peter Scarborough, Nature Climate Change, 7 NOVEMBER 2016 | DOI: 10.1038/NCLIMATE3155.

I am attaching this recently published study to facilitate ARB development of a serious GHG-based direct taxation approach as part of an alternative to Cap and Trade. As such, I insist that ARB review this study and produce a good faith and reasoned analysis of a "Cap and Tax" alternative to "Cap and Trade" that is informed by the Springmann et al (2016) study attached.

I want to emphasize for the record that ARB should include within this Cap and Tax alternative all the GHG emissions that are produced by the Agriculture economic sector in California, especially with reference to the dairy and livestock industries.

(Note: the attached paper has a link to the supplementary material for this paper that ARB will want to analyze as well.)

Through this referencing above, I request that the supplementary material for the Springmann et al. [2016] paper be also considered as part of the administrative record of this proceeding.

Sincerely,

Todd Shuman, Camarillo

Attachment: [www.arb.ca.gov/lists/com-attach/102-sp2030disc-dec16-ws-WyhTJVwvUGoBaVA3.pdf](http://www.arb.ca.gov/lists/com-attach/102-sp2030disc-dec16-ws-WyhTJVwvUGoBaVA3.pdf)

Original File Name: Springmann\_nclimate3155.pdf

Date and Time Comment Was Submitted: 2016-12-16 14:57:53

No Duplicates.

**Comment 101 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBZ@pge.com

Affiliation:

Subject: PG&E Comments on Discussion Draft 2030 Target Scoping Plan Update

Comment:

Please find PG&E's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/103-sp2030disc-dec16-ws-ViZTMIYIUGYBWABj.pdf](http://www.arb.ca.gov/lists/com-attach/103-sp2030disc-dec16-ws-ViZTMIYIUGYBWABj.pdf)

Original File Name: PG&E Comments - Discussion Draft 2030 Target Scoping Plan 12.2.16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:38:10

No Duplicates.



**Comment 102 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Lyla

Last Name: Fadali

Email Address: septarbres@sbcglobal.net

Affiliation:

Subject: scoping plan

Comment:

Hi ,

I want to thank the California ARB for helping make our state a leader on climate change. I'd like to encourage CARB to look into a carbon tax more thoroughly. I think it would have a number of advantages, like making sure the economy as a whole is covered without having to go crazy with regulations, and making revenue more predictable.

Thanks .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:45:21

No Duplicates.

## **Comment 103 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Vermilion

Email Address: nvermilion@placeworks.com

Affiliation: AEP Climate Change Committee

Subject: AEP Climate Change Committee Comments on the Discussion Draft 2030 Target Scoping Plan

Comment:

On behalf of the Association of Environmental Professionals (AEP), Climate Change Committee, we appreciate the opportunity to provide comments on the Discussion Draft, 2030 Target Scoping Plan Update. This supplements our comments previously provided to CARB on June 8, 2016 on the 2030 Target Scoping Plan Concept Paper and comments provided on November 21, 2016 on the November 7, 2016, Public Workshop on the 2030 Target Scoping Plan Update: GHG Policy Scenarios, Natural & Working Lands, and Public Health Analysis.

AEP is a non-profit organization of California's environmental professionals. AEP's Climate Change Committee (Committee) members are actively involved in supporting California cities and counties in the evaluation of greenhouse gas (GHG) emissions impacts for new development subject to the California Environmental Quality Act (CEQA), preparing communitywide GHG emissions inventories and forecasts and developing and implementing Climate Action Plans (CAPs).

The update to the Scoping Plan to address the 2030 target in Senate Bill 32 (SB 32) and Executive Order B-30-15 is of great interest to the Committee and our CEQA and climate action planning work with California cities and counties, especially as it relates to local target setting. The Committee supports CARB in its challenging work to establish a working framework for achieving the next milestone in GHG reductions for California. The Committee published two white papers in 2015 and 2016 (<http://califaep.org/climate-change>) that examine in detail the challenges for both CEQA practice and local climate action planning related to post-2020 GHG reduction targets. Many of us are already engaged in developing local CAPs that include post-2020 GHG reduction goals. As a result, we are concerned that the proposed policies for local plan level goals extend too far into local policy decision-making by specifically identifying a local target for climate action plans. The committee is also concerned that establishing a community-wide goal for 2050 will immediately shift the focus of CEQA and Climate Action Plan target setting to the 2050 goal, for which no clear path is certain for local governments and which will result in an ineffective and speculative focus on 2050 at the expense of the real and urgent necessity to focus on meeting the ambitious 2030 goal. Moreover, delving into project-level CEQA thresholds is better left to local air districts and counties since they are attuned to local-regional constraints. Therefore, our recommendation is to remove the section regarding Local Plan-Level GHG Reduction Goals and the section

regarding Project-Level GHG Reduction Actions and Thresholds from the 2030 Target Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/105-sp2030disc-dec16-ws-VTRdPgBxBQkHYIU6.pdf](http://www.arb.ca.gov/lists/com-attach/105-sp2030disc-dec16-ws-VTRdPgBxBQkHYIU6.pdf)

Original File Name: AEP\_Comments\_ARB\_DD2030TSP.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:32:33

No Duplicates.

**Comment 104 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Sekita

Last Name: Grant

Email Address: sekitag@greenlining.org

Affiliation: The Greenlining Institute

Subject: Greenlining Comments to 2030 SP Discussion Draft

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/106-sp2030disc-dec16-ws-ATNSZFNhVjUBWAZ1.pdf](http://www.arb.ca.gov/lists/com-attach/106-sp2030disc-dec16-ws-ATNSZFNhVjUBWAZ1.pdf)

Original File Name: 2030 Scoping Plan Comments\_Dec 2016\_GLI.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:50:54

No Duplicates.

**Comment 105 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Vincent

Last Name: Wiraatmadja

Email Address: vincent@weidemangroup.com

Affiliation: BYD

Subject: BYD Comments to the Updated Scoping Plan Discussion Draft

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/107-sp2030disc-dec16-ws-B3JcKgRhBTcKeFM2.pdf](http://www.arb.ca.gov/lists/com-attach/107-sp2030disc-dec16-ws-B3JcKgRhBTcKeFM2.pdf)

Original File Name: Update to Scoping Plan Comment Letter 12-16-16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:53:00

No Duplicates.

**Comment 106 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: Please see attached

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/108-sp2030disc-dec16-ws-UiFSNgBiVVIWMQBy.pdf](http://www.arb.ca.gov/lists/com-attach/108-sp2030disc-dec16-ws-UiFSNgBiVVIWMQBy.pdf)

Original File Name: SBC\_ARB\_2030ScopingPlanDiscPaperCommentLtr\_2016\_12\_16-2.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:50:38

No Duplicates.

**Comment 107 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Donald

Last Name: Goldberg

Email Address: donald@clpproject.org

Affiliation: Climate Law & Policy Project

Subject: CLPP Comments on the 2030 Target Scoping Plan

Comment:

Thank you for the opportunity to comment on the Scoping Plan.  
Comments are attached in PDF format.

Donald M. Goldberg, Executive Director  
Climate Law & Policy Project

Attachment: [www.arb.ca.gov/lists/com-attach/109-sp2030disc-dec16-ws-AGMGbFwtU3AAWQJh.pdf](http://www.arb.ca.gov/lists/com-attach/109-sp2030disc-dec16-ws-AGMGbFwtU3AAWQJh.pdf)

Original File Name: CLPP comments on Calif ARB 2030 Scoping Plan Dec 16, 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:49:44

No Duplicates.

**Comment 108 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Devin

Last Name: Carroll

Email Address: devinc@sbcglobal.net

Affiliation: Citizen's Climate Lobby

Subject: Carbon fee or tax

Comment:

Thanks for your good work in CARB in making California a leader in reducing the burning of carbon fuels.

I recommend that you seriously consider a carbon fee or tax as a better alternative than cap and trade.

A steadily rising carbon fee is more predictable than cap and trade, which is good for business. It also covers a greater part of the economy and does not favor one kind of business over others.

Many economists, both liberal and conservative, like the carbon tax over other solutions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:52:22

No Duplicates.



**Comment 109 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation:

Subject: Natural land group comments

Comment:

Please see attached letter from 5 conservation groups. Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/112-sp2030disc-dec16-ws-B2MHZAdlBAgHMFNh.pdf](http://www.arb.ca.gov/lists/com-attach/112-sp2030disc-dec16-ws-B2MHZAdlBAgHMFNh.pdf)

Original File Name: Dec 12 SPU Group letter.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:00:51

No Duplicates.

**Comment 110 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Hannah  
Last Name: Goldsmith  
Email Address: hannah@caletc.com  
Affiliation: CalETC

Subject: CalETC Comments on the 2030 Target Scoping Plan Update Discussion Draft  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/113-sp2030disc-dec16-ws-UjRXOFQ7VmQKYAhX.pdf](http://www.arb.ca.gov/lists/com-attach/113-sp2030disc-dec16-ws-UjRXOFQ7VmQKYAhX.pdf)

Original File Name: Final CalETC Comments Re 2030 Target Scoping Plan Update Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:43:49

No Duplicates.

## **Comment 111 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Mark

Last Name: Gagliardi

Email Address: mgagliardi@oaklandnet.com

Affiliation: Recyclers Global Warming Council

Subject: Zero Waste Climate Solution Actions

Comment:

The Recyclers Global Warming Council (RGWC) of the California Resource Recovery Association (CRRRA) represents interests within the CRRRA and overall resource recovery industry to address the issue of climate protection through Zero Waste strategies: reduce, reuse, recycling, composting and product stewardship. The CRRRA is the oldest and one of the largest non-profit organizations in the United States dedicated to reducing waste, pollution, and greenhouse gas (GHG) production through Zero Waste strategies.

RGWC appreciates the opportunity to provide input on the Draft 2030 Target Scoping Plan (Plan). The published draft Plan includes many worthwhile recommendations, particularly regarding organics. We wholeheartedly endorse the proposals regarding organics and support the ban of 75% of them from landfills, as now required by law in SB1383. The Scoping Plan should now detail how ARB will support CalRecycle in implementing the SB1383 organic ban, including supporting funding for composting and anaerobic digestion facilities with Cap and Trade funding.

We also recommend that the Plan include more specific actions such as:

- Recycling Market Development - Invest in direct incentives and the Recycling Market Development Zone program to grow in-state markets for recycled materials. Recycled content manufacturing avoids emissions from raw materials extraction, primary processing, transportation, and refining. Recycling also promotes forest carbon sequestration, and directly reduces direct manufacturing emissions by displacing virgin materials which require more energy for processing, and generate more waste. Re-introducing discards with intrinsic energy value back into manufacturing processes also creates more local jobs by supporting in-state processing and manufacturing with recycled feedstocks.
- Local Climate Actions Plans - Increase support for and incentives to local governments to implement local climate action plans. Local actions complement statewide measures and may be more cost effective and provide more co-benefits than relying exclusively on top-down statewide regulations to achieve the State's climate stabilization goals.
- Limit waste-based energy technologies - Require any feedstocks under consideration for waste-based energy be addressed individually, using full life-cycle analyses to compare to source reduction, reuse, recycling and composting alternatives. The Waste Management Sector Plan developed by the ARB and CalRecycle acknowledges that "recycling, composting and anaerobic digestion, and biomass conversion result in even lower GHG emissions" than MSW

Thermal facilities, since these facilities compete with recycling, composting and anaerobic digestion. Limit any high-temperature thermal processing technologies to uniform, controlled feedstock such as agricultural scrap. Exclude mixed municipal solid waste, as its use only facilitates continued resource depletion by institutionalizing waste as an unsustainable "commodity" feedstock for energy production.

- Establish an extended producer responsibility (EPR) framework - Prioritize products with high toxicity, and difficult to reuse, recycle or compost products, particularly high-GHG commodities such as carpets in EPR frameworks. EPR programs for those types of products could have significant GHG emissions reduction impact with low implementation cost for state and local governments and can give producers a financial incentive to design products that close the loop by being easy to repair, reuse, recycle and/or compost.

Thank you for considering RGWC's recommendations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:59:04

No Duplicates.

## **Comment 112 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Shrayas

Last Name: Jatkar

Email Address: shrayas@ccair.org

Affiliation: Coalition for Clean Air

Subject: Comments on 2030 Target Scoping Plan Update Discussion Draft

Comment:

The Coalition for Clean Air (CCA) supports a 2030 Target Scoping Plan that will ensure California meets its 2030 climate change mitigation goal, while also maximizing opportunities to address long-standing environmental injustices in communities faced with high levels of pollution and social vulnerabilities to pollution. We believe these outcomes can be best achieved by a suite of measures that prioritize a reduction in greenhouse gas emissions directly at mobile and large stationary sources, and supplemented by an emissions tax system that covers greenhouse gases as well as criteria air pollutants and toxic air contaminants. We appreciate that the 2030 Target Scoping Plan Update Discussion Draft (Discussion Draft) considers several of these issues, and emphasizes the transportation sector which is the largest source of climate-disrupting and health-damaging pollution in California.

CCA favors a carbon tax over cap-and-trade as the State's carbon pricing mechanism, because of concerns that emissions-trading programs do not mitigate localized pollution burdens adequately and could exacerbate pollution hotspots. While we recognize the challenges involved in designing and implementing an emissions tax, we urge the Air Resources Board (ARB) to make the following revisions so that references to a carbon tax in the Proposed 2030 Target Scoping Plan (Proposed Plan) present a more accurate description of this policy option and a fairer comparison with cap-and-trade. For instance, the Proposed Plan should clearly state that a carbon tax could generate revenue for climate mitigation programs and projects just as a potential post-2020 cap-and-trade program would – and likewise, carbon tax revenue could be deposited into the Greenhouse Gas Reduction Fund and adhere to state laws (SB 535 and AB 1550) regarding equitable climate investments in and benefiting disadvantaged and low-income communities. The Proposed Plan should also discuss how a cap on emissions, or other environmental integrity mechanisms, could accompany a carbon tax in order to address the issue of uncertainty in emission reductions. Furthermore, CCA requests ARB to consider in the Proposed Plan the benefits and challenges associated with expanding a carbon pricing mechanism to include air pollutants. We believe a broad tax proposal that covers both greenhouse gases and air pollutants would help achieve deep reductions in emissions needed to meet federal, health-based air quality standards and generate revenues for incentive funding at the scale required to transform California's transportation, industrial, and energy sectors. If cap-and-trade were to be extended post-2020, CCA would support and strongly urge ARB to institute all of the potential changes to the program mentioned in the Discussion Draft (page 91) so that communities

living near large sources of emissions have greater assurances of lower pollution burdens and improved air quality.

The Transportation Sustainability section in the Discussion Draft includes several important measures that should be pursued. CCA supports establishing a strong target of 100 percent zero-emission vehicle (ZEV) sales facilitated by well-designed regulations and complementary incentive funding. We have and continue to support specific measures identified in the Discussion Draft, such as sustained incentives for consumers, dealer incentives, and free or low-cost electricity that will help to accelerate the sale of ZEVs in California and make ZEV ownership more desirable to consumers.

We also appreciate the attention paid to increasing ZEV penetration in the medium- and heavy-duty vehicle sector, because of the multiple environmental, public health, social justice, and economic benefits that would result from a transition to a more sustainable freight system. Goods movement in California must be addressed more aggressively due to the severe environmental injustices associated with freight transportation, which is projected to grow considerably in the coming years. CCA recognizes ARB's efforts to improve data collection at freight hubs and facilities, and recommends including a proposal in the Proposed Plan to establish aggressive targets for ZEV penetration in freight vocations in the near term as more information is available. The interaction between on-road vehicles and freight infrastructure is also important to address, and the examples provided under the "Sustainable Freight Goals" (page 52) are useful in showing how these elements can be aligned toward a low carbon transportation system. In addition, ARB should consider expanding the support and assistance available to local and regional governments (under "Known Commitments-Vibrant Communities and Landscapes," page 55) to include planning and implementation of widespread transportation electrification infrastructure - an element likely to be incorporated into the updated Regional Transportation Plan (RTP) Guidelines in January 2017.

CCA agrees with the three main "Clean Fuel Goals" listed in Discussion Draft that are aimed at reducing emissions from transportation fuels, and recommends adding Renewable Diesel to the second point about development and deployment of low carbon fuels. We also support implementation of the known commitments for cleaner fuels, namely increasing the stringency of the Low Carbon Fuel Standard. In addition, CCA strongly urges ARB to begin development of the potential new clean fuel measures, and a Low Emission Diesel Standard in particular. This measure is urgently needed in order to make significant progress in the near-term on climate, air quality, and public health, while zero-emission technologies are developed for the heaviest-duty trucks and equipment types for which a zero-emission alternative does not yet exist. Lastly, we recommend broadening the discussion of cross-sector interactions with respect to transportation fuels to include environmental justice, though we understand the emphasis on the consequences for greenhouse gas emissions. To be specific, CCA believes policymakers should safeguard against a concentration of Natural Gas and other fueling depots (even if the fuels are low carbon) in disadvantaged communities, which would lead to increased truck traffic and attendant problems in areas already facing high cumulative environmental impacts.

As stated in our November 2016 comment letter, CCA is a strong supporter of the Refinery Measure and other potential new measures

to reduce emissions from the Industrial sector. We support implementation of the main strategies described in this section of the Discussion Draft that focus on addressing emissions generated by fuel combustion, such as greater deployment of fuel cells that are renewably powered and requirements for Best Available Retrofit Control Technology at large stationary sources. Fluorinated gases, or F-gases, are also critically important to control, especially given that this is the fastest-growing greenhouse gas and with an extremely high global warming potential. A regulatory measure, coupled with a sustained incentive program, is needed and should be pursued to replace F-gases in air conditioning and refrigeration systems across the food processing and transport and building sectors of the economy.

Lastly, CCA agrees with and supports the Environmental Justice Advisory Committee's recommendation to begin planning for a just transition for incumbent workers in fossil fuel industries. Over time, these workers are likely to face a greater risk of unemployment due to changes in business operations or reductions in output to meet climate and clean air obligations. In addition to issues of fairness and equity, a just transition could yield environmental benefits if incumbent workers' accumulated knowledge and skills are leveraged in closely related occupations and industries that are aligned with a low carbon economy. California has proven that environmental protection and economic growth can be coupled and with great success on both fronts, and now is the time to ensure this extends to employment and people's livelihoods.

Sincerely,  
Shrayas Jatkar  
Policy Associate  
Coalition for Clean Air

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:04:31

No Duplicates.

**Comment 113 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Morris

Email Address: jenyum@gmail.com

Affiliation: Southern California Gas Company

Subject: SoCalGas Comments on the 2030 Scoping Plan Discussion Draft

Comment:

Please find attached SoCalGas and SDG&E's comments on the 2030 Target Scoping Plan Discussion Draft. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/116-sp2030disc-dec16-ws-AnEHYgRiAAwBdAJm.pdf](http://www.arb.ca.gov/lists/com-attach/116-sp2030disc-dec16-ws-AnEHYgRiAAwBdAJm.pdf)

Original File Name: SCG\_SDGE SPU Discussion Draft 12-16-16\_final.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:08:03

No Duplicates.



**Comment 114 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

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

Subject: Comments from the Alliance of Regional Collaboratives for Climate Adaptation  
Comment:

Dear Chair Nichols and Staff:

Thank you for the opportunity to provide comments on the 2030 Target Scoping Plan Discussion Draft. Please find attached a comment letter from the Alliance of Regional Collaboratives for Climate Adaptation.

We understand that with limited staff capacity at ARB that you are hoping to receive actionable comments. We welcome the opportunity to discuss any of our comments in greater detail and to help draft language for inclusion in the final Scoping Plan.

Sincerely,

Julia Kim  
Coordinator for ARCCA

Attachment: [www.arb.ca.gov/lists/com-attach/117-sp2030disc-dec16-ws-UjMGcgBiWWkLbAJd.pdf](http://www.arb.ca.gov/lists/com-attach/117-sp2030disc-dec16-ws-UjMGcgBiWWkLbAJd.pdf)

Original File Name: ARCCA Comments - 2030 Scoping Plan Disussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:09:18

No Duplicates.

**Comment 115 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Francesca

Last Name: Wahl

Email Address: fwahl@solarcity.com

Affiliation:

Subject: SCTY Comments - 2030 Target Discussion Draft Dec 16

Comment:

Please find attached SolarCity's comments on the 2030 Target Scoping Plan Update discussion draft released on Dec.2, 2016.

Attachment: [www.arb.ca.gov/lists/com-attach/118-sp2030disc-dec16-ws-UyBRNFUgUnhRCFc0.pdf](http://www.arb.ca.gov/lists/com-attach/118-sp2030disc-dec16-ws-UyBRNFUgUnhRCFc0.pdf)

Original File Name: SCTY Comments ARB 2030 Scoping Plan Update Discussion Draft 12 16 16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:52:00

No Duplicates.

**Comment 116 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: Comments on Discussion Draft 2030 Target Scoping Plan

Comment:

Thank you for the opportunity to provide the attached written comments from California ReLeaf on the discussion draft for the 2030 Target Scoping Plan Update

Attachment: [www.arb.ca.gov/lists/com-attach/119-sp2030disc-dec16-ws-UDMBZgR3WWgCWwc1.pdf](http://www.arb.ca.gov/lists/com-attach/119-sp2030disc-dec16-ws-UDMBZgR3WWgCWwc1.pdf)

Original File Name: CARB 2030 target written comments 12-16-16.pdf

Date and Time Comment Was Submitted: 2016-12-16 15:52:11

No Duplicates.

**Comment 117 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jason

Last Name: Rhine

Email Address: jrhine@cacities.org

Affiliation:

Subject: Comments: Discussion Draft 2030 Scoping Plan Update

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/120-sp2030disc-dec16-ws-BnVdOABuVHdWOVQ6.pdf](http://www.arb.ca.gov/lists/com-attach/120-sp2030disc-dec16-ws-BnVdOABuVHdWOVQ6.pdf)

Original File Name: Scoping Plan Update Discussion Draft 12 16 16.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:12:18

No Duplicates.

**Comment 118 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Haines

Email Address: [thaines@swc.org](mailto:thaines@swc.org)

Affiliation: State Water Contractors

Subject: SWC Comments on 2030 Target Scoping Plan

Comment:

SWC Comments on the 2030 Target Scoping Plan Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/121-sp2030disc-dec16-ws-WyhWJ1IwBwsKf1Mw.pdf](http://www.arb.ca.gov/lists/com-attach/121-sp2030disc-dec16-ws-WyhWJ1IwBwsKf1Mw.pdf)

Original File Name: SWC Scoping Plan Comments12162016.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:12:49

No Duplicates.

**Comment 119 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Christopher

Last Name: Valadez

Email Address: cvaladez@cafreshfruit.com

Affiliation:

Subject: 2030 Scoping Plan Comments

Comment:

Please see the attached comment from the California Fresh Fruit Association.

Attachment: [www.arb.ca.gov/lists/com-attach/122-sp2030disc-dec16-ws-BTcFM1dlBGcLUIIz.pdf](http://www.arb.ca.gov/lists/com-attach/122-sp2030disc-dec16-ws-BTcFM1dlBGcLUIIz.pdf)

Original File Name: 2030 ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:17:49

No Duplicates.

**Comment 120 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Claire

Last Name: Broome

Email Address: cvbroome@gmail.com

Affiliation: 350 Bay Area

Subject: Comments on Discussion Draft Dec 16 2016

Comment:

Comments in attached file

Attachment: [www.arb.ca.gov/lists/com-attach/123-sp2030disc-dec16-ws-WmldblNiAg4CZ1Q1.docx](http://www.arb.ca.gov/lists/com-attach/123-sp2030disc-dec16-ws-WmldblNiAg4CZ1Q1.docx)

Original File Name: 350 CARB SP comments 12-16-2016.docx

Date and Time Comment Was Submitted: 2016-12-16 16:18:12

No Duplicates.

**Comment 121 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Todd  
Last Name: Shuman  
Email Address: tshublu@yahoo.com  
Affiliation: WUMU - Wasteful Unreasonable Methane Upr

Subject: 2030 Target Scoping Plan Discussion Draft  
Comment:

To CA ARB

As a supplement to my previously submitted comments, I also wish to submit for the record this article by Darien Shanske concerning state-level Border Tax Adjustments for prospective carbon taxes.

The legal theory propounded and explored by Shanske addresses direct carbon tax mechanisms at the state level that would alleviate, minimize, and perhaps eliminate altogether, GHG "leakage" concerns.

This material should be considered in conjunction with the previously submitted material in Springmann et al (2016), as CA ARB develops a Cap and Tax alternative to Cap and Trade.

Again, such a Cap and Tax alternative should apply to the Agricultural economic sector and should address frequently-voiced concerns about GHG "leakage" that might occur if high-GHG-polluting industries (and the direct consumers of these industries' commodities) are required in the future to "internalize" the social and environmental costs of commodity production that are currently being "externalized" to the broader society and environment. I would argue that Shanske provides the legal map for instituting, implementing, enforcing, and collecting state-level carbon taxes in a manner that will minimize GHG "leakage" in the future.

Sincerely,

Todd Shuman, Camarillo

Attachment: [www.arb.ca.gov/lists/com-attach/124-sp2030disc-dec16-ws-AHNQPIQ0BThRJAFq.pdf](http://www.arb.ca.gov/lists/com-attach/124-sp2030disc-dec16-ws-AHNQPIQ0BThRJAFq.pdf)

Original File Name: Shanske BTA Carbon Tax.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:03:26

No Duplicates.



**Comment 122 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Linda

Last Name: Rudolph

Email Address: linda.rudolph@phi.org

Affiliation:

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

The Public Health Institute's Center for Climate Change and Health is pleased to submit the attached comments on the 2030 target scoping plan discussion draft. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/125-sp2030disc-dec16-ws-AmEFZIE+UXZXNAR2.docx](http://www.arb.ca.gov/lists/com-attach/125-sp2030disc-dec16-ws-AmEFZIE+UXZXNAR2.docx)

Original File Name: Center Climate Change Health December Scoping Plan Comments.docx

Date and Time Comment Was Submitted: 2016-12-16 16:27:45

No Duplicates.

**Comment 123 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on Discussion Draft Scoping Plan

Comment:

Please find attached.

Thank you,

Clare Breidenich

Western Power Trading Forum

Attachment: [www.arb.ca.gov/lists/com-attach/126-sp2030disc-dec16-ws-V2YGMIR4AmAFNVd6.pdf](http://www.arb.ca.gov/lists/com-attach/126-sp2030disc-dec16-ws-V2YGMIR4AmAFNVd6.pdf)

Original File Name: 12-16-16 WPTF to CARB on Scoping Plan Discussion Draft .pdf

Date and Time Comment Was Submitted: 2016-12-16 16:29:37

No Duplicates.

**Comment 124 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Townsend

Email Address: ktownsend@bluesource.com

Affiliation: Blue Source

Subject: AB 197 & Cap and Trade with Offsets

Comment:

Thank you for the opportunity to comment. Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/127-sp2030disc-dec16-ws-UDNSOwRoAjwBYIM9.pdf](http://www.arb.ca.gov/lists/com-attach/127-sp2030disc-dec16-ws-UDNSOwRoAjwBYIM9.pdf)

Original File Name: Comment Letter\_Blue Source\_121616.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:29:02

No Duplicates.

**Comment 125 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Peter

Last Name: Imhof

Email Address: pimhof@sbcag.org

Affiliation: SBCAG

Subject: SBCAG Comments on Draft 2030 Target Scoping Plan

Comment:

Please see SBCAG's comments on the draft 2030 Target Scoping Plan, attached.

Attachment: [www.arb.ca.gov/lists/com-attach/128-sp2030disc-dec16-ws-UmAHMVJiWTwAKwc2.pdf](http://www.arb.ca.gov/lists/com-attach/128-sp2030disc-dec16-ws-UmAHMVJiWTwAKwc2.pdf)

Original File Name: 2016-12 SBCAG Staff Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:29:07

No Duplicates.

**Comment 126 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Abigail

Last Name: Ramirez

Email Address: aramirez@leadershipcounsel.org

Affiliation: LCJA

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/129-sp2030disc-dec16-ws-BWNTPFc4AjBWPAil.pdf](http://www.arb.ca.gov/lists/com-attach/129-sp2030disc-dec16-ws-BWNTPFc4AjBWPAil.pdf)

Original File Name: Final--\_2030 Target Scoping Plan (Discussion Draft) Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:20:55

No Duplicates.

**Comment 127 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Chanell

Last Name: Fletcher

Email Address: chanell@climateplanca.org

Affiliation: ClimatePlan

Subject: ClimatePlan comments on 2030 Target Scoping Plan Discussion Draft

Comment:

ClimatePlan is a network of over 50 partners committed to improving land use and transportation planning. I have attached our comments, please follow up if there are any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/130-sp2030disc-dec16-ws-VTMGaVwzAzFROwFe.pdf](http://www.arb.ca.gov/lists/com-attach/130-sp2030disc-dec16-ws-VTMGaVwzAzFROwFe.pdf)

Original File Name: Final Comment Letter discussion draft 2030 scoping plan 12\_16.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:33:51

No Duplicates.

**Comment 128 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kelly

Last Name: McBee

Email Address: KellyM@acwa.com

Affiliation: Association of California Water Agencies

Subject: ACWA's Comments on the Discussion Draft of the 2030 Target Scoping Plan Update  
Comment:

Please see the attached letter on behalf of the Association of California Water Agencies regarding the Discussion Draft of the 2030 Target Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/131-sp2030disc-dec16-ws-VDVRNAN1VWdRCABj.pdf](http://www.arb.ca.gov/lists/com-attach/131-sp2030disc-dec16-ws-VDVRNAN1VWdRCABj.pdf)

Original File Name: ACWA Comments on Discussion Draft of 2030 Target Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:19:38

No Duplicates.

**Comment 129 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-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 Discussion Plan

Comment:

Please find attached the comments of Calpine Corporation on the 2030 Scoping Plan Discussion Draft. Thank you for the opportunity to submit these comments. Please contact Barbara McBride or Kassandra Gough at 925.557.2238 or 916.491.3366, respectively, with any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/132-sp2030disc-dec16-ws-UjFQN1A9UXIHAdp.pdf](http://www.arb.ca.gov/lists/com-attach/132-sp2030disc-dec16-ws-UjFQN1A9UXIHAdp.pdf)

Original File Name: Calpine Comments on 2030 Scoping Plan Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:33:45

No Duplicates.



## **Comment 130 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Bob

Last Name: Hitchner

Email Address: bob@nexusewater.com

Affiliation: Nexus eWater Inc.

Subject: On achieving water-related GHG emissions reductions

Comment:

I am writing to comment on the Discussion Draft for the 2030 Target Scoping Plan with respect to water-related use of energy for pumping, conveying, treating and heating water.

Nexus eWater is a San Diego-based company that manufactures residential-scale solutions to recover and reuse valuable resources that are in the "grey water" discharge that leaves every home - the water itself, and the energy that is in the water. Ours is an emerging technology category that can play a positive role in the achievement of the goal of significant Greenhouse Gas Emissions reduction. However, it is critical that the Plan be able to adapt to challenges that are sometimes presented by new technologies.

I would like to emphasize two points that are illustrated particularly in the water-related use of energy:

1. Conservation, efficiency and recycling are the shortest paths to cutting GHG emissions, not to mention directly engaging all Californians in the achievement of these goals.

2. The Plan must be open to switching between fuels, and to switching from one technology to another, if that results in system-wide reductions in energy and GHG emissions. In particular, I am referring to two technological paradigms: Electric vs. gas water heating; and distributed (on-site) vs. centralized water recycling.

Water-related Greenhouse Gas Emissions - the Impact of Conservation and Onsite Water Reuse

The Scoping Plan correctly identifies the water sector as a major user of energy, and thus a major source of greenhouse gas emissions. The Discussion Draft notes that 10% of the State's energy use is associated with water-related end uses, and water and wastewater systems account for an additional 2% of energy use (page 76).

The energy-intensity of water can be addressed at many different points in the long water supply, process and treatment chain. The most effective way to reduce the GHG impact of water use (page 77) -- bar none -- is to reduce water use. This, of course, is the well-worn concept of conservation or efficiency.

The second most effective way to reduce the GHG impact of water is to switch our reliance from high-energy sources of water to locally-sourced water. The best example of this is the use of on-site sources of water such as grey water and rainwater as a replacement for potable water (for appropriate uses). Generally, this is known as on-site water reuse.

In order to achieve the GHG emissions goals of the scoping plan with respect to water, we need our policies to appropriately prioritize water conservation, water efficiency, and water reuse in our policy portfolio. Without an appropriate policy mix, we will instead be forced, over time, to move to more energy-intensive sources of water such as desalination or centralized wastewater treatment for potable reuse.

Fortunately, in California we have already begun to move toward more on-site water reuse. Jurisdictions such as the City and County of San Francisco, the City of Los Angeles, and the service area of the Santa Clara Valley Water District have policies, or draft policies, which will encourage more and more residential and commercial buildings to make more effective reuse of grey water and rain water in the future.

On-site sources of water can be used in California for landscape irrigation and toilet flushing, which are two of our largest residential uses of water. When homeowners are reusing their own water, they become more closely engaged with the process of producing and using water, rather than simply "consuming" water. A citizenry that is engaged in the process of conserving, using it efficiently, and recycling it for their own reuse is a citizenry that better understands and appreciates our climate policies and goals.

#### Building-Level vs. System-wide Efficiency - Addressing Perverse Policy Incentives when Technologies Change

Each scenario presented in the Discussion Draft reflects the State's known commitment to double building-level energy efficiency by the year 2030, as required under AB 350 (see page 41). One means to do so is the replacement of inefficient space heating and water heating appliances with more efficient appliances, such as electric heat pumps. A number of participants in the review process have called for ending the use of fossil fuels in buildings on the pathway to achieving our GHG emissions reduction goals.

On-site water reuse is an example of an emerging solution that can simultaneously contribute to the doubling of energy efficiency of the broader system, but not necessarily at the level of the individual building. It is obvious to see how it can contribute to this goal when the embedded energy in a home's grey water is harvested and reused on site, which is already possible but not yet common. It is less obvious when on-site water treatment results in a new appliance power demand that currently is handled off-site at a centralized facility. Even if the net energy use is lower to treat and move water around at the building level than it is at a centralized treatment facility, it is not uncommon for policy-based calculators to create perverse incentives that may result in less efficient outcomes at the system level. This should not be allowed to happen.

As was the case of rooftop solar, on-site water reuse solutions have the potential to transform a portion of water treatment from a

centralized to a distributed solution. When this can happen, we need our policies to adapt to the technological change and not create perverse incentives that may perpetuate less efficient pre-existing technologies.

The potential water and energy impact of on-site solutions for water is nothing short of transformational, and can have just as great an impact as the move from a centralized to the distributed power grid.

Let us make certain that the Scoping Plan has the flexibility to anticipate, adapt to, and encourage such technological transformation that may be critical to our achievement of the goals of the plan – the 40% reduction in greenhouse gas emissions by the year 2030.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:35:58

No Duplicates.

**Comment 131 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-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 Discussion Draft  
Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/134-sp2030disc-dec16-ws-USFXMABiWWMHZwdu.pdf](http://www.arb.ca.gov/lists/com-attach/134-sp2030disc-dec16-ws-USFXMABiWWMHZwdu.pdf)

Original File Name: Pacific Forest Trust Comments on SPU Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:04:14

No Duplicates.

**Comment 132 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Carol B.

Last Name: Vesecky

Email Address: cbvesecky@gmail.com

Affiliation: Citizens Climate Lobby

Subject: Recommendation to study and analyze carbon fee and dividend

Comment:

Dear California Air Resources Board members,

As a California resident and a member of the Citizens' Climate Lobby, I deeply appreciate your work to strengthen our great state's role in controlling the emissions that cause global climate change,

I am writing now to recommend that CARB make efforts to study and analyze the results of a carbon tax, in particular "carbon fee and dividend," in comparison with the current cap-and-trade system.

It is my hope that a carbon tax would be simple to introduce and manage, and help to limit the use of fossil-fuel carbon throughout the economy. It would also provide a consistent revenue stream, while offering the possibility of replication in other states and countries.

Thank you for all you do to ensure a livable future for us all,

Carol B. Vesecky

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:35:39

No Duplicates.

**Comment 133 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: [william.westerfield@smud.org](mailto:william.westerfield@smud.org)

Affiliation: Sacramento Municipal Utility District

Subject: SMUD's Comments on 2030 Target Scoping Plan Discussion

Comment:

SMUD's Comments on 2030 Target Scoping Plan Discussion

Attachment: [www.arb.ca.gov/lists/com-attach/136-sp2030disc-dec16-ws-Am4GZQZgBQkGMgY2.pdf](http://www.arb.ca.gov/lists/com-attach/136-sp2030disc-dec16-ws-Am4GZQZgBQkGMgY2.pdf)

Original File Name: LEG 2016-1038 SMUD Comments on Discussion Draft 2030 Scoping Plan Update12162016f.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:40:37

No Duplicates.

**Comment 134 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-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 Discussion Draft

Comment:

Attached please find the Northern California Power Agency (NCPA) comments on the 2030 Target Scoping Plan Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/137-sp2030disc-dec16-ws-WjRcOQNyAzEBWAFi.pdf](http://www.arb.ca.gov/lists/com-attach/137-sp2030disc-dec16-ws-WjRcOQNyAzEBWAFi.pdf)

Original File Name: NCPA comments re 12-2-16 Scoping Plan Discussion Document (final 12-16-16).pdf

Date and Time Comment Was Submitted: 2016-12-16 16:41:43

No Duplicates.

**Comment 135 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Adam

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on the Discussion Draft

Comment:

Please find comments from Southern California Edison on the Discussion Draft.

All the best,

Adam R. Smith

Program Manager, Climate Policy

Southern California Edison

Attachment: [www.arb.ca.gov/lists/com-attach/138-sp2030disc-dec16-ws-VyRVIIYiU19WPAht.pdf](http://www.arb.ca.gov/lists/com-attach/138-sp2030disc-dec16-ws-VyRVIIYiU19WPAht.pdf)

Original File Name: SPU Letter- Discussion Draft.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:42:54

No Duplicates.



## **Comment 136 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Public Solar Power Coalition

Subject: ITSC Immediate Total Solar Conversion of CA et al by HE/PSPC for 2030 CA Scoping Plan Paper

Comment:

Dec 16, 2016 these comments are for me he harvey eder ffor myself and for PSPC as Ex, Dir,.....we must have Immediate Total Solar Conversion of CA. based on the 2014 paper by Jacobson et al and Dellucci from Stanford and UC Berkley on converting CA asap as Expediently as Practiable which means like converting our and the us economey to convert the wld to solar renewables at once this also incorporates by redfernce all past state fed and int proceedings commented on eytc including Nov 7 ,2016 comments etc.

More time isneeded for comments

CA will ber 60 percent or more ccas in a few urs. we neede immediate distribute4d solar pv cca and other publicv power and ev s10 million for low and middle income cas by 2023 with private public jv with gm amd y tesla and pther ex mfgs PAS PSPC is working on this this must be installed within the next 3 to 5 yrs with battery storage just back from thw 2nd storage GTM s.f. and there has been as 30% decrease over the last 6 months witj 50 percent more espected inthe next 3 yrs

Notice this and all cosuments submitt4ed are copy righted c this is circuled and app copyright etcd innovation law is taken all rights revercved including reporduction.. thnis included EJ including the prrrrrivate ca pemsion syste, and or others etc for solar equity these syste,s will be using the Federa; tax syste, fo00000 from apx 30 to 50 percent plus will be paid by the federal gov by the tax credits and excellaarated depreciation etc.Communbity solar and shared solar will br used with seasonal storage like Drakes Landing in Canada using seasonal storage that is cost effictive as all solar has beccome sepecoallyy with record low interest rates 30 or 40 yyeqars age we had record high interest rates prome ins1980 was 20 per cent.. for jeppers swake... with the over 300ppm co2e today form ch4 methane.

Ypure plan is a fossel fuel plan an natural gas and iol plan and a js just as noxious biomas methane and other biomass ITSC eil will have short term and long term seasonal or multilply yr storage etf for chc solar district heating and cooling

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the air pollution dists must be used to implement ITSC vid tjeor  
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CITY IF

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are low income less tythan 20k per yr and 40 ;er cent make over  
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solar power cafillitites ..

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manufacturing businessiooportunitys etcl

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less to bri8ng natural gas trcuks etc in the dist  
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BY 2203 AND 100 PER CENT BY 2050 ORMUCH SOONER WE HAVE 2100  
NUMBERS NW AND MUST ACT WHAT IS THE TERNIN ADICEMIA PUBLISH OR  
PARISH.... THUS US AN EXISWESTENTIAL THREAT  
TAKE ACTION LIKE IT IS//IN AL IN COMP LAW AND CA THESE IS A  
COMP[emsable consequence....etc;  
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e

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 15:59:22

No Duplicates.

**Comment 137 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Greg  
Last Name: Nord  
Email Address: GNord@octa.net  
Affiliation: OCTA

Subject: Inadequate notification of release  
Comment:

Thank you for providing a discussion draft of the 2030 Target Scoping Plan and hosting the associated workshop on December 16, 2016. However, OCTA and many of our partner agencies were unaware of the December 2nd release of the discussion draft. As a result, there was inadequate time to review and prepare a complete set of comments prior to the December 16th deadline. An extension of the comment period would be appreciated. Additionally, the Air Resources Board should ensure that future draft releases of the Scoping Plan utilize a more thorough notification process, to ensure that all stakeholders are properly informed. We look forward to future opportunities to collaborate with the Air Resources Board on the development of the 2030 Target Scoping Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:30:59

No Duplicates.

**Comment 138 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Kendra

Last Name: Daijogo

Email Address: Kendra\_Daijogo@GualcoGroup.com

Affiliation:

Subject: CA Council for Environmental and Economic Balance

Comment:

Comments submitted on behalf of the California Council for Environmental and Economic Balance ("CCEEB").

Attachment: [www.arb.ca.gov/lists/com-attach/142-sp2030disc-dec16-ws-UzAAZV05V2EHYwBf.pdf](http://www.arb.ca.gov/lists/com-attach/142-sp2030disc-dec16-ws-UzAAZV05V2EHYwBf.pdf)

Original File Name: CCEEB Scoping Plan Final Comments December 16 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:46:29

No Duplicates.

## **Comment 139 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Steve

Last Name: Smith

Email Address: ssmith@sanbag.ca.gov

Affiliation: San Bernardino Associated Governments

Subject: Comments on the Discussion Draft 2030 Scoping Plan

Comment:

Comments on the Discussion Draft 2030 ARB Scoping Plan Update  
Steve Smith, Director of Planning, San Bernardino Associated  
Governments  
ssmith@sanbag.ca.gov  
December 16, 2016

San Bernardino Associated Governments (SANBAG) appreciates the opportunity to provide comments on the December 2, 2016 discussion draft of the California Air Resources Board (ARB) 2030 Target Scoping Plan Update. SANBAG is the County Transportation Commission and the Council of Governments for San Bernardino County, serving 24 cities and the County of San Bernardino. We were the lead agency on the Regional Greenhouse Gas Inventory and Reduction Plan and accompanying Environmental Impact Report for San Bernardino County, prepared in 2014. A number of cities in the County prepared local Climate Action Plans (CAPs) based on this work, focusing on 2020 goals and tiering from the regional EIR for their environmental clearance. We understand the structure, benefits, and challenges of GHG reduction planning at the local level. Our comments focus on three primary topics:

- Climate Action with Local Permitting (pages 102 through 105)
- Transportation Sustainability (pages 48-56), and
- Funding (general)

Climate Action with Local Permitting

On page 104, the Discussion Draft makes the following statement:

"The recommended local government goals of six metric tons CO<sub>2</sub>e per capita by 2030 and no more than two metric tons CO<sub>2</sub>e per capita by 2050 are intended to provide consistency with the 2030 Target Scoping Plan and the State's long term goals. Knowing that the per capita emissions goals may not be appropriate in some jurisdictions, mass emissions and service population emissions are also important to discuss. Per the community protocol, a local government should focus on those emissions that the jurisdiction controls, while disclosing emissions within its geographical boundary but for which the local government does not have regulatory authority."

To date, our Regional GHG Reduction Plan and the targets in our jurisdictions' CAPs have been based on percentage reduction of GHGs from a baseline. Even SB 32 is based on a percentage reduction of GHGs from 1990 levels. A fixed goal of six metric tons of CO<sub>2</sub>e per

capita is unworkable, as it fails to take into consideration the baseline characteristics of the climate and other characteristics of individual jurisdictions. Home energy consumption, for example, tends to be lower in coastal communities and higher in the inland areas and deserts.

Residents of California have many reasons for living where they do, and one of the major factors is affordability. Median home prices in San Bernardino County are half of the median price in Los Angeles County and one third of the median price in Orange County. Many inland residents may prefer to live closer to the coast, with a more temperate climate, but cannot afford to do so. Further, San Bernardino County has one of the largest concentrations of disadvantaged communities in the State. Imposing the same fixed goal on an inland city as for a coastal city would unfairly burden the inland communities, and it is likely that the 6 metric ton goal would be unattainable by 2030 for most inland locations. In the spirit of the "ambitious but achievable" language of AB 32, we urge the language of the Scoping Plan to be modified to express other specific options, such as percent reductions, not an implied absolute target.

Further, we believe that the choice of CAP targets should be made at the local level and not at the state level. A one-size-fits-all target would be inappropriate and counterproductive. We recognize that the CAP targets should be related to the 2030 reduction target in SB 32, but the approach should ultimately be left up to the responsible local agency. This has worked well for the original 2020 target, and the concept should be carried forward to 2030.

We also appreciate the mention of tiering as a CEQA tool, as this is a means to see achievement of GHG reduction goals more holistically, with greater flexibility at a project level. Having a project-by-project view, for either development projects or transportation projects, is an inefficient and restrictive means to accomplish either GHG reduction or VMT reduction goals. A tiered approach can also promote regional goals and policies more effectively.

#### Transportation Sustainability

The last paragraph on page 50 begins with the statement:

"While the majority of the GHG reductions from the transportation sector in this Discussion Draft will come from technologies and low carbon fuels, a reduction in the growth of VMT is also needed."

We agree with this general assessment. However, ARB should not under-estimate the challenges nor over-estimate the potential GHG reduction benefits of VMT-related strategies. SANBAG has been at the front lines of VMT-reduction initiatives for a number of years, through the promotion and funding of ridesharing programs, transit service improvements, collaborative land use planning with local jurisdictions and regional agencies, and active transportation planning and implementation.

We are now investing in high-capacity transit systems at a level unprecedented for San Bernardino County, with over \$600 million being committed to capital improvements (i.e. excluding operations) for passenger rail and bus rapid transit systems over the 10-year period beginning in 2014. We have been actively pursuing with the

South Coast Air Quality Management District the opportunity to implement zero emission light rail service for our nine-mile Redlands Passenger Rail Project, currently in design, and planned for operation in 2020. Even with these major investments and aggressive policies supporting transit oriented development (TOD), it is a stark reality that significant reductions in VMT (or at least slowing the growth in VMT) will come very slowly.

To illustrate this point, the California population grew by almost two thirds between 1980 and today. Over the same period, VMT has essentially doubled, with a slight dip during the Great Recession. At the same time, Corporate Average Fuel Economy for light duty vehicles has increased significantly, by about 45% since 1980. This illustrates the power of technology to temper the impact of population growth.

Much like the dramatic advancements that have been made in reduction of criteria pollutants, we believe technology is also the primary path to GHG reduction. Freedom of travel, a world-class goods movement network, and associated economic growth is what has enabled these technological investments to occur in cleaning up the air. The state should be cautious not to apply policies that restrict travel in a way that would set back the economy. This would limit the generation of capital needed to fund the building energy upgrades, efficiency measures, and penetration of zero and near-zero emission vehicles that will ultimately drive the reduction in GHGs. The more successful we are at reducing the vehicle-based GHG output, the less important VMT reduction becomes from a GHG perspective.

We also appreciate the acknowledgement on page 49 of the importance of freight. This relates to our comments immediately above. For example, a number of improvements need to be made to our freeway system to address current freight bottlenecks. Future state policy, related to SB 743 or otherwise, should not make it more difficult to deliver these projects, which are vitally needed to support our logistics-based economy.

#### Funding

We also appreciate the acknowledgement on page 24 that:

"California's strategic vision for achieving at least a 40 percent reduction in GHG emissions by 2030 is based on the principle that economic prosperity and environmental sustainability can be achieved together."

We believe this is possible, but the state needs to be wary of possible unintended consequences of its actions. We have alluded above to the care that will be needed in how VMT reduction strategies are applied, particularly with respect to maintaining efficient freight flows within and through our region. About a third of San Bernardino County jobs are tied to the logistics economy. This is particularly important given the substantial presence of disadvantaged communities, for whom logistics industry employment is an important gateway to the middle class.

That said, the costs of achieving the SB 32 GHG reduction goals will be extraordinary. Just the ARB Mobile Source Strategy and State Implementation Plan (SIP) Strategy show costs in the tens of billions of dollars by 2031. In pursuing these goals, we need to be aware that the businesses needed to fund the technological



improvements should not be put in a position of having to choose between growing their business in California versus moving to or growing in places where costs will be lower, just so that they are able to stay competitive in the global economy. Leakage of business activity to other states would be an unfortunate result and would ultimately undermine our ability to generate the capital needed for the technologies to reach these goals, as stated earlier. In other words, we should be careful not to get too far ahead of the GHG reduction progress in the U.S. overall. Although California is the largest state in the Union, we cannot do this alone. The federal government should also be player in providing incentive funding, rather than the full burden falling on California alone.

Again, we appreciate the opportunity to comment and look forward to the receipt of the full draft in January 2017.

Attachment: [www.arb.ca.gov/lists/com-attach/143-sp2030disc-dec16-ws-WygHYgNtByQKZVM9.pdf](http://www.arb.ca.gov/lists/com-attach/143-sp2030disc-dec16-ws-WygHYgNtByQKZVM9.pdf)

Original File Name: ScopingPlanCommentsSANBAG20161216\_Clean.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:44:24

No Duplicates.

**Comment 140 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Ryan  
Last Name: Schuchard  
Email Address: rschuchard@calstart.org  
Affiliation: CALSTART

Subject: Scoping Plan Comments  
Comment:

Dear ARB Staff,

Thank you for this opportunity to provide input on the Scoping Plan. Our comments are attached.

Warmly,  
Ryan

Attachment: [www.arb.ca.gov/lists/com-attach/144-sp2030disc-dec16-ws-AGNTNFwxBCRQIgRl.pdf](http://www.arb.ca.gov/lists/com-attach/144-sp2030disc-dec16-ws-AGNTNFwxBCRQIgRl.pdf)

Original File Name: CALSTART Comments on ARB Scoping Plan for December 16, 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:51:23

No Duplicates.

**Comment 141 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Erik

Last Name: White

Email Address: ecwhite@placer.ca.gov

Affiliation: Placer County Air Pollution Control Dist

Subject: Comments-Target Scoping Plan Update 2030 Discussion Draft

Comment:

Comments Target Scoping Plan Update 2030

Attachment: [www.arb.ca.gov/lists/com-attach/145-sp2030disc-dec16-ws-UzVRPIE+BzVWPFMM.pdf](http://www.arb.ca.gov/lists/com-attach/145-sp2030disc-dec16-ws-UzVRPIE+BzVWPFMM.pdf)

Original File Name: FINAL Comments Target Scoping Plan Update 2030 Dec 2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:18:02

No Duplicates.

**Comment 142 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Agricultural Council of California

Subject: 2030 Scoping Plan Discussion Draft Comments

Comment:

Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/146-sp2030disc-dec16-ws-AWBSM1QKU2MCawl8.pdf](http://www.arb.ca.gov/lists/com-attach/146-sp2030disc-dec16-ws-AWBSM1QKU2MCawl8.pdf)

Original File Name: Ag Council 2030 Scoping Plan Discussion Draft Comments .pdf

Date and Time Comment Was Submitted: 2016-12-16 16:55:06

No Duplicates.

**Comment 143 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environmen

Subject: Comments on 2030 Target Scoping Plan Discussion Draft

Comment:

Comments by environmental justice and public health groups on the Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/147-sp2030disc-dec16-ws-UGJVVwMzUTRSegEw.pdf](http://www.arb.ca.gov/lists/com-attach/147-sp2030disc-dec16-ws-UGJVVwMzUTRSegEw.pdf)

Original File Name: 2016.12.16 scoping plan comments FINAL Exhibits.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:53:09

No Duplicates.

**Comment 144 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: University of California, Berkeley

Subject: Scoping Plan comments supporting a smaller carbon offset program

Comment:

Please find comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/148-sp2030disc-dec16-ws-UGEGNIV5AmBQZAYr.pdf](http://www.arb.ca.gov/lists/com-attach/148-sp2030disc-dec16-ws-UGEGNIV5AmBQZAYr.pdf)

Original File Name: 16-12-16 Scoping Plan comments-Haya.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:58:39

No Duplicates.

## **Comment 145 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Darrell

Last Name: Clarke

Email Address: darrell@dclarke.org

Affiliation:

Subject: Comments on Discussion Draft 2030 Target Scoping Plan

Comment:

I commend this process and the progress so far! In the Transportation section (beginning on page 50):

1. I strongly support the "goal of achieving 100 percent ZEV sales in the light-duty vehicle sector." (page 50) I would explicitly add to fulfill the critical infrastructure of multi-family-building home charging, ideally via an easy process of one-stop shopping to buy an EV bundled with charger installation.

2. I would explicitly call for railroad electrification in California to "improve freight efficiency and infrastructure development, and shift demand to alternate, low-carbon modes" (page 50).

3. I agree that "VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this plan. ... There is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals." (page 50) I would add to explicitly promote incentives to drive less that divert trips to biking, walking, transit, and car-pooling, and reform parking requirements and pricing. I would especially focus on facilitating carpooling, both workplace-based and informally by smart phone, where transit alternatives are not good or trips are too long to be reasonable for transit or biking.

4. "Complete the pilot road usage charge program pursuant to SB 1077 and evaluate deployment of a statewide program" (page 54) overlooks that the road charge program loses the current gasoline tax's superior proportionality to fossil fuel consumption and GHG emissions.

5. Finally I would add emphasis on creating inviting good-quality Transit Oriented Districts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:46:49

No Duplicates.





**Comment 146 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jody  
Last Name: Strait  
Email Address: jstrait@berkeley.edu  
Affiliation:

Subject: A Price on Carbon  
Comment:

Dear CARB,

I would like to thank you all for your work on reducing California's reliance on big oil and coal. Going forward, I request that CARB undertake a more comprehensive analysis and comparison of a carbon tax. I believe a carbon tax can be a positive policy alternative for California by providing a more predictable price on carbon, economy-wide emissions coverage, greater portability to other states and countries, greater revenue certainty and greater equity across all California communities.

Thank you again for your continued dedication and for your precious time.

Best regards,

Jody Strait  
Waterford, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:53:13

No Duplicates.

## **Comment 147 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Jan

Last Name: Dietrick

Email Address: bugnet@rinconvitova.com

Affiliation: President, Rincon-Vitova Insectaries, In

Subject: Comments on 2030 Climate Policy Scoping from small insectary business perspective  
Comment:

We are a small business of \$1.2 million sales in biological inputs for agriculture. We are the oldest business of our kind in North America since 1960. We are the 2016 recipient of the Global Regenerative Business Prize which essentially recognizes the degree to which we were founded on and maintain a view of essence within the biggest, most complex picture of society and the natural world that guides us to help our customers achieve their fullest potential. We have reduced our fossil fuel use by approximately 75% in the past decade.

We invest increasing time doing advocacy for strong effective climate policy, because what difference will our hard work to cut emissions make if others are allowed to continue with business as usual polluting. We are Health Ambassadors for Physicians for Social Responsibility-LA and believe you should be listening to their leadership for environmental justice.

But in terms of our business goals, your agency is frankly the nodal point for our company to achieve its highest aspirations. You must require the same of all businesses of all sizes, no matter what! All businesses and all residents need emissions reduction goals and targets as well as more encouragement and recognition of small businesses that are striving to be part of climate change solutions.

Our company did the fieldwork for a study 20 years ago funded by the California Energy Commission that showed that the biggest energy savings in the transition of a farm from conventional to organic was in the pest management sector, mainly in being able to reduce the number of tractor passes. That knowledge has sat on the shelf for two decades! It is time for climate policy to recognize the potential contribution of biological row crop agriculture, not just grazing land and forests. The point is that an abundance of knowledge exists for farms to reduce their fossil fuel use as well as sequester CO<sub>2</sub>. What is needed is the economic incentive.

The best way to support all small businesses and farms to transition away from fossil fuels through sound biologically based practices like carbon farming is via a comprehensive market-driven state policy, such as a simple straight-forward predictable gradually and steadily increasing carbon tax. Because emissions are increasing and we are running out of time, the goal must be at least \$100 per ton of CO<sub>2</sub> equivalent by 2025.

Besides carbon dioxide emissions reduction and widespread

sequestration incentives, California also has an urgent role to play in enacting strong and necessary reductions policy for methane, especially from livestock. California has the biggest methane hotspot in North America. The urgency of accelerated impacts from methane requires a minimum goal of 50 percent reduction in enteric emissions by 2025. A methane fee or tax must be based on its true social cost using the 20 year interval methane GTP. Your agency must stop ignoring the current scientific data on calculating the social cost of methane and start getting tough on emissions.

California must neither compromise on climate policy nor make the model you create appear unnecessarily complicated. Simple policies are going to spread to other states and nations faster. We can use our prosperity and capacity best on the world stage by modeling simple, market-based, transparent, comprehensive carbon dioxide and methane pricing mechanisms.

Thank you for this opportunity.

Jan Dietrick, MPH, President  
Ron Whitehurst, PCA, Secretary  
Rincon-Vitova Insectaries, Inc  
108 Orchard Dr  
Ventura, CA 93001

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:52:42

No Duplicates.

**Comment 148 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Kammen

Email Address: [kammen@berkeley.edu](mailto:kammen@berkeley.edu)

Affiliation: Univ. of California, Berkeley

Subject: draft comments

Comment:

We send this comments hoping to arrange a sit-down discussion or to refine and clarify them as needed.

Regards

Dan

Attachment: [www.arb.ca.gov/lists/com-attach/152-sp2030disc-dec16-ws-AWsAc1A8AiEGc1Qg.pdf](http://www.arb.ca.gov/lists/com-attach/152-sp2030disc-dec16-ws-AWsAc1A8AiEGc1Qg.pdf)

Original File Name: Jumpstarting Californias Low Carbon Future-Dec16-2016.pdf

Date and Time Comment Was Submitted: 2016-12-16 16:59:11

No Duplicates.

## **Comment 149 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Amy Dryden

Last Name: Dryden

Email Address: amy@builditgreen.org

Affiliation:

Subject: Comments on 2030 Scoping Plan Update, December 2, 2016

Comment:

RE: Comments on 2030 Scoping Plan Update, December 2, 2016

Energy Efficiency: As mentioned in the plan cleaner and more efficient technologies, new policies and incentives that better recognize and reward innovation and prioritize low carbon investments. As mentioned SB 375 is one of the ways to address housing and transportation needs and provide climate benefits. AB 32 Scoping plan can expand this effort by assessing and addressing the energy-related and non-energy benefits of accelerating energy efficiency efforts in existing homes, where much of California's GHG emissions come from. Without some careful analysis and consideration of this opportunity, stakeholders and the public in general cannot evaluate how well the draft Scoping Plan will meet the goals for 50% energy use reduction and weatherization of all eligible homes, and improvements in human health and environmental equity.

The co-benefits of energy efficiency in existing building also directly correlate to improved living conditions, reduced stress, and reduction in fuel poverty. In the SB 350 barrier report it is recommended that a common set of NEB's should be defined along with metrics to measure them and should be integral to delivery of energy services for low income communities. In a recently published study Occupant Health Benefit of Residential Energy Efficiency (November 2016), it was demonstrated that residential energy efficiency programs that typically improve the building envelope and HVAC systems creating more comfortable homes, improve the environmental conditions and the occupant health including reduced hospital visits. The plan should look to capture and identify these avoided social costs of energy efficiency and support innovative approaches to achieve the co-benefits.

One of California's goals is to reduce energy use in existing buildings by 50% by 2030. As noted in the plan (on page 30) Zero Net Carbon Building is an important strategy to achieve our 2050 target, but requires work needs to start now. In that vein, the scoping plan should look to accelerate efforts in the following areas to take advantage of the GHG reduction opportunities in the existing building stock. The plan should evaluate the opportunities to increase energy efficiency in existing buildings to achieve our 50% reduction target including but not limited to the following examples:

- Explore cost effective ways to reduce GHG emissions from a large number of stationary sources of CO2 such as furnaces, boilers and

water heaters.

- Identify opportunities to be more aggressive and streamlined ways of weatherizing moderate income homes should be demonstrated and pursued immediately.
- Demonstrate the opportunity for green building programs to achieve greater reductions in GHGs associated with efforts beyond energy efficiency including overall reduction in energy use, water and resource conservation and waste reduction (possibly in Appendix G in 2017)
- Support local government initiatives to achieve improvements in existing residential sector. Owner - occupied homes can be addressed through requirements at time of sale such as Portland and Berkeley have done. The city of Boulder addressed its rental housing stock through an ordinance to achieve an energy efficiency threshold by a date certain.

In light of the potential reduction in federal support for low income weatherization programs in the near future, California may need to expand support to these efforts through other sources in order not to fall shorter of its GHG reduction targets and climate adaptation than planned.

**Electrification:** The plan also identifies the importance of reducing consumption and reliance on natural gas. We understand that we must decarbonize our fuel source in order to meet greenhouse gas emission goals. In this vein, it is recommended that ARB include additional measures to support the decarbonization of our buildings when carbon pricing itself will not be effective. The new policy in Alternative 1 is highly supported, but this option must be coupled with additional actions to have the intended impact on the market. While the technology in the market is increasing, there is a need to make the technology more accessible/affordable, less risky, and more available. In addition, the energy code and the CPUC rule set for fuels switching prevent the electrification of existing homes. ARB should evaluate the scenarios and existing regulation and programs to ensure there are mechanisms to support intended outcomes of carbon reduction. The actions should support fuels switching in existing homes and all electric new homes that will be leveraging a cleaner source of electricity under the RPS.

**Resiliency:** Please consider the opportunity to include resilient design measures for extreme heat and other anticipated climate changes that will affect the most vulnerable populations. Our current building model does not take into account these future impacts and would not address the ability of a building to be thermally comfortable in an extreme heat wave or increased durations of heat waves, as an example. LEED and GreenPoint Rated as green building certification programs have included vulnerability assessments and improvements to address climate adaptation in addition to social equity measures.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-12-16 16:14:44

No Duplicates.



**Comment 150 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject:  
Comment:

WSPA Comment Letter on Draft ARB 2030 Target Scoping Plan Update

Attachment: [www.arb.ca.gov/lists/com-attach/154-sp2030disc-dec16-ws-B3BcKVcmWWsCWwR3.pdf](http://www.arb.ca.gov/lists/com-attach/154-sp2030disc-dec16-ws-B3BcKVcmWWsCWwR3.pdf)

Original File Name: WSPA Scoping Plan Comments December \_16\_2016.pdf

Date and Time Comment Was Submitted: 2016-12-19 08:29:13

No Duplicates.



**Comment 151 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Advisory Committee  
Last Name: Environmental Justic  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Environmental Justice Advisory Committee Presentation  
Comment:

Please see attachment.  
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Attachment: [www.arb.ca.gov/lists/com-attach/155-sp2030disc-dec16-ws-BmNRPQRkVWVXYwc3.pdf](http://www.arb.ca.gov/lists/com-attach/155-sp2030disc-dec16-ws-BmNRPQRkVWVXYwc3.pdf)

Original File Name: ejac2030sp121616.pdf

Date and Time Comment Was Submitted: 2016-12-19 15:07:21

No Duplicates.

**Comment 152 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Robert

Last Name: Parkhurst

Email Address: [rparkhurst@edf.org](mailto:rparkhurst@edf.org)

Affiliation: Environmental Defense Fund

Subject: EDF Comments on Draft Scoping Plan- Natural & Working Lands

Comment:

Please accept the attached comments on the Draft Scoping Plan, Natural & Working Lands section from the Environmental Defense Fund.

Attachment: [www.arb.ca.gov/lists/com-attach/156-sp2030disc-dec16-ws-VDEBYwNkV1tQNQNs.pdf](http://www.arb.ca.gov/lists/com-attach/156-sp2030disc-dec16-ws-VDEBYwNkV1tQNQNs.pdf)

Original File Name: EDF Comments on Draft Scoping Plan NWL Section Dec 16 2017.pdf

Date and Time Comment Was Submitted: 2016-12-20 07:45:50

No Duplicates.

**Comment 153 for 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) - 1st Workshop.**

First Name: Donald  
Last Name: Goldberg  
Email Address: donald@clpproject.org  
Affiliation:

Subject: CLPP Comments on the 2030 Target Scoping Plan Comment:  
Comment:

Thank you for the opportunity to comment on the Scoping Plan.  
Comments are attached in PDF format.

Donald M. Goldberg, Executive Director  
Climate Law & Policy Project

Attachment: [www.arb.ca.gov/lists/com-attach/157-sp2030disc-dec16-ws-AmFUPlcmBCdVDAIq.pdf](http://www.arb.ca.gov/lists/com-attach/157-sp2030disc-dec16-ws-AmFUPlcmBCdVDAIq.pdf)

Original File Name: CLPP comments on Calif ARB 2030 Scoping Plan Draft Dec 2016.pdf

Date and Time Comment Was Submitted: 2017-01-05 09:24:17

No Duplicates.

**There are no comments posted to 2030 Target Scoping Plan Discussion Draft (sp2030disc-dec16-ws) that were presented during the Workshop at this time.**