

# Comment 1 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.

First Name: Sid  
Last Name: Abma  
Email Address: Sid@SidelSystems.com  
Affiliation: Sidel Systems USA Inc.

Subject: California's Climate Change Challenge

Comment:

Good day CARB

From what I read on the Scoping Plan Updates, Increasing natural gas energy efficiency does not seem to be important enough to make mention.

What are the 3 main objects of Climate Change?

Correct me if I am wrong.

- 1) Reduce Global Warming
- 2) Reduce CO2 Emissions
- 3) Conserve Water

California can chase increasing electricity energy efficiency and tail pipes of cars and trucks, and this is all good.

But what energy beside nuclear is California's next important fuel for producing this electricity? Natural Gas?

How much natural gas is consumed? Does each of these natural gas appliances have a chimney? What is leaving most of these chimneys?

Hot Exhaust? CO2? Water?

How is it that the state of California can just want to ignore this method of Increasing Energy Efficiency and combating Climate Change?

This technologies home state is California, and we are working to promote it across America and the world, and California does not want to recognize this potential?

The US DOE states that for every 1 million Btu's of heat energy recovered from these waste exhaust gases, and this recovered heat energy is utilized in the building or facility where it was combusted, 117 lbs of CO2 does not go into the atmosphere.

They also state that if a 60 watt light bulb is left on for 24 hours, it will generate 3.3 lbs of CO2.

How many light bulbs have to be changed or turned off HOURLY to keep up with the CO2 reduction happening Hourly in the buildings boiler room?

Sidel Systems USA Inc. has a goal to make a difference in California, and in America and the around the World.

Increased Energy Efficiency is a World Wide Issue.

Does California want to work with Sidel Systems USA and promote Increased natural gas energy efficiency, and then show America and the world, or will California say one day "They are a California company".

I look forward to your reply.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-draft-update-sp-ws-AXJRPM2BDJQOIMM.pdf>

Original File Name: Sidel SRU Brochure.pdf

Date and Time Comment Was Submitted: 2013-10-01 21:15:54

No Duplicates.

## **Comment 2 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Bruce

Last Name: French

Email Address: a1\_bfrench@yahoo.com

Affiliation:

Subject: AB 32 Scoping Plan- Comments

Comment:

Upon reviewing the AB32 Scoping Plan, I noticed that it was "lean" on defined verification, auditing and enforcement. The CARB position of allowing companies to self-report and verify is a naïve policy as it leaves too much room for producing an annual set of bogus data. It is imperative that this program be of the highest quality and that can only be attained and maintained through unbiased, independent auditing and enforcement with a well-defined penalty schedule. The enforcement division must be fully-staffed and funded by the legislature at least through the year 2100.

As for the state's clean energy program, I offer the following initiatives for consideration and implementation:

1-Take immediate action to eliminate all subsidies and allowances related to fossil fuels and ethanol; divert all fuel tax-related revenues to clean energy technologies

2-Authorize all utilities to enact a Feed In Tariff program to allow unlimited electric power input to the grid by "non-carbon-fuels" energy technologies. See the example 2013 FIT program at: <https://www.gru.com/TabID/3824/Default.aspx>

3-Accelerate the deployment of Ocean Current/Wave Electric Generators by authorizing significant incentives (15-years "zero-tax" moratorium) for private investors to make sales on the grid: <http://snmrec.fau.edu/about%20>

4-Authorize significant incentives to accelerate the deployment of a fleet of offshore, deep-water Ocean Thermal Energy Conversions Plants to produce electricity, hydrogen and methanol for delivery to state ports and grid:

<http://www.lockheedmartin.com/us/products/otec.html%20>

5-Accelerate the R&D efforts to exploit deep ocean hydrothermal vents for energy conversion to hydrogen, methanol and electricity and issue an open/renewable state Purchase Order for 10 GW equivalents of energy from this sector to stimulate commercial investment anywhere along the 50,000 KM Ring-of-Fire. See NOAA VENTS Program: <http://www.pmel.noaa.gov/vents/>; the UN International Seabed Authority at: <http://www.isa.org.jm/>; and, US Navy [http://www.navysbir.com/n11\\_1/N111-071.htm](http://www.navysbir.com/n11_1/N111-071.htm)

6-Immediately initiate action items to make all major state highways fully-accessible to electric and fuel-cell vehicles by 2020

7-Halt all development of local and state government properties and assets on low-lying coastal lands subject to a sea level rise of 24 inches

8-Plan to relocate all water and sewage treatment plants, plumbing, landfills, and hazardous materials to a land elevation greater than 15 feet NGVD by 2050 to avoid problems due to sea level rise

9-Support, fund and promote a large-scale R&D program (\$50 M/yr) for low energy nuclear reactions (LENR) technology in the state; provide a 20-yr tax-free incentives program for commercialization of viable reactors and products for the state's wholesale and retail markets. Designate SRI's-McKubre as the Chairman on a Board of Technical R&D Advisors. Contacts:

Dr. Graham Hubler (University of Missouri)  
<http://iccf18.research.missouri.edu/>

Dr. Peter L. Hagelstein (MIT, USA)  
<http://www.rle.mit.edu/bio-hagelstein/>

Dr. George Miley (University of Illinois - Urbana Champaign, USA)  
<http://researchpark.illinois.edu/directory/lenuco>

Dr. Michael McKubre (Stanford Research Institute International)  
<http://www.sri.com/research-development/chemical-biological-radiological-nuclear-and-explosives-defense>

Dr. Frank Gordon (SPAWAR (retired), US Navy) Dr. David J. Nagel  
(George Washington University, USA)  
<http://www.seas.gwu.edu/david-j-nagel>

Examples:

<http://climate.nasa.gov/news/864>

<http://www.lenr-cars.com/>

<http://defkalion-energy.com/>

http://brillouinenergy.com/

http://www.blacklightpower.com/

http://www.globalenergycorporation.net/Publications.aspx and

http://www.globalenergycorporation.us/

10-Provide a 20-year tax-free incentives program to all companies investing in commercial production of electricity from inland, geothermal resources

An idea submitted to the Bicameral Task Force on Climate Change submitted in July 2013 is attached for consideration and support in Congress.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-draft-update-sp-ws-AG4CZQRxV20FbAfp.pdf>

Original File Name: National Incentive Plan 6-2013.pdf

Date and Time Comment Was Submitted: 2013-10-02 10:55:22

No Duplicates.

## **Comment 3 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Evan  
Last Name: Edgar  
Email Address: evan@edgarinc.org  
Affiliation: CRRC

Subject: Support the Waste Sector Scoping Plan updates  
Comment:

CRRC strongly supports the following programs as part of 2013  
Update to Scoping Plan:

- Produce carbon negative fuel for the 15,000 heavy duty collection trucks in California
- Develop Net-Zero recycling and composting facilities
- Mandate commercial organic collection and streamline the permitting of composting and anaerobic digestion facilities
- Support distributed renewable energy from biomass and biomethane development
- Utilize "cap-and-trade" revenue to assist in funding the above programs

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-draft-update-sp-ws-WyhSN1U7V3RSPVU7.pdf>

Original File Name: ScopingPlanUpdateOct15-2013.pdf

Date and Time Comment Was Submitted: 2013-10-14 20:49:49

No Duplicates.

## **Comment 4 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Tim

Last Name: Goncharoff

Email Address: dpw131@co.santa-cruz.ca.us

Affiliation: County of Santa Cruz

Subject: Resources for Local Governments

Comment:

In response to a state mandate, local communities across California have developed ambitious Climate Action Plans. These plans call for exactly the type of initiatives spelled out in this plan. But most local cities and counties lack the resources to implement these plans. Directing funding to local governments would be one of the most far-reaching, impactful and balanced approaches the state could take to combat climate change. Specific strategies in need of support include:

Community Choice Aggregation (CCA) programs  
Upgrading fleets to low or zero-emission vehicles  
Landfill gas capture upgrades  
Solar installations for local government facilities  
Conversion of streetlights to LEDs  
Wind power facilities  
Low or zero-emission public transit vehicles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-15 08:59:17

No Duplicates.

## **Comment 5 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: dawn

Last Name: pedersen

Email Address: dawn.pedersen@fire.ca.gov

Affiliation:

Subject: carbon sequestration

Comment:

A "Forest Carbon Plan" should be developed to describe the actions necessary to ensure that California's forests are managed to optimize emission reduction and sequestration opportunities

This is the quote from the draft plan - what plans are there to develop this plan? - acknowledging the roles our forest play in the carbon sequestration is essential to meeting the goals for GHG reduction. The board must develop this plan and take credit for the huge sinks of GHG that are being permanently stored in the products that come from our forests.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-22 11:49:32

No Duplicates.

## **Comment 6 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Barry  
Last Name: Cohen  
Email Address: [Algaepreneur@aol.com](mailto:Algaepreneur@aol.com)  
Affiliation: National Algae Association

Subject: Algae: The Green Crude

Comment:

It's one solution to help reduce dependence on foreign oil and create new green jobs.

Algae oil is renewable, does not affect the food channel and consumes CO2. It's one solution to help reduce dependence on foreign oil and create new green jobs.

The National Algae Association, a 501(c)6, is the first algae trade association algae farmers. Algae oil can be made into jet fuel, biodiesel, biogasoline and bioplastics. Algae biomass can be made into many different co-products such as nutraceuticals, pharmaceuticals, cosmetics, feed, food and organic fertilizer.

Algae production plants are scaling-up production. The algae industry is quickly moving technologies out of the lab and into commercial-scale algae production.

National Algae Association  
4747 Research Forest Drive, Suite 180  
The Woodlands, TX 77381  
936-321-1125  
[www.nationalalgaeassociation.com](http://www.nationalalgaeassociation.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-24 10:13:00

No Duplicates.

## **Comment 7 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Debra

Last Name: Hale

Email Address: debbie@tamcmonterey.org

Affiliation: Transportation Agency for Monterey Count

Subject: Re: AB 32 Scoping Plan Update – Maximize Transportation's Share of Cap and Trade Funds  
Comment:

Dear Chairperson Nichols:

The Transportation Agency for Monterey County (TAMC) supports the Transportation Coalition for Livable Communities in recommending that the AB 32 Scoping Plan Update assure that Cap and Trade revenues are utilized to achieve major statewide greenhouse gas emission reductions in the transportation sector.

The transportation sector is estimated to produce 40% of greenhouse gas emissions, and revenues generated by the Cap and Trade program from transportation and fuel sources are estimated to be even higher. Our agency supports investing a commensurate share of Cap and Trade auction revenues in projects that link land use to improved transportation infrastructure. This strategy will generate the long-term GHG reductions critical to meeting California's 2050 goals.

Through SB 375, regional agencies throughout the state have developed Sustainable Community Strategies to leverage these coordinated transportation and land use strategies and meet long term GHG reduction goals. Investing Cap and Trade auction revenues from the fuels sector in transportation projects that implement these strategies will be key in both meeting the state's 2050 goals and creating efficient and well-maintained transportation networks statewide.

We strongly support the opportunity to use Cap and Trade revenues for integrated transportation and land use projects, which will deliver the GHG emission reductions California needs to meet the Scoping Plan's 2050 GHG reduction targets and will further AB 32 goals to create healthier communities and stronger economies.

Thank you very much for supporting our efforts to improve transportation and increase Sustainable Communities in Monterey County. If you have any questions, please feel free to contact Sharon Gavin of my staff at (831) 775-4415 or sharon@tamcmonterey.org.

Debra L. Hale  
Executive Director  
Transportation Agency for Monterey County

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-draft-update-sp-ws-WjtRNVEPB2cANAdY.pdf>

Original File Name: AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-10-24 10:51:58

No Duplicates.

## **Comment 8 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Peter

Last Name: Slote

Email Address: [pslote@oaklandnet.com](mailto:pslote@oaklandnet.com)

Affiliation: CA Resource Recovery Association (CRRA)

Subject: AB 32 Scoping Plan – Waste Management and Zero Waste

Comment:

October 25, 2013

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

Re: AB 32 Scoping Plan – Waste Management and Zero Waste

Dear Chair Nichols,

CRRA is California's statewide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. Our members work for cities, counties and municipal districts, as well as hauling and recycling companies, material processors, non-profit organizations, state agencies, and allied professionals.

CRRA appreciates the opportunity to provide input on the AB 32 Scoping Plan (Plan). The published review draft of the Plan includes many worthwhile recommendations. We recommend that the Plan prioritize the following:

1. Divert organic wastes to address short-lived GHG methane emissions. Take specific and tangible actions reduce landfilling organics, including establishing a defined timetable for requiring phase-out of organics disposal, expanding in-state organics processing capacity (composting and anaerobic digestion). Doing so is necessary to achieve waste reduction goals and reduce GHG's from avoided landfill methane emissions, and reduced synthetic fertilizer and water usage from use of finished compost.

2. Limit waste-based energy technologies.

a. Eliminate consideration of cap-and-trade and Renewable Portfolio Standard credits for MSW Thermal facilities. 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.

b. Include incineration in cap-and-trade. Waste incineration facilities should be covered entities with compliance obligations under cap-and-trade.

c. Require any feed stocks under consideration for waste-based energy be addressed individually, using full life-cycle analyses to compare to source reduction, reuse, recycling and composting alternatives

d. 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. High-temperature

thermal processing uses require large energy inputs to capture only a fraction of the embodied energy in wasted material - net energy output is unproven and disputed. The safe containment of hazardous outputs produced by these facilities is unproven; disposal of toxic by-products and emissions to air, land and water are significant public health concerns.

3. Adopt cap-and-trade compliance offset protocols for composting and anaerobic digestion. The Climate Action Reserve has adopted protocols for voluntary trading markets, but the Air Resources Board has no for AB 32. Protocols would improve the financial viability of facilities, further incentivizing waste reduction and in-state landfill methane greenhouse gas (GHG) reductions.

4. Establish waste sector emissions reduction goals for total emissions (i.e., direct plus indirect - 75% reduction by 2020), as well for specific materials (e.g., reduce waste carpet emissions by 75%). Doing so targets not only reductions in downstream emissions, but also the more significant upstream emissions.

5. Establish an extended producer responsibility (EPR) framework. Prioritize high-GHG commodities, products with high toxicity, and difficult to recycle products under an established EPR framework. EPR has significant GHG emissions reduction impact with low implementation cost by giving producers a financial incentive to design products that close the loop by being easy to repair, reuse, and recycle.

6. Focus on waste reduction, especially for food and packaging waste. CalRecycle can provide statewide leadership to change unnecessarily wasteful individual and institutional behavior, using community-based social marketing techniques to overcome obstacles.

7. Provide a consumption based view of California's greenhouse gas emissions. Consumption inventories, linked with materials management efforts, provide more accurate and nuanced understanding of end-of-life issues within the full product lifecycle. Focusing solely on "waste management" limits decision-maker and public support by understating product impacts.

8. Include an alternative analysis of methane emissions, emphasizing the short-term benefits of immediate methane reduction to limit temperature increases. Demonstrate the volume of methane emitted using its actual atmospheric life rather than standardizing to carbon dioxide.

9. Finally, we are concerned about the logic of counting all biomass conversion emissions as biogenic. The Biomass Conversion technical paper says, "[w]hile these facilities result in direct GHG emissions (mostly as carbon dioxide) when biomass is burned, the majority of these emissions are biogenic, and not counted as discussed above." Biomass conversion is an anthropogenic process and accelerates natural biogenic emissions. Note that the Recycling Emissions Reduction Factors indicate a much lower factor for dimensional lumber than EPA's Waste Reduction Model. In fact, WARM's factor is about ten times greater than the RERF.

CRRA appreciates the opportunity to provide input to this important project. Thank you for your consideration of our comments.

Tracie Bills  
President

CRRA, founded in 1974, is California's statewide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. CRRA is dedicated to achieving environmental sustainability in and beyond California through Zero Waste strategies including product stewardship, waste

prevention, reuse, recycling and composting. CRRA advances local, regional and state wide waste reduction efforts which result in critical environmental and climate protection outcomes. CRRA's members represent all aspects of California's reduce-reuse-recycle-compost economy. Our members work for cities, counties and municipal districts, as well as hauling companies, material processors, non-profit organizations, state agencies, and allied professionals.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-draft-update-sp-ws-VzRVIV0uV2UKU1Mw.pdf>

Original File Name: CRRA comments to CARB AB 32 Scoping Plan 10-25-13.pdf

Date and Time Comment Was Submitted: 2013-10-25 09:38:56

No Duplicates.

**Comment 9 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Joe  
Last Name: Byrne  
Email Address: cwc@water.ca.gov  
Affiliation: California Water Commission

Subject: California Water Commission Comments on Scoping Plan Update  
Comment:

See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-draft-update-sp-ws-AjNQZIAOUTAHNQRb.pdf>

Original File Name: 10 24 13 ARB re Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-10-28 16:00:45

No Duplicates.

**Comment 10 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jeanie

Last Name: Ward-Waller

Email Address: [jeanie@saferoutespartnership.org](mailto:jeanie@saferoutespartnership.org)

Affiliation: Safe Routes to School National Partnersh

Subject: Greater emphasis on active transportation needed

Comment:

Please see the attached letter for comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-draft-update-sp-ws-VjdWMIBiVzYHcgIq.pdf>

Original File Name: AB32ScopingPlanUpdateLetter\_102813.pdf

Date and Time Comment Was Submitted: 2013-10-28 18:32:23

No Duplicates.

## **Comment 11 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Kurt

Last Name: Evans

Email Address: kurt.evans@vta.org

Affiliation: Santa Clara VTA

Subject: AB 32 Scoping Plan Update Comment Letter

Comment:

Please see the attached comment letter for the AB 32 Scoping Plan Update from Joe Pirzynski, chairperson of the Board of Directors of the Santa Clara Valley Transportation Authority (VTA).

Thanks,  
Kurt Evans  
Government Affairs Manager  
Santa Clara VTA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-draft-update-sp-ws-WzgAZwFyWGkKU1c7.pdf>

Original File Name: CARB Letter on AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-10-29 13:17:17

No Duplicates.

## **Comment 12 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: David

Last Name: Rosenheim

Email Address: drosenheim@theclimateregistry.org

Affiliation:

Subject: The Climate Registry's Comments on Updated Scoping Plan

Comment:

Please accept the attached comments from The Climate Registry on the updated scoping plan. These comments are additional to the comments submitted by The Climate Registry on July 2, 2013 as part of the first feedback period.

Please do not hesitate to contact me with any questions regarding these or our previous comments.

Sincerely,

David Rosenheim  
Executive Director  
The Climate Registry  
drosenheim@theclimateregistry.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-draft-update-sp-ws-WjtXM1ZkVzYEXQFy.pdf>

Original File Name: AB32 Scoping Plan TCR Comments Round 2.pdf

Date and Time Comment Was Submitted: 2013-10-29 16:08:32

No Duplicates.

**Comment 13 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: ClearEdge Power

Subject: Comments to 2013 Scoping Plan Update

Comment:

Attached are comments on behalf of ClearEdge Power. If you have any questions, please do not hesitate to contact Bob Lucas at 916-444-7337.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-draft-update-sp-ws-UTJTOVUxADIEcAZj.pdf>

Original File Name: ClearEdge Power comments to 2013 Update to AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-10-30 10:58:28

No Duplicates.

## **Comment 14 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Alexandra

Last Name: Maratou

Email Address: alexandra.maratou@shecco.com

Affiliation: Deputy Public Affairs Manager

Subject: Draft AB 32 Scoping Plan Update - comments by shecco on section 9

Comment:

Dear Sir/Madam,

I am writing to provide input to the Air Resources Board discussion draft of updated AB 32 Scoping Plan.

Our input relates to section 9 "High Global Warming Potential Gases" and more specifically page 44 of the draft which reads "In spite of ARB efforts, significant obstacles remain for further reductions of HFCs, due to the diverse nature of sources.

Substantial progress has been made in recent years in the development of low-GWP alternatives in the refrigeration and foam industries that can achieve significant reductions in the high-GWP sector. Low-GWP refrigerants and insulating foam are currently under evaluation to better understand their technical feasibility and cost effectiveness in various applications. Based on further analysis, ARB may develop programs to require low-GWP insulating foam materials and refrigeration systems that use either no HFCs or significantly reduced amounts of HFCs.)"

We would like to draw your attention to two of our recent publications that relate to the use of HFC-free natural refrigerants in North America:

1. "GUIDE 2013: Natural Refrigerants - Market Growth for North America": the attached report highlights market trends for sustainable refrigerants with very low Global Warming Potential, namely CO<sub>2</sub>, ammonia, the various hydrocarbons, water and air. The publication focuses on the North American market, including the USA, Canada and Mexico, and analyses results from 550+ respondents about the industry's level of familiarity with natural refrigerants, the use of natural refrigerant products today and the expected use tomorrow. (You can access the report following this link:

[http://www.shecco.com/files/guide\\_natural\\_refrigerants\\_north\\_america\\_2013.pdf](http://www.shecco.com/files/guide_natural_refrigerants_north_america_2013.pdf))

2. ATMosphere America 2013: The Business Case for Natural Refrigerants in North America (18 - 19 June 2013, Washington DC) - Conference Summary Report: The North American Conference on Natural Refrigerants was held from June 17-19, 2013 in Washington DC. Under the banner "The Business Case for Natural Refrigerants," the event brought together around 200 industry experts from the HVAC&R (heating, ventilation, air conditioning and refrigeration) sector, including leading retailers, suppliers, engineering and consultancy firms and government representatives. The interactive forum, geared towards making natural refrigerant technology more visible to the global community, gathered presentations from over 40 speakers. It also included many networking opportunities, creating a unique space for fruitful discussions to further spur the uptake of natural refrigerant (CO<sub>2</sub>, ammonia, hydrocarbons, air, and water) technologies.

(You can access the summary report following this link:

[http://www.atmo.org/files/reports/atmo\\_america\\_report.pdf](http://www.atmo.org/files/reports/atmo_america_report.pdf) )

#### About shecco

shecco is a market development company that works closely with over 100 progressive companies worldwide that endeavour to bring climate-friendly technologies faster to the market. In the sector of heating and cooling, our primary focus is to facilitate the market uptake of solutions based on natural refrigerants CO2, ammonia, hydrocarbons, water and air, or their combinations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-draft-update-sp-ws-AGMBZlIhAzIFXAJx.pdf>

Original File Name: CARB Scoping Plan AB32 shecco comments 30 October 2013.pdf

Date and Time Comment Was Submitted: 2013-10-30 10:48:06

No Duplicates.

**Comment 15 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jason

Last Name: Rhine

Email Address: [jrhine@cacities.org](mailto:jrhine@cacities.org)

Affiliation:

Subject: Comments on AB 32 Scoping Plan First Update

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-draft-update-sp-ws-BzUANlFhVDQLUgRl.pdf>

Original File Name: 2013 AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-10-30 14:57:05

No Duplicates.

**Comment 16 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Steven  
Last Name: Brink  
Email Address: steveb@calforests.org  
Affiliation: 916-208-2425

Subject: AB32 Scoping Plan Update Comments  
Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-draft-update-sp-ws-UGFQZVRkAmFYgk5.docx>

Original File Name: 131030\_CFA\_comments\_on\_AB32\_Scoping\_Plan\_Update.docx

Date and Time Comment Was Submitted: 2013-10-30 16:29:02

No Duplicates.

**Comment 17 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: CCA Comments to ARB on Discussion Draft for 2013 Update to AB 32 Scoping P

Comment:

comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-draft-update-sp-ws-B2RTNIU1BwsDZghn.docx>

Original File Name: CCA Comments on AB 32 Scoping Plan Update Discussion Draft 10.30.13.docx

Date and Time Comment Was Submitted: 2013-10-30 16:40:27

No Duplicates.

## **Comment 18 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Theodore

Last Name: Hadzi-Antich

Email Address: tha@pacificlegal.org

Affiliation: Pacific Legal Foundation

Subject: Comments on the 2013 Amendments to the AB 32 Scoping Plan

Comment:

On behalf of itself and other interested parties that it represents, Pacific Legal Foundation submits these comments on CARB's Draft 2013 Amendments to the 2008 AB 32 Scoping Plan (the "Scoping Plan Amendments"). The Scoping Plan Amendments discuss at length the actions that CARB and other California state agencies plan to take in going beyond the 2020 greenhouse gas emissions goals set forth in AB 32. Neither CARB nor any other state agency has the legal authority under AB 32 to take any steps to devise, promulgate, or implement post-2020 goals for greenhouse gases, with one minor exception: CARB and other agencies may make recommendations to the California Legislature regarding greenhouse gas legislation that they believe would be prudent for the legislature to enact in order to further reduce greenhouse gas emissions in California beyond the emissions goals established by the Legislature in AB 32 for the year 2020. Accordingly, the Scoping Plan Amendments may include post-2020 proposals, goals, plans, or aspirations only if the amendments are intended to function solely as proposals for legislation addressed to the California Legislature. Otherwise, the 2013 Scoping Plan Amendments may not touch upon any post-2020 goals but must be limited to implementation of the 2020 goals actually mandated by the Legislature in AB 32. Any effort to include post-2020 issues in the 2013 Scoping Plan Amendments is not only ultra vires but also constitutes a wasteful and unauthorized use of state resources that could trigger constitutional as well as statutory challenges.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-30 16:50:03

No Duplicates.

**Comment 19 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Alex

Last Name: Porteshawver

Email Address: aporteshawver@ci.benicia.ca.us

Affiliation:

Subject: City of Benicia - Comments on Scoping Plan Update

Comment:

See attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-draft-update-sp-ws-B2RROFc7AD4EZwZo.docx>

Original File Name: CommentsonAB32ScopingPlanUpdate\_CityofBenicia10 31 13.docx

Date and Time Comment Was Submitted: 2013-10-31 08:28:08

No Duplicates.

## **Comment 20 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Xuaco  
Last Name: Pascual  
Email Address: xuaco.pascual@honeywell.com  
Affiliation:

Subject: Comments re: ARB scoping plan and use of low global warming (GWP) blowing agents  
Comment:

October 29, 2013

Chair Mary Nichols  
California Air Resources Board

Re: Comments regarding ARB Scoping Plan actions to promote the use  
of low Global Warming Potential (GWP) blowing agents

Dear Chair Nichols:

We commend ARB for promoting the use of low-GWP blowing agents in California within the current ARB Scoping Plan. Honeywell agrees with ARB, as stated in the Scoping Plan, that there are a number of commercially available alternatives to cost effectively replace existing use of high-GWP blowing agents in California. Honeywell has consistently helped manufacturers replace ozone-depleting and global warming substances and is a recognized leader in developing high-performance blowing agent technology for closed-cell spray polyurethane foam insulation, extruded polystyrene board insulation and advanced energy efficient refrigerants.

Today in California, high-GWP foam blowing agents incorporated into polyurethane and polystyrene foams are installed every day onto roofs, wall cavities of unfinished walls, against the interior side of sheathing, and through holes drilled in sheathing or drywall to insulate new and existing buildings. The predominant foam technologies used to insulate buildings and reduce energy usage utilize high-GWP gases such as HFC-134a (or R-134a), HFC-365mfc, or HFC-245fa with each being up to 1,200 times more effective at trapping atmospheric heat than carbon dioxide. For example, one twenty-four ounce can of R-134a has the equivalent GWP of one ton of carbon dioxide, roughly equivalent to the emissions from a car driven from Los Angeles to New York.

As you know, a new generation of gases and liquids have been developed called Hydrofluoroolefins (HFOs) that can replace HFC-134a, HFC-365mfc and HFC-245fa which are commonly used today. These new technologies have better characteristics for reducing climate impacts with no apparent compromise on performance. Examples of these include HFO-1233zd(E) and HFO-1234ze(E) produced by Honeywell and branded under our Solstice line of products. These alternatives have GWP values of 1 or less and have multiple

uses in foam insulation as well as aerosol applications such as dusters and tire inflators among others. These cost effective, safe and commercially available alternatives are readily available and can reduce the GWP impact of existing products by more than 100X. In fact, users of this emerging technology have found it cost effective with realized increases in energy efficiency performance, improvements in material properties and no significant equipment or processing changes.

With California leading a number of new initiatives to support greater energy efficiency in school buildings (Proposition 39), in existing Buildings (AB 758-Skinner) and now in the ARB Scoping Plan, low-GWP products should be promoted to ensure state GHG reduction measures are making net GHG reductions over the long term. A key opportunity for GHG reductions within California is to encourage the replacement of 134a, HFC-365mfc and HFC-245fa for use in insulating foam applications and propellant applications. As mentioned in the existing Scoping Plan, low-GWP alternatives to foam blowing agents are readily available and are gaining acceptance globally. For example, 1233zd(E) is currently being used in construction and appliance applications in the US, Japan, and next year in even China. Similarly, 1234ze (E) is currently being used in polystyrene, foam and aerosol applications.

Thank you for your consideration and please contact me at +1 (973) 455-4187 if I can provide any more details regarding the use, promotion and availability of alternative low-GWP blowing agents and other technologies.

Sincerely,

Sanjeev Rastogi  
Director, Structural Enclosures  
Honeywell Performance Materials and Technologies

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-draft-update-sp-ws-UzJdKVQ3Aw9QJQRn.pdf>

Original File Name: ARB Scoping Plan letter Honeywell Final.pdf

Date and Time Comment Was Submitted: 2013-10-31 10:12:20

No Duplicates.

## **Comment 21 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Scott

Last Name: Walker

Email Address: [walker6622@yahoo.com](mailto:walker6622@yahoo.com)

Affiliation:

Subject: Coordination of Waste and Forest Sectors and Refining Net Emissions Reductions

Comment:

Comments From: Scott Walker, PE

Date: October 31, 2013

Thank you for considering the following comments on the discussion draft document (these comments are copied in the attached .pdf file).

1. The prior Forest Sector Greenhouse Gas Inventory (1990-2004) has been removed from the most recent Statewide Inventory (2000-2011) and is indicated as currently under development. The prior Inventory and protocols for the Forest Sector (including technical support document excerpt dated May 2009) included discarded forest wood product biogenic emissions from landfill, composting, and biomass combustion facilities. Wood product emissions in the prior Forest Sector Inventory offset Forest carbon sinks, have potential to be double counted in the Waste Sector, are likely to significantly change with organic waste management diversion measures identified in the Waste Sector Plan and CalRecycle AB 341 Strategies, and will impact the relative AB 32 Target benefits of waste management measures.

The discussion document should acknowledge the need to coordinate the Waste and Forest Sectors and identify the process and timeline, including stakeholder involvement, to ensure a science-based objective analysis of net reduction in emissions, and better understanding of the relative benefits of waste management measures.

2. New direct measurement studies and monitoring results to date from the Landfill Methane Capture Early Action Measure (adopted 2009) are available to improve understanding of the performance of the measure in reducing emissions and federal NSPS/EG requirements.

Will the discussion document and Waste Sector Plan include evaluation, with stakeholder involvement, of the results to date of the Landfill Methane Capture measure and reflect those results in estimates of net reduction in emissions for waste management strategies?

3. The most recent Greenhouse Gas Inventory (2000-2011) includes methane and NO<sub>2</sub> emissions estimates for composting in Biological Treatment of Solid Waste. These estimates will change with waste management strategies, warrant update of emission factors, and addition of anaerobic digestion.

Will the discussion document and Waste Sector Plan include update of these emission factors and reflect those results in estimates of net reduction in emissions for waste management strategies?

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-draft-update-sp-ws-ViVXNQB2U19SNwVq.pdf>

Original File Name: SDW Comments on the discussion draft Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-10-31 10:38:31

No Duplicates.

**Comment 22 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tara

Last Name: Thronson

Email Address: [tara.thronson@valleyvision.org](mailto:tara.thronson@valleyvision.org)

Affiliation: Valley Vision

Subject: AB 32 Scoping Plan Update - Broadband Infrastructure as a GHG Emission Reduction Strategy

Comment:

Please see the attached letter with recommendations regarding the AB 32 Scoping Plan. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-draft-update-sp-ws-BXZSNwZoU3BSPQFv.pdf>

Original File Name: ScopingPlan\_VV\_Comments\_103113\_FINAL.pdf

Date and Time Comment Was Submitted: 2013-10-31 14:52:00

No Duplicates.

**Comment 23 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Adams  
Email Address: linda@ctechadvocates.com  
Affiliation: Clean Tech Advocates

Subject: New technology for biosynthetic motor oils and industrial lubricants  
Comment:

Please see attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-draft-update-sp-ws-VzYHc1EyAg4KYAJ2.pdf>

Original File Name: ARB ltr re scoping plan 103113.pdf

Date and Time Comment Was Submitted: 2013-10-31 15:32:32

No Duplicates.

## **Comment 24 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: LA Integrated Waste

Last Name: Los Angeles County

Email Address: taskforce@dpw.lacounty.gov

Affiliation:

Subject: Updated AB 32 Scoping Plan (Discussion Draft) Released October 1, 2013

Comment:

Please see the attached correspondence from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) commenting on the 2013 Updated AB 32 Scoping Plan (Discussion Draft) that was released on October 1, 2013.

Should you have any questions regarding these comments, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-draft-update-sp-ws-VjVSNVwxAyJQM1Ix.doc>

Original File Name: CalRecycle Title 14 and 27 - 10-10-13.doc

Date and Time Comment Was Submitted: 2013-10-31 15:36:25

No Duplicates.

## **Comment 25 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Los Angeles County

Last Name: Waste Mgmt Task Forc

Email Address: taskforce@dpw.lacounty.gov

Affiliation:

Subject: Updated AB 32 Scoping Plan (Discussion Draft) Released October 1, 2013

Comment:

Please see the attached correspondence from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) commenting on the 2013 Updated AB 32 Scoping Plan (Discussion Draft) that was released on October 1, 2013.

Should you have any questions regarding these comments, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-draft-update-sp-ws-VSZUMVM9UnFXOFC5.pdf>

Original File Name: Scoping Plan Five Year Update 10-31-13.pdf

Date and Time Comment Was Submitted: 2013-10-31 15:36:25

No Duplicates.

**Comment 26 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Kenny

Last Name: Key

Email Address: kenny@interraenergy.us

Affiliation:

Subject: Comment of Interra Energy, Inc.

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-draft-update-sp-ws-B24BaVInBDIEcAd1.pdf>

Original File Name: Interra Energy - Comments on CARB Scoping Plan Discussion Draft.pdf

Date and Time Comment Was Submitted: 2013-10-31 16:42:57

No Duplicates.

**Comment 27 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Megan

Last Name: Scott

Email Address: [megan.scott@berkeley.edu](mailto:megan.scott@berkeley.edu)

Affiliation:

Subject: UC Berkeley Donald Vial Center comments on AB 32 Scoping Plan Discussion Draft

Comment:

Attached please find comments submitted on behalf of the UC Berkeley Donald Vial Center on Employment in the Green Economy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-draft-update-sp-ws-BWFcLFAyWVUDZghn.pdf>

Original File Name: DVC comments on AB 32 scoping plan update 10-31-13.pdf

Date and Time Comment Was Submitted: 2013-10-31 16:42:41

No Duplicates.

## **Comment 28 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Wendy

Last Name: Sommer

Email Address: miya@stopwaste.org

Affiliation: StopWaste

Subject: StopWaste Comments

Comment:

Thank you for the opportunity to submit comments on the Discussion Draft of the Climate Change Scoping Plan Update. Please see our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-draft-update-sp-ws-B2QGY1ULWHgGY1M8.pdf>

Original File Name: CC Scoping Plan Update Comments\_Nov1\_StopWaste.pdf

Date and Time Comment Was Submitted: 2013-10-31 17:05:33

No Duplicates.

## **Comment 29 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Jamie

Last Name: Song

Email Address: jsong@meca.org

Affiliation: MECA

Subject: Comments to 2013 Update to AB 32 Scoping Plan

Comment:

November 1, 2013

To Whom It May Concern,

Please find attached the Manufacturers of Emission Controls Association's (MECA) public comments to ARB's 2013 update to the AB 32 Scoping Plan.

Best Regards,  
Jamie Song

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-draft-update-sp-ws-BWhVNlw+BDZQCQNg.pdf>

Original File Name: MECA comments on ARB AB 32 Scoping Plan Update110113.pdf

Date and Time Comment Was Submitted: 2013-11-01 06:27:36

No Duplicates.

**Comment 30 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Robin

Last Name: Fraser

Email Address: [fraser@ieta.org](mailto:fraser@ieta.org)

Affiliation: International Emissions Trading Assoc.

Subject: IETA Comments on ARB Scoping Plan Update Discussion Draft

Comment:

Please find attached IETA's comments related to the ARB's Scoping Plan Update Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-draft-update-sp-ws-Vz5SMVMmBDYFXAhr.pdf>

Original File Name: IETA Comments on ARB Scoping Plan Update\_1Nov2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 08:02:30

No Duplicates.

**Comment 31 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Essner

Email Address: kristinessner@yahoo.com

Affiliation: Orange County Transportation Authority

Subject: OCTA Comments on Draft Scoping Plan Update

Comment:

Please see the attached comments from the Orange County Transportation Authority on the AB 32 Draft Scoping Plan Update.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-draft-update-sp-ws-WmtXYFV5BWdQe1Vk.pdf>

Original File Name: 11-1-13-Nichols ltr.pdf

Date and Time Comment Was Submitted: 2013-11-01 08:47:52

No Duplicates.

## **Comment 32 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Staci  
Last Name: Heaton  
Email Address: sheaton@crcnet.org  
Affiliation: RCRC

Subject: Comments on the discussion draft of the AB 32 Scoping Plan Update  
Comment:

Attached please find RCRC's comments on the discussion draft, as well as one attachment. Please contact me if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-draft-update-sp-ws-BnVVMANtVHcLZABu.zip>

Original File Name: ScopingPlanUpdate.zip

Date and Time Comment Was Submitted: 2013-11-01 08:45:28

No Duplicates.

**Comment 33 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Kiana  
Last Name: Buss  
Email Address: kbuss@counties.org  
Affiliation: CA State Association of Counties

Subject: AB 32 Scoping Plan

Comment:

AB 32 Scoping Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-draft-update-sp-ws-AGMGc1ExAzMFXAJm.pdf>

Original File Name: CSAC Draft Scoping Plan Update Comments\_110113(FINAL).pdf

Date and Time Comment Was Submitted: 2013-11-01 09:45:17

No Duplicates.

**Comment 34 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: West

Email Address: [jwest@cmua.org](mailto:jwest@cmua.org)

Affiliation:

Subject: CMUA Comments Water Sector Draft Scoping Plan

Comment:

Please see the attached CMUA comments on the draft AB 32 Scoping Plan for the water sector.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-draft-update-sp-ws-AmFcN1ElBzUAWQJh.pdf>

Original File Name: CMUA CARB-AB32 Scoping Plan Comments 10\_31\_13.pdf

Date and Time Comment Was Submitted: 2013-11-01 09:34:32

No Duplicates.

**Comment 35 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation:

Subject: CA ReLeaf 2013 Discussion Draft Scoping Plan Comments

Comment:

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-draft-update-sp-ws-UzBUMwRaU3JSMVA8.pdf>

Original File Name: CA ReLeaf Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 09:55:13

No Duplicates.

**Comment 36 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: joey@wspa.org

Affiliation: WSPA

Subject: WSPA Comments on First Update to AB 32 Scoping Plan (Update) – October 15, 2013 Workshop  
Comment:

Please see attached WSPA Comments on First Update to AB 32 Scoping Plan (Update) – October 15, 2013 Workshop.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-draft-update-sp-ws-UjRRPIU6AzEDaVUK.doc>

Original File Name: Final WSPA Comments on First Update to AB 32 Scoping Plan.doc

Date and Time Comment Was Submitted: 2013-11-01 10:24:18

No Duplicates.

**Comment 37 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Connie

Last Name: Gallippi

Email Address: cmgallippi@caufc.org

Affiliation: California Urban Forests Council

Subject: California Urban Forests Council Comments on Draft Scoping Plan Update

Comment:

Attached please find comments on the Draft Scoping Plan Update from the California Urban Forests Council and our seven Regional Councils statewide.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-draft-update-sp-ws-UjFVMIYIVXNSJIw.pdf>

Original File Name: CA Urban Forests Council Scoping Plan Update Comment Letter Final\_11.1.13.pdf

Date and Time Comment Was Submitted: 2013-11-01 10:46:21

No Duplicates.

**Comment 38 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Rau

Email Address: [trau@heca.com](mailto:trau@heca.com)

Affiliation: Hydrogen Energy California

Subject: Comments on Discussion Draft of First Update to AB 32 Scoping Plan

Comment:

Hydrogen Energy California LLC (HECA) appreciates the opportunity to comment on the First Update to the AB 32 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-draft-update-sp-ws-WzNSMVU3BzVWDwB1.pdf>

Original File Name: HECA Updated Scoping Plan Comments 110113.pdf

Date and Time Comment Was Submitted: 2013-11-01 11:19:17

No Duplicates.

**Comment 39 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 40 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: glenn  
Last Name: klupsak  
Email Address: gklupsak@gmail.com  
Affiliation: Clean Energy Technologies

Subject: Emerging Technology Funding  
Comment:

CARB Board of Directors,

I would like to request consideration be made as part of this scoping plan update to allocate funding that would directly benefit emerging technologies and make it easier for small business to bring emission reduction products to market in California.

The current avenues of testing required by CARB is VERY costly, and by design anti-competitive, prohibiting start-ups and small companies that do not have adequate funding from bringing their products to market.

I represent a company called Clean Energy Technologies, we have a very effective device to meet Tier 3 and Tier 4 emission standards that also improves fuel economy a minimum of 13%.

Our system, compared to the currently mandated DPF filters, is about half the cost, is easily maintained, IMPROVES fuel economy instead of reducing it, is completely recyclable instead of creating hazardous waste from the trapped particles, and does not negatively impact the efficiency of the engine or require any downtime for regeneration.

The biggest challenge CARB faces in creating a more successful Diesel Bus and Truck Regulation that everyone can support, is the financial impact of mandating very costly DPF filters and the deficiencies of the DPF technology.

These two issues were very clear in the recent Hearing and the 40 plus people who commented on the challenges of the current regulation.

Clean Energy Technologies, along with a handful of other companies, currently possess rigorously tested technologies that can resolve the challenges CARB faces with a successful implementation of this Regulation.

I hope you will strongly consider allocating funds that will help bring these technologies to market quickly.

Kind Regards,

Glenn T. Klupsak  
Chairman & CEO  
Clean Energy Technologies

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-01 11:40:48

No Duplicates.

**Comment 41 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: CCEEB

Subject: Comments to 2013 Scoping Plan Update

Comment:

Attached is CCEEB's comment letter. If you have any questions, please do not hesitate to contact Bob Lucas. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-draft-update-sp-ws-B2RcOQdjBzELbwVa.pdf>

Original File Name: CCEEB Comments re Discussion Draft of the 2013 Updated AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-11-01 12:57:17

No Duplicates.

## **Comment 42 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Julee

Last Name: Malinowski Ball

Email Address: [julee@ppallc.com](mailto:julee@ppallc.com)

Affiliation:

Subject: CBEA Comments AB 32 Scoping Plan Update

Comment:

Attached please find comments from the California Biomass Energy Alliance (CBEA) re AB 32 Scoping Plan Update. Thank you for your kind consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-draft-update-sp-ws-WjlTNAZ1AzJQCQV2.pdf>

Original File Name: CARB Scoping Plan Update Comments (FINAL) 11-01-2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 12:56:52

No Duplicates.

**Comment 43 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Ray  
Last Name: Pingle  
Email Address: Ray\_Pingle@msn.com  
Affiliation: Sierra Club California

Subject: Comments on 2013 AB 32 Scoping Plan Update  
Comment:

Attached are Sierra Club California's comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-draft-update-sp-ws-VSZcM1M3WXhWIgRl.pdf>

Original File Name: Sierra Club California Comments on CARB 2013 Scoping Plan Update 11-1-13.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:08:37

No Duplicates.

**Comment 44 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Shalini

Last Name: Swaroop

Email Address: [sswaroop@marinenergy.com](mailto:sswaroop@marinenergy.com)

Affiliation:

Subject: MEA Comments on CARB Discussion

Comment:

Please find attached the COMMENTS OF THE MARIN ENERGY AUTHORITY ON THE DISCUSSION DRAFT OF THE AB 32 SCOPING PLAN UPDATE.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-draft-update-sp-ws-BjdXYAMvBGcDNAEs.pdf>

Original File Name: 11-01-13 MEA Comments on CARB Discussion FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:07:59

No Duplicates.

**Comment 45 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation:

Subject: Pacific Forest Trust comments on Scoping Plan

Comment:

Please see attached comments on the Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-draft-update-sp-ws-V2ZWYQEuUzELIwc2.pdf>

Original File Name: 11.1.13 PFT Scoping Plan comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:14:38

No Duplicates.

## **Comment 46 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Lauren

Last Name: Michele

Email Address: lauren.michele@policyinmotion.com

Affiliation: TRANSPORTATION COALITION

**Subject: TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES\_AB32 SCOPING PLAN  
COMMENTS**

Comment:

Dear Chairperson Nichols:

The Transportation Coalition for Livable Communities is a diverse coalition of agencies and institutions responsible for operating, maintaining, and advancing a sustainable transportation system in California. Our primary interest in this Scoping Plan Update is to ensure that transportation-related strategies contribute to significant and long-term greenhouse gas emission reductions. Building off key elements of the 2008 Scoping Plan, we strongly recommend that the Board consider the use of cap and trade revenues for transportation projects and programs that are coordinated with land use policies in order to achieve regional greenhouse gas emission reduction targets and to meet the state's 2030 and 2050 goals.

Transportation is a key emitter of greenhouse gases, but no single strategy in this sector will achieve AB 32 goals. To reach the long-term goals of this Scoping Plan Update, the state will need to partner with local and regional governments—its “critical partners”—to implement projects that improve the efficiency and connectivity of transportation systems. In addition, infrastructure investments will need to be made to support projects that coordinate transportation and land use policies. The best research indicates that investments in transportation infrastructure lead to greater emission reductions when coordinated with surrounding land use policies and services.

Our recommendation for the Scoping Plan is that ARB consider and prioritize funding for transportation related projects based on cost effectiveness and coordination with land use policies. SB 375 has already created this framework. Regional agencies have developed Sustainable Communities Strategies to leverage coordinated transportation and land use strategies to meet long-term GHG reduction targets. Thus, prioritizing auction revenues in regional strategies that link land use to improved transportation infrastructure will generate the long-term GHG reductions critical to meeting the Scoping Plan goals.

By linking costs likely to be imposed on the motoring public to improvements in the transportation system, our proposal also aligns with broad public sentiment: the Public Policy Institute of California's July 2013 annual survey on the environment reports that over 70% of voters favor spending cap and trade revenues on public transit, repaving roads, and encouraging local governments to change land use and transportation planning so that people could drive less.

We urge you to consider these important factors in the final update to the Scoping Plan:

- SB 375 has the potential to make significant contributions to the

2030 and 2050 AB 32 Scoping Plan Update goals if it's implemented to its full potential.

- The critical component lacking is a funding mechanism tied to SB 375 to ensure that we get beyond plans to full implementation. Cap and trade revenue could be a key source of funds for this purpose and to create a transportation system with a significantly lower carbon footprint than the current one.
- A key factor in achieving SB 375 potential is integration of land use and transportation infrastructure under a performance-based approach. While the Scoping Plan highlights specific references to affordable transit-oriented development (TOD), selecting all projects, including TOD and transportation improvements, based on GHG performance will encourage changes to overall land use patterns that result in significantly greater GHG emissions reductions.
- The Transportation Coalition for Livable Communities has put forward a plan for spending a portion of cap and trade revenue that would incentivize improved land use and a more efficient transportation system while achieving the most cost-effective GHG emission reductions.
- We urge you to focus on implementing and building upon the framework of SB 375 Sustainable Community Strategies as part of achieving the Scoping Plan's 2030 and 2050 goals.

This approach is supported by members of the Transportation Coalition for Livable Communities, which includes the California Transit Association; California Alliance for Jobs; Natural Resources Defense Council; League of California Cities; California State Association of Counties; CALCOG, as well as California's major Metropolitan Planning Organizations including SACOG, MTC, SCAG and SANDAG; San Joaquin Valley Policy Council; Sacramento Metropolitan Air Quality Management District; Environmental Defense Fund; Transportation California; California Chapter of the American Planning Association; American Lung Association in California; California Center for Sustainable Energy; and a growing list of over 50 environmental, business, and government organizations statewide.

Our uniting principle is that auction revenues derived from vehicle fuels should be used to fund emission reductions from the transportation sector. This should include integrated transportation investments that implement the AB 32 regulatory program and build on the framework of SB 375 and other GHG reduction strategies. The approach incentivizes combinations of transportation investments, including transit service and operating costs, road and bridge maintenance, retrofits for complete streets and urban greening, and clean technology infrastructure - all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

An integrated strategy most equitably and effectively meets the transportation and greenhouse gas emission reduction goals of the state and local communities. Furthermore, this approach achieves the most cost-effective results and supports a range of community benefits including public health, resource protection, affordable housing, equity, air quality, safe routes to schools, and other community services.

In this Scoping Plan Update, we strongly support your consideration of cap and trade revenues as a key greenhouse gas emission reduction strategy for the transportation sector. Implementing strategies that integrate transportation and land use investments will be key in both meeting the state's 2050 goals and creating efficient and well-maintained transportation networks statewide. We urge you to consider the Transportation Coalition's proposal (attached) that was developed for the Investment Plan as part of your update to the Scoping Plan.

Sincerely,

## TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES

### STEERING COMMITTEE MEMBERS

- California Alliance for Jobs
- California Transit Association
- California State Association of Counties
- League of California Cities
- California Association of Councils of Governments
- Natural Resources Defense Council

### COALITION SUPPORT LIST

- Sacramento Area Council of Governments
- Southern California Association of Governments
- Metropolitan Transportation Commission
- San Diego Association of Governments
- San Joaquin Valley Regional Policy Council
- Sacramento Metropolitan Air Quality Management District
- Environmental Defense Fund
- Transportation California
- Self-Help Counties Coalition
- American Lung Association in California
- American Planning Association - California Chapter
- American Council of Engineering Companies of California
- Alameda County Transportation Commission
- Association of Monterey Bay Area Governments
- Bay Area Council
- California Center for Sustainable Energy
- California Urban Forests Council
- Capitol Corridor Joint Powers Authority
- Central Coast Coalition
- City of Davis
- City of Sacramento
- Cobblestone Placemaking
- Council of San Benito County Governments
- County of Marin
- County of Monterey
- County of Napa
- County of Sacramento
- County of San Bernardino
- County of Santa Clara
- County of Stanislaus
- El Dorado County Transportation Commission
- Humboldt County Association of Governments
- Kern Council of Governments
- Livermore Amador Valley Transit Authority
- Local Government Commission
- Madera County Transportation Commission
- Marlon Boarnet, Director of Graduate Programs in Planning and Development, USC
- Merced County Association of Governments
- Met Sacramento High School
- Napa County Transportation and Planning Agency
- Napa Valley Transportation Authority
- OmniTrans - San Bernardino Valley
- Placer County Transportation Planning Agency
- Sonoma County Transportation Authority/Regional Climate Protection Authority
- Richmond SPOKES
- Sacramento 350
- Sacramento Tree Foundation
- San Francisco Bay Area Rapid Transit District
- San Francisco Municipal Transportation Authority
- San Luis Obispo Council of Governments
- San Mateo County Transit District
- Santa Barbara County Association of Governments
- Santa Clara Valley Transportation Authority
- Santa Cruz County Regional Transportation Commission
- Santa Cruz Metropolitan Transit District
- Santa Monica Big Blue Bus

- Shasta Regional Transportation Agency
- Sonoma County Bicycle Coalition
- Sustainable Napa County
- Teichert
- Transportation Agency for Monterey County
- United Contractors
- Urban Counties Caucus
- Victor Valley Transit Authority
- WALKSacramento
- Western Riverside Council of Governments

ELECTED OFFICIALS SUPPORT

- Steve Cohn, Councilmember, City of Sacramento
- Don Saylor, Supervisor, County of Yolo
- Joe Krovoza, Mayor, City of Davis

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-draft-update-sp-ws-BXEAdFU1Um9VIAd3.zip>

Original File Name: TRANSPORTATION COALITION LETTER AND PROPOSAL.zip

Date and Time Comment Was Submitted: 2013-11-01 13:02:49

No Duplicates.

## **Comment 47 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

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

Subject: AB 32 IG Comments Regarding ARB's Scoping Plan Discussion Draft  
Comment:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding the 2013 Updated Scoping Plan Discussion Draft released on October 1, 2013.

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

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-draft-update-sp-ws-BmdSNlcJVzcHMwhX.pdf>

Original File Name: AB 32 IG SPU Comments\_11\_1\_2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:32:54

No Duplicates.

**Comment 48 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jeanne

Last Name: Merrill

Email Address: [jmerrill@calclimateag.org](mailto:jmerrill@calclimateag.org)

Affiliation: CA Climate and Agriculture Network

Subject: Scoping Plan Update Comments - CalCAN

Comment:

We appreciate the opportunity to provide comments on the 2013 Scoping Plan Update on behalf of the California Climate and Agriculture Network (CalCAN), a coalition of sustainable agriculture and farmer member groups. Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-draft-update-sp-ws-AWIGYQZrUGBWMVM9.pdf>

Original File Name: CalCAN Comments - Scoping Plan Update - 11-1-13.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:40:50

No Duplicates.

## **Comment 49 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: SDeslauriers@carollo.com  
Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on the Discussion Draft of the Updated Scoping Plan  
Comment:

CWCCG appreciates the opportunity to provide comments on the First Update to the Climate Change Scoping Plan Discussion Draft. The attached letter provides a summary of our comments and recommendations for CARB's consideration. We want to emphasize that wastewater treatment facilities have opportunities to be significant renewable energy providers, suppliers of a marketable renewable organic fertilizer/soil amendment product, suppliers of a sustainable water supply, and environmental stewards of our natural and working lands.

Please contact me if you have any questions at (925) 705-16404 or sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position.

Sincerely,  
Sarah Deslauriers  
CWCCG Program Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-draft-update-sp-ws-UjFdLFMxUmJRMFUK.pdf>

Original File Name: CWCCG\_AB 32 2013 Scoping Plan Update Discussion Draft\_Final.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:09:52

No Duplicates.

## **Comment 50 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Seth  
Last Name: Shonkoff  
Email Address: sshonkoff@psehealthyenergy.org  
Affiliation: PSE and UC Berkeley

Subject: PSE Comments on AB 32 Scoping Plan Draft  
Comment:

AB 32 Climate Change Scoping Plan First Update:  
Comments and Recommendations

Comments Submitted to the California Environmental Protection  
Agency  
Air and Resources Board (CARB)

by

Seth B. Shonkoff, PhD, MPH (1,2)

(1) Executive Director  
Physicians, Scientists & Engineers for Healthy Energy, Inc. (PSE)  
436 14th Street, Suite 808  
Oakland, CA 94612

(2) Visiting Scholar  
Department of Environmental Science Policy & Management  
University of California, Berkeley

sshonkoff@psehealthyenergy.org  
510.899.9706

on behalf of

Physicians, Scientists & Engineers for Healthy Energy, Inc.  
<http://www.psehealthyenergy.org>

Dear Members of the California Air Resources Board,

Physicians Scientists & Engineers for Healthy Energy (PSE) is a United States-based, multidisciplinary scientific non-profit that provides evidence-based information on novel energy production methods, such as shale gas, shale (tight) oil, and renewable energy technologies. PSE has offices in Oakland, CA, Ithaca, NY, and New York, NY, and maintains formal associations with faculty members at University of California at Berkeley, Stanford University, Cornell University, Weill Cornell Medical College, University of Pennsylvania, and George Washington University, among other institutions and organizations. The aim of PSE is to bring scientific transparency to important policy issues surrounding energy policy issues.

The Global Warming Solutions Act (AB 32) has helped California develop a balanced approach to addressing climate change through its development of regulations and market mechanisms. It has been

largely successful and has fostered a clean-energy economy through new technologies, venture capital investment, and job creation. Meanwhile, greenhouse gas emissions have dropped sharply since 2008 towards the 2020 target (427 MMT). The success of AB 32 has been due to a number of diverse measures outlined in the 2008 scoping plan, such as the a low carbon fuel standard, advanced clean cars, cap-and-trade regulation, sustainable community strategies, water efficiency, building efficiency standards, and a movement toward a 33% renewable energy portfolio standard. All of these measures are correctly focused on the reduction of greenhouse gas emissions and the transition to cleaner, sustainable forms of energy.

For this reason, we are concerned that the new scoping plan does not include a measure and evaluation of carbon and carbon equivalents stemming from oil and gas production. If California is serious about managing climate change and reaching its 2020 and 2050 greenhouse gas emissions goals, it must include fossil fuel production, and not only fossil fuel refining and consumption under the cap. Indeed, California is the fourth largest oil producer in the lower-48 United States and data suggests that it contributes a potentially significant amount of greenhouse gas emissions to the atmosphere.

The production of fossil fuel resources such as oil and gas development is a potentially significant part of the overall lifecycle emissions (Brandt 2011; Karion, Sweeney et al. 2013; Peischl 2013) of fossil fuels. Much of the oil currently developed in California is very carbon intensive to produce and process (Brandt 2011; CARB 2012). The California Air Resources Board (CARB) reported in 2012 that more than 30% of the oil developed in California is as carbon intensive to develop and refine as the Alberta tar sands in Canada (CARB 2012), one of the most climate-disrupting fuels on earth. CARB's reporting did not include the development of the Monterey Shale, which may be even more carbon intensive to develop than conventionally developed oil. Although steam injection and other types of thermal well stimulation techniques are likely to be the most greenhouse gas intensive (Brandt 2011), factors such as the production rate, well depth, and length of the lateral well may hold implications for the carbon intensity of shale tight oil and gas development, including high volume hydraulic fracturing and acidization.

Evidence suggests the process of fossil fuel development including shale tight oil and gas development using hydraulic fracturing, acidization, and other forms of well stimulation will exacerbate many environmental issues, particularly climate disruption due to fugitive methane leakage throughout the lifecycle. AB 32 appropriately considers both carbon dioxide (CO<sub>2</sub>) and CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>-eq), including methane, NO<sub>x</sub>, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons. Methane is a potent greenhouse gas with a global warming potential that is 86 times that of CO<sub>2</sub> on the 20 year time horizon (IPCC 2013), a time frame that is particularly relevant given AB 32's greenhouse gas emission goals for 2020 and 2050. Methane is vented and leaked into the atmosphere during shale gas and tight oil development production and recent field measurements in the Los Angeles Basin of California indicate that 17% of gross natural gas production is leaked to the atmosphere (Peischl 2013), a very high number from a climate and air quality perspective. According to the US EPA, oil and gas development emits more methane to the atmosphere in the United States than any other industrial process.

In addition to greenhouse gas emissions, CARB has enumerated goals of reducing co-pollutant emissions that may be health damaging such as volatile organic compound (VOC), nitrogen oxides (NO<sub>x</sub>), and 8-hr ozone attainment. While VOCs and NO<sub>x</sub> are health damaging in their own right, these compounds are the primary anthropogenic driver of atmospheric production of tropospheric (ground-level) ozone a key risk factor for asthma, other respiratory and cardiovascular illnesses (EPA 2013). Moreover, tropospheric ozone is also a

shorter-lived greenhouse pollutant and contributes to climate warming (IPCC 2013). Studies suggest that oil and gas development increase atmospheric concentrations of ground-level (tropospheric) ozone due to emissions of ozone precursor emissions such VOCs and NOx (Kemball-Cook, Bar-Ilan et al. 2010; Peñtron, Frost et al. 2012; Roy, Adams et al. 2013).

Other air pollution emissions from oil and gas development, and especially high volume hydraulic fracturing (HVHF), include diesel particulate matter, benzene, and aliphatic hydrocarbons may contribute to health problems among populations living near oil and gas development sites (McKenzie, Witter et al. 2012). Failing to put oil and gas development under the AB 32 cap could thus potentially place an unequal environmental burden on low-income people of color who disproportionately live in close proximity to oil and gas development. Much of the air pollution emissions from oil and gas development come from the production phase and thus it would be detrimental to exclude this stage of the overall development from the scope of AB 32 given its stated goals.

AB 32 is correct to focus on energy alongside transportation, agriculture, building infrastructure, water, waste, and land use as useful measures for lowering emissions and combating climate change. However, if it is serious about reaching its goal it must include more focus on oil and gas production. The comments that follow will be directed towards climate change mitigation efforts and progress toward the 2020 goal, focusing in particular on the energy sector, GHG emissions, and the latest understanding of climate science.

#### 1. Change the Global Warming Potential (GWP) of Methane (CH<sub>4</sub>) to Reflect Latest Measures from IPCC's Fifth Assessment Report (2013)

As noted in section III(C)(b) Emission Reductions to Meet the 2020 Target of the scoping plan, most national and international climate change organizations have moved to the International Panel on Climate Change's (IPCC) Fourth Assessment Report (AR4) (2007) when considering the potency (GWP) of high global warming potential gases such as methane. Previously, the board approved a total statewide GHG 1990 emissions level and 2020 emissions limit based on the IPCC's second report published in 1996. Presumably, the decision to update the 2020 goal, weighting the 1990 emissions with GWPs from the Fourth Assessment Report, was to incorporate the most accurate and current scientific information on GWPs.

Given the recent publication of IPCC's Fifth Assessment Report (AR5) on September 26, 2013, CARB likely did not have the ability to account for recent assessments in its scoping plan. However, the report is available with new numbers for the GWP of methane and other high potency greenhouse gases. CARB should incorporate these more up-to-date numbers into its weighting scheme.

The new IPCC Climate Change 2013 report assigns higher measures to the global warming potential of methane of 86 over a 20-year time frame and 34 over a 100-year time frame. This is up from 72 and 25, respectively in AR4, meaning the GWP increased 19.4% for the 20-year time frame and 36% for the 100-year time frame. These changes are not insignificant, however, the decision to adhere to up-to-date consensus climate science will determine the meaning and accuracy of CARB's statewide GHG emission inventory, forecasts, and targets.

#### 2. Include More Discussion of Methane Emissions from Oil and Gas Industry Under the Cap

The scoping plan draft acknowledges that methane is emitted from the oil and gas industry during transmission when it is vented and leaked from processing equipment and pipelines (p. 16). Then, in the impact section concerning high global warming potential gases, it is recommended that releases of high-GWP gases (e.g., methane)

should be avoided using gas recovery options, "such as...leak tightness specifications" (p. 44). The Scoping Plan acknowledges a proposal to develop a measure to reduce venting and fugitive emissions associated with oil and gas production. The proposal will be based upon a "survey of the industry to improve the emissions inventory for this sector" (p. 36).

### 3. Include All Upstream (Oil and Gas Production) And Midstream (Oil and Gas Transmission) Emission Sources Of Oil And Gas Development Under The Cap

There are multiple greenhouse pollutant emission sources in both the upstream (oil and gas production) and midstream (oil and gas transmission) that should be included under the AB 32 cap. Vented and fugitive emissions of CH<sub>4</sub>, NO<sub>x</sub>, VOCs, and other greenhouse pollutants and greenhouse pollutant precursors are known to be emitted from multiple sources including, but not limited to: wellhead compressors, pneumatic devices, heaters, flares, drill rigs, natural gas dehydrators, completion venting, blowdowns, wastewater storage tanks and sumps, and glycol dehydrators (Kemball-Cook, Bar-Ilan et al. 2010; US EPA 2012).

#### Sources Cited

Brandt, A. (2011). "Oil Depletion and the Energy Efficiency of Oil Production: The Case of California." *Sustainability* 3: 1833-1854.

CARB (2012). Detailed California-Modified GREET Pathway for California Reformulated Gasoline Blendstock for Oxygenate Blending (CARBOB) from Average Crude Refined in California. Sacramento, CA, California Air Resources Board.

EPA, U. (2013). Integrated Science Assessment for Ozone and Related Photochemical Oxidants. Washington, DC, United States Environmental Protection Agency.

IPCC (2013). Working Group I Contribution To The IPCC Fifth Assessment Report Climate Change 2013: The Physical Science Basis, Intergovernmental Panel on Climate Change.

Karion, A., C. Sweeney, et al. (2013). "Methane emissions estimate from airborne measurements over a western United States natural gas field." *Geophysical Research Letters*: n/a-n/a.

Kemball-Cook, S., A. Bar-Ilan, et al. (2010). "Ozone impacts of natural gas development in the Haynesville Shale." *Environ Sci Technol* 44(24): 9357-9363.

McKenzie, L. M., R. Z. Witter, et al. (2012). "Human health risk assessment of air emissions from development of unconventional natural gas resources." *Sci Total Environ* 424: 79-87.

Peischl, J., et al. (2013). "Quantifying sources of methane using light alkanes in the Los Angeles basin, California." *Journal of Geophysical Research: Atmospheres* 118: 1-17.

Peisach, G., G. Frost, et al. (2012). "Hydrocarbon emissions characterization in the Colorado Front Range: A pilot study." *Journal of Geophysical Research-Atmospheres* 117(D04304): 1-19.

Roy, A., P. Adams, et al. (2013). "Air pollutant emissions from the development, production and processing of Marcellus Shale natural gas." *Journal of the Air & Waste Management Association*.

US EPA (2012). Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews: 40 CFR Parts 60 and 63. Washington, DC, United States Environmental Protection Agency.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-draft-update-sp-ws-AHAFcARgUV0DZAhq.pdf>

Original File Name: PSE AB 32 Scoping Comments\_2013.11.1.pdf

Date and Time Comment Was Submitted: 2013-11-01 13:54:46

No Duplicates.

**Comment 51 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Amy  
Last Name: Mmagu  
Email Address: amy.mmagu@calchamber.com  
Affiliation: CalChamber

Subject: Scoping Plan Discussion Draft Comments  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-draft-update-sp-ws-WjlROFQ4UmwAYwln.pdf>

Original File Name: Comments - CARB Scoping Plan Update 11.1.13.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:01:44

No Duplicates.

**Comment 52 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Autumn

Last Name: Bernstein

Email Address: autumn@climateplanca.org

Affiliation: ClimatePlan

Subject: Re: Climate Change Scoping Plan, First Update

Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-draft-update-sp-ws-UDFXM1IMVjYHM1cl.pdf>

Original File Name: AB 32 scoping plan sign on letter FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:10:34

No Duplicates.

**Comment 53 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Amisha

Last Name: Rai

Email Address: arai@aee.net

Affiliation: Advanced Energy Economy

Subject: AEE Comments on Discussion Draft

Comment:

AEE comments on the draft Scoping Plan Update are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-draft-update-sp-ws-AmMAYwNnU19WIwFi.pdf>

Original File Name: AEE Scoping Plan Update Comments-11.1.13.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:12:16

No Duplicates.

## **Comment 54 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Anthony

Last Name: Harrison

Email Address: [policy@efficiencycouncil.org](mailto:policy@efficiencycouncil.org)

Affiliation: CEEIC

Subject: Efficiency Council Comments on AB 32 Scoping Plan

Comment:

To Whom It May Concern,

Please find the attached comments of the California Energy Efficiency Industry Council (Efficiency Council) on CARB's Revised AB 32 Scoping Plan.

Best Regards,

Anthony Harrison  
Policy Director  
(831) 525-5334  
[aharrison@efficiencycouncil.org](mailto:aharrison@efficiencycouncil.org)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-draft-update-sp-ws-WjlcP1M3V20HYglW.docx>

Original File Name: CEEIC letter to CARB on AB32 Scoping Plan Update.docx

Date and Time Comment Was Submitted: 2013-11-01 14:13:24

No Duplicates.

**Comment 55 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Shimoda  
Email Address: cshimoda@caltrux.org  
Affiliation: California Trucking Association

Subject: 2013 Scoping Plan Update Discussion Draft Comments  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-draft-update-sp-ws-WmhUY11tVjZVDFMy.pdf>

Original File Name: 2013 AB32 Scoping Plan OCT Discussion Draft Comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:29:55

No Duplicates.

**Comment 56 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Ann

Last Name: Trowbridge

Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)

Affiliation: Day Carter & Murphy LLP

Subject: Comments on CARB Discussion Draft of updated AB 32 Scoping Plan

Comment:

Attached please find CCDC's Comments on the California Air Resources Board 2013 Discussion Draft of Updated AB 32 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-draft-update-sp-ws-WjkCawRoV2lWNQNt.pdf>

Original File Name: Comments on the CARB 2013 Discussion Draft of Updated AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:35:16

No Duplicates.

**Comment 57 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Gagne

Email Address: dgagne@eia-global.org

Affiliation: Environmental Investigation Agency

Subject: EIA Comments on First Update to AB 32 Scoping Plan

Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-draft-update-sp-ws-VzJXOFMzUl5VMABv.zip>

Original File Name: EIA Comments on First Update to AB 32 Scoping Plan.zip

Date and Time Comment Was Submitted: 2013-11-01 14:45:54

No Duplicates.

**Comment 58 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Erica  
Last Name: Morehouse  
Email Address: emorehouse@edf.org  
Affiliation: Environmental Defense Fund

Subject: Comments on Discussion Draft  
Comment:

Please find attached EDF's comments on the Discussion Draft for the First Update to the Scoping Plan (12 pages) combined with previous comments submitted on Aug. 5.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-draft-update-sp-ws-AWRWNFA3AyMKbwBv.pdf>

Original File Name: EDFScopingPlanDiscussionDraftCommentsCombinedNov.1.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:50:22

No Duplicates.

**Comment 59 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Vitale

Email Address: [cynthia@csgcalifornia.com](mailto:cynthia@csgcalifornia.com)

Affiliation: Working Lands Coalition

Subject: Inclusion of Working Lands in the Climate Change Scoping Plan Update Discussion Draft

Comment:

Please see the attached comments submitted on behalf of the Working Lands Coalition regarding the inclusion of Working Lands in the Climate Change Scoping Plan Update Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-draft-update-sp-ws-AXZcNlc1V1sBa1A1.pdf>

Original File Name: WLC Letter to CARB- Inclusion of Working Lands in Scoping Plan 11.01.13.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:59:08

No Duplicates.

**Comment 60 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Scoping Plan Update Discussion Draft

Comment:

Please see attached for SCE's Comments on the Scoping Plan Update Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-draft-update-sp-ws-ATMGMAMzA2MKIQIz.pdf>

Original File Name: 2013-10-25 SCE Comments on Scoping Plan First Update Discussion.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:02:52

No Duplicates.

## **Comment 61 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Luke

Last Name: Wake

Email Address: luke.wake@nfib.org

Affiliation:

Subject: Comments Concerning AB 32 Scoping Plan

Comment:

Dear Ms. Nichols:

The National Federation of Independent Business Small Business Legal Center (NFIB Legal Center) submits these comments on behalf of California's small business community, and on behalf of small business owners nationwide who may be impacted by regulations promulgated by the Air Resources Board (ARB). We write specifically to express concern over speculation that ARB is laying the groundwork—through adoption of the proposed scoping plan—for regulation of greenhouse gas emissions (GHGs) in a manner that exceeds the agency's authority. Specifically, the proposed Climate Change Scoping Plan First Update refers to "California's 2020 and 2050 climate goals." But, the Legislature has not yet authorized ARB to take any action to regulate emissions beyond 2020, and has never set climate goals for 2050.

ARB's authority to regulate GHGs derives from AB 32's mandate to reduce California's GHGs to 1990 levels by the year 2020. This may confer broad authority upon the agency to tailor its regulatory program to achieve that end, but it cannot serve as a predicate for regulating beyond 2020. Nor can this grant of authority be understood to authorize ARB to take steps to reduce emissions below 1990 levels. As such, NFIB Legal Center files here to make the point that it is inappropriate for ARB to include plans for emission reductions beyond 2020, or below 1990 levels, in its scoping plans.

California is already imposing draconian burdens on the regulated community under AB 32 and NFIB would object to any further effort to exacerbate those burdens beyond what is plainly authorized by the Act. To the extent ARB is contemplating regulatory changes, we encourage the agency to specifically contemplate the effects such changes will have on small business. Moreover, we encourage the agency to consider economic feasibility of contemplated regulatory changes before committing to them in adopting the proposed scoping plan.

For the foregoing reasons, NFIB Legal Center respectfully objects to the inclusion of scoping plans proposed for the years 2021-2050.

Luke A. Wake  
NFIB SMALL BUSINESS LEGAL CENTER  
921 11th Street, Suite 400  
Sacramento, CA 95814

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-draft-update-sp-ws-BnUGY1A+UXIGaQJs.docx>

Original File Name: Scoping Plan Comments.docx

Date and Time Comment Was Submitted: 2013-11-01 15:03:02

No Duplicates.

**Comment 62 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Bundy

Email Address: kbundy@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Center for Biological Diversity Comments on Scoping Plan Update Discussion Draft

Comment:

Attached is a .zip file containing comments on the Scoping Plan Update Discussion Draft submitted by the Center for Biological Diversity on the Scoping Plan Update Discussion Draft, along with PDF copies of referenced exhibits. Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-draft-update-sp-ws-UzBUJgBzUl5VMVI7.zip>

Original File Name: Ctr Bio Div SPU Discussion Draft Comments 2013\_1101.zip

Date and Time Comment Was Submitted: 2013-11-01 15:05:43

No Duplicates.

## **Comment 63 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: Draft GHG Scoping Plan Update

Comment:

Please accept the attached package of comments on the Scoping Plan Update with respect to the waste management sector. These comments are being submitted by the Solid Waste Industry Group (SWIG) and the Solid Waste Industry for Climate Solutions (SWICS). The package consists of a cover letter and two attachments. Attachment A is a single document. Attachment B is a document with several of its own attachments. Please contact me if you have any questions.

Sincerely,

Charles A. White, P.E.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-draft-update-sp-ws-UiFTIgFpBzMFXAZ1.zip>

Original File Name: SWIG\_SWICS\_Package\_Final.10.31.13.zip

Date and Time Comment Was Submitted: 2013-11-01 15:03:37

No Duplicates.

## **Comment 64 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 65 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jody

Last Name: London

Email Address: [jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

Affiliation: Local Gov't Sustainable Energy Coalition

Subject: LGSEC Comments RE AB 32 Scoping Plan Update

Comment:

Attached please find the comments of the Local Government Sustainable Energy Coalition on the October 1 version of the AB 32 Scoping Plan Update. Please contact me with any questions or comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-draft-update-sp-ws-UGJcagExA2MHXgAx.pdf>

Original File Name: 2013\_11\_01 LGSEC Comments re Draft AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:11:37

No Duplicates.

**Comment 66 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Ken

Last Name: Weinberg

Email Address: [kweinberg@sdcwa.org](mailto:kweinberg@sdcwa.org)

Affiliation: San Diego County Water Authority

Subject: Comments on Oct 2013 Discussion Draft Climate Change Scoping Plan

Comment:

Attached please find our letter "San Diego Cuonty Water Authority  
Comments on October 2013 Discussion Draft of Climate Change Scoping  
Plan."

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-draft-update-sp-ws-WmsCNVMNWDsKPQNc.pdf>

Original File Name: 11\_01\_2013-CARB-DraftClimateActionScopingPlan.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:10:08

No Duplicates.

**Comment 67 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Erin  
Last Name: Grizard  
Email Address: erin.grizard@bloomenergy.com  
Affiliation: Bloom Energy

Subject: Bloom Energy Comments on Scoping Plan Update  
Comment:

Please find attached Bloom Energy Corporation's comments on the First Update to the AB 32 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-draft-update-sp-ws-WjhWPFU7BDhVPgVa.pdf>

Original File Name: Bloom Comments on Scoping Plan\_Final.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:51:42

No Duplicates.

**Comment 68 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Blubaugh

Email Address: [tblubaugh@emamail.org](mailto:tblubaugh@emamail.org)

Affiliation: Truck & Engine Manufacturers Association

Subject: Climate Change Scoping Plan First Update

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-draft-update-sp-ws-UDUGbVQ0VloAZVI9.pdf>

Original File Name: EMA Comments on ARB Climate Change Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-11-01 14:51:45

No Duplicates.

**Comment 69 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

Email Address: [tderivi@scppa.org](mailto:tderivi@scppa.org)

Affiliation: SCPPA

Subject: AB 32 Scoping Plan Comments

Comment:

Please see the attached comments by the Southern California Public Power Authority on the draft AB 32 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-draft-update-sp-ws-AXJXMiACMLbFMM.pdf>

Original File Name: SCPPA ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:21:56

No Duplicates.

## **Comment 70 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 71 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Jason  
Last Name: Schmelzer  
Email Address: jason@shawyoderantwih.com  
Affiliation: Shaw/Yoder/Antwih Inc.

Subject: Scoping Plan Update Comments - Solid Waste Association of North America  
Comment:

Good Afternoon,

I have attached comments for the Scoping Plan Update on behalf of the Solid Waste Association of North America (California Chapters).

Please contact me if you have any questions or would like to discuss further.

Best,

Jason Schmelzer  
Legislative Advocate  
Shaw/Yoder/Antwih Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-draft-update-sp-ws-UiFVJFU1BDkEY1UK.pdf>

Original File Name: SWANA Scoping Plan Comments Documents.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:31:23

No Duplicates.

## **Comment 72 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Mike

Last Name: Jacob

Email Address: [mjacob@pmsaship.com](mailto:mjacob@pmsaship.com)

Affiliation: Pacific Merchant Shipping Association

Subject: PMSA Comments to "Draft-Update-SP-WS"

Comment:

Please find attached PMSA's comments on the Discussion Draft of the Update to the AB 32 Scoping Plan.

thank you,

Mike Jacob

Vice President & General Counsel

PMSA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-draft-update-sp-ws-UCACaQFzV2UDWgh7.pdf>

Original File Name: PMSA scoping plan comments (11-1-13).pdf

Date and Time Comment Was Submitted: 2013-11-01 15:35:20

No Duplicates.

**Comment 73 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Rasberry

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

Affiliation:

Subject: SDG&E Comments on 2013 Scoping Plan Update Draft

Comment:

Attached are comments filed by San Diego Gas and Electric.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-draft-update-sp-ws-VzFTPFWzAzEHbQIW.pdf>

Original File Name: Final SDGE Comments 2013 Scoping Plan Update Discussion Draft 10-31-2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:41:28

No Duplicates.

**Comment 74 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Rob  
Last Name: McHenry  
Email Address: Rob.McHenry@parc.com  
Affiliation: PARC

Subject: PARC Scoping Plan Update Comments  
Comment:

Please find attached PARC's comments on the Discussion Draft of the First Update of the Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-draft-update-sp-ws-U2EFM1NjVDRWfQAx.pdf>

Original File Name: 2013-10-31 PARC Comments on Updated Scoping Plan (final).pdf

Date and Time Comment Was Submitted: 2013-11-01 15:41:15

No Duplicates.

## **Comment 75 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Blacet

Email Address: danielleb@acwa.com

Affiliation: Association of California Water Agencies

Subject: Discussion Draft of the 2013 Updated AB 32 Scoping Plan

Comment:

Please see the attached comments from the Association of California Water Agencies on the Discussion Draft of the 2013 Updated AB 32 Scoping Plan.

Please feel free to contact me with any questions. Thank you.

Danielle Blacet  
Special Projects Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-draft-update-sp-ws-BmcAZAFFAmIANAVa.pdf>

Original File Name: AB 32 Scoping Plan Update Discussion Draft Final Cmts 110113.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:45:28

No Duplicates.

**Comment 76 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tim

Last Name: Carmichael

Email Address: [tim@cngvc.org](mailto:tim@cngvc.org)

Affiliation: CA Natural Gas Vehicle Coalition

Subject: Natural Gas Transportation

Comment:

Please find our multi-stakeholder comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-draft-update-sp-ws-WzpTN1dlVTQGX1ck.pdf>

Original File Name: AB32 Scoping Plan comment letter re Nat Gas transportation final.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:49:39

No Duplicates.

## Comment 77 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.

First Name: Jeffrey  
Last Name: Creque  
Email Address: jacreque@sonic.net  
Affiliation: Marin Carbon Project

Subject: Scoping Plan Update

Comment:

TO: CA ARB  
FROM: Marin Carbon Project  
RE: Comments on the ARB Climate Change Scoping Plan First Update  
DATE: 11/1/13

The Marin Carbon Project (MCP) welcomes the opportunity to comment on the ARB Climate Change Scoping Plan of October, 2013. Research conducted by the MCP in conjunction with UC Berkeley and UC Cooperative Extension (Ryals and Silver, 2012, Delonge, 2013) over the past six years has tested and confirmed the enormous carbon sequestration potential of California's soils, given appropriate management intervention, including the use of compost on permanent pastures and rangeland systems. We are pleased, therefore, to see the inclusion of carbon sequestration language throughout the Scoping Plan, particularly in the working lands and agricultural sectors. Nevertheless, the enormous potential of biological sequestration -particularly soil sequestration of carbon- in California is not fully recognized in the Plan. We focus our comments, therefore, by providing suggested language in bold italics to strengthen the carbon sequestration component of the Plan.

As the Plan makes clear, reducing emissions is essential, but not enough to reduce atmospheric greenhouse gases to safe levels. We must take advantage of the enormous capacity of our managed lands to capture increased quantities of atmospheric carbon by supporting that capacity with informed management. The diversion of organics from anaerobic storage or disposal systems to aerobic composting, and utilization of compost for the enhancement of soil quality, is among the carbon-sequestering and GHG avoidance practices advocated by the MCP due to its powerful capacity to increase water holding capacity and plant productivity, which in turn drive the capacity of landscapes for further carbon capture and sequestration.

Thank you again for the opportunity to comment on the ARB Scoping Plan Update.

Jeffrey Creque, Ph.D.  
Marin Carbon Project  
jacreque@sonic.net

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-draft-update-sp-ws-VTQHc1U2BwtVIFQ3.docx>

Original File Name: ARB Scoping Comments.docx

Date and Time Comment Was Submitted: 2013-11-01 15:52:43

No Duplicates.

**Comment 78 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: West

Email Address: [jwest@cmua.org](mailto:jwest@cmua.org)

Affiliation:

Subject: CMUA Comments on Draft Scoping Plan -- Water Sector

Comment:

These comments are intended to replace our previous comments (number 34) submitted this morning.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-draft-update-sp-ws-WzgHbAdzWGoHXlQ3.pdf>

Original File Name: CMUA CARB-AB32 Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:52:13

No Duplicates.

## **Comment 79 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Felicity  
Last Name: Gasser  
Email Address: fgasser@housingca.org  
Affiliation: Housing California

Subject: Comments on Update to the Scoping Plan  
Comment:

Dear Chairman Nichols and Members of the Board,

Please see attached letter submitted on behalf of Housing California, San Diego Housing Federation, California Housing Partnership, Center for Sustainable Neighborhoods, Non-profit Housing Association of Northern California and the Sacramento Housing Alliance.

Thank you for the opportunity to comment.

Sincerely,

Felicity Gasser  
Housing California

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-draft-update-sp-ws-UjFTOgNvAD5VNIQ6.pdf>

Original File Name: Comments on First Update of Climate Change Scoping Plan.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:55:36

No Duplicates.

**Comment 80 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Bill  
Last Name: Higgins  
Email Address: [bhiggins@calcog.org](mailto:bhiggins@calcog.org)  
Affiliation: CALCOG

Subject: Scoping Plan Comments  
Comment:

The comments of the California Association of Councils of Governments is attached to this message.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-draft-update-sp-ws-VTZQN1E8WGhVPAVi.pdf>

Original File Name: CALCOG SP Comments.pdf

Date and Time Comment Was Submitted: 2013-11-01 15:58:57

No Duplicates.

**Comment 81 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Rader

Email Address: nrader@calwea.org

Affiliation: CA Wind Energy Assn

Subject: Comments on Scoping Plan Update Discussion Draft

Comment:

Please see attached file. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-draft-update-sp-ws-AGNTNFM+ACRWNVQ1.pdf>

Original File Name: CalWEA Comments on ARB Scoping Plan Update Discussion Draft (11-1-13).pdf

Date and Time Comment Was Submitted: 2013-11-01 15:59:43

No Duplicates.

**Comment 82 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Jamie

Last Name: Hall

Email Address: [jhall@calstart.org](mailto:jhall@calstart.org)

Affiliation: CALSTART

Subject: CALSTART Comments on Discussion Draft of First Update to AB 32 Scoping Plan

Comment:

CALSTART's comments on the Discussion Draft of First Update to the AB 32 Scoping Plan are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-draft-update-sp-ws-AWJVMIE8V3dXJQFg.pdf>

Original File Name: CALSTART comments on AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:05:09

No Duplicates.

**Comment 83 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tess

Last Name: Lengyel

Email Address: tlengyel@alamedactc.org

Affiliation:

Subject: Comments on AB 32 Scoping Plan Update Comments

Comment:

Hello, Please accept this letter from the Bay Area Congestion Management agencies commenting on the AB 32 Scoping Plan Update Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-draft-update-sp-ws-UzBSOV09Aw9QN1U3.pdf>

Original File Name: CMA\_AB32Scoping Plan updateLetter\_20131101.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:06:49

No Duplicates.

**Comment 84 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Adrienne

Last Name: Alvord

Email Address: AAlvord@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Union of Concerned Scientists Scoping Plan Comments

Comment:

The Union of Concerned Scientists (UCS) is pleased to have the opportunity to comment on the California Air Resources Board (CARB) Discussion Draft to the Climate Change Scoping Plan First Update (the Scoping Plan Update, or Update). Please see the attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-draft-update-sp-ws-VSACZ1clAg4Lfqlq.pdf>

Original File Name: UCS Scoping Plan Comments\_November 2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:10:41

No Duplicates.

**Comment 85 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Paul

Last Name: Buttner

Email Address: pbuttner@calrice.org

Affiliation:

Subject: Discussion Draft of New AB 32 Scoping Plan

Comment:

Comments from the California Rice Commission are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-draft-update-sp-ws-UTIGcgNhAg5RNAZp.pdf>

Original File Name: CRC Comments-ScopingPlan(Nov2013).pdf

Date and Time Comment Was Submitted: 2013-11-01 16:13:44

No Duplicates.

## **Comment 86 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Skip

Last Name: Lacaze

Email Address: skip.lacaze@sanjoseca.gov

Affiliation: City of San Jose

Subject: City of San José comments on Scoping Plan Update

Comment:

Please accept the attached comments from the City of San José on the Draft Scoping Plan.

Local communities have one of the most important opportunities to impact greenhouse gases. Local communities lead planning efforts that set the foundation for building and transit options. Local communities drive change locally and this is what will create the long term success and change that is needed to meet and exceed California's objectives. Therefore, we respectfully request that there be significant investment in local government from the auction proceeds so that we can deliver the carbon reduction programs and sustainable communities of the future.

Please do not hesitate to contact me with any questions regarding these or our previous comments.

Skip Lacaze  
Sustainability and Compliance Division  
City of San José | Environmental Services Department  
200 E Santa Clara St - Fl 10 | San José, CA 95113

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-draft-update-sp-ws-AnECZVwzAg4Db1Q7.pdf>

Original File Name: San Jose comments on scoping plan.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:05:09

No Duplicates.

**Comment 87 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: J.P.

Last Name: Cativiela

Email Address: caresjp@aol.com

Affiliation:

Subject: Dairy Cares Comments on Discussion Draft

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-draft-update-sp-ws-VTEFYgRsUnMHeAFi.pdf>

Original File Name: DairyCares comment.11.1.13.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:21:23

No Duplicates.

**Comment 88 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Amy  
Last Name: Kopin  
Email Address: amy.kopin@daimler.com  
Affiliation: Daimler

Subject: DTNA Comments on CARB's Scoping Plan  
Comment:

DTNA Comments on CARB's Scoping Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-draft-update-sp-ws-BWFSIFI9WWtSCwdh.doc>

Original File Name: DTNA Final Comments on CARB Scoping Plan 11\_1\_13.doc

Date and Time Comment Was Submitted: 2013-11-01 16:20:28

No Duplicates.

**Comment 89 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Claire

Last Name: Halbrook

Email Address: [cehu@pge.com](mailto:cehu@pge.com)

Affiliation: PG&E

Subject: PG&E Comments on the Discussion Draft of the Scoping Plan Update

Comment:

PG&E Comments on the Discussion Draft of the Scoping Plan Update

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-draft-update-sp-ws-WipcPVULU2UKU1Q3.pdf>

Original File Name: PG&E Comments on Discussion Draft of Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:26:59

No Duplicates.

## **Comment 90 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Tim

Last Name: Shestek

Email Address: [tim\\_shestek@americanchemistry.com](mailto:tim_shestek@americanchemistry.com)

Affiliation: American Chemistry Council

Subject: Comments re: Update to the AB 32 Scoping Plan

Comment:

The American Chemistry Council's (ACC) Plastics Division is pleased to submit these comments on the California Air Resources Board's discussion draft to update AB 32. The goal of reducing greenhouse gas emissions is an important one, and we hope to provide helpful comments and insights to the Board in both these written comments as well as later in the public comment process.

ACC sponsors educational and outreach programs to improve plastics recycling and recovery. Environmental policy is a critical issue for the business of American chemistry and we are pleased to participate as stakeholders in this important activity.

We do not here comment on all the areas presented in the Draft. Our primary purpose in commenting is to emphasize for the Board that plastics play a critical role in reducing greenhouse gas emissions in several key areas, and to explain how enhanced recycling and recovery of plastics could provide additional greenhouse gas emissions reductions in the state.

Please feel free to contact us should you have any questions or comments. Thank you in advance for considering our views.

Steven Russell  
Vice President, Plastics Division  
202-249-7000  
[steven\\_russell@americanchemistry.com](mailto:steven_russell@americanchemistry.com)

Craig Cookson  
Director, Sustainability  
202-249-6622  
[craig\\_cookson@americanchemistry.com](mailto:craig_cookson@americanchemistry.com)

Tim Shestek  
Senior Director, State Affairs  
916-448-2581  
[tim\\_shestek@americanchemistry.com](mailto:tim_shestek@americanchemistry.com)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-draft-update-sp-ws-AmQCbV0yVmRVPwZZ.pdf>

Original File Name: Final\_California AB32 Scoping Plan\_comments\_11 1 2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:22:08

No Duplicates.

## **Comment 91 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Quentin

Last Name: Foster

Email Address: Quentin@caletc.com

Affiliation: CalETC

Subject: 2013-14 Climate Change Scoping Plan Comments

Comment:

November 1, 2013

CalETC Comments: 2013-14 Climate Change Scoping Plan (Revised Staff Draft)

Dear Chairman Nichols,

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the 2013-2014 Climate Change Scoping Plan, Revised Staff Draft. CalETC is a non-profit coalition with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric Company, Sacramento Municipal Utility District, San Diego Gas & Electric Company and Southern California Edison.

CalETC fully supports the ARB staff's hard work in taking a more collaborative approach, working with other agencies in addressing emission reductions. We agree with ARB staff that more is needed particularly in addressing heavy duty fleet usage in freight transportation, and support the staff's approach to incorporate stakeholder involvement in developing a 2014 Sustainable Freight Strategy (page 24). Additionally, we welcome the opportunity to provide assistance with ARB's upcoming assessments of transportation electrification segments such as off-road equipment, airport ground support equipment, ports and rail in future Scoping Plans.

We encourage ARB staff to continue to look at accomplishing the state's GHG and AQ emission reduction goals from a broad perspective that includes the many benefits, both fiscal and environmental, associated with the electrification of the transportation sector.

CalETC also commends the ARB staff for taking a "well-to-wheels" lifecycle approach where the power plants, refineries, and other production facilities are being included in its review of the transportation system impact on the energy sector.

Pursuant to the original language in the initial Scoping Plan (page 106, 2008), CalETC anticipates ARB staff will continue to incorporate all information and stakeholder input during the plan development process. The momentum for addressing California's emissions goals continues to grow with constant collaborative engagement. The ARB will need to consider both stakeholder and participating agency recommendations in order to maintain the progress this momentum has yielded.

We recognize there are still many steps to take to accomplish the emissions goals the state has set for 2020 and achieve the goals beyond 2020. CalETC is committed to continual engagement with economic stakeholders, the ARB and other state agencies in progressing towards California's environmental goals.

Sincerely,

Eileen Wenger Tutt, Executive Director  
California Electric Transportation Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-draft-update-sp-ws-VTZdOlY7AzVSIAFi.pdf>

Original File Name: CALETC Scoping Plan Comments (FINAL) 11-01-2013.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:30:37

No Duplicates.

## **Comment 92 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Nic  
Last Name: Lutsey  
Email Address: nic@theicct.org  
Affiliation: ICCT

Subject: Climate Change Scoping Plan Update  
Comment:

November 1, 2013

RE: California Air Resources Board's Climate Change Scoping Plan  
First Update

The International Council on Clean Transportation (ICCT) welcomes the opportunity to provide comments on the California Air Resources Board's Climate Change Scoping Plan First Update: Discussion Draft for Public Review and Comment. The ICCT is an independent nonprofit organization founded to provide first-rate, unbiased research and technical analysis. Our mission is to improve the environmental performance and energy efficiency of road, marine, and air transportation, as well as their fuels, in order to benefit public health and mitigate climate change.

The ICCT has long supported, and welcomes the opportunity to provide comments on, California's efforts to mitigate global climate change. We commend the Air Resources Board for its continuing efforts to promote a cleaner, lower-carbon economy and especially for its leadership in the transportation sector. We hope these comments can help in the dialogue to continue to develop a comprehensive long-term strategy to stabilize the effects from human-caused climate change.

We would be glad to clarify or elaborate on any points made in the attached comments. If there are any questions, Air Resources Board staff can feel free to contact our US program co-Lead, Dr. Nicholas Lutsey (nic@theicct.org).

Fanta Kamakaté  
Chief Program Officer  
International Council on Clean Transportation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-draft-update-sp-ws-VD0GY1EzWX4LUIQ3.pdf>

Original File Name: ICCT comments CA Scoping v6.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:28:22

No Duplicates.

## **Comment 93 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Tim

Last Name: Schott

Email Address: [tschott@schottlites.com](mailto:tschott@schottlites.com)

Affiliation: California Association of Port Authoriti

Subject: Discussion Draft Scoping Plan - CAPA Comments

Comment:

Please accept these comments from the California Association of Port Authorities (CAPA) regarding the Discussion Draft Climate Change Scoping Plan.

We appreciate the opportunity to comment and look forward to working with you to continue our historic efforts to improve California's air quality.

If you have questions or concerns, please email or call.

Thank you.

Tim Schott  
Executive Director  
California Association of Port Authorities (CAPA)  
(916) 444-7158 office  
(916) 607-0700 cell

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-draft-update-sp-ws-VSYGY10zBSZVOgln.pdf>

Original File Name: ScopingPlan.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:45:06

No Duplicates.

## Comment 94 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.

First Name: Jim

Last Name: Stewart

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Emissions 80% below 1990 levels do not protect health and safety of Californians.

Comment:

The latest science makes it urgent that California go faster than just aiming to reducing emissions to 80% below 1990 levels by 2050, as specified in Executive Order S-3-05. The best available scientific data now indicates that the threats posed by even small increases in temperature are far greater than previously thought. Stabilization of greenhouse gas emissions at 450 ppm and targets of less than 2°C increase are insufficient to minimize the risk of catastrophic outcomes. These analyses show the best available science strongly supports immediately stopping all GHG emissions in order to prevent dangerous climate change and protect the health and safety of all Californians.

Executive Order S-3-05 lists several of the consequences of climate change where it states, "...increased temperatures also threaten to further exacerbate California's air quality problems and adversely impact human health by increasing heat stress and related deaths, the incidence of infectious disease, and the risk of asthma, respiratory and other health problems."

As Naomi Klein reports (<http://www.newstatesman.com/2013/10/science-says-revolt>), "Anderson and Bows inform us that the often-cited long-term mitigation target - an 80 per cent emissions cut below 1990 levels by 2050 - has been selected purely for reasons of political expediency and has "no scientific basis". That's because climate impacts come not just from what we emit today and tomorrow, but from the cumulative emissions that build up in the atmosphere over time. And they warn that by focusing on targets three and a half decades into the future - rather than on what we can do to cut carbon sharply and immediately - there is a serious risk that we will allow our emissions to continue to soar for years to come, thereby blowing through far too much of our 2° "carbon budget" and putting ourselves in an impossible position later in the century."

For more information see: Jordan A, et al. 2013. Going beyond two degrees? The risks and opportunities of alternative options, *Climate Policy*, 13:6, 751-769, DOI: 10.1080/14693062.2013.835705, plus slide show at <http://www.slideshare.net/DFID/professor-kevin-anderson-climate-change-going-beyond-dangerous>  
Also: Anderson, K., Bows, A., (2011) Beyond 'dangerous' climate change: emission scenarios for a new world. *Philosophical Transactions of the Royal Society A*: 369, 20-44, doi:10.1098/rsta.2010.0290, and references therein.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-01 16:54:34

No Duplicates.

## **Comment 95 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Brian

Last Name: Biering

Email Address: bsb@eslawfirm.com

Affiliation:

Subject: Praxair, Inc.'s Comments on the Updated Scoping Plan

Comment:

Deard Clerk of the Board,

Please find attached Praxair Inc.'s Comments on the updated Scoping Plan.

If you have questions, please contact us.

Sincerely,

Brian S. Biering  
Attorneys for Praxair

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-draft-update-sp-ws-UmMGM1dnBWYFMFNj.pdf>

Original File Name: 131030\_Praxair ARB Scoping Plan Comments (00194450).pdf

Date and Time Comment Was Submitted: 2013-11-01 16:54:49

No Duplicates.

**Comment 96 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Hal

Last Name: Romanowitz

Email Address: hal@altonenergy.com

Affiliation: Alton Energy

Subject: Alton Energy Comments to Scoping Plan

Comment:

With this message we upload our timely filed comments to the Scoping Plan, due November 1, 2013.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-draft-update-sp-ws-B2YBawN2UGwHb1QL.pdf>

Original File Name: Alton - ARB Comments on Draft Scoping Plan 20131101.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:30:50

No Duplicates.

## **Comment 97 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Marybelle

Last Name: Nzegwu

Email Address: mnzegwu@publicadvocates.org

Affiliation: Staff Attorney

Subject: Joint Comments on AB 32 Scoping Plan Discussion Draft

Comment:

Please find the attached joint comments submitted by Public Advocates Inc., Urban Habitat, Regional Asthma Management & Prevention, Breakthrough Communities, and West Oakland Environmental Indicators Project on ARB's AB 32 Scoping Plan Update Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-draft-update-sp-ws-VD5QOVw0WWQKeAFe.pdf>

Original File Name: Joint Comments on AB 32 Scoping Plan Discussion Draft 11-1-13.pdf

Date and Time Comment Was Submitted: 2013-11-01 16:38:51

No Duplicates.

**Comment 98 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Lautze  
Email Address: [slautze@oaklandnet.com](mailto:slautze@oaklandnet.com)  
Affiliation: CARMDZ

Subject: Updated Scoping Comments  
Comment:

Right at the wire...

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-draft-update-sp-ws-AGMCZVAjBzlVNwZ8.doc>

Original File Name: CARMDZ AB 32 Scope Comments 11-1-13.doc

Date and Time Comment Was Submitted: 2013-11-01 16:58:54

No Duplicates.

**Comment 99 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

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

Subject: Comments on the 2013 Scoping Plan Update-Waste Management Sector  
Comment:

Our comments on the AB 32 Scoping Plan Update are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-draft-update-sp-ws-VDdSN1Y0UV0Kf1Q3.pdf>

Original File Name: CCC Scoping Plan - Draft Comments 110113.pdf

Date and Time Comment Was Submitted: 2013-11-04 09:33:45

No Duplicates.

## **Comment 100 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Mary  
Last Name: Bean  
Email Address: mbean@brandman.com  
Affiliation: FirstCarbon Solutions

Subject: Considering streamlining for Central Valley food production facilities  
Comment:

I realize I just missed your deadline. Please consider this brief comment:

Meeting the 2050 target reduction could benefit from consequent streamlining of CEQA to allow for the development of food production facilities in the Central Valley.

Produce is often sent out of state for processing rather than simply being processed locally. By encouraging the development of food processing facilities in the Central Valley, the current VMT and associated GHG emissions could be greatly reduced. A co-benefit would be job creation, which would benefit the residents of the hard hit counties of the Central Valley.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-04 10:38:42

No Duplicates.

**Comment 101 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: [Mpassero@tnc.org](mailto:Mpassero@tnc.org)

Affiliation:

Subject: TNC comments on Scoping Plan Update Discussion Draft

Comment:

Please replace the comments submitted by TNC on Friday Nov. 1 with the attached comments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-draft-update-sp-ws-V2Vda1dnB2AKaAV3.pdf>

Original File Name: 2014DraftSCopingPlanCommentsTNC.pdf

Date and Time Comment Was Submitted: 2013-11-04 12:22:03

No Duplicates.

## **Comment 102 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Tony  
Last Name: Brunello  
Email Address: tbrunello@greentechleadership.org]  
Affiliation: California Strategies, LLC

Subject: Question/comment  
Comment:

I commend ARB on working to include the reduction of high GWP gas measures in California. One area that receives little to no attention is addressing the use of high GWP gases in building materials. I would like to recommend more specific language in the Scoping Plan to reduce GHG emissions through use of Low GWP building material alternatives that are currently commercially available.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-04 14:15:09

No Duplicates.

## **Comment 103 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Ed

Last Name: Pike

Email Address: [epike@energy-solution.com](mailto:epike@energy-solution.com)

Affiliation: Energy Solutions

Subject: comments for AB32 scoping plan update

Comment:

We appreciate the efforts of CARB staff to prepare the scoping plan update including looking ahead to long term targets.

We encourage you to build on California's leadership reducing transportation emissions by including action items for passenger vehicle in-use efficiency in the scoping plan update. We believe that estimates in the original scoping plan (p.C-64) of \$750 million annual consumer savings and 3 million metric tons per year of GHG reduction are very achievable.

In particular we recommend that the update include a pathway to improve deployment of fuel efficient passenger vehicle replacement tire and engine oil technology, which were included as part of measure T-4 in the original scoping plan. The scoping plan update should recognize the benefits of exploring both incentives and standards. The discussion draft update defers to possible action by the Department of Transportation (p.25) for tires. This program is several years overdue and would be limited to ratings and customer information, which are helpful but not likely to achieve the full potential benefit of policies to promote low rolling resistance tires. We also encourage including action items for similar efforts for improved engine oil technology in-use.

Thank you for the opportunity to provide suggestions for the AB32 Scoping Plan update.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-04 14:18:59

No Duplicates.

## **Comment 104 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defence Fund

Subject: EDF comment in current workshop

Comment:

EDF will also be providing more detailed written comments. But for now I would like to voice our strong support for the recommendation that California set a 2030 target. A 2030 target would send an important message to the market that long-term investments in clean energy are necessary. Evidence that EDF has collected in Europe demonstrate that a longer-term price signal can mean more banking, earlier emissions reductions, and long-term market stability. We look forward to working closely with ARB and with other decision makers in California as they consider planning for a 2030 target. We would also like to echo NRDC in noting that ARB is well within it's legal authority to provide recommendations and engage in this type of planning regarding post-2020 GHG reduction activities that are needed in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-04 14:21:10

No Duplicates.

## **Comment 105 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Jay

Last Name: McKeeman

Email Address: [jaymck@cioma.com](mailto:jaymck@cioma.com)

Affiliation: California Independent Oil Marketers Ass

Subject: CIOMA Comments on AB 32 2050 Scoping Plan

Comment:

per comments by Mike Tollstrup and others at Friday's meeting with the agricultural community in Modesto we submit the attached comments on the 2050 AB 32 Scoping Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-draft-update-sp-ws-WzhcM1U7VGoBZIMM.pdf>

Original File Name: CIOMA comments on AB 32 2050 Scoping Plan 11-1-13.pdf

Date and Time Comment Was Submitted: 2013-11-04 15:25:50

No Duplicates.

**Comment 106 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Rasberry

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

Affiliation:

Subject: 2013 Scoping Plan Update Comments

Comment:

Attached are CORRECTED comments from the Southern California Gas Company. Please do not hesitate to contact me for further questions.

Tamara Rasberry

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-draft-update-sp-ws-UzBWP1YlAyIAYwhr.pdf>

Original File Name: Corrected Final\_SCG comments on Scoping Plan 11-1-13.pdf

Date and Time Comment Was Submitted: 2013-11-04 16:35:55

No Duplicates.

**Comment 107 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Barry  
Last Name: Wallerstein  
Email Address: [bwallerstein@aqmd.gov](mailto:bwallerstein@aqmd.gov)  
Affiliation: South Coast AQMD

Subject: Updated Scoping Plan Comments  
Comment:

Please see SCAQMD's attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-draft-update-sp-ws-WyhcOVY2V3VXPFM3.pdf>

Original File Name: SCAQMD-UpdatedScopingPlan.pdf

Date and Time Comment Was Submitted: 2013-11-05 08:22:38

No Duplicates.

## **Comment 108 for Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) - 1st Workshop.**

First Name: Tranette

Last Name: Sanders

Email Address: TSANDERS@dpw.lacounty.gov

Affiliation: LA Co Solid Waste Man. Com. Task Force

Subject: Comments

Comment:

Please see the attached correspondence from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) commenting on the 2013 Updated AB 32 Scoping Plan (Discussion Draft) that was released on October 1, 2013.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/117-draft-update-sp-ws-VDhXMAZYV2cFbFQL.pdf>

Original File Name: LA Co Solid Waste Com 10-31-13.pdf

Date and Time Comment Was Submitted: 2013-11-05 08:30:46

No Duplicates.

**Comment 109 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: [bonnie.holmes-gen@lung.org](mailto:bonnie.holmes-gen@lung.org)

Affiliation: American Lung Assoc. in California

Subject: Comments

Comment:

Please accept our American Lung Association in California updated comments on the Scoping Plan Update. Many thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-draft-update-sp-ws-VztVJgFuWGwLULMy.doc>

Original File Name: Lung Association Scoping Plan Update Comments 10 31 13 docx (2).doc

Date and Time Comment Was Submitted: 2013-11-05 08:36:27

No Duplicates.

**Comment 110 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Curtis

Last Name: Moore

Email Address: camoore@erols.com

Affiliation:

Subject: Comments

Comment:

Please find attached as a WordPerfect document my comments for the Board's AB 32 Scoping Hearing.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-draft-update-sp-ws-USUAaVQhUmBXPVUK.rtf>

Original File Name: Total comments C. Moore 10.16.13.rtf

Date and Time Comment Was Submitted: 2013-11-05 08:43:38

No Duplicates.

**Comment 111 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Casey  
Last Name: Creamer  
Email Address: casey@ccgga.org  
Affiliation: CCGGA/WAPA

Subject: Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-draft-update-sp-ws-ViVcOV0zAiFRPghm.pdf>

Original File Name: Scoping Plan Comments 11.5.13 (2) copy.pdf

Date and Time Comment Was Submitted: 2013-11-07 07:44:31

No Duplicates.

**Comment 112 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Hunter

Last Name: Parks

Email Address: [hunter@green-assets.com](mailto:hunter@green-assets.com)

Affiliation:

Subject: Comments on Draft Discussion of Scoping Plan October 2013

Comment:

Please see attached document...

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-draft-update-sp-ws-BmdTJwZIU18FYFQ7.pdf>

Original File Name: ARB comment FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-07 08:44:06

No Duplicates.

**Comment 113 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Hal  
Last Name: Romanowitz  
Email Address: hal@altonenergy.com  
Affiliation: Alton Energy

Subject: COMMENTS OF ALTON ENERGY ON ARB SCOPING PLAN DISCUSSION DRAFT  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-draft-update-sp-ws-VDVQOIQhADwDawFe.pdf>

Original File Name: Alton - ARB Comments on Draft Scoping Plan 20131101.pdf

Date and Time Comment Was Submitted: 2013-11-07 09:09:33

No Duplicates.

**Comment 114 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Julie

Last Name: Bussey

Email Address: JBussey@chevron.com

Affiliation:

Subject: Comments

Comment:

See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-draft-update-sp-ws-  
VTYBb1czVHEGcghn.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-draft-update-sp-ws-VTYBb1czVHEGcghn.pdf)

Original File Name: Chevron Comments on Climate Change Scoping Plan First Update.pdf

Date and Time Comment Was Submitted: 2013-11-07 11:58:41

No Duplicates.

**Comment 115 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Heidi

Last Name: Sanborn

Email Address: climatechange@calrecycle.ca.gov

Affiliation: California Product Stewardship Council (

Subject: COMMENTS ON AB 32 SCOPING PLAN UPDATE – WASTE MANAGEMENT SECTOR

Comment:

COMMENTS ON AB 32 SCOPING PLAN UPDATE – WASTE MANAGEMENT SECTOR

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-draft-update-sp-ws-VDdcKgFzAzMFXAhp.pdf>

Original File Name: CPSC AB 32 Scoping Plan Comments 2013\_11\_01.pdf

Date and Time Comment Was Submitted: 2013-11-07 13:33:37

No Duplicates.

**Comment 116 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Dennis  
Last Name: Albiani  
Email Address: DALbiani@caladvocates.com  
Affiliation: National Renderers Association

Subject: Comments on the 2013 Scoping Plan Update  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-draft-update-sp-ws-UGJTZVFhA2MDNAIz.pdf>

Original File Name: 20131112145240413.pdf

Date and Time Comment Was Submitted: 2013-11-13 08:02:01

No Duplicates.

**Comment 117 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: Ed  
Last Name: Pike  
Email Address: [epike@energy-solution.com](mailto:epike@energy-solution.com)  
Affiliation: Energy Solutions

Subject: comments for AB32 scoping plan update  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-draft-update-sp-ws-AWRTO1UxV3YlagJ7.pdf>

Original File Name: Energy Solutions AB32\_scoping plan comment 11-1-2013.pdf

Date and Time Comment Was Submitted: 2013-11-13 08:32:16

No Duplicates.

**Comment 118 for Scoping Plan Update Discussion Draft and Workshop Comments Log  
(draft-update-sp-ws) - 1st Workshop.**

First Name: V John

Last Name: White

Email Address: [tehya@ceert.org](mailto:tehya@ceert.org)

Affiliation:

Subject: CEERT's Comments on the California Air Resources Board (CARB) 2015 Draft Update

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-draft-update-sp-ws-VTZTMFYyU3IEdgBf.doc>

Original File Name: CEERT Scoping Plan Comments\_11\_1\_13.doc

Date and Time Comment Was Submitted: 2013-11-14 10:28:42

No Duplicates.

**There are no comments posted to Scoping Plan Update Discussion Draft and Workshop Comments Log (draft-update-sp-ws) that were presented during the Workshop at this time.**