

**Comment 1 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: REY

Last Name: LEON

Email Address: RLEON@VALLEYLEAP.ORG

Affiliation: VALLEY LEAP

Subject: GREEN BUILDING CONSTRUCTION ADVANCEMENT

Comment:

Does the state have sample models and blue prints that are readily implementable to construct a green affordable home for low income communities?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-10-01 10:38:51

No Duplicates.

## **Comment 2 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Steve

Last Name: Raney

Email Address: [steve\\_raney@cities21.org](mailto:steve_raney@cities21.org)

Affiliation:

Subject: Scoping Plan Update

Comment:

The Scoping Update comment process will benefit from staff response to each comment with a tracking mechanism. Otherwise, it is de-motivating to submit comments that appear to get lost in Sacramento.

Transport comment 1: Residents will pay for relief from the agony of Bay Area and Los Angeles driving (the nation's first and second worst traffic congestion). In the state's long-term GHG modeling, pricing is the game changer that shifts mode. Please prepare an analysis of congestion pricing policy options. Please rank policy efficacy on: GHG reduction, congestion reduction, cost-effectiveness, social justice, and ease of implementation. Policies to be considered could include {trip caps, workplace parking feebate, pay as you drive auto insurance, employer TDM, carbon fee & dividend applied to transport fuel, gas tax increase, workplace parking charge, parking cashout, tolling general purpose freeway lanes while increasing HOV lane occupancy requirement, road user charge / VMT fee, ramp metering, and cordon charging}. Details: <http://bit.ly/1MYZ7NZ>

Transport comment 2: The CTP2040 vision for 20M ZEVs by 2050 via the 2013 ZEV Action Plan and more ZEV incentives is not sufficiently thorough or believable. Please provide an analysis of a) a year by year forecast of product evolution that will make ZEVs more enticing to consumers (longer battery range, price reductions, etc), b) specific policies to accelerate ZEV market adoption, such as a revenue-neutral ICE to ZEV feebate. For example: Details: <http://bit.ly/1C0m2W0>

Transport comment 3: "Induced demand" impacts of autonomous vehicles on freeways are conceptually understood by many transport planners. The Scoping Update should comprehend the expected VMT/GHG increase from autonomous vehicles. Without this, the Scoping Update understates VMT. An appropriate research project might be: <http://bit.ly/1FSngFM>

Land Use comment 4: The update to SB375 Sustainable Communities Strategy targets should pursue smarter smart growth innovations that can provide a larger impact, for example A) a High to Low VMT New Home Revenue-Neutral Feebate: Details: <http://bit.ly/1FOQXHj> B) accelerate Low-Impact, Low-Commute Microunit Housing. Details: <http://bit.ly/1GDYbMT>

Energy comment 5: There appears to be a large policy gap that is not being filled by our siloed institutions. The state should research how to Transform Utility Region to 75% Local Renewable. A policy plan and analysis that systemically/holistically transforms energy ecosystems in major metropolitan regions (with 5M or more customers) to reduce carbon footprint. Address issues of governance (institutional design), funding, new asset ownership, disposal of stranded assets/contracts, storage, reliability, grid technology, phasing, placement and permitting of renewables, cost optimization,

demand reduction, pace of electrification of transportation, financial incentives, social justice, and ongoing implementation performance monitoring. Details: <http://bit.ly/1GE1NOY>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-10-06 15:08:44

No Duplicates.

## **Comment 3 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: David  
Last Name: Schonbrunn  
Email Address: David@Schonbrunn.org  
Affiliation: TRANSDEF

Subject: Transportation Section of the Scoping Plan  
Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-2030targetsp-ws-WmgCNFdnA2VSCwZz.pdf>

Original File Name: 2015 Update comment letter (complete).pdf

Date and Time Comment Was Submitted: 2015-10-06 21:26:33

No Duplicates.

## **Comment 4 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Diana

Last Name: Vazquez

Email Address: Diana.Vazquez@sierraclub.org

Affiliation: Sierra Club California

Subject: Scoping Plan Update to Reflect the 2030 Target  
Comment:

Comment letter attached!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-2030targetsp-ws-WzhXMFUmUGFVDAhr.pdf>

Original File Name: CARB Comment Letter- Scoping Plan May 2014- Oct 2015.pdf

Date and Time Comment Was Submitted: 2015-10-07 14:43:01

No Duplicates.

## **Comment 5 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Dan  
Last Name: Silver  
Email Address: dsilverla@me.com  
Affiliation: Endangered Habitats League

Subject: Natural and Working Lands focus area of 2030 Scoping Plan  
Comment:

Gentlepersons:

The attached comments on the Natural Resources Section of the Second Investment Plan are relevant to the closely related Natural and Working Lands focus area of the 2030 Scoping Plan. We have suggested language changes to improve the common elements of these two initiatives.

Thank you very much.

Dan Silver  
Endangered Habitats League

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-2030targetsp-ws-VTBRPwRpUixSJwJn.pdf>

Original File Name: EHL-SecondInvestmentPlan-8.28.15.pdf

Date and Time Comment Was Submitted: 2015-10-08 13:59:39

No Duplicates.

## **Comment 6 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Christina

Last Name: Benz

Email Address: christinabbenz@gmail.com

Affiliation:

Subject: Comments on AB 32 Scoping Plan

Comment:

I live in Napa County and believe that strengthening the following measures will have the largest impact on our ability to slow climate change:

--Energy efficiency of existing buildings. Update building codes and require that existing buildings be updated on sale.

--Integrating Zero Emission Vehicles into local-haul (short distance) freight companies. Offer incentives and grants to encourage this.

--Land use policies that require maintenance of carbon sequestration.

--Integrate SLCP Strategy recommendations in all aspects of the scoping plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-10-12 09:39:27

No Duplicates.

## **Comment 7 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: CA Releaf written comments on Kickoff Workshop Presentation

Comment:

Thank you for the opportunity to provide written comments on this important subject.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-2030targetsp-ws-VTZdOlwvUGFSC1An.pdf>

Original File Name: CARB written comments 10-15-15 CA ReLeaf.pdf

Date and Time Comment Was Submitted: 2015-10-15 11:58:36

No Duplicates.



## **Comment 8 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: George

Last Name: Lange

Email Address: glange@crpd.org

Affiliation: Mountains Recreation & Conservation

Subject: Mountains Recreation and Conservation Authority comments

Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-2030targetsp-ws-Am9RJVQ2UWNSC1Mw.pdf>

Original File Name: MRCA Comments on AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2015-10-15 15:45:11

No Duplicates.

## **Comment 9 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Bullock  
Email Address: mike\_bullock@earthlink.net  
Affiliation: Elected to SDCDPCC

Subject: CARB Scoping of B-30-15 & Climate Stabilization  
Comment:

My letter and 4 reference files are in the attached zip files.

In case that doesn't work, here is the letter:

Mike Bullock  
mike\_bullock@earthlink.net  
1800 Bayberry Drive  
Oceanside, CA 92054  
October 15, 2015, 2010

Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95814  
SUBJECT: Car and Light-Duty Vehicle (LDV) Considerations of Joint  
agency workshop to initiate discussion of an update to the AB 32  
Scoping Plan to reflect the State's "40% by 2030" GHG emission  
reduction target

Dear Air Resources Board Chair Mary Nichols and Members of the  
Board:

### 1.0 Introductory Comments

Since this is a technical topic, I feel I should list some of my  
qualifications. I have a BSEE degree, and an MSE. I am a retired  
satellite systems engineer, and a guest lecturer at UCSD on the  
topic of climate and transportation. I have authored two papers at  
the Air and Waste Management Association (AWMA) on how cars and  
light-duty trucks could achieve climate-stabilizing targets, in  
California. I have also coauthored an AWMA paper on car-parking  
policy.

Regarding climate, it is time to be brutally honest and open. You  
have a responsibility to explain the difference between climate  
stabilization at a livable level and climate destabilization, where  
the positive feedbacks become dominant; we lose the ability to  
prevent disaster; and the climate changes to one which will not  
support most life forms on the planet, including our own species. A  
2008 issue of Scientific American, The Ethics and Economics of  
Climate Change, describes our situation as heading towards a  
"devastating collapse of the human population."

A reasonable climate stabilizing target for 2030 is 80% below 1990  
levels; not the 40% below 1990 levels of B-30-15.

My AWMA paper, Reference 1 of this letter, derives the 2030 climate  
of 80% below 1990 levels (see also Reference 2), using Reference  
3.

However, the B-30-15 target is seen to be too little by your own,  
Scoping Plan, words, for which I thank you deeply and sincerely  
(emphasis added):

### B. Achieving Climate Stabilization

Scientific research indicates that an increase in the global  
average temperature of 2°C (3.6°F) above pre-industrial levels,  
which is only 1.1°C (2.0°F) above present levels, poses severe  
risks to natural systems and human health and well-being.  
Considering knowledge from the paleo-climate record with changes

currently observed in the Greenland and Antarctic ice sheets, we can expect substantial sea level rise, 0.4 to 0.8 meters, with upper end uncertainties approaching one meter above present day during the 21st Century and continued substantial increase after 2100 even with stringent mitigation of emissions to achieve 2°C stabilization. Increased climate extremes, already apparent at present day climate warming (~0.9°C), will no doubt be more severe. To have a good chance (not a guarantee) of avoiding temperatures above those levels, studies focused on a goal of stabilizing the concentration of heat-trapping gases in the atmosphere at or below the 450 parts per million (ppm) CO<sub>2</sub>-equivalent (CO<sub>2</sub>e, a metric that combines the climate impact of all well-mixed GHGs, such as methane and nitrous oxide, in terms of CO<sub>2</sub>).

The CO<sub>2</sub>e target is a somewhat approximate threshold, and the exact level of CO<sub>2</sub>e is not precisely known because the sensitivity of the climate system to GHGs has uncertainty. Different models show slightly different outcomes within this range. An example of a pre-IPCC assessment study (Meinshausen et al. 2009)<sup>15</sup> which has synthesized many studies on climate sensitivities, concluded that we would need to stabilize at about 400 ppm CO<sub>2</sub>e in order to likely avoid exceeding the 2°C threshold (even at that stabilization target, there is still about a 20 percent chance of exceeding the temperature target). Further, a recent paper by an international team of scientists (Hansen et al. 2013)<sup>16</sup> asserts that the widely accepted target of limiting human-made global climate warming to 2°C above preindustrial levels is likely too high and may subject future generations and nature to irreparable harm. Recognizing this fact, the international community agreed in meetings in Cancun in 2012 to review, by 2015, progress to the 2°C target and consider whether it should be strengthened to a 1.5°C threshold.

Regarding the emphasized words, as we all know, the atmospheric level of CO<sub>2</sub>e already exceeds 400 PPM. The kicker here is that it may be that the 1.5°C threshold is what we should have been working to from the start. We need the reductions to be as soon as possible and as large as possible. The AB 32 words come to mind that all mitigations are needed that are "technologically feasible and cost effective."

CARB can use Reference 1 to show how a systems engineer would solve this problem.

Part of the Reference 1 solution was the required per-capita driving reduction

2.0 Comments Regarding Your Appendix C - Focus Group Working Papers, 1 March 14, 2014

As near as I can tell, Appendix C is all true. It is useful. Thank you for the work. However it needs to be much more quantitative. The LDV fleet-efficiency must be quantified and the LDV per-capita driving level that is associated with the derived fleet efficiency must also be shown. The strategies and mitigation measures to reduce driving must have driving-reduction estimates associated with them and the total must equal what is required.

Parking Policy and a Viable State Strategy

In order to solve this climate problem (how LDVs can support B-30-15), CARB must focus on how to get improved methods of how we pay for parking widely implemented. The damage from bundled-cost parking (often called "free") must be fully mitigated, in nearly all cases. This paper, Reference 4 of this letter shows how this can be done:

<http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>.

Regarding parking, this is one of the two most-promising entries (Page 18, emphasis added):

A new coordinated policy and planning approach should utilize all available means, including, but not limited to, regulations, regional planning, enforceable agreements, project mitigation, and a sustained commitment to incentives (e.g., grants, vouchers, rebates, parking or transit benefits, high occupancy vehicle lane access, etc.). Each of these can play a strategic role in implementation of the vision for transportation.

Here is the second (Page 21, emphasis added):

In order to expedite the proliferation of equitable TODs and other infill, it will be necessary to break through common barriers

created by federal, State, regional, local, and private sector policies and practices on financing, environmental review, parking, and other issues.

Here is the third (Page 23, emphasis added):

Continuing to promote employer-based transportation solutions such as facilitated carpooling and parking cash out would allow employees more options to reduce commute-related VMT.

Finally, here is the fourth (Page 24, emphasis added):

Given the urgency of the necessary transition, policy measures will be needed to increase incentives in varying forms and decrease operating costs. In addition to financial incentives, other equally effective incentives can take the form HOV lane access, preferential parking, among other approaches.

None of these 4 statements regarding parking show sufficient thought, considering what is at stake and the fact that parking is generally operated in a way that is unfair, economically. Parking is required by local governments and legislation will eventually be needed to stop the unfairness, not to mention the harmful climate implications.

However, what is needed first is a demonstration project of a reduced-feature (compared to the Reference 4 system) system. Road Usage Charge (RUC, see SB-1077)

The authors of Appendix C have overlooked the fact that the gas tax is already being subsidized heavily by general taxes and this can't continue, given our urgent need for improved fleet efficiency.

Reference 1 shows how fast we must adopt zero-emission vehicles (ZEVs) over internal combustion engine vehicles (ICEs). Reference 5 shows that the state is developing a Road Usage Charge pilot project. I am disappointed that CARB is not participating to ensure that this work will support a system with the features needed to both protect low-income drivers and contribute significantly to solving our climate crisis. Reference 6 shows a set of useful requirements for a RUC. Legislation is needed as soon as possible to direct and speed up the process to get an environmentally-sound RUC that will also protect the economic interests of low-income drivers.

Need for a Systems Engineering Solution

Appendix C needs to follow the path shown in Reference 1 to quantify the needed LDV fleet conversion and the needed reduction in per-capita driving, with respect to the SB375 reference year of 2005. Table 9 in reference 1 shows how the needed LDV fleet efficiency could be achieved; Equation 9 computes the associated driving reduction to be 32% (a factor of 0.68).

The advantages of systems to unbundle the cost of parking and driving is that, if need be, they could be adjusted to get the driving reductions we need in a responsible way.

3.0 Comments Regarding Your Slides, "2030 Scoping Plan, October 1, 2015, Slides 61 to 80

As for Appendix C, these slides show no quantification of the problem. CARB can't possibly solve a problem it does not first "size" the problem. Again, see Reference 1 to see how the requirement to achieve a target (in the case of Reference 1, it is a climate-stabilizing target) can be flowed down into fleet efficiency and level of driving. Page 17 of Reference 1 starts the information on how to achieve the needed driving reduction.

4.0 Unbundling the Cost of Car Parking

For the vast majority of destinations in California, the cost of car parking is hidden within other costs. This has serious consequences. For example, at most places of employment, parking costs reduce the wages that can be paid to all the employees, even those that never use the parking. Similarly, at many apartment complexes, bundled parking costs increase the rent and this is true, even for families that do not own a car. Bundled parking costs routinely increase the costs of goods, such as groceries, for all customers. Again, this is even true for those that do not drive. Since governments require businesses to provide minimum levels of parking, they are involved in this economic discrimination towards those that drive less.

Driving less is, to some degree, a lifestyle choice. Since government has no valid reason to encourage driving, the lifestyle

choice of less driving deserves constitutional, or at least legal, protection from any practices that discriminate against it, economically.

On June 22nd (2010), I presented a paper (Reference 4) on how parking could be operated to unbundle parking costs in a way that supports the sharing of parking. This was at the 101st Conference and Exhibit of the Air and Waste Management Association, in Calgary, Canada. The session, Sustainable Land Use and Transportation, included my paper, A Plan to Efficiently and Conveniently Unbundle Car Parking Costs, which was well received. My paper is therefore both peer reviewed and published. I would be pleased to present this paper to the staff of CARB, in the hopes that CARB could bring about equitable and environmentally-sound parking policies to California.

The following points, taken from the paper, apply.

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution.
- California's Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035.
- The appropriate pricing of parking is one of the least costly tools documented to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.
- Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.
- Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.
- Good policies will eventually let cities turn parking minimums into parking maximums.

Less land and resources devoted to parking will support mixed use and make "smart growth" more economically viable. It should therefore be a key ingredient supporting the MPO's stated desire to foster "smart" growth, where "smart" should be defined as "less VMT".

Here is a copy of the abstract of the paper. The Introduction shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called "Intelligent Parking," will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a "Request for Proposal" (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of Intelligent Parking. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of Intelligent Parking are listed. Eleven definitions and concepts, that together define Intelligent Parking, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% ("Congestion Pricing"). An implementation strategy is described. This abstract aroused enough interest among those responsible for A&WMA's Sustainable Land Use and Parking session that they requested that I submit a manuscript, which was ultimately selected to become part of the written Conference Proceedings and for presentation. I hope that it will similarly arouse the interest in the CARB Board and staff. CARB needs to consider working to execute

the implementation strategy described in A Plan to Efficiently and Conveniently Unbundle Car Parking Costs. I would be honored to help in any way possible.

References 4, 7, and 8 have the details.

#### 6.0 Conclusions

Climate is a math problem. More specifically, it is a systems engineering problem.

The best, largely overlooked strategies to reduce VMT are a comprehensive and variable road use fee pricing system; unbundling the cost of car parking; and putting a stop to all freeway expansions. I would like to discuss further a state-wide strategy to unbundle the cost of car parking.

CARB's performance so far is going to put too much emphasis on the fact that fuel for vehicles is a capped sector. This is unsound policy. If the increased cost of gasoline becomes the dominant way that driving is reduced, there is a significant risk that there will be a powerful political backlash. Ideally, the state will be led by a CARB that realizes that policy to both improve fleet efficiency and reduce driving in a controlled way will mean the emission trajectory from LDVs will be achieved without much need to apply the Cap and Trade to limit allocations. Frankly, we do not want to give our friends in the oil industry ammunition to shoot down these vital efforts.

Sincerely yours,

Mike Bullock  
mike\_bullock@earthlink.net  
760-754-8025  
1800 Bayberry Drive  
Oceanside, CA 92054

1 Bullock, Mike R; The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving, Paper 30973-AWMA, from the Air and Waste Management Association's 107th Annual Conference and Exhibition; Long Beach, CA, June 24-27, 2014; Attached with submission of comment letter and available on request from mike\_bullock@earthlink.net

2 Power Point Slides used to present Reference 1, attached with submission of comment letter (if possible) and available on request from mike\_bullock@earthlink.net

3 Hansen, James, Brief of Amicus Curiae, Exhibit A; United States District Court for the Northern District of California San Francisco Division, Case4:11-cv-02203-EMC Document108 Filed 11/14/11

<http://ourchildrenstrust.org/sites/default/files/Hansen%20Amicus%20.pdf>

4 Bullock, M.; Stewart, J.; A Plan to Efficiently and Conveniently Unbundle Car Parking Costs; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103rd Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010. Available on request from mike\_bullock@earthlink.net or

<http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>

5 Madaffer, Jim; Letter from the Chair of the Road Users Charge Technical Advisory Committee to Stakeholders, May 5, 2015.

[http://www.catc.ca.gov/meetings/Committees/Road\\_Charge/Road\\_Charge\\_March\\_27\\_2015/Stakeholder\\_Agenda\\_Letter\\_March\\_2015.pdf](http://www.catc.ca.gov/meetings/Committees/Road_Charge/Road_Charge_March_27_2015/Stakeholder_Agenda_Letter_March_2015.pdf)

6 Bullock, Mike; Environmentally-Sound and Economically-Fair Road Usage Charge; a resolution of the California Democratic Party Environmental Caucus; approved on May 16, 2015; available on request from mike\_bullock@earthlink.net

7 Bullock, Mike; Equitable and Environmentally-Sound Car Parking Policy at Schools; July 20, 2011; unpublished report; attached with submission of comment letter and available on request from mike\_bullock@earthlink.net

8 Bullock, Mike; Equitable and Environmentally-Sound Car Parking Policy at a Work Site; Oct. 4, 2014; unpublished report; attached with submission of comment letter (if possible) and available on request from mike\_bullock@earthlink.net

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-2030targetsp-ws-Uj5VNgRxUnUCYVUn.zip>

Original File Name: Letter2CARB\_And4References.zip

Date and Time Comment Was Submitted: 2015-10-15 19:31:49

No Duplicates.

**Comment 10 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Clark

Email Address: taskforce@dpw.lacounty.gov

Affiliation: LA Co Solid Waste Management Taskforce

Subject: Comments on the 2030 Target Scoping Plan Kickoff Public Workshop

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-2030targetsp-ws-UTAAZABeVjZQZFcI.pdf>

Original File Name: AB 32 Scoping\_Plan 10-15-15.pdf

Date and Time Comment Was Submitted: 2015-10-16 13:15:39

No Duplicates.



## **Comment 11 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: Comments from The Nature Conservancy in response to 2030 Scoping Plan  
Comment:

Please accept the attached comments from The Nature Conservancy

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-2030targetsp-ws-B3NVPQNhWXkFYAVq.pdf>

Original File Name: TNCSCoping2030\_final\_MERGEDDOC.pdf

Date and Time Comment Was Submitted: 2015-10-16 13:53:00

No Duplicates.

## **Comment 12 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: Comments from The Nature Conservancy in response to 2030 Scoping Plan  
Comment:

Please accept the attached comments from The Nature Conservancy

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-2030targetsp-ws-UycFbQdlUXFVMFI9.pdf>

Original File Name: TNCSCoping2030\_final\_MERGEDDOC.pdf

Date and Time Comment Was Submitted: 2015-10-16 13:53:00

No Duplicates.

## **Comment 13 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 Implementation Group Comments - Target Scoping Plan Udate  
Comment:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding the ARB's Target Scoping Plan Amendments.

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

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-2030targetsp-ws-UjNSNlwCVDQLPwNq.pdf>

Original File Name: AB 32IG\_TSP Comments\_10\_16\_15.pdf

Date and Time Comment Was Submitted: 2015-10-16 13:55:39

No Duplicates.

## **Comment 14 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation:

Subject: COMMENTS: Joint Agency Discussion Re Update of the AB 32 Scoping Plan  
Comment:

The California Electric Transportation Coalition (CaETC) appreciates the opportunity to submit comments based on the October 1, 2015, Joint-Agency discussion regarding the update of the AB 32 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-2030targetsp-ws-AWJVMgBtU2UDcQJh.pdf>

Original File Name: CaETC Comments Re Updating AB 32 Scoping Plan (FINAL).pdf

Date and Time Comment Was Submitted: 2015-10-16 13:55:49

No Duplicates.

**Comment 15 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

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

Affiliation:

Subject: AB 32 Scoping Plan Comments

Comment:

Comments attached in word document

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-2030targetsp-ws-AWIGb1U5AD4DYFA+.docx>

Original File Name: Comment Letter CR 10 16 15 (004).docx

Date and Time Comment Was Submitted: 2015-10-16 14:15:14

No Duplicates.

## **Comment 16 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on Scoping Plan Analysis

Comment:

Please find attached comments of the Western Power Trading Forum on the Scoping Plan Process.

Thank you,

Clare Breidenich

GHG Committee Director

Western Power Trading Forum

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-2030targetsp-ws-BzZQZld7VDYHN1B9.pdf>

Original File Name: 10-16-15 WPTF Comments to CARB on Scoping Plan Process.pdf

Date and Time Comment Was Submitted: 2015-10-16 14:17:40

No Duplicates.

## **Comment 17 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@scppa.org  
Affiliation: SCPPA

Subject: SCPPA Comments on Modified Text to 2030 Target Scoping Plan  
Comment:

Attached are the Southern California Public Power Authority  
comments on the 2030 Target Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-2030targetsp-ws-UyBRNFUkAyALbFIN.pdf>

Original File Name: SCPPA Comments for 2030 ARB Scoping Plan.pdf

Date and Time Comment Was Submitted: 2015-10-16 14:41:17

No Duplicates.

## **Comment 18 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Joseph  
Last Name: Edmiston  
Email Address: edmiston@smmc.ca.gov  
Affiliation: SMMC

Subject: Santa Monica Mountains Conservancy comments  
Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-2030targetsp-ws-BnVUP1c7VWVSCwhr.pdf>

Original File Name: SMMC Comments on AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2015-10-16 14:50:27

No Duplicates.



## **Comment 19 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Birdlebough  
Email Address: affirm@friendshouse.org  
Affiliation: Transportation & Land-Use Coalition

Subject: Transportation Sector  
Comment:

Dear ARB—

A significant amount of GHG emissions are produced by trucks and trains, and it is important to develop low-carbon substitutes for petroleum diesel. Because diesel motors last for decades and represent a big investment, there is likely to be strong resistance to a rapid shift to fuel cells or electrified rail systems other than for classification yards. A low-GHG fuel that can be used in existing equipment is preferable. Many options are available, including ammonia which is well known to agriculture.

Active transportation that relies on bicycles and transit is gaining users much too slowly. The Swiss, Canadians, and many American transit operators have discovered that the main barrier to wider use of transit is not dispersed users, but the lack of a fare card. Where most people have transit passes, and service is frequent, and the network is well coordinated, ridership is high. Where bicycle/pedestrian pathways are common and safe, they tend to be well used. The amount of Greenhouse Gas Reduction funds devoted to transit and to bicycles should at least be doubled, and focused on developing tightly coordinated systems.  
<https://www.jtlu.org/index.php/jtlu/article/view/346>

Businesses and members of the public can be strongly influenced to reduce oil use by visible price signals. But we need to be reminded of the money and time that we often waste by our reliance on congestion-prone cars. Auto manufacturers spend lavishly to advertise their products next to refreshing mountain lakes where the air is clear. Please find ways to counter such messages with humorous parodies. And encourage cities to charge for auto parking.

My wife and I have enjoyed driving our Prius for eleven years, and plan soon to buy a car like the Volt, that runs longer in battery-only mode. Our plan is to expand our rooftop solar electric system to recharge the car, but we need to know that charging stations are also widely available in strip malls and at motels.

We were very disappointed to see the Western States Petroleum Association's campaign against the target for a 50% reduction in petroleum use by 2030. We realize that the target is likely to become more aggressive—a 50% reduction by 2025 would be more consistent with the science. Our health and our trees will benefit from a rapid reduction of GHG emissions.

Thank you for this opportunity to comment.  
Steve Birdlebough  
684 Benicia Dr., Santa Rosa, CA  
707-576-6632

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-10-16 15:20:56

No Duplicates.

## **Comment 20 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Raspberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation:

Subject: Comments on 2015 Scoping Plan Update

Comment:

Please find attached comments from the Sempra Utilities: Southern California Gas Company and San Diego Gas and Electric.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-2030targetsp-ws-ViUGZQFtByRQJAlo.pdf>

Original File Name: Sempra Utilities Comments\_ ARB SPU 10-15-15 Final.pdf

Date and Time Comment Was Submitted: 2015-10-16 15:58:22

No Duplicates.

## **Comment 21 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Noah

Last Name: Deich

Email Address: noah.deich@centerforcarbonremoval.org

Affiliation: UC Berkeley / Center for Carbon Removal

Subject: Comments for 2030 Target Scoping Plan Kickoff Workshop

Comment:

Please see attached document for comments.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-2030targetsp-ws-VTYHZFc4AiVQM1Qm.pdf>

Original File Name: Center for Carbon Removal CARB 2030 Target Scoping Plan Comments 20151016.pdf

Date and Time Comment Was Submitted: 2015-10-16 15:59:41

No Duplicates.

## **Comment 22 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-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

Comment:

Attached please find the Bioenergy Association of California's  
Comments on the 2030 Target Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-2030targetsp-ws-BWdcO1Y0V1sAZQFu.pdf>

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

Date and Time Comment Was Submitted: 2015-10-16 16:02:32

No Duplicates.

## **Comment 23 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: comments on 2030 Targets AB 32 Scoping Plan Workshop

Comment:

Please accept the attached letter with Sierra Business Council's comments on the October 1 kickoff workshop for the 2030 Targets AB 32 Scoping Plan Update.

Sincerely,  
Kerri Timmer

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-2030targetsp-ws-WilXMwNhAw8KPIVl.pdf>

Original File Name: SBC\_2030TargetScopingARB\_2015\_10\_16.pdf

Date and Time Comment Was Submitted: 2015-10-16 15:55:44

No Duplicates.

## **Comment 24 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Richard

Last Name: Lyon

Email Address: astinson@cbia.org

Affiliation: California Building Industry Association

Subject: CBIA's Comments on the 2030 Target SP-WS

Comment:

Please accept the attached comments on behalf of the California Building Industry Association.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-2030targetsp-ws-UGJWYFFjVjUBWFQn.pdf>

Original File Name: 2030 Scoping Plan Comments to ARB.pdf

Date and Time Comment Was Submitted: 2015-10-16 15:06:48

No Duplicates.

## **Comment 25 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Barbara

Last Name: McBride

Email Address: barbara.mcbride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on 2030 Target Scoping Plan

Comment:

Please find the comments of Calpine Corporation on the California Air Resources Board's kick-off of efforts to update the Scoping Plan to meet the 2030 target established by the Governor.

Thank you for the opportunity to submit these comments. Please contact me with any question regarding these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-2030targetsp-ws-BWZWMVQ5BCcBbgRq.pdf>

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

Date and Time Comment Was Submitted: 2015-10-16 16:13:56

No Duplicates.



**Comment 26 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: 2030 Target Scoping Plan

Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-2030targetsp-ws-BXZUMVM9ACMFagVr.docx>

Original File Name: Scoping plan comments 2015ccfinal.docx

Date and Time Comment Was Submitted: 2015-10-16 16:21:23

No Duplicates.

## **Comment 27 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

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

Affiliation:

Subject: Request for Cost-effectiveness Study of GHG Reduction Measures

Comment:

Comments from the California Compost Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-2030targetsp-ws-AmFSNQR3VmcFXAZl.pdf>

Original File Name: CARB Cost Effectiveness AB 32 Study Request101615.pdf

Date and Time Comment Was Submitted: 2015-10-16 16:35:03

No Duplicates.

**Comment 28 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on October 1 2030 Target Scoping Plan Workshop  
Comment:

PG&E Comments on October 1 2030 Target Scoping Plan Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-2030targetsp-ws-UiYBZIYIBDACYQB0.pdf>

Original File Name: Target 2030 Scoping Plan Comments .pdf

Date and Time Comment Was Submitted: 2015-10-16 16:42:30

No Duplicates.

## **Comment 29 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on 2030 Target Scoping Plan Workshop

Comment:

Attached please find the Northern California Power Agency comments on the 2030 Target Scoping Plan Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-2030targetsp-ws-B2kBZAR1UGILUgVm.pdf>

Original File Name: NCPA comments 2030 target scoping plan workshop (10-16-15).pdf

Date and Time Comment Was Submitted: 2015-10-16 16:38:37

No Duplicates.

## **Comment 30 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Agricultural Council of California

Subject: Comments on the 2030 Target Scoping Plan Public Workshop

Comment:

Ag Council appreciates the opportunity to submit comments based on the October

1, 2015, Joint-Agency discussion regarding the 2030 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-2030targetsp-ws-AXIBZFU7AiFXOAhm.pdf>

Original File Name: ScopingPlanComments\_AgCouncil\_Oct2015.pdf

Date and Time Comment Was Submitted: 2015-10-16 16:43:59

No Duplicates.

**Comment 31 for 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) - 1st Workshop.**

First Name: Mike  
Last Name: Wang  
Email Address: mwang@wspa.org  
Affiliation: WSPA

Subject: WSPA Scoping Pan Comments  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-2030targetsp-ws-WyxSJ1QIVGYEXQl6.pdf>

Original File Name: WSPA Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-10-21 08:50:20

No Duplicates.

**There are no comments posted to 2030 Target Scoping Plan kickoff workshop (2030targetsp-ws) that were presented during the Workshop at this time.**