

## Comment 1 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.

First Name: James

Last Name: Allison

Email Address: jima@capitolcorridor.org

Affiliation: Capitol Corridor Joint Powers Authority

Subject: Comments Re: Cap & Trade, Project Benefits, and DACs

Comment:

CARB Cap & Trade Comments

Thank you for the opportunity to make these comments. I am the Manager of Planning for the Capitol Corridor Joint Powers Authority (CCJPA). My comments come with a background in air quality and as a twice successful TIRCP grantee. The comments that follow regard review of grant materials related to disadvantaged and low income communities but more so, how project benefits will be assessed during repeated project evaluations. CARB literature on this topic acknowledges the challenges of accounting for hard-to-quantify project benefits. This is precisely where I wanted to comment.

Capitol Corridor Intercity Passenger Rail (IPR) TIRCP awarded projects are a challenge. In nearly all cases that we can envision, the benefits of a project accrue to some or all parts of the larger corridor. For instance, we were awarded funds to expand service between Sacramento and Roseville by two additional round trips. The physical location of the project is, in this case, mostly in the Roseville city area but the benefits of the project are purely operational in nature and the benefits we accrue are two additional round trips - we get to extend two more trains starting or ending in Roseville. Once this project goes into service we expect more ridership due to those two additional round trips. Two more round trips means our project includes two more locomotives operating between Sacramento and Roseville and all the locomotive emissions that can be expected in operations. Whether it is the Roseville project or other projects that generally aid ridership, the obvious benefit is to reduce (primarily) light-duty vehicle use by offering those two additional round trips. The result is less emissions and hopefully benefits to disadvantaged communities, but how do we measure all that?

Those light-duty vehicles that no longer make their trips due to the new train service, we do not know where they are from, which neighborhood, but we can guess many are from the general Roseville area. Where would those vehicles no longer be headed? The answer is quite mixed but many were, if we use the Roseville project example, probably headed to Sacramento, or Davis, or perhaps further west - we don't know precisely but we have some general ideas. The way ridership is measured is by collected tickets that have origins and destinations. How ridership goes up or down and is spread across the provided service is caused by a variety of factors, economy, gas prices, added frequency, free WiFi on the train, a job relocation, or no longer having to drop off the kids at school, thus making a train trip possible, or the reverse, starting to drive kids to school - the factors are many and complicated. Drawing out the benefits as TIRCP related, next to impossible, not to mention assigning that benefit to a specific DAC or two, or three or all in Northern California.

The metrics by which we have been asked to assess benefits of the funded TIRCP project falls completely outside any reasonable means of assigning cause but also location; meaning location in the way specific communities might benefit. We can suggest answers but the

criteria asked to assess project benefits will generally never be specific enough to allow CARB to definitively claim clear project benefit. The only means of getting at this would be to conduct extensive surveys that draw out such information. The CCJPA did do this for introduction of free WiFi, but determining that there was a 2.7% increase in trips on the Capitol Corridor involved a partnership with UC Davis researchers and a \$40,000 budget. We don't have the resources to respond to every nuance in ridership changing and sort it out. Over the FY 15 ridership year compared to FY 16, our ridership increased 6.8% with only some schedule changes near the end of the comparative year. That increase exceeds any of the estimated ridership benefits from each of the two TIRCP awarded projects and if this happens at any time during the "benefit" period of our TIRCP projects, how do we claim TIRCP benefits with this sort of noise in the measurement criteria?

When we get to assessing benefits to specific disadvantaged communities, the complications in making benefit claims multiply. Our benefits are always in ridership (light-duty vehicles not driven) but sometimes those must be offset by locomotive emissions associated with additional service. If a particular TIRCP project has locomotive emissions (e.g., the Roseville project does), we can determine in which corridor those emissions are being emitted and then each criteria pollutant can be assessed for its impact based on accepted CARB measurement criteria. This is what is done for CEQA environmental impact documentation. But for reduced light-duty vehicle activity, we have no such measure because we do not know what trip O-Ds were not made due to the project. Using our station ridership O-D information, we have a general sense of what the alternative freeway/road routes might have been for any O-D pair but don't have that assessment available at a disadvantaged or low income community level. On a daily, monthly, or annual basis we can't say that 27 less light-duty vehicles would have passed through DAC X, Y, or Z nor can we say that the benefits were for DAC X were 4.2 times more than DAC Z. We just have boarding a station and an alighting station and tremendous noise as to if that was a new non-taken trip because of a particular TIRCP project.

Another complicating factor are the categories of pollutants themselves. If we divert a light-duty trip, how is benefit measured for ozone precursors vs particulates? How many miles wide and which dispersion direction is the source of benefit for each pollutant type? Do those get assessed at a local to regional scale (depending on the accepted assessment criteria for pollutant types) along the trip-shed based on O-D pairs and then we see what DACs might benefit using general transport patterns? For GHG calculation - because it is a global scale and just related to non-geographic calculations, there are no issues. It is not the same with the criteria pollutants that present the dispersion issues and benefit assessment challenges.

Given the context I have discussed above, let's view the present day criteria used to assess how beneficial a particular project really is. My answers for just about any passenger rail project are as follows:

Benefits to Disadvantaged Communities (DAC) (Y/N) - ANSWER - sure, conceptually there must be benefits somewhere at some level  
DAC Census Tracts Benefiting from the Project - ANSWER - every DAC Census tract conceptually in and downwind from the benefit area of the projects impact but how far do you want to carry that and by what pollutant?  
DAC Criteria Satisfied - ANSWER - Yes in general. The transit service is better and the pollutants are less because less people drive so generally all measurement criteria improve qualitatively.  
Identify What DAC Needs the Project Addresses - ANSWER - all of them for criteria pollutants and transit access. Some criteria are better off than others but generally everything improves.  
Identify How the Project Address the DAC Need - ANSWER - every way that reduced criteria pollutant emissions help any community and

every way in how more transit or more attractive transit options benefit people.

Qualitative Description of How the Project Benefits the DAC - ANSWER - in the same way the project addressed DAC need.

Estimated Total TIRCP Dollars Benefiting DAC (\$) - ANSWER - I do not know how to spread out the investment across DACs and non-DACs

Our concerns discussed above regard over estimating or under estimating project benefits and the specificity of measuring project benefits to specific geographic locations. If we respond in this way, we are doing the Cap & Trade program benefits, but it would be difficult for CARB to report that these DACs got better and those other ones did not. There is no accepted means of first, drawing out the TIRCP benefits, secondly, compartmentalizing benefits across a corridor, and finally, assigning those benefits to geographical locations based on criteria pollutant behavior. Project proponents do not have anything close to the tools or knowledge that might be applied in such an attempt.

We suggest that CARB consider a different scale of gathering project benefits and then, based on the nature of the project's benefits distributed by the project proponent (aka with varying intensity along the route) that CARB provide the criteria, by pollutant, for assessing dispersal to DAC and low-income communities. If CARB could accept initial project benefit estimates (which models are used to predict success), then we could "believe the model" and use that share of benefit (as opposed to sifting out all the many factors that affect ridership) and disperse that modeled benefit accordingly. For instance, we can suggest that project benefits might be applied across a distribution of locations, more in some and perhaps tapering off the further west you get in the example of the Roseville service expansion. If the benefits are distributed across a geography perhaps using GIS then CARB pollutant criteria and air quality emission and dispersion models can be used to distribute benefits to DACs and low income areas. This is just a suggestion but hopefully this sparks some ideas because the present situation is, at best, intellectually uncomfortable, inaccurate, and probably not a suitable reporting tool for legislative purposes.

If you have any questions regarding the points raised, please feel free to contact me at [jima@capitolcorridor.org](mailto:jima@capitolcorridor.org). Thank you for your time reviewing and considering this correspondence.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-02-01 08:25:04

No Duplicates.

## **Comment 2 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Campbell

Last Name: Ingram

Email Address: campbell.ingram@deltaconservancy.ca.gov

Affiliation: Delta Conservancy

Subject: Western Delta Islands

Comment:

Looking at the map on line that shows disadvantaged communities all in green, carve out the following western Delta islands: Bradford, Webb Tract, Jersey Island, Bethel Island, Hotchiss Tract and Holland Tract. These islands are functionally no different than the islands that are included to the north, west and east of this carve out, so I can't imagine what would eliminate them. Bradford, Webb and Jersey islands represent some of the highest priority lands for conversion to managed wetlands for emission reduction, carbon sequestration and subsidence reversal.

Campbell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-02-07 14:48:54

No Duplicates.

**Comment 3 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Rodney

Last Name: Higgins

Email Address: ZEN12many@aol.com

Affiliation:

Subject: Cap&Trade Auction Proceeds 2-YR Spending Plan

Comment:

Attached is a proposal for a state-wide pathway system focused on the disadvantaged areas.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-ab1550meetings-ws-BWRRJQRnAmMBfgBy.docx>

Original File Name: ARB2yrSpendingPlan.docx

Date and Time Comment Was Submitted: 2017-02-09 11:27:58

No Duplicates.

## **Comment 4 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Gordon

Last Name: Piper

Email Address: rgpiper33@gmail.com

Affiliation:

Subject: Violation of State and Federal Civil Rights Laws & Constitution

Comment:

The State of California, the Environmental Protection Agency, and many State agencies are violating both State of California civil rights laws including the Unruh Civil Rights Act prohibition against arbitrary discrimination based on considerations of geographic location, race, color, national origin, ancestry and income as well as the requirements of the California Fair Employment and Housing Act and their obligations for compliance with Title VI and VII of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987. The violations also extend to denial of equal protection of the laws of both the State and the United States. The State of California has blatantly ignored its obligations to ensure nondiscrimination in the previous and the proposed allocation of investments targeting benefits primarily to benefit to low-income minority communities of color in violation of the California Constitution that prohibits preferential treatment based on race in State contracting and employment, and has been allowing contractors and recipients of State and Federal funds to discriminate in their employment practices. The State laws referenced are unconstitutional and should be overturned by our courts, and the State of California should be required to compensate those 75% of California census tract residents that are being denied important civil and constitutional rights. The actions of the State of California and EPA are inconsistent with the codified definition of environmental justice and are not fair to all races, cultures and incomes and unfairly target benefits to benefit low-income minority communities in 2000 census tracts while redlining and excluding millions of Californians in 6000 census tracts. This promotes environmental racism, not environmental justice.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-02-14 19:24:11

No Duplicates.

## **Comment 5 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Heather

Last Name: Tomley

Email Address: heather.tomley@polb.com

Affiliation: Port of Long Beach

Subject: Request to Include "Cross-Hatched Areas" as Disadvantaged Communities

Comment:

Please see attached comment. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ab1550meetings-ws-VmQGMAMzUjZWYAU3.pdf>

Original File Name: 20170214\_CalEPA\_Cross-Hatched\_Areas\_Disadvantaged\_Communities\_RM.pdf

Date and Time Comment Was Submitted: 2017-02-15 10:32:23

No Duplicates.

## **Comment 6 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Michael

Last Name: Zeller

Email Address: mike@tamcmonterey.org

Affiliation:

Subject: Transportation Agency for Monterey County comment letter

Comment:

Please see the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ab1550meetings-ws-Uj4BbIIIU2kLYwBn.pdf>

Original File Name: Livingston & Faust - ARB, CalEPA, OEHHA - Cap & trade comments.pdf

Date and Time Comment Was Submitted: 2017-02-16 16:20:09

No Duplicates.

## **Comment 7 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation:

Subject: Comments on proposed methodology for identifying low-income communities under AB 1550  
Comment:

Attached please find RCRC's comments on the proposed methodology for identifying low-income communities under Assembly Bill 1550 (Gomez). Please contact me if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ab1550meetings-ws-WjsGclEyAAwDaQlm.pdf>

Original File Name: ARB\_Low\_income\_communities\_Ltr\_02172017.pdf

Date and Time Comment Was Submitted: 2017-02-17 16:05:59

No Duplicates.

## **Comment 8 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: ROBYN

Last Name: WAPNER

Email Address: ROBYN.WAPNER@SANDAG.ORG

Affiliation:

Subject: SAN DIEGO ASSOCIATION OF GOVERNMENTS COMMENT LETTER

Comment:

Please see the attached comment letter from the San Diego Association of Governments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ab1550meetings-ws-VjdVMVQKUjBVZlNm.pdf>

Original File Name: AB 1550 SB 535 Implementation.pdf

Date and Time Comment Was Submitted: 2017-02-17 17:53:38

No Duplicates.

## **Comment 9 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Phil

Last Name: Martien

Email Address: pmartien@baaqmd.gov

Affiliation: Bay Area Air Quality Management District

Subject: Letter to Secretary Matt Rodriquez for Environmental Protection

Comment:

Please see attached file. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-ab1550meetings-ws-Am4GZVciWX5SMVUn.pdf>

Original File Name: Letter to CARB\_CalePA on identifying DACs for GGRF Final.pdf

Date and Time Comment Was Submitted: 2017-02-21 09:25:11

No Duplicates.

## **Comment 10 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Kenneth

Last Name: Payne

Email Address: ken.payne@edcgov.us

Affiliation: El Dorado County Water Agency

Subject: Comment Letter - Investment of Cap-and-Trade Auction Proceeds to Benefit DAC & LIC  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-ab1550meetings-ws-VDcHYFQIUwCcANx.pdf>

Original File Name: Cap-Trade-DAC-LIC-Identification-CommentLetter-2.21.17.pdf

Date and Time Comment Was Submitted: 2017-02-21 10:32:31

No Duplicates.

## **Comment 11 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Melissa

Last Name: Smith

Email Address: msmith@accesadmin.com

Affiliation:

Subject: ACCES Public Comment

Comment:

Attached is the public comment from the Association of California  
Community and Energy Services (ACCES).

Thank You,

Melissa Smith

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-ab1550meetings-ws-AWYCY1ckUmcBWAJj.pdf>

Original File Name: GGRF ACCES Public Comment .pdf

Date and Time Comment Was Submitted: 2017-02-21 14:41:32

No Duplicates.

## **Comment 12 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Collin

Last Name: Tateishi

Email Address: ctateishi@chpc.net

Affiliation:

Subject: AB 1550 – Defining low-income households for California Climate Investments

Comment:

Please see attached comments from California Housing Partnership.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ab1550meetings-ws-AmEBb1cmAjJXDghp.pdf>

Original File Name: CHPC\_AB1550-Comments\_20170221.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:38:31

No Duplicates.

## **Comment 13 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Anna

Last Name: Lee

Email Address: anna.lee@acgov.org

Affiliation: Alameda County Public Health Department

Subject: AB 1550 letter from Dr. Muntu Davis

Comment:

Please find attached a letter on AB 1550 implementation from Dr. Muntu Davis, Alameda County Health Officer.

Best,  
Anna Lee

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ab1550meetings-ws-BmddOVEPUjAAM1di.pdf>

Original File Name: AB 1550 - Dr. Muntu Davis final letter 2-21-17.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:44:15

No Duplicates.

## **Comment 14 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: SBC comments on SB 535/AB 1550 Implementation

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-ab1550meetings-ws-ViVSNIEzVFgEY1Mh.pdf>

Original File Name: SBC\_ARB\_DACLow-Inc\_CommentLtr\_2017\_02\_21.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:53:56

No Duplicates.

## **Comment 15 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Long

Email Address: rlong@mtc.ca.gov

Affiliation: MTC

Subject: Comments on Definition of Disadvantaged Community

Comment:

Attached please find our comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-ab1550meetings-ws-AmYCZVEzUFwFZwBl.pdf>

Original File Name: DAC Definition 2017 Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:57:40

No Duplicates.

## **Comment 16 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Nikita

Last Name: Daryanani

Email Address: ndaryanani@leadershipcounsel.org

Affiliation:

Subject: Comments on AB 1550 Implementation and Funding Guidelines

Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-ab1550meetings-ws-UGJTewY1AGIFLQU0.pdf>

Original File Name: 2.21.17 AB 1550.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:35:46

No Duplicates.

## **Comment 17 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Shrayas

Last Name: Jatkar

Email Address: shrayas@ccair.org

Affiliation: CA Climate Equity Coalition

Subject: AB 1550 Implementation & GGRF Funding Guidelines

Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-ab1550meetings-ws-AGNcOQNnUWEGXwNw.pdf>

Original File Name: CCEC steering committee - AB 1550 Implementation & GGRF Funding Guidelines - 2.21.2017.pdf

Date and Time Comment Was Submitted: 2017-02-21 20:10:05

No Duplicates.

## **Comment 18 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Adriano

Last Name: Martinez

Email Address: amartinez@earthjustice.org

Affiliation: Earthjustice

Subject: Comments

Comment:

The wrong file was included in the prior submission. Please use this version instead.

All the best,  
Adrian Martinez

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-ab1550meetings-ws-AmFdOIY7UmQDdQZn.pdf>

Original File Name: CalEPA-CARB Letter Re GGRF funds 2-21-2017 Final.pdf

Date and Time Comment Was Submitted: 2017-02-22 00:03:57

No Duplicates.

## **Comment 19 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Mutziger

Email Address: amutziger@co.slo.ca.us

Affiliation: San Luis Obispo County APCD

Subject: SLOCOG-SLOCAPCD Comment Letter Re. Disadvantaged & Low-Income Communities  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-ab1550meetings-ws-AXJVP1wyUmlHbgVi.pdf>

Original File Name: SLOCOG.pdf

Date and Time Comment Was Submitted: 2017-02-22 09:42:53

No Duplicates.

## **Comment 20 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: RCRC

Subject: Proposed methodology for identifying low-income communities under Assembly Bill 1550  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-ab1550meetings-ws-VTQGclIxBagLYQFu.pdf>

Original File Name: ARB\_Low\_income\_communities\_Ltr\_02172017.pdf

Date and Time Comment Was Submitted: 2017-02-22 09:48:29

No Duplicates.

## **Comment 21 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Nikita

Last Name: Daryanani

Email Address: ndaryanani@leadershipcounsel.org

Affiliation:

Subject: Comments on AB 1550 Implementation and Funding Guidelines

Comment:

Hello,

I submitted this letter on Tuesday the 20th and have received 2 additional sign-ons since then. I've attached the updated version with sign-on additions here.

Thank you!

Nikita

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-ab1550meetings-ws-BjRUfFRnUzMFLQU0.pdf>

Original File Name: 2.23.17 AB 1550.pdf

Date and Time Comment Was Submitted: 2017-02-23 10:15:26

No Duplicates.

## **Comment 22 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Don

Last Name: Tran

Email Address: trangen1@gmail.com

Affiliation: self

Subject: ADD MORE EV CHARGING STATIONS” along 10 freeway, especially at 9530 Telstar, which is CARB

Comment:

can CARB / Caltrans district 7 install and “ADD MORE EV CHARGING STATIONS” along 10 freeway, especially at 9530 Telstar, which is CARB office, there are only 4 charging stations and they are often full, AND THE WAIT IS OFTEN LONG AS SOME CARS REQUIRE 2-4 HOURS of charge time’ we need more charging stations as people buy more EVs and drive them

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-02-27 08:55:29

No Duplicates.

## **Comment 23 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Dennis  
Last Name: Trembly  
Email Address: trembly@usc.edu  
Affiliation:

Subject: Cap and Trade Tax  
Comment:

Mar 4, 2017

Tracy Jensen  
1001 I Street  
Sacramento, CA 95814

Dear Jensen,

I urge you to reject the false climate solutions of cap and trade and a carbon tax in favor of direct source reductions, i.e., emission reductions made directly at the source of pollution.

A 2016 report found that industrial facilities are more often located in low-income communities and communities of color, and that many of these industrial polluters (which are covered by the cap-and-trade market) have had increases, not decreases, in localized greenhouse gas emissions. In addition, carbon cap and trade has not been successful in achieving significant and rapid emission reductions anywhere it has been implemented.

Similarly, a carbon tax has not been proven as an effective means to reduce emissions. British Columbia's carbon tax actually saw an increase in taxed emissions of 4.3 percent from 2009 to 2014. Given the immediate threat we now face, we do not have time to "wait and see" if a carbon tax will work a decade from now. Rapid, significant reductions in greenhouse gas emissions are needed now.

Only by adhering to the legislature's mandate for "direct source" reduction approaches and by forgoing market "solutions" will California achieve the significant and swift emission reductions our planet needs. This can be achieved if ARB adopts the "Alternative 1: No Cap-and-trade" scenario of its scoping plan.

Please enact meaningful protections for our climate through direct source reductions, rather than market schemes like cap and trade.

Sincerely,

Dennis Trembly

Los Angeles, CA 90012-2443  
trembly@usc.edu

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-04 17:25:46

3 Duplicates.



## **Comment 24 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Caryn  
Last Name: Cowin  
Email Address: caryn\_cowin@yahoo.com  
Affiliation:

Subject: Reject Cap and Trade  
Comment:

I urge you to reject the false climate solutions of cap and trade and a carbon tax in favor of direct source reductions, i.e., emission reductions made directly at the source of pollution.

A 2016 report found that industrial facilities are more often located in low-income communities and communities of color, and that many of these industrial polluters (which are covered by the cap-and-trade market) have had increases, not decreases, in localized greenhouse gas emissions. In addition, carbon cap and trade has not been successful in achieving significant and rapid emission reductions anywhere it has been implemented.

Similarly, a carbon tax has not been proven as an effective means to reduce emissions. British Columbia's carbon tax actually saw an increase in taxed emissions of 4.3 percent from 2009 to 2014. Given the immediate threat we now face, we do not have time to "wait and see" if a carbon tax will work a decade from now. Rapid, significant reductions in greenhouse gas emissions are needed now.

Only by adhering to the legislature's mandate for "direct source" reduction approaches and by forgoing market "solutions" will California achieve the significant and swift emission reductions our planet needs. This can be achieved if ARB adopts the "Alternative 1: No Cap-and-trade" scenario of its scoping plan.

Please enact meaningful protections for our climate through direct source reductions, rather than market schemes like cap and trade.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-06 10:42:19

No Duplicates.

## **Comment 25 for AB 1550 Community Meetings (ab1550meetings-ws) - 1st Workshop.**

First Name: Leslie

Last Name: Mink

Email Address: leslie@plumascorporation.org

Affiliation:

Subject: More Consideration for DACs in the Sierras

Comment:

The definition of DACs is too narrow for this program. Sierran Communities are rural low income, and are disadvantaged for numerous reasons, including our location away from services and programs available to other communities. Please use DWR's IRWM definition of DACs. It is more inclusive, and takes into account rural poverty. Sierran communities also suffer from valley air pollution blowing into the mountains and getting stuck here, as well as from wildland fires. Proceeds from auctions should be invested here. We are seeking the recognition that the natural areas surrounding us are carbon sinks. However, investment is needed to restore the level of carbon sequestration needed to combat climate change. Not only are forests important carbon sinks, but meadow soils are, perhaps more significant. However, most meadows are currently in a degraded state and are emitting carbon rather than sequestering it. Restoring meadow hydrology restores a suite of ecological services of these systems, including carbon sequestration. Recognition of, and investment in, Sierran DACs with these monies would provide an excellent return on the investment now and into the future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-29 12:10:51

No Duplicates.

**There are no comments posted to AB 1550 Community Meetings (ab1550meetings-ws) that were presented during the Workshop at this time.**