

## Comment 1 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

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

Subject: Reducing GHG Emissions and Conserving California's Water

Comment:

As Presented In The Scoping Plan:

Water is the lifeblood of our State and economy, and integrally connected to our food supply and energy systems. With the declaration of a drought emergency, the State needs to employ a range of approaches that will cut emissions, maximize efficiency and conservation, and enhance water quality and supply reliability, while also addressing growing climate resiliency requirements. A greater focus on integrated policy design in the water sector is needed as California implements strategies that will support our State's longer-term climate objectives. State policy and regulatory frameworks must be developed that allow for, and incentivize, effective regional integrated planning and implementation. We need to employ pricing policies that will maximize efficiency and conservation efforts in the water sector, and put in place mandatory conservation measures to reduce greenhouse gas emissions and maintain water supply reliability during drought periods.

Last year California commercial buildings and industry and the electricity producing power plants consumed approximately 1.8 Trillion cu.ft of natural gas. Approximately 60% of this combusted natural gas was wasted and blown up chimneys across the state as Hot exhaust. This does not help us in our battle against global warming. This heat energy can be recovered with technologies, making this heat energy available for a variety of different applications.

Natural gas can be utilized to near 100% energy efficiency. The US Department of Energy states that for every 1 million Btu's of heat energy that is recovered from this combusted exhaust and is utilized, 117 lbs of CO2 will not be put into the atmosphere. In every 1 million Btu's of combusted natural gas are 5 gallons of distilled water. The IEA just put out a report stating that if 20% of the water is recovered from a power plants exhaust, the power plant would be self sustaining. If more than 20% was recovered the power plant could be a water supplier.

This is something that California should be placing more importance on to reducing global warming and CO2 emissions and helping to conserve our water.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-20 13:25:22

No Duplicates.

## **Comment 2 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Nathan

Last Name: Ahle

Email Address: nahle@fresnochamber.com

Affiliation: Fresno Chamber of Commerce

Subject: CARB AB-32 Implementation

Comment:

On behalf of the Fresno Chamber of Commerce, the largest business advocacy organization in California's Central Valley I would like to submit the following statement for the record.

The Central Valley is one of the most impoverished regions in America. Our employment rate is well below the state and national averages, and our region is, as it has always been, one of the last to climb out of the recession, with employment only starting to rise as of the last year or so.

The valley has also been ravaged by one of the most unforgiving droughts in centuries over the last few years. This natural phenomenon caused massive layoffs in our region's largest employer, our Ag industry, with unemployment numbers in Fresno County communities like Mendota rising to as high as 50%.

On top of our unemployment issues we also recognize that the valley has significant challenges when it comes to air quality, and the effects of that issue on our residents.

AB-32 seeks to reduce emission amounts to 1990 numbers by 2020, this target, in our opinion, will have a significant impact on the Central Valley, its economy, and most importantly its people. With Agriculture being our largest economic engine, the imposition of additional unfunded mandates on growers, processors and distributors of Ag goods will have a negative impact on our region.

While we share the opinion that it is imperative that we improve the air which our children, friends and neighbors breathe we must also seek to do so in a way that ensures that we are protecting their jobs, and allowing for the region to continue to prosper and feed the world.

We urge this committee and the California Air Resources Board to consider the way in which the AB-32 standards and provisions are implemented. We ask that you provide flexibility and the means by which our Ag industry can comply in a way that is cost effective and considerate of the economic challenges that we all face in the region. We appreciate your time, and we thank you for visiting Fresno to seek our input.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-26 09:48:05

No Duplicates.



## **Comment 3 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Niki

Last Name: Wong

Email Address: niki@redeemercp.org

Affiliation: Redeemer Community Partnership

Subject: Disproportionate burden of pollution on EJ Communities

Comment:

From the perspective of an environmental justice neighborhood in South Los Angeles, I am concerned with how cap and trade essentially gives big polluters permission to pollute in communities who already bare a disproportionate burden of environmental injustice. It allows large companies to buy pollution credits from pollution sources outside of LA or even the state, but the same company can then pollute in already vulnerable communities. There needs to be a greater recognition and change in the policy to reflect which communities should have priority to benefit from the cap and trade funding. For example, while the disproportionate burden of air pollution exposure is on EJ communities, programs like the Active Transportation Program only earmarks a minimum of 10% of its funding to EJ communities. The proportion of funding for "solutions" programs going to EJ communities, such as ATP, should be much greater and be prioritized for communities with the greatest burden and proximity to sources of pollution. Community health must come before corporate wealth.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-26 18:09:52

No Duplicates.

## **Comment 4 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Dr. Clyde T.

Last Name: Williams

Email Address: [ctwilliams2012@yahoo.com](mailto:ctwilliams2012@yahoo.com)

Affiliation: Citizens Coalitions for a Safee Communit

Subject: EJ and Solar Panels

Comment:

Any financial supports or subsidies for solar voltaic or thermal water panels go to the owners' of the properties...not the renters.

2+Million people in LACity rent but cannot benefit from solar electricity directly/indirectly but could receive water heated with solar.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-26 22:20:01

No Duplicates.

## Comment 5 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Kevin  
Last Name: Van Steenberge  
Email Address: kevin@lodiiron.com  
Affiliation: Lodi Iron Works, Inc.

Subject: Post-2020 AB 32 Scoping Plan

Comment:

"Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Lodi, CA. My company employs 50 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan . We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you,  
Kevin Van Steenberge  
Lodi Iron Works, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-27 07:57:38

No Duplicates.

## **Comment 6 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Myles

Last Name: Harris

Email Address: myles@allstate.com

Affiliation:

Subject: AB32 - EJAC Community Workshop

Comment:

To whom it may concern:

I am a small business owner, representing employees and clients who support their businesses and families in my community.

With respect to the potentially unnecessary and costly regulations being considered, I wanted to have my voice heard. I do not fully understand all of AB32's impact or scope, however as a consumer I'm very concerned about whether the "unintended" consequences have been evaluated.

I would ask that before implementation of any new or more stringent regulations be implemented that there be considerable consideration as to the impact to small businesses, minority and lower income families who's budgets are stretched by current utilities/energy costs.

Your understanding and consideration is greatly appreciated.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-27 09:15:28

No Duplicates.

## Comment 7 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Eric

Last Name: Vaughn

Email Address: eric@redtruck.us

Affiliation:

Subject: AB 32

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own two small businesses located in San Joaquin County. My company employs 4 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in minority and low-income communities. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-27 10:09:05

No Duplicates.

## Comment 8 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Chuck

Last Name: Argus

Email Address: chuck.argus@sbcglobal.net

Affiliation:

Subject: Climate Change Law

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Stockton CA. My company employs 3 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in minority and low-income communities. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities. Please be as mindful when spending other people's money as you are spending our own.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-27 10:52:19

No Duplicates.

## **Comment 9 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Robert

Last Name: Gutierrez

Email Address: [bgutierrez@paqinc.com](mailto:bgutierrez@paqinc.com)

Affiliation:

Subject: Public Comment re: recommendations fro EJAC

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I am the President of the San Joaquin Hispanic Chamber of Commerce representing the counties regional small businesses, agriculture, industrial manufactures, and transportation operators. The collective employment of our membership is in the 10's of thousands in this region and we are concerned about the ability to provide a future for our employees under the proposed regulations.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

Our families and employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in minority and low-income communities. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you,

Bob Gutierrez  
President  
San Joaquin Hispanic Chamber of Commerce

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-27 15:39:34

No Duplicates.

## Comment 10 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Eugene C.

Last Name: Gini

Email Address: ggini@collinselectric.com

Affiliation:

Subject: Speak Out For Business

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a business located in Stockton, California. My company employs 148 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-28 13:09:28

No Duplicates.

## Comment 11 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Carol

Last Name: Clarkson

Email Address: randcc@gmail.com

Affiliation:

Subject: State's Climate Change Laws

Comment:

"Thank you for the opportunity to comment on the recent EJAC community workshops. I own 2 small businesses located in Acampo and Stockton. My husband and I rely on our businesses to support our family.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. Small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in minority and low-income communities. Before EJAC advocates for more costly regulations that could put a small business like mine out of business please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Carol A. Clarkson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-28 17:01:01

No Duplicates.

## Comment 12 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Muriel

Last Name: Strand

Email Address: [auntym@earthlink.net](mailto:auntym@earthlink.net)

Affiliation:

Subject: Scoping Plan Update and Environmental Justice

Comment:

The Environmental Justice Advisory Committee offers many good suggestions for the Scoping Plan Update.

Energy literacy is very important, especially since fossil fuels are so cheap relative to people power. For example, power from our muscles costs at least 200 times as much as the same power from a gallon of gasoline, a ratio that depends on the minimum wage and the price at the pump.

Consumer education and empowerment is critical in making the connection between banning fracking and cutting the fossil fuel fat from the 'American Dream.' For example, what if all packaged product labels had to inform us of the kinds of energy and materials and GHGs required for both product and package and their presence on the store shelf or delivered to our doorstep?

Another green job to include in those listed is - farming. Polyculture and permaculture offer far more productivity in terms of nutrition per acre than do current large-scale monocultures, including monocultures which qualify for the "organic" label. And do reconsider the usage of "organic" which now has two meanings - both food grown with traditional amendments and plastic (synthetic chemicals containing carbon double bonds). Clarity suggests referring to the former as "biological."

The quality of the EJAC's comments suggests that this is the final stage of updating the Scoping Plan, and that basic changes at this stage probably can't make it into the Plan. Nonetheless, as we endeavor to make real our vision of the sustainable future, it behooves us to continue refining that vision.

From a larger perspective, the scope of planning pursuant to AB32 and the context of California's climate change regulations are mostly about grafting alternative energy sources such as PVs, windmills, and conservation onto the existing fossil-fuel infrastructure and lifestyles.

Because fossil fuels are so cheap, people - especially in the U.S. - have been able to construct lifestyles where needs and wants are produced and provided in ways whereby vast amounts of unnecessary energy are used. And many of the reasons for this excessive energy use are structural, such as the distances between farms, offices, schools and homes.

As an example of the problem I refer to transit, a topic seen several times in the EJAC's comments on the scoping plan update. While high-occupancy transit is more energy efficient than single-occupancy vehicles, buses and intercity rail use fossil fuels and electric trains also use quite a bit of energy. Transit also requires pavement, and every square foot of pavement is ground that is not available to grow food and sequester carbon.

According an article about urban sprawl in The Economist (7/2/16), planners recommend paving a third or more of the land in residential development. If all this land were instead used to grow food, many commutes could be walkable. Before fossil fuels became widespread, people worked in workshops rather than factories and offices, and most people worked next to where they lived.

And when crafts and trades are practiced on a town or neighborhood scale, the distances and weights now common for freight movement may be expected to drop dramatically.

Moreover, there is good reason to think that fossil fuels will be needed if we are to mine and refine more than a tiny fraction of the various metals that are now used to manufacture electric cars, batteries, smartphones, server farms, etc. Ozzie Zehner describes these kinds of constraints in detail in his book, "Green Illusions." <http://www.greenillusions.org/>

So while we are planning near-term changes such as transitioning to renewable sources as a much greater proportion of energy usage, we should also be identifying the most adroit use of those renewables so as to provide the most for our basic physical needs - clean air and water, healthy food, comfy shelter, cooking, and plenty of sleep and exercise.

I believe that the infrastructure which would be optimal for meeting these needs is radically different from our current fossil fuel infrastructure. And I am certain that basic, blank-slate consideration of our eventual sustainable infrastructure is needed. Rebuilding current infrastructure would require energy and resources that would not later be available for building optimally efficient, human-scale infrastructure.

And of course all energy and resources that are wasted with rebuilding twice rather than once will not be available later for supporting environmental justice. A key perspective for analyzing various scenarios of rebuilding would be to use a long-term sustainability discount rate:

<http://www.rff.org/research/publications/how-should-benefits-and-costs-be-discounted-intergenerational-context-0>

Displacement from one's home due to gentrification or free-trade globalization or palm oil plantations is of course the opposite of environmental justice. Property rights must give precedence to those indigenous people who have lived in a neighborhood or region the longest. And "affordable housing" must mean owner-occupied as well as rental. Protecting people's relationships with their local ecologies must surely also protect the health of the planetary ecology.

A paper, originally written for a CalPERS-UC Davis symposium on sustainable economics, which discusses some of this information in more detail, is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-ejac-comm-mtgs-ws-B2QBZIY7AyAHZAV3.pdf>

Original File Name: CalPERS essay 1.1.pdf

Date and Time Comment Was Submitted: 2016-07-29 08:54:57

No Duplicates.

## Comment 13 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Matthew

Last Name: Kozina

Email Address: matt@haggertyconstruction.net

Affiliation: Haggerty Construction, Inc.

Subject: AB 32 Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Stockton, CA. My company employs 48 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Matthew Kozina

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-29 14:45:35

No Duplicates.

## **Comment 14 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Joseph

Last Name: Nevins

Email Address: Jpnevins@gmail.com

Affiliation:

Subject: CALTRANS and SANDAG

Comment:

Contrary to the stated objectives and goals of CALTRANS the San Diego district 11 management is pursuing massive freeway expansion at the expense of transit and alternative multi-modal transportation. SANDAG has proposed a transportation plan that will severely impact the residents health and air quality within a mile of the 5 and other freeways. Although token conservation, transit and bicycling and pedestrian projects are included in their proposed projects the freeway those will not be funded until the freeway portions are completely paid including all change orders and cost overruns, thus assuring that little if any monies will be available for those portions of the proposed plan that actually reduce emissions. Please step up and step in, join the Sierra Club and others suing SANDAG. Use all the powers you have to fast track transit and alternative transportation infrastructure instead of freeway expansion. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-07-29 16:38:12

No Duplicates.

## Comment 15 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Seth  
Last Name: Cheek  
Email Address: [seth@c3cginc.com](mailto:seth@c3cginc.com)  
Affiliation:

Subject: AB 32 SCOPING PLAN

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Ceres, Ca. My company employs 48 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for costlier regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you,

Seth Cheek  
C3 Construction Group, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-01 14:45:45

No Duplicates.

## Comment 16 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: STEVE

Last Name: SYMONDS

Email Address: symondsbuilding@gosnc.com

Affiliation:

Subject: SUBJECT: AB 32 SCOPING PLAN

Comment:

"Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Sonora, Tuolumne County. Although I don't have any employees I am impacted by the cost of living and environmental regulations.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

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Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for costlier regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Furthermore, some of the restrictions already implemented are self defeating. One example would be the introduction of adjustment resistant carburetors on landscaping equipment. The result of this is home owners replacing otherwise good equipment & adding to the landfill crisis by dumping perfectly good equipment. A diesel engine is still the most energy efficient engine developed and I strongly disagree with your efforts to eliminate these.

As a species the human race has developed a system that relies on ever increasing populations to become consumers to buy ever increasing products. Furthermore products are increasingly "disposable" instead of repairable. Now we have the ability to view from space our tiny planet, how long will it take to come to the inevitable conclusion that the only true environmental responsibility is to reduce our numbers?

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-02 05:11:19

No Duplicates.

## Comment 17 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Stephen  
Last Name: Montgomery  
Email Address: samonty5365@me.com  
Affiliation: Sierra Club

Subject: conduct of meeting

Comment:

We appreciated the opportunity to attend this informative meeting and the opportunity to participate in the discussion.

The only problem was the time allowance for public speakers. Unfortunately for events like this there is always the ill informed highly opinionated gadfly who, given the chance, monopolizes the microphone. Time limits and limits on how often the panel can be addressed need to be implemented and the rules of the game made public at the beginning of the presentation along with the admonition to stay on topic along with other rules of courtesy and respect for the views of others.

On other topics: small but contributing factors to poor air quality include the frequent but bad practice of motorists filling their auto's gas tanks by "topping." That is trying to force more fuel into the tank than it can hold.

In addition to wasting their time and the time of everyone else behind them in line for the pump this fouls the vapor recovery system and frequently results in gasoline spills. While the pump handle frequently has a small note admonishing users to not top and the computer display on some pumps also reminds anyone who may be watching that display to not top this has never risen to the priority of other safety messages in bold large type on signs and banners on or about the filling facility like those stating "Stop engine," "No Smoking" and that sort of thing. (Think Costco gas)

Another contributor are idling cars, One source are traffic lights that too frequently hold up whole platoons of cars to let one car come out of a side street; demand signal that doesn't note an oncoming platoon of cars from a nearby signal on the main street, signals that give a green to a lane with few or no cars while holding a far busier and crowded traffic lanes.

Another cause of idling are drive through lanes at banks and fast food parlors. A number of progressive communities have outlawed these amenities as a way to reduce pollution from vehicles idling while waiting for service and the state could also eliminate this for most types of enterprises commonly using this sort of service. That matter, like all such proposals, would need study considering issues like ADA accessibility.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-04 12:21:08

No Duplicates.



**Comment 18 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Karli

Last Name: Quinn

Email Address: karli@agamsi.com

Affiliation:

Subject: Thank you for the opportunity to comment

Comment:

A state with lofty environmental co-benefit goals but without jobs, higher energy costs, and increasing food costs will be a state that is doing a disservice to all residents, not only those in disadvantaged communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-05 14:15:40

No Duplicates.

## **Comment 19 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Kyra

Last Name: Rude

Email Address: KyLeigh716@yahoo.com

Affiliation: community member

Subject: More resources for city buses

Comment:

I think it is important to devote more resources to the city bus system. I choose to use public transportation in lieu of owning a car, but the bus system could be more convenient.

There should be later bus routes across the board. I used to work a second job that ended after 10:00pm - past when all of the bus routes end for the day. I had to walk 2.5 miles home on the nights I worked. I can't be the only person with a minimum wage job that ends past the times the buses operate.

It would also be nice to have an additional route up to Ojai; currently there is one bus per hour.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-08 15:10:32

No Duplicates.

## **Comment 20 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Ara

Last Name: Marderosian

Email Address: [ara@sequoiaforestkeeper.org](mailto:ara@sequoiaforestkeeper.org)

Affiliation: Sequoia ForestKeeper

Subject: RE Recommendations for Reducing Air Pollution to EJ Advisory Committee

Comment:

RE Recommendations for Reducing Air Pollution to EJ Advisory Committee

Attachments Respectfully submitted,

Mr. Ara Marderosian

Sequoia ForestKeeper®

P.O. Box 2134

Kernville, CA 93238

(760) 376-4434

[ara@sequoiaforestkeeper.org](mailto:ara@sequoiaforestkeeper.org)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-ejac-comm-mtgs-ws-WmsCMVBgB2UGMgIx.pdf>

Original File Name: 151123-2\_SFK\_et\_al\_CARB\_Methane\_Fee\_Based\_on\_Shindell\_2015.pdf

Date and Time Comment Was Submitted: 2016-08-08 15:44:08

No Duplicates.

## Comment 21 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Ron

Last Name: Whitehurst

Email Address: [ron@rinconvitova.com](mailto:ron@rinconvitova.com)

Affiliation: Rincon-Vitova Insectaries, Inc.

Subject: Small business concerns re reducing GHG

Comment:

Comments EJAC 8-5-2016

Ron Whitehurst

Pest Control Advisor

Rincon-Vitova Insectaries, Inc.

[www.rinconvitova.com](http://www.rinconvitova.com)

108 Orchard Dr

Ventura, CA 93001

I am a small business owner, working in the area of biological pest control, with our rearing facility situated in the oil field north of Ventura. Half of my business is the production of tiny wasps that attack houseflies. We are part of a \$10-25 million industry selling biocontrol to animal agriculture and to the equine industry.

Methane

We understand the struggles of California's dairies, but we know that those who use our products and keep trying to do a better job of pasture management and less antibiotics can ALSO adopt the technologies to stop emitting methane into the atmosphere. I have seen calculations showing that it will add less than 20% to the retail price of dairy products, a small price for society to pay for demonstrating to the world how to stop that source of climate forcing. Downsizing herds and managing cows to capture the methane is not a hardship on consumers, because the less polluting alternative nut, legume, and seed milks are proven to be much healthier for everyone. I read an article showing that the Dairy Cares threat of leakage is based on false assumptions. It is time to stop letting our state be a leading methane polluter because ARB can't stand up to the dairy industry.

While the oil industry pollution risk around my home and business is a big concern, global warming far outstrips pollution as a problem of extremely high consequence in my view. California must continue to improve its policies to be a world model for faster emissions reductions. We need your support for a WW II style mobilization with much more ambitious goals and targets for GHG emissions and unburnt, uncaptured methane reduction. 2050 is too long to wait for 80% reductions of GHG emissions and 40% is far too low a target by 2030 for enteric methane reductions. California can and must set honest goals and targets commensurate with the scale of the problem. Otherwise, how can it claim climate leadership? With climate change tearing our world apart right now, policies that take us to 2nd or 3rd base are another form of climate denial. We need state plans that knock this problem out of the park and drive all the runners home AND we also MUST have a federal price on carbon to bring all the states along and serve as a trigger for a predictable, incorruptible, steadily rising global price on carbon. California business that adapts to the new priorities of GHG reduction/elimination will be world leaders as the rest of the world catches up.

Here are my specific recommendations related to my business and profession that would help create jobs and expand or create new small businesses similar to mine in rural areas to support the scaling up of biological agriculture and low-emission dairies.

#### Carbon Dioxide and Toxic Drift

As an expert in the field of biological pest control, I know that toxic chemical pesticides are not needed to produce food or manage landscapes. Promoting biologically intensive agriculture (regenerative organic) has the following benefits:

- Decrease fossil fuel use (soil has better tilth)
- Decrease NOx from synthetic nitrogen fertilizers
- Increase sequestering of carbon through healthier soil food web
- Decrease toxic pesticide drift
- Decrease particulate material (PM) (from reduced tillage and better soil tilth)

Create good clean jobs for the unemployed youth coming out of college

Create new professions of Biological Pest Control Scouts, Soil Carbon Builders and Certifiers, and other practitioners needed to rapidly scale up carbon farming on conventional farms

To do that a simple metric is needed for soil carbon or soil organic matter SOM - which is part of the standard soil test done for agriculture. This is needed to set up a meaningful reward system for carbon farmers who meet an obvious threshold of SOM or carbon sequestration. We only need a three-point scale: a lot, a little, and almost none. Trading is unacceptable, especially when you admit to the problem that assigning a true cost for methane threatens to destroy the carbon credit market and we must start being honest about the social cost of methane! So, stop trading carbon credits! Just set the appropriate, comprehensive caps and/or fees including for uncaptured, unburnt methane. This is the way for ARB to use the immense potential of biologically intensive (regenerative organic) agriculture to meet climate action plans (CAPs) and environmental justice (EJ) while the US Congress establishes a basic foundational program through a revenue neutral carbon tax.

Living and working in an oil field, I appreciate regulations on the volatiles coming from oil wells, pipe lines, dehydration facilities (DeHy), and other processing sites. I am especially concerned about benzene, a carcinogen, and hydrogen sulfide, a neurotoxin.

Earthworks did some monitoring of wells in Ojai and Bakersfield and found disturbing levels of emissions, and negative health effects on the surrounding communities.

[https://www.earthworksaction.org/library/detail/californians\\_at\\_risk\\_full\\_report#.V6g8-zKKjfY](https://www.earthworksaction.org/library/detail/californians_at_risk_full_report#.V6g8-zKKjfY).

The dust in the Ventura oilfield is getting worse and worse. There is no remedy for that except to make the oil industry pay the true cost on society of its product. Contrary to the keynote speaker at the conference brought to Ventura last year by WSPA, there is no moral case for fossil fuels.

#### EVs

Ventura County Transit Commission never talks about emissions reductions nor about promoting technology. They should be looking at promoting electric vehicles (EVs) and other zero emission vehicles instead of widening 101. Being in the SCAG, VCTC thinks it can ride the coattails of SCAG's emissions reductions achievements. Clearly the behavior of VCTC shows that the emissions reductions goals and targets are too low and that each county must be required to carry its own weight rather than be averaged with other counties. Every county must be required to have a technology development plan for zero emission vehicles and fast-track transit and alternative transit infrastructure instead of freeway expansion.

With the millions of gas cars on the road, representing a huge

amount of embedded energy, we should encourage conversions to electric which would create good middle-income jobs through:

Electric conversion training programs at high schools, junior colleges and trade schools.

Subsidized or no-interest financing for the batteries (the expensive part of a conversion)

Classy converted antique and 'clunker' car shows with how-to demos

Associated solar carport installs where the converted EV's can be directly charged.

RV parks require occupants to move out of park for 3-5 days every 6 months. This is a wasteful practice as far as gas consumption is concerned, and a burden on low income people who use RVs as easy entry home ownership. Further, solar carports, solar sheds and solar RV roofs would decrease the carbon footprint of RVs. Solar roofs also decrease the heat load on the RV, decreasing the energy required to bring the interior to a comfortable temperature. Combination solar heat and PV panels on RV roofs or south sides would reduce fossil fuel use. Of course solar covers for EV charging are needed at mobile homes parks as well as RV parks.

Small businesses, such as ours need a good zero emissions van or truck for pick up and delivery. My business needs a small pickup that can go 85 miles on a charge once a week. If there were a trustworthy garage and a way to borrow for one of the new longer lasting batteries, I would do a conversion that would perfectly meet my needs for the lowest cost. Many small businesses like ours have similar specialized transport requirements and I understand that small businesses employ over 90% of the people in our county so if ARB helps me do right by the climate in an economical way I can compensate my employees better.

Yours,

Ron Whitehurst

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-08 16:29:50

No Duplicates.

## Comment 22 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Ara

Last Name: Marderosian

Email Address: ara@sequoiaforestkeeper.org

Affiliation: Sequoia ForestKeeper

Subject: Recommendations for Reducing Air Pollution to EJ Advisory Committee

Comment:

8 August 2016

Environmental Justice Advisory Committee  
P.O. Box 2815  
Sacramento, CA 95812

RE Recommendations for Reducing Air Pollution to EJ Advisory Committee

Dear Committee Members:

The California Global Warming Solutions Act of 2006, (AB 32; Stats. 2006, chapter 488) calls for the Air Resources Board (ARB or Board) to convene an Environmental Justice Advisory Committee (Committee), to advise the Board in developing the Scoping Plan, and any other pertinent matter in implementing AB 32. It requires that the Committee be comprised of representatives from communities in the State with the most significant exposure to air pollution, including, but not limited to, communities with minority populations or low-income populations, or both (AB 32; Part 7. Miscellaneous Provisions Section 38591). On January 25, 2007, the Board appointed the first Environmental Justice Advisory Committee to advise it on the Initial Scoping Plan and other climate change programs. To advise the Board on the 2013 Scoping Plan Update, ARB solicited nominations and reconvened a new Committee on March 21, 2013. Committee meetings are open to the public and include a public comment period.

The California Supreme Court has written, "the Legislature declared its intention that all public agencies responsible for regulating activities affecting the environment give prime consideration to preventing environmental damage when carrying out their duties." California courts have ruled, "the greater the existing environmental problems are, the lower the threshold should be for treating a project's contribution to cumulative impacts as significant."

The ARB has an opportunity and an obligation to remedy this egregious and life-threatening pollution condition that affects the health of many residents. The ARB should include strong policies and performance standards that help to clean our dirty air.

On 28 July 2016, I attended the Environmental Justice Advisory Committee (EJAC) local community meeting in Bakersfield. I provided oral recommendations on the four areas of interest discussed at the meeting by presenting three, brief oral comments.

On 28 July 2016, I attended the Environmental Justice Advisory Committee (EJAC) local community meeting in Bakersfield. I provided oral recommendations on the four areas of interest discussed at the meeting by presenting three, brief oral comments.

This written comment, in addition to documenting the recommendations that were presented orally, also includes my recommendations for solar panels for mobile homes and at RV parks to benefit low-income people, concerns about bad air quality in the San Joaquin Valley, the need for more meaningful farmland conversion arrangements, and expanded recommendations related to forest and land management practices to minimize impacts of mechanized equipment, to retain insect-infected trees and other biomass in place, and to generally manage forests according to known science that fosters forest moisture, reduces wildfires, and sequesters carbon to reverse global warming, which will benefit all California residents.

First, my three oral comments at the workshop in Bakersfield

(1) In answer to the stated objective of EJAC is to determine how to differently manage forests to reduce Greenhouse gasses (GHGs) and increase carbon storage, I stated that forests must be managed as closed canopy forests. Maintaining closed canopy forests, rather than logging, will increase forest moisture, and decrease forest temperature and surface winds, which will all reduce severe wildfires and increase carbon sequestration.

(2) In response to a presenter's statement that the California Public Utilities Commission (CPUC) is charged with considering impacts, of its decisions, to individuals in disadvantaged communities in order to not create barriers to the use of energy efficiency, I stated that the CPUC's decision to allow power companies to charge customers who generate solar power a grid connect fee that increases the minimum monthly charge for power to \$10, which would be a dis-incentive to invest in solar panels for individuals in disadvantaged communities.

(3) Written and oral comment on Short-Lived Climate Pollutant Reduction Strategy were submitted on behalf of Jan Dietrick, MPH, Steering Committee, Ventura County Climate Hub, Ventura, CA 805.746.5365, Todd Shuman, Senior Analyst, Wasteful Unreasonable Methane Uprising, Camarillo, CA 805.987.8203, and Sequoia ForestKeeper, Kernville, CA, which included three recommended actions for methane emissions reduction to achieve 80% reduction below current levels by 2030:

- (A) A robust fee or fine on unburnt, uncaptured methane emissions of \$4700/CH4 ton (in 2007 US dollars) paid by emitters,
- (B) A rapidly decreasing mandatory cap on allowable methane emissions from all sources, and
- (C) Discontinuation of subsidies on animal products.

A more complete explanation of (A) the robust fee or fine on unburnt, uncaptured methane emissions of \$4700/CH4 ton is available in a letter, dated November 23, 2015, to California Governor Jerry Brown and Mary Nichols, Chair of California Air Resources Board, which is attached and found along with other comment letters on the Sequoia ForestKeeper website [www.sequoiaforestkeeper.org](http://www.sequoiaforestkeeper.org) and directly at this link:

[http://www.sequoiaforestkeeper.org/pdfs/climate\\_change/151123-2\\_SFK\\_et\\_al\\_CARB\\_Methane\\_Fee\\_Based\\_on\\_Shindell\\_2015.pdf](http://www.sequoiaforestkeeper.org/pdfs/climate_change/151123-2_SFK_et_al_CARB_Methane_Fee_Based_on_Shindell_2015.pdf)

We have submitted other comments and recommendations about methane and water use to the State Water Resources Control Board and California Air Resources Board. The links to locate and download comments are pasted below.

The California Air Resources Board is attempting to regulate carbon emission without addressing the methane contribution of the livestock industry or the carbon emitted by burning biomass. Sequoia ForestKeeper: Ara Marderosian, Wasteful Unreasonable Methane Uprising: Todd Shuman, and Ventura County Climate Hub: Jan Dietrick outline their concerns in this comment letter.

Attachments to the above letter:

Climate impact of beef: an analysis considering multiple time scales and production methods without use of global warming potentials. RT Pierrehumbert {Grass fed vs feedlot Eshel Pierrehumbert 2015}

Letter from Center for Biological Diversity and Climate Change Law Foundation to CARB on their Proposed Short-Lived Climate Pollutant Reduction Strategy and Draft

Environmental Analysis, May 26, 2016. {16 05 26 Final CBD SLCP Strategy comments}

New use of global warming potentials to compare cumulative and short-lived climate pollutants. Myles R. Allen, et al. {Allen et al on SLCP GWP 2016}

Offsetting methane emissions – An alternative to emission equivalence metrics.

A.R. Lauder, et al. {Lauder et al 2012}

Short-Lived Climate Pollution. R.T. Pierrehumbert {Pierrehumbert on SLCPs}

SFK letter from November 25, 2015 to California Governor Jerry Brown and Mary Nichols, Director of the California Air Resources Board, for a methane emissions fee or fine on uncaptured or unburned methane.

[http://www.sequoiaforestkeeper.org/comments\\_to\\_sqf\\_and\\_other\\_agencies.aspx](http://www.sequoiaforestkeeper.org/comments_to_sqf_and_other_agencies.aspx)

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/comments\\_tucp2015/](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/comments_tucp2015/)

State Water Board Drought Year Water Actions

2015 Public Comments / Objections / Protests / Petitions for Reconsideration

Comments / Objections / Protests Regarding January 23, 2015

Temporary Urgency Change Petition and Petitions for Reconsideration of Order Approving Temporary Urgency Change for the Central Valley and State Water Projects

Comments/Objections/Protest/Petitions for Reconsideration Submitted After April 6, 2015

Sequoia ForestKeeper and Wasteful UnReasonable Use Ara Marderosian, Todd Shuman, Mike Hudak, & Jan Dietrick 04/13/2016

Sequoia ForestKeeper and Wasteful UnReasonable Use Ara Marderosian, Todd Shuman, Mike Hudak, & Megan Gallagher 10/14/2015

Sequoia ForestKeeper and Wasteful UnReasonable Use Ara Marderosian, Todd Shuman Mike Hudak, & Megan Gallagher 08/16/2015

Sequoia ForestKeeper Ara Marderosian et al. 07/06/2015

Sequoia ForestKeeper Ara Marderosian et al 06/19/2015

WURU Press Release Todd Shuman 06/19/2015

Additional Recommendations Based on EJAC Presentations on Transportation, Energy, Ag, and Working Lands, and Public Comments made During the 28 July 2016 Meeting

ARB Should Investigate PV Solar Distributed Generation and EV Access Projects for Low-Income Households, Especially Over Mobile Home and RV Parks in EJ Communities to Provide Shade for Cooling as well as Power

Given the seriousness of the global warming issue, EJAC and the California ARB should be addressing the issue with Plan objectives, policies, performance criteria, and specific, feasible implementation measures, measures that address criteria pollutant emissions as well. Here are a number of possible, feasible implementation and mitigation measures:

- In order to encourage the use of non-polluting electric vehicles (EVs), the ARB should include a policy to require new projects to include quick charge Level 3 EV charging facilities. Projects adjacent to highways should install multiple fast charge facilities that could reduce pollution by encouraging intercity EV travel. See

[http://www.wind-works.org/cms/index.php?id=84&tx\\_ttnews%5Btt\\_news%5D=3401&cHash=ae60686195244d8cb5d31cad14e4aa92](http://www.wind-works.org/cms/index.php?id=84&tx_ttnews%5Btt_news%5D=3401&cHash=ae60686195244d8cb5d31cad14e4aa92).

- In order to encourage the use of non-polluting electric vehicles, the ARB should require new commercial projects and hotels to include EV charging facilities.

- In order to encourage the use of non-polluting electric vehicles,

the ARB should require parking lots in all communities to include dedicated EV parking with solar panel covered parking spaces to shade the vehicles while charging them.

- Green building measures might include passive solar design and a requirement that buildings be at least 25% more energy efficient than Title 24 standards current when permits are pulled.
- Satisfy LEED Silver standards on hotel and the commercial buildings.

• Design features to reduce Vehicle Miles Traveled (VMT). Such features might include adjacent bus stops and/or other public transportation and should include bicycle-friendly features. The ARB should commit to increased pedestrian and bicycle connectivity.

• A requirement that new structures contain solar photovoltaics (PV) and solar water heating. As a result of a settlement of a recent Sierra Club lawsuit with Tulare County regarding their General Plan Update, 20% of new housing in Tulare County will contain solar PV. The Rio Bravo Ranch project in Bakersfield will build solar PV into 25% of the new residences. Every kilowatt of solar PV power offsets about a ton per year of global warming gasses that would otherwise have been produced by a fossil fuel-fired power plant (according to Environment California Research and Policy Center in a publication entitled The Economics of Solar Homes in California).

• A requirement that residences, mobile homes, and manufactured homes built without rooftop solar PV should be pre-wired for solar PV.

• A requirement that each new residence and manufactured home contain a Level 2 EV charging station, relatively inexpensive when wired during construction. In order to reduce vehicle emissions, the use of electric vehicles (EVs) should be encouraged.

• A requirement for partial funding of an area energy efficiency program creating equivalent reductions in carbon emissions.

• A requirement that new home or commercial projects partially subsidize public transportation in order to reduce area VMT.

• A condition that parking lots be covered and that parking lot roofs contain solar PV.

• Adopt a policy that funds covered roofs containing PV Solar panels for residents in mobile home and RV parks in EJ disadvantaged communities to provide these residents with power and shade that would reduce trailer temperatures by 15 degree below ambient.

• Stop the policy that requires residents in RV parks to move their RV out onto the streets every six months for four days sometimes jeopardizing stable tenancy in the park.

• Parking management measures that promote walking and transit use.

• A requirement that developers and counties retrofit solar PV on existing area buildings. Retrofitting existing area buildings with solar PV would effectively offset emissions associated with county and project operations in much the same way as the San Joaquin Valley Air Pollution Control District (SJAPCD) uses Indirect Source Rule (ISR) funds to fund offsite projects to offset criteria pollutants associated with development projects.

• A requirement that developers contribute funding for area solar PV incentives. Most solar PV incentive programs use funding rebates to encourage PV construction.

• A requirement that developers contribute a GHG fee to an air pollution control district like the SJVAPCD to be used to fund projects that would reduce GHG emissions elsewhere. This could be built in to a criteria pollutant Voluntary Emission Reduction Agreement (VERA) as the Air District has suggested in the past.

• The Bay Area Air Quality Management District (BAAQMD) has assembled a list of potential general plan policies and mitigation measures that the ARB could incorporate in its plan. These may be found in the following document between pages 98 and 110 at the website

[http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Draft\\_BAAQMD\\_CEQA\\_Guidelines\\_May\\_2010\\_Final.ashx](http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Draft_BAAQMD_CEQA_Guidelines_May_2010_Final.ashx)

The ARB should address each of these measures in order to determine its feasibility and effectiveness in reducing or offsetting the GHG and criteria pollutant emissions associated with setting standards for Reducing Air Pollution.

#### Air Quality

The southern San Joaquin Valley fights it out every year with Los Angeles for having the worst air pollution in the nation. See the American Lung Association report at <http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html>

• Nearby Bakersfield is ranked either first or second for having the dirtiest air in the nation. Since our extreme air pollution affects the health of many residents, the ARB should thoroughly and seriously address the issue of air quality in all of its aspects.

Additionally, California has nonattainment designations for various federal and state air quality standards, including extreme nonattainment for the ozone 8-hour standard. Existing regulatory requirements at the federal, state, and local levels have been lacking in addressing these very serious air quality issues.

The ARB should include a goal to reduce Vehicle Miles Traveled (VMT). Reducing VMT would have benefits to air quality, climate change, and circulation impacts and would be consistent with AB 32 and SB 375 requirements. In order to help implement this goal, we suggest adopting a graduated traffic impact fee for new residential projects. It should be graduated in the sense that the fee is directly proportional to the distance from the project to the nearest major city, thus encouraging infill and lower VMT. Ultimately, the ARB should consider allowing only in-fill development - build up not out - to preserve open space, forest wildlife habitats, chaparral wildlife habitats, desert wildlife habitat, and food-growing farmlands.

While many projects in the San Joaquin Valley will be subject to the Air District's ISR rule, we note that ISR offsets less than half the air pollution associated with a new project. Given the very serious nature of air pollution in the San Joaquin Valley, air pollution associated with projects should be required by the ARB to be thoroughly and completely mitigated.

A number of southern San Joaquin Valley developers (including the West Ming project and the Old River Ranch project, both in Bakersfield) have agreed to participate in an Emissions Reduction Program (VERA) through the SJVAPCD. The City of Bakersfield has required a zero emissions agreement of a number of development projects. Through this program, developers promise to completely offset the emissions associated with their project through onsite design features and offsite pollution reduction projects.

Participation in such a program has, therefore, been shown to be clearly feasible and effective in reducing air quality impacts to zero, both project-specific impacts and, hence, cumulative impacts, since zero project-specific impact could not add to the cumulative impact.

CEQA requires that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."

#### FARMLAND CONVERSION

The ARB should require development projects on farmland to pay an Agricultural Land Impact fee for use by a land conservancy entity operating to conserve agricultural land. The fee should be set at higher than one-to-one and perhaps as high as three times the value of the developed farmland in order to first discourage farmland for development and second to acquire similar quality farmland for conservation easement.

• The ARB should include a performance standard that specifies the ratio of preserved mitigation farmland to converted farmland. In

order to ensure that CEQA requirements for future projects are met, the Plan should include a policy that the ratio be higher than one-to-one; i.e., that more than one acre of equally good, equally at risk farmland be preserved via conservation easements for every acre of farmland converted.

- The ARB should include a performance standard that specifies the quality of the preserved replacement mitigation land. There is little point in placing an unnecessary conservation easement on farmland that is so far away from urban areas that there is little or no development pressure on it. Preserving farmland that does not need to be preserved, that is under no development pressure and will almost certainly remain farmland even without a conservation easement, does not compensate for the loss of currently producing farmland. The ARB Plan should require that replacement land have similar conservation easement value as that of the converted farmland.

- The ARB should include a policy that requires that a need for a new project be demonstrated and that substantial evidence for this need demonstration be given before approval for farmland is converted to urban use. i.e., if the surrounding urban area contains high numbers of vacant or foreclosed homes, or there is no available and uncommitted drinking water source to support more development, or the air pollution levels in the area are already high, then there would seem to be no need for further development.

- The ARB should include a policy that requires converted farmland to be contiguous to existing urban use and services.

- In order to ensure that the mitigation is administered by a competent organization, the ARB should include a policy that the "land conservancy entity" be accredited by the Land Trust Accreditation Commission. See

<http://www.landtrustaccreditation.org>.

- In order to reduce overall per capita land consumption, the ARB should include goals, policies, and specific implementation measures that would first focus development up in already developed urban areas and second increase the efficiency of development and thereby reduce the pressure to convert farmland to non-agricultural uses.

Forest Biomass removed for Energy Pollutes, Prevents Sequestration, and is Uneconomical

Continuing to extract biomass from forests cannot sustain soil because removing biomass removes soil nutrients for growing future forests, removes the smaller materials and therefore causes subsequent fires to burn larger materials, thus causing more intense fires, and prevents the greatest levels of carbon sequestration from taking place in the forests. Biomass removal should not be enabled by the plan because the cumulative impact of removing biomass has many environmental consequences.

Opening the forest canopy causes the sun to shine on the forest floor, causes the forest to become hot and dry, causes brush to grow where the trees once stood, and causes surface winds to increase, which all increase, not decrease, fire risk, removes some sequestered carbon from the forest, and jeopardize the trees that are already struggling. Opening the forest canopy would also jeopardize the old-growth species that are already on the brink of extinction, including the Pacific fisher, California Spotted owl, Northern goshawk, and a host of frog and salamanders, as well as other reptiles.

North et al. (2009) is an unpublished and non-peer-reviewed report often cited and relied upon by the Forest Service and other agencies for most fuel reduction, ecosystem restoration, and forest health actions, including biomass removal from forested areas. But the North et al. (2009) report did not mean to use the word "remove" to suggest commercial logging of mature trees up to, or over, 20 inches in diameter-as opposed to simply "removing" a given mature live tree from competition with other larger trees by turning it into a large snag or downed log.

Indeed, the authors of North et al. (2009), on page 24 of that report, specifically discuss the potential removal of trees over 10-16 inches in diameter "for socioeconomic purposes" such as "generating revenue" or "providing merchantable wood for local sawmills." Nowhere do the authors of North et al. (2009) specifically recommend "removal" of mature trees (as opposed to snag creation or downed log creation) for strictly ecological purposes, or offer a single citation to any ecological study concluding that some mature trees must be removed from the forest ecosystem, as opposed to being left as live trees, converted into large snags, or converted into large downed logs.

**Forest Biomass Removal: The Environmental Analysis for all Forest Treatments, including, but not limited to Biomass Removal, Fuels Treatment, and Burning, Must Disclose the Effects On and Contribution to Climate Change**

The ARB should require that environmental analysis for all forest management projects must discuss how proposed treatments will potentially emit CO<sub>2</sub>, Methane, and other GHG's, that may contribute to climate change, including the carbon emitted from the vehicles and equipment used for fuel reduction treatments, as well as felling, stacking, slash treatments, and biomass collection, hauling from the forest, and burning outside the forest in a power or heat generating facility or prescribed burning. The environmental analysis must disclose what efforts will be taken to mitigate these emissions.

A recent article by Mitchell et al. (2009) describes tradeoffs for managing for carbon storage (a valid goal in any forest management action) versus fuels reduction. That study suggests that, with the exception of some xeric ecosystems (not present in the Sierra), "fuel reduction treatments should be forgone if forest ecosystems are to provide maximal amelioration of atmospheric CO<sub>2</sub> over the next 100 years." Id. at 653. For that reason, each alternative should discuss and analyze carbon emissions from implementation, and the no-action alternative should also provide information about the potential for carbon storage from foregoing project implementation.

Depro et al., 2007, found that eliminating logging would result in massive increases in Carbon sequestration. "Our analysis found that a "no timber harvest" scenario eliminating harvests on public lands would result in an annual increase of 17-29 million metric tonnes of carbon (MMTC) per year between 2010 and 2050-as much as a 43% increase over current sequestration levels on public timberlands and would offset up to 1.5% of total U.S. GHG emissions." (Depro et al., 2007 abstract)

Moreover, Mitchell et al. (2009) found the amount of net carbon released into the atmosphere, on an acreage basis with small diameter thinning for fuel reduction (if used for biomass), puts more carbon into the atmosphere than an average fire, on an acreage basis:

Our simulations indicate that fuel reduction treatments in these ecosystems consistently reduced fire severity. However, reducing the fraction by which C is lost in a wildfire requires the removal of a much greater amount of C, since most of the C stored in forest biomass (stem wood, branches, coarse woody debris) remains unconsumed even by high-severity wildfires. For this reason, all of the fuel reduction treatments simulated for the west Cascades and Coast Range ecosystems as well as most of the treatments simulated for the east Cascades resulted in a reduced mean stand C storage. One suggested method of compensating for such losses in C storage is to utilize C harvested in fuel reduction treatments as biofuels. Our analysis indicates that this will not be an effective strategy in the west Cascades and Coast Range over the next 100 years.

In any case, the environmental analysis must disclose the emissions from fuel reduction treatments, associated slash treatments, and biomass collection, hauling, and burning/incineration or prescribed burning for each action alternative. For this, the Washington Office of the Forest Service has generated specific direction on how to discuss climate change effects in a National Environmental Policy Act (NEPA) analysis. See Climate Change Considerations in Project Level NEPA Analysis (Jan. 13, 2009) ([http://www.fs.fed.us/emc/nepa/climate\\_change/includes/cc\\_nepa\\_guidance.pdf](http://www.fs.fed.us/emc/nepa/climate_change/includes/cc_nepa_guidance.pdf)).

That document specifically mentions fuel reduction projects in the types of projects that should disclose direct effects on climate change:

- The effect of a proposed project on climate change (GHG emissions and carbon cycling). Examples include: short-term GHG emissions and alteration to the carbon cycle caused by hazardous fuels reduction projects, GHG emissions from oil and gas field development, and avoiding large GHG emissions pulses and effects to the carbon cycle by thinning overstocked stands to increase forest resilience and decrease the potential for large scale wildfire.

Id. at 2. To assist in disclosing these effects, the Forest Service provides tools that can help managers determine the direct contributions of GHG emissions from project burning or treatments. Id. at 5 (FOFEM 5.5, Consume 3.0, and the Forest Vegetation Simulator). Because the Forest Service has tools or models to effectively calculate emissions, it must disclose these emissions for each of the action alternatives, and so should State and other agencies operating in California in order to reduce GHG emissions in California that are globally cumulative. In addition, the guidance document suggests that the NEPA document include a qualitative effects analysis. Id. Such an analysis should include the cumulative effects, quantified in an "individual, regional, national, global" context. Id. at 6.

Finally, the guidance suggests that NEPA provides direction on how managers should respond to comments raised during project analysis regarding climate change:

1. Modify alternatives including the proposed action.
2. Develop and evaluate alternatives not previously given serious consideration by the Agency.
3. Supplement, improve, or modify the analysis.
4. Make factual corrections.
5. Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the Agency's position and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.

Id. at 8. At the very least, because any project that proposes biomass removal includes fuel reduction treatments and burning that will contribute GHG emissions, the EIS must include an acknowledgment of carbon emissions and must provide a response to this issue.

Moreover, the analysis should account for and quantify (as part of the cumulative effects analysis) not only the emission from prescribed burning on-site and the emissions from any biomass that is removed from the project area and later burned or incinerated off-site, but also the contribution of emissions from transporting this material for off-site burning, and the contribution of emissions from the off-site burning, planning, and implementing the project by the agency, a contractor, and/or other agent that implements such projects.

Our experience with projects proposed by the Forest Service in Sequoia National Forest since 2009 is that no project analysis has

utilized these guidelines, despite their importance in determining the impacts to climate change.

This holistic approach to account for GHG emission is necessary to provide managers and the public with the kind of information under NEPA to make informed choices between alternatives and to mitigate for climate change, and to consider and assess the larger picture of GHG contributions from all projects on the national forests that may contribute GHG emissions.

#### Disclose the Impact from Mechanical Equipment Use on Forest Soils, Streams, and Watersheds

Mechanized fuel treatments and biomass removal treatments incur ecological costs by damaging soils, vegetation, and hydrologic processes, as proponents of fuel reduction treatments have acknowledged (e.g., Allen et al., 2002; Graham et al., 1999; 2004; Agee and Skinner, 2005). Mechanical fuel reduction treatments typically involve the same suite of activities as logging, with the same set of impacts to soils, runoff, erosion, sedimentation, water quality, and stream structure and function. These effects, their mechanisms, and their aquatic impacts have been extensively and repeatedly documented across the West (e.g., Geppert et al., 1984; Meehan, 1991; USFS et al., 1993; Rhodes et al., 1994; CWWR, 1996, USFS and USBLM, 1997a; c; Beschta et al., 2004). Watershed damage ultimately translates into aquatic damage.

The collateral impacts of fuel treatments and biomass removal actions are of considerable concern due to the existing aquatic context. Across the West, aquatic systems are significantly and pervasively degraded (Rieman et al., 2003; Beschta et al., 2004). As a result, many populations of aquatic species, including most native trout and salmonids, have undergone severe contractions in their range and number and remaining populations are now imperiled and highly fragmented (Frissell, 1993; USFS and USBLM, 1997a; Kessler et al., 2001; Behnke, 2002; Bradford, 2005). Additional damage to watersheds and aquatic systems reduces the prospects for the protection and restoration of imperiled aquatic species (USFS and USBLM, 1997c; USFWS, 1998; Karr et al., 2004).

These impacts to soils, streams, and watersheds from these biomass removal project must be added to the existing damage and foreseeable future damage from past and future treatments in the forest to provide an accurate assessment of the adverse effects of biomass removal projects.

#### Science Does Not Support Removing Insect-Infected Trees to Reduce Fire Danger

Biomass removal projects often claim insect-infected trees must be removed from the forest to reduce the fire danger. Proposals of this type must provide a scientific basis for the number of snags to leave in the forest and the snag removal enabled by the project must consider and be based on the ecological functions of snags. There are many types of snags and each performs a different function in an ecosystem. Snags can't be counted as if they were coke cans on a shelf. As biologists will know, snags can be standing, down, large, small, of various species, and in various stages of decomposition. They should not be uniformly spaced around the forest like candles on a cake nor should they be all in one corner of a survey plot and then averaged in with the other plots, so it appears there are snags throughout the surveyed area. Additionally, after a serious drought/insect infestation event, the forest responds in positive ways - insectivorous species thrive. Standing dead trees may be the tallest structure the forest will have for many decades. Within a year, likely sooner than the highly flammable slash a biomass removal project will create can be burned, the dead needles and smaller branches of the dead trees will shed and the dead trees will become less flammable. Science indicates that most dead trees outside of the 200 feet surrounding

structures should be left standing in place.

There is no evidence that removing a tree infected with beetles after it has died will decrease the infection rate to other trees. Additionally, logging dead and diseased trees can spread the insect infection problem. Some beetles, such as Ips, can incubate in piles of slash and spread more rapidly than had the tree been left standing. Forest Service Botanists have recommended methods to avoid spreading bark beetle. These include not cutting diseased trees unless it is mid-summer, pulling slash away from any living tree, and covering slash piles with black tarps to increase the heat in the pile.

A recent compilation of data by leading scientist in the Pacific Northwest has found that "By dampening subsequent burn severity, native insects could buffer rather than exacerbate fire regime changes expected due to land use and climate change. In light of these findings, we recommend a precautionary approach when designing and implementing forest management policies intended to reduce wildfire hazard and increase resilience to global change." "In addition, by dampening subsequent burn severity, insect outbreaks could buffer rather than exacerbate some fire regime changes expected due to global change (e.g., climate warming, drought, invasive species (Littell et al 2010, Ayres et al 2014)) and forest response to land use (e.g., fire exclusion, timber harvest, livestock grazing (Hessburg et al 2000))." See Miegs et al. (2016).

All trees that must be removed should be surveyed for any active nesting or dens the same season as the cutting will occur - preferably just prior to the planned cutting. No cutting or treatment should be allowed near meadows during fawning season.

When biomass removal projects propose to concurrently protect communities in the Wildland Urban Interface (WUI), some of the responsibility for protection of privately owned structures must be borne by the private property owner. Just as those who build homes on shorelines accept the risks of high seas eroding or undercutting their structures because they love living by the ocean, so must those who chose to live surrounded in Sierra forests accept the risk that accompanies living in an ecosystem that not only burns frequently, but must burn if it is to survive as a forest.

Science support treatments limited to the Home Ignition Zone (HIZ). The Forest Service's own Jack Cohen (Jack D. Cohen, Research Physical Scientist, Fire Sciences Laboratory, PO Box 8089, Missoula, MT 59807 406-329-4821 (fax) 406-329-4825 jcohen@fs.fed.us), has shown that the Home Ignition Zone - the 200 to 300 feet immediately surrounding homes, is where mechanical fuel treatments should be implemented to protect homes. The Home Ignition Zone treatments can be the mechanically-treated safezone that anchors prescribed fire treatments that would then be implemented beyond the HIZ and into the WUI to protect homes.

However, the Forest Service, County, and State should investigate measures that would assist private property owners to not only be aware of things they can do to make their homes less likely to ignite in a fire, but also actively seek sources of funding such as grants for property owners that would give financial assistance for replacing flammable roofing and siding with flame resistant materials. Many studies show that homes with these and other fire-wise building methods often survive fire. The cost of providing financial assistance to private property owners would be more than offset by the costs of replacing homes and in providing assistance to families after their homes and possessions have been destroyed. See, also Safe At Home, Natural Resources Defense Council's study, conducted with a former California State Fire Marshall, on preparing Sierran communities for wildfire, attached.

In summary, the ARB should require that community protection projects should be scaled down to treat only the 200 feet immediately adjacent to private structures as well as important access routes, not miles from homes.

Biomass Removal Projects that Allow Any Additional Erosion are Unacceptable

Biomass removal projects that use both commercial and non-commercial activities to thin ladder fuels, restore species composition to those present before fire suppression and logging, and increase the resiliency of stands of trees to drought, insects, and fire may release sediments downstream because heavy equipment on slopes up to 35% and greater have a risk of soil erosion, and loss of soil to erosion, which is unacceptable.

No additional erosion or sediment flow into down-stream watersheds would be considered acceptable. All sediment flows into streams is cumulative and eventually contributes to causing reservoirs like Isabella Reservoir to fill with sediment, as it has. The U.S. Army Corps of Engineers is now spending hundreds of millions of taxpayer dollars to restore the Isabella Reservoir because the Forest Service implements biomass removal projects, in the mountains above the reservoir, which cause soil erosion and sedimentation that cumulatively impact the Kern River watershed, and which the agency considers to be "acceptable."

Consider All Existing Water Uses and Water Resources

Is the massive die-off of trees in the Sierra Nevada being caused only by the drought and climate change, or is the die-off being exacerbated by the limited water supply in the Sierra because of the granitic structure of the mountains where water is found in isolated fracture pockets where tree roots must penetrate to reach the needed water supply when surface water flows are intermittent? Water wells in the Sierra Nevada are located and placed using fracture drilling techniques. Forest managers must consider the anthropogenic uses of water in the forests, including, but not limited to, water wells, water diversions, water withdrawals, and water developments that serve people who have established in forested areas of California. How are these anthropogenic uses of water impacting the available water for growing forests and maintaining the forest species? These human uses of forest water must be identified, their flows determined and totaled, and the cumulative extracted water volume considered along with drought and climate change. Should these extractions be permitted to continue at the expense of the needs of the forest which is California's major location for sequestering carbon?

Global climate change will likely lead to water resource shortfalls. According to the CEC document <http://www.energy.ca.gov/2009publications/CEC-500-2009-014/CEC-500-2009-014-F.PDF>, "there is a disquieting preponderance of simulations that become significantly drier during the twenty-first century." Also, "The incidence of years with very low spring snowpack and associated low soil moisture in late spring and early summer occur much more frequently." According to the CEC document *Using Future Climate Projections to Support Water Resources Decision Making in California at* <http://www.energy.ca.gov/2009publications/CEC-500-2009-052/CEC-500-2009-052-F.PDF>, "The 30-year trend indicates that the fraction of annual runoff occurring from April through July decreases from about 35% for the historical base scenario (historical conditions with no increase in air temperature) to about 15% for the +4°C scenario."

After thinning stands of mature trees, to increase heterogeneity and resilience, and after hand thinning stands of smaller trees, the temperature of forest fuels and forest air will increase, the moisture level of forest fuels decreases, and the relative humidity in the understory decreases, it stands to reason that surface and

groundwater resources could also be impacted by the removal of these materials. It therefore stands to reason that forest managers should provide a comprehensive inventory of surface and groundwater resources of water in the watersheds of any project area where trees are proposed for removal as a way to establish a baseline for assessing the impacts of the project on forest resources. These inventories and an analysis of water resources must be considered in the environmental analysis, especially now that we are in a prolonged drought period in California. This water balance must be specified in order to be able to determine if sufficient water is available to cope with the increased forest temperatures that would result following tree removal.

The ARB must therefore consider how unlogged forests retain water before allowing forest management agencies in California to approve tree removal. The ARB must consider whether commercial logging is an appropriate treatment since commercial logging would cause the forest to become hot and dry and allow surface winds to increase, all of which would exacerbate wildfire.

If a proposed project is to restore and maintain the forest ecosystem so it is resilient to the effects of wildfire, drought, disease, and other disturbances, the EIS must include an assessment of and documentation to show all water diversions, withdrawals, and developments that utilize water in the watersheds involved in the project area in order to establish a baseline of available water for making a decision as to what can be done to protect the forest ecosystem from drought, and whether commercial thinning would be effective, since thinning would cause the forest understory to become hotter and dryer, and would allow moisture-robbing surface winds to increase.

Managing forest ecosystems and clearing fire prone vegetation runs counter to common sense by exposing soils and understory vegetation to desiccating conditions. Removing forest biomass to supposedly reduce fire danger runs counter to making the forest resilient to climate change because opening the forest canopy to winds or the drying heat of the sun results in drying out the layers of moisture-holding duff, small trees, and down woody material. This is especially true in the Sequoia National Forest, which receives relatively little moisture due to its geographic location in the Southern Sierra, essentially surrounded on three sides by desert, and the prevailing weather patterns.

Water vapor in the air comes almost entirely from three sources: Evaporation from any moist surface or body of water, evaporation from soil, and transpiration from plants. Plants have large surfaces for transpiration; occasionally they have as much as 40 square yards for each square yard of ground area. Transpiration from an area of dense vegetation can contribute up to eight times as much moisture to the atmosphere as can an equal area of bare ground.

Relative humidity is most important as a fire-weather factor in the layer near the ground, where it influences both fuels and fire behavior. The relative humidity that affects fuels on the forest floor is often quite different from that in the instrument shelter, particularly in unshaded areas where soil and surface fuels exposed to the sun are heated intensely, and warm the air surrounding them. This very warm air may have a dew point nearly the same or slightly higher than the air in the instrument shelter, but because it is much warmer, it has a much lower relative humidity. Vegetation moderates surface temperatures and contributes to air moisture through transpiration and evaporation - both factors that affect local relative humidity. A continuous forest canopy has the added effect of decreasing surface wind speeds and the mixing that takes place with air movement. The differences in humidity between forest stands and open areas generally vary with the density of the crown canopy. Under a closed canopy, humidity is normally higher than outside (the closed canopy) during the day, and lower at

night. The higher humidities are even more pronounced when there is a green understory. While temperature and moisture distribution in the layer of air near the ground are important in fire weather because of their influence on fuel moisture, the distribution of temperature and moisture aloft can critically influence the behavior of wildland fires.

Cumulative impacts that remove trees up to 30 inch diameter and larger that results in opening the canopy and causes the sun to shine where the trees once stood heats and dries forest materials and soil and causes flammable brush to grow where the less flammable tree trunks once stood. Sequoia ForestKeeper's teams of environmental graduate summer interns have repeatedly observed and documented in Sequoia the inverse relationship between canopy cover and ground cover. When forest canopy increases, groundcover decreases: when forest canopy decreases, groundcover increases. (See Fire Weather and other research that indicates the same.)

Much of this is known and is discussed in the US Forest Service's Publication FIRE WEATHER . . . A Guide For Application Of Meteorological Information To Forest Fire Control Operations, by Mark J. Schroeder, Weather Bureau, Environmental Sciences Administration, U.S. Commerce Department and Charles C. Buck, Forest Service, U.S. Department of Agriculture U.S. Government Printing Office: 0-244:923, first published in May 1970. Reviewed and approved for reprinting August 1977, Stock No. 001-000-0193-0 / Catalog No. A 1.76:360 (available at [http://gacc.nifc.gov/nwcc/content/products/intelligence/Fire\\_Weather\\_Agriculture\\_Handbook\\_360.pdf](http://gacc.nifc.gov/nwcc/content/products/intelligence/Fire_Weather_Agriculture_Handbook_360.pdf)).

Congress recognized that managing natural resources in National Forests was "highly complex" and enacted the Forest and Rangeland Renewable Resources Planning Act. The Act requires that the Forest Service develop an inventory of "present and potential renewable resources, and an evaluation of opportunities for improving their yield of tangible and intangible goods and services." In addition the Act requires that all forest management activities to be preceded by a "comprehensive assessment" of environmental and economic impacts in order to create a management plan that is consistent with MUSYA and NEPA. Congress emphasized the "fundamental need" for the management plans to "protect and, where appropriate, improve the quality of soil, air, and water resources." Developing an inventory of surface and groundwater resources and an assessment of the environmental impacts on surface and groundwater including potential impacts of groundwater use on surface water resources, is an integral step in ensuring that a management plan protects the water quality in California's forests.

Because much of the Sierra Nevada Forests are Habitat for Pacific Fisher, the Thresholds for cumulative restorative treatments, like Biomass removal, should not exceed, on average, 2.6% of Pacific fisher habitat per year (or 13% over a 5-year period) to Prevent Putting fisher habitat and fisher use of the areas at risk.

The types of treatments are referred to in Zielinski et al. (2013b) (Exhibit E) as restorative, which include fuel reduction thinning, prescribed fire, or pre-commercial (hand) thinning. Zielinski et al. (2013b) suggest that fishers occupy habitat at the highest rates where restorative treatments "are applied at rates that do not exceed about 13% of an area in 5 years ...." or 2.6 % per year. See p. 825.

Zielinski et al. (2013b) noted that although fishers showed no aversion to including treated areas within their home ranges, Garner (2013) (Exhibit F) found that "fishers avoided using treated areas when resting and foraging." Id.

If cumulatively Project treatments are likely to exceed this 2.6%

average treatment acreage per year, proposed treatments "may put fisher habitat and fisher use of these areas at risk." Id. The Forest Service must therefore rethink its course of treatments in the fisher's habitat.

Projects must be reconsidered where there is a constricted corridor in the Fisher's Core Habitat, and the proposed treatments in this corridor may cut off fisher movement through the corridor. As discussed above in Zielinski et al. (2013b), Garner (2013) (Exhibit G) found that "fishers avoided using treated areas when resting and foraging." When an entire corridor is proposed for treatment, meaning there is a likelihood that fishers will completely avoid use of this corridor after treatment, which will completely sever the movement of fishers through the corridor for an extended period of time, which would have a devastating effect on foraging, reproductive behavior, and genetic diversity of the fishers, the management agency must reconsider or rethink implementations of such a project. In essence, if movement through a corridor is severed, it would cut-off and genetically isolate the fisher population in the fisher's already limited range.

#### Ecological Restoration Principles - Restoration Without Tree Removal

The management agencies should not place too much reliance on mechanical methods for ecological restoration and maintenance. Instead, fire should be used as the primary tool for restoration, as suggested in both the California Spotted Owl and Fisher Conservation Strategies. Moreover, agencies should not overstate the need for ecological restoration to create resiliency from drought, and native insects and diseases, which are natural processes that should be preserved rather than eliminated.

Thinning of medium and large diameter trees (12-30" dbh) should not be permitted for the purpose of ecological restoration to prevent natural stresses from competition. Tree competition, caused primarily by increases in stand density, is a natural process which induces other natural process that deal with this density, such as native insect- and disease-caused tree mortality. These processes, in turn, produce structural forest elements that are vital for wildlife-snags. While the removal of trees to reduce this natural competition may prevent the death of a small number of large trees, it would also prevent the creation of some of the most important elements in the forest ecosystem-snags-for the perpetuation of certain wildlife species, including California spotted owls, various woodpeckers, and countless other species. It is well-documented that these species need abundant large snags at a certain densities in order to thrive. Even the artificial method of increasing the number of snags by girdling trees will not create as diverse a variety of snags for these species as will natural snag recruitment. And while the cutting or removal of trees to prevent competition-induced stresses may be good for the remaining trees, it prevents natural snag recruitment that helps perpetuate a number of key wildlife species.

For proposed actions that promote resilience as a goal, it is important to understand that resilience is not a process. Instead, it is a characteristic, which results from the continued perpetuation of natural processes, including competition. The perpetuation of the forest ecosystem is not the same as the perpetuation of the lives of all of the larger trees in that ecosystem. This means that we need some of these large trees to die at a rate that can sustain certain wildlife species. Competition mortality will result in large snag recruitment beyond what silviculturalists may want in a forest that is 'managed' to produce maximum growth.

Even if the project allows tree cutting a few of the larger trees for ecological restoration or to reduce safety hazards along roads, these tree boles should be retained in the forest as large down

woody material. Ecological restoration provides an opportunity to restore forest areas with large down woody material for soil nutrients, wildlife (especially for Pacific fishers), and to maintain ecological functions.

Leaving a large number of downed logs will not increase fire risk. The Forest Service's own science clearly concludes that large logs (defined by the 2001 Sierra Nevada Forest Plan Amendment as being over 12 inches in diameter) are essentially irrelevant to fire behavior. And tree boles over 12 inches in diameter that the agency says it needs to fell for ecological restoration would not create any significant fire hazard if left standing. Operability for prescribed fire management should not be an issue when leaving these large tree boles as down logs. In fact, the 2004 Framework standards takes large down logs into consideration, stating that managers should design prescribed burn prescriptions and techniques to minimize the loss of large down material.

Forest management agencies should use the reintroduction of fire as the primary tool for ecological restoration and should prohibit the thinning of larger trees to reduce fire risk, just as the National Park Service has done with the use of natural process of prescribed and fire use fires for the past 40 years managing the Sequoia and Kings Canyon National Parks. Agencies should limit manual and mechanical methods that prepare the forest for the reintroduction of fire to the cutting of only some trees 8-10 inches dbh and smaller. As the adjacent Sequoia and Kings Canyon National Parks ("SEKI") has found, "cutting trees up to and including 8" in diameter has proven effective in fuels reduction in SEKI." SEKI demonstrated the effectiveness of their prescribed fire treatments that showed dramatically different and beneficial burn result from the Rough Fire compared to the devastating result of the fire in Sequoia National Forest where thinning is the primary management treatment. After fire is reintroduced into stands where only some trees up to 8" in diameter were removed, natural processes can perpetuate, making future thinning applications for ecological maintenance unnecessary.

Human-caused Fires are Now the Norm – Lightning-caused Natural Wildfires are infrequent

Thousands of acres of forests and chaparral habitats were burned, hundreds of people were displaced, several people were killed, thousands of homes were incinerated with millions of dollars spent in suppression costs, and countless environmental losses occurred as a result of human-caused fires in 2015 and 2016. Heat sources, whether from flames from a campfire, or embers from a tossed cigarette, or sparks from an engine of a nonfunctional spark arrestor, or sparks from a bullet that bounces off a rock, or sparks from the rotating blade of a county-manned road clearance weed cutter that strikes a rock – they are all examples of human-caused fires that must be addressed.

Lightning-caused natural fires in forested habitats generally ignite near the top of a tree and slowly burn down the tree because heat rises, so the fire is not easily spread down to the ground where most fires would eventually be extinguished due to the cool environment below the trees where small fuels are less abundant. Human-caused fires generally start at ground level and burn quickly up because heat rises and rising heat creates wind conditions that carry and accelerate the fire's spread.

The ARB research report from 18 April 2016 titled, Source Speciation of Central Valley GHG Emissions using In-Situ Measurements of Volatile Organic Compounds, (Contract No. 11-315) prepared by Principal Investigator Professor Allen H. Goldstein from the University of California Berkeley, points to the air pollution from forest fires as being a significant sources.

Due to the changing climate, the drought, and the frequency of

expensive human-caused fires, California should place Public Service Announcements (PSA's) in multiple languages and in every media outlet and through every organization that operates in California to get the word out about ways to reduce GHG's, climate change, and forest fires. Preventing human-caused forest fires would benefit every Californian, including residents of EJ disadvantaged communities. Also, the ARB should prohibit all camp fires and smoking in camping areas and impose severe financial penalty for smoking and fires in forested areas.

#### Distributed Clean PV Solar on Rooftops

Distributed Clean Energy has six key energy efficiency measures that are recommended for immediate action. The following specific reasons are provided as to why:

(1) Reduce the distance needed for transmission and distribution of power to decrease transmission losses that will reduce the need for fuel to generate power, improve air quality, and reduce impacts to the global climate and (2) improve grid stability and reliability. Distributed clean energy (3) involves the entire community in energy solutions, and (4) reduces transmission impacts and (5) reduces disruptive transmission bottlenecks.

Most of these benefits of Distributed Clean Energy reduce reliance on transmission of electricity over long distances. The reduced average distance needed for moving electricity over transmission and distribution lines means that less infrastructure is needed to move power around the grid. This can save a lot of money; developing a single long-distance transmission project costs hundreds of millions to billions of dollars. Transmission can also have significant environmental impact. It requires a cleared corridor potentially extending for hundreds of miles. Transmission lines can cause wildfires, and by one estimate may kill 130 to 170 million birds per year in the US.

Large remote renewable energy projects may depend upon transmission lines that can take a decade to permit and construct. Because local, small-scale projects can be built relatively quickly, and normally don't need transmission, and Distributed Clean Energy can speed up conversion to renewable energy.

Distributed Clean Energy provides economic development opportunities, inner city jobs, and increased urban tax collections. It also supports grid reliability, which can be important where natural disasters, such as earthquakes and ice storms, disrupt long distance transmission lines.

One major advantage of Distributed Clean Energy is that it reduces or avoids the energy losses that occur in the transmission and distribution grid. Electrical resistance in wires and other grid components converts electric energy into heat that escapes into the atmosphere. In the US an average of 6.5% of electricity is "lost" in the power grid; over a year that would amount to approximately 260 terawatt-hours—roughly the amount of electricity consumed by the entire state of California.

This is the energy price we pay for generating electricity in one place and sending it off to be consumed in another place. The available and affordable way to avoid this energy loss in the power grid is first to reduce the overall consumption of electricity, and then to produce electric power where it is consumed.

A paper called "Community Power" describes the benefits of distributed power generation and the fallacy of unbalanced, permissive favoritism towards centralized solar development in lieu of more balanced, socially, technologically, economically and democratically beneficial, distributed, localized renewable resources. The link to the "Community Power" paper that describes the benefits of distributed power generation can be downloaded at: <http://www.localcleanenergy.org/Community-Power-Publication>.

Respectfully submitted,

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Attachment:

November 23, 2015, to California Governor Jerry Brown and Mary Nichols, Chair of California Air Resources Board

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-09 10:53:33

No Duplicates.

## Comment 23 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Bryan  
Last Name: Singer  
Email Address: hogparts@gmail.com  
Affiliation: Hogties Inc.

Subject: Scoping Plan  
Comment:

I own a small business located in South Gate. My company employs 10 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 12:20:08

No Duplicates.

## **Comment 24 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Luis  
Last Name: Marquez  
Email Address: lmarquez@downeyca.org  
Affiliation: Downey Councilmember

Subject: EJAC Community Hearings  
Comment:

Please see the attachment for my comments on this issue.

Thank you.

Luis Marquez  
Councilmember  
City of Downey

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-ejac-comm-mtgs-ws-UWMANIZmBWBRZ1Vt.pdf>

Original File Name: 20160810-CARB Scoping Plan-Marquez.pdf

Date and Time Comment Was Submitted: 2016-08-10 13:45:41

No Duplicates.

## Comment 25 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Oscar  
Last Name: Zamora  
Email Address: oscar2031@yahoo.com  
Affiliation: J&S Belts and Bias, Inc.

Subject: CARB Scoping Plan

Comment:

I would like to express my concern regarding the current Environmental Justice Advisory Committee - Community Meetings. As I understand these community meetings are meant to inform all community stakeholders on the scoping plan for the reduction of green house gas emissions. These meetings are also intented for committee members to receive input from stakeholders, unfortunately this is not the case.

As a community stakeholder I would like my comments to be put on record as this important piece of legislation moves forward. This legislation provides no assurances that an extension of California's current energy programs will be effective, affordable or have protections in place for consumers and businesses. In addition, this bill will grant the California Air Resources Board (ARB) more authority to mandate new programs, when the current programs have not been resolved, nor a comprehensive accounting of the costs and effectiveness of the programs has been provided.

As the Environmental Justice Advisory Committee (EJAC) meetings continue throughout the next few weeks, we need to guarantee that both the industries and the local residents are providing their feedback in order for California to have a comprehensive policy that protects affordability and reliability, and works in symmetry with existing climate programs, while providing appropriate legislative engagement and oversight.

I urge you to keep all community stakeholders in mind as this process moves forward.

Thank you for your consideration of my views and concerns.

Sincerely,

Oscar Zamora

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 13:57:15

No Duplicates.

## Comment 26 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Steve  
Last Name: Quiñones  
Email Address: carlitosauto@yahoo.com  
Affiliation: Carlitos Auto

Subject: ARB Scoping Plan  
Comment:

I own a small business located in South LA. My company employs 3 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Steve Quiñones

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 14:03:05

No Duplicates.

## **Comment 27 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Catherine

Last Name: Wilson

Email Address: cwilson@yahoo.com

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

It is important that any new regulations to improve air quality or deal with climate change provide measurable environmental benefits that justify any increased costs. Small businesses and lower income communities already spend a high percentage of their budgets on energy. We need to preserve small businesses, like family farms, that provide employment as they also supply local, fresh food. Please insure there is a balance as you make recommendations to the scoping plan that insure jobs are preserved as well as the environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 14:02:12

No Duplicates.

## Comment 28 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Isidro  
Last Name: Vargas  
Email Address: ezautocollisionrepair@gmail.com  
Affiliation: EZ Auto Collision Repair

Subject: ARB Scoping Plan

Comment:

I own a small business located in the City of Bell. My company employs 5 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 14:12:19

No Duplicates.

## Comment 29 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Abraham

Last Name: Paez

Email Address: Abraham@ArmstrongLogistics.net

Affiliation: Armstrong Logistics

Subject: EJAC Community Hearings

Comment:

I would like to express my concern regarding the current Environmental Justice Advisory Committee - Community Meetings. As I understand these community meetings are meant to inform all community stakeholders on the scoping plan for the reduction of green house gas emissions. These meetings are also intented for committee members to receive input from stakeholders, unfortunately this is not the case.

As a community stakeholder I would like my comments to be put on record as this important piece of legislation moves forward. This legislation provides no assurances that an extension of California's current energy programs will be effective, affordable or have protections in place for consumers and businesses. In addition, this bill will grant the California Air Resources Board (ARB) more authority to mandate new programs, when the current programs have not been resolved, nor a comprehensive accounting of the costs and effectiveness of the programs has been provided.

As the Environmental Justice Advisory Committee (EJAC) meetings continue throughout the next few weeks, we need to guarantee that both the industries and the local residents are providing their feedback in order for California to have a comprehensive policy that protects affordability and reliability, and works in symmetry with existing climate programs, while providing appropriate legislative engagement and oversight.

I urge you to keep all community stakeholders in mind as this process moves forward.

Thank you for your consideration of my views and concerns.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 15:15:00

No Duplicates.

## **Comment 30 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Pablo

Last Name: Flores

Email Address: [fivestarmoto82@gmail.com](mailto:fivestarmoto82@gmail.com)

Affiliation: FiveStar Motorcycles

Subject: EJAC Community Hearings

Comment:

I own a small business located in Cerritos. My company employs 7 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Pablo Flores  
Owner-Operator  
FiveStar Motorcycles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 15:54:19

No Duplicates.

## Comment 31 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Pablo

Last Name: Flores

Email Address: [fivestarmoto82@gmail.com](mailto:fivestarmoto82@gmail.com)

Affiliation: FiveStar Motorcycles

Subject: EJAC Community Hearings

Comment:

I own a small business located in Cerritos. My company employs 7 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Pablo Flores  
Owner-Operator  
FiveStar Motorcycles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 15:54:19

No Duplicates.

## Comment 32 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Samuel

Last Name: Vidrio

Email Address: galleryframesdowney@gmail.com

Affiliation: Gallery Frames

Subject: EJAC Community Hearings

Comment:

I would like to express my concern regarding the current Environmental Justice Advisory Committee - Community Meetings. As I understand these community meetings are meant to inform all community stakeholders on the scoping plan for the reduction of green house gas emissions. These meetings are also intented for committee members to receive input from stakeholders, unfortunately this is not the case.

As a community stakeholder I would like my comments to be put on record as this important piece of legislation moves forward. This legislation provides no assurances that an extension of California's current energy programs will be effective, affordable or have protections in place for consumers and businesses. In addition, this bill will grant the California Air Resources Board (ARB) more authority to mandate new programs, when the current programs have not been resolved, nor a comprehensive accounting of the costs and effectiveness of the programs has been provided.

As the Environmental Justice Advisory Committee (EJAC) meetings continue throughout the next few weeks, we need to guarantee that both the industries and the local residents are providing their feedback in order for California to have a comprehensive policy that protects affordability and reliability, and works in symmetry with existing climate programs, while providing appropriate legislative engagement and oversight.

I urge you to keep all community stakeholders in mind as this process moves forward.

Thank you for your consideration of my views and concerns.

Sincerely,

Samuel Vidrio  
Owner-Operator  
Gallery Frames

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-10 17:54:41

No Duplicates.

## Comment 33 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Todd

Last Name: Shuman

Email Address: tshublu@yahoo.com

Affiliation:

Subject: Educate public re climate & health costs of eating meat and dairy

Comment:

Under your SLCP reduction strategy I recommend public education about the costs to the climate and to human health from eating meat and dairy products; measure program effectiveness by establishing a baseline and goal of 50 percent reduction in consumption of products from ruminant animals by 2030; stop any subsidies to dairy, especially export of dairy products; offer assistance to renovate industrial dairy farms to activities that do not emit significant greenhouse gases.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 01:20:27

No Duplicates.

## **Comment 34 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Cheryl

Last Name: Cross

Email Address: [ccross@southgatecc.org](mailto:ccross@southgatecc.org)

Affiliation: South Gate Chamber of Commerce, Exec Dir

Subject: Priorities and Concerns for CARB Update - South Gate Chamber of Commerce

Comment:

On behalf of the businesses and job creators in the City of South Gate, we are writing to express our priorities and concerns for the California Air Resources Board's (CARB) update to the state's climate change law. We appreciate the opportunity to comment on the recent efforts of CARB's Environmental Justice Advisory Committee (EJAC) workshops.

Indeed, the Chamber supports reasonable regulations to improve our air quality, but we strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost. EJAC was created to be a voice for vulnerable communities and to make recommendations under the AB 32 Scoping Plan.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. California already has the cleanest energy and the lowest emitting industrial facilities in the country. Small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy. Before EJAC advocates for more costly regulations that could overburden small businesses and put employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful and measurable air quality benefits for our communities.

As Environmental Justice Advisory Committee (EJAC) meetings are taking place in local communities across the State we want to make certain that our industries are kept in mind and are invited to attend so that our voices are also heard. We share the goals of a clean environment and support achievable policies. We believe that a portion of revenue that is collected through these policies should be returned to affected businesses and industries in order to assist in achieving greenhouse gas emission goals. We must ensure that said businesses are not driven out of the State and help keep California in a competitive business climate.

We want to work with you to make sure these policies will truly benefit this community and that we have a balanced approach.

Thank you for your consideration of our views and concerns.

Sincerely,

Cheryl Cross  
Interim Executive Director  
South Gate Chamber of Commerce  
3350 Tweedy Blvd.  
South Gate, CA 90280  
323-567-1203  
[ccross@southgatecc.org](mailto:ccross@southgatecc.org)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 08:05:25

No Duplicates.

## **Comment 35 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Julian

Last Name: Carranza

Email Address: jcarranza@youthbuildcharter.org

Affiliation:

Subject: Environmental Justice AC meetings

Comment:

As a Conservation Corps member I would have liked to attend this meeting regarding the future of our State and our community as it relates to Climate

Change. I believe that we should all have a say in our future especially the younger

generations because we need to live with the decisions made by our predecessors.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 10:54:11

No Duplicates.

## **Comment 36 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Ricardo

Last Name: Diaz

Email Address: rdiaz@youthbuildcharter.org

Affiliation:

Subject: Member, San Gabriel Valley Conservation Corps

Comment:

The environment and air quality is important to all of us especially in

disadvantaged communities such as the one I live in. As a Corps member I think it is

extremely important that ALL disadvantaged communities in the State participate

and learn about how environment policies impact us and how we can take

advantage of existing programs that help us comply with new climate laws. I hope

that moving forward the staff at CARB reaches out to everyone and we get to have

our say too.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 10:56:37

No Duplicates.

## **Comment 37 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Linda

Last Name: Ramirez

Email Address: lramirez@youthbuildcharter.org

Affiliation:

Subject: Member, San Gabriel Valley Conservation Corps

Comment:

As a Corps member we are taught how to conserve and clean our environment. Attending the EJAC community meeting would have been a great

opportunity for me and other corps members to learn how we can play a part in

programs that are needed in our community. For myself, the environment is just as

important as jobs in our area and we need to make sure that we balance saving our

environment and making sure that we don't drive vital jobs outside the State.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 10:58:06

No Duplicates.

## **Comment 38 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Mia

Last Name: Gutierrez

Email Address: mgutierrez@youthbuildcharter.org

Affiliation: Member, San Gabriel Valley Conservation

Subject: EJAC meetings

Comment:

I am a Corps member at the San Gabriel Valley Conservation Corps and I

believe in creating a better environment for better generations. I would have liked

to attend one of the EJAC meetings that took place around the State, especially the

San Bernardino meeting since it was closer to our community. These types of

meetings are important for all stakeholders because it gives us an opportunity to

share our concerns and ideas. For the future I would like for the EJAC staff to do

more outreach because otherwise all recommendations are just coming from one

group and they are not reflective of the overall working community.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 11:00:07

No Duplicates.

## Comment 39 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Ricardo

Last Name: Diaz

Email Address: rdiaz@youthbuildcharter.org

Affiliation:

Subject: EJAC meetings

Comment:

The environment and air quality is important to all of us especially in

disadvantaged communities such as the one I live in. As a Corps member I think it is

extremely important that ALL disadvantaged communities in the State participate

and learn about how environment policies impact us and how we can take

advantage of existing programs that help us comply with new climate laws. I hope

that moving forward the staff at CARB reaches out to everyone and we get to have

our say too.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 11:08:30

No Duplicates.

## **Comment 40 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Linda

Last Name: Ramirez

Email Address: lramirez@youthbuildcharter.org

Affiliation:

Subject: EJAC meetings

Comment:

As a Corps member we are taught how to conserve and clean our environment. Attending the EJAC community meeting would have been a great

opportunity for me and other corps members to learn how we can play a part in

programs that are needed in our community. For myself, the environment is just as

important as jobs in our area and we need to make sure that we balance saving our

environment and making sure that we don't drive vital jobs outside the State.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 11:10:07

No Duplicates.

## Comment 41 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Toni

Last Name: Raymus

Email Address: toni@raymushomes.com

Affiliation:

Subject: AB32

Comment:

Thank you for the opportunity to comment. One of the stated goals of AB 32 is "improved job outcomes." As the owner of a small business located in Manteca, I am concerned that jobs will be lost not added due to additional regulations. My company employs 16 workers, who rely on their jobs to support their families and provide for the education of their children.

It is increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this area. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-income families already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in low-income communities. Before EJAC advocates for more costly regulations, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 11:12:59

No Duplicates.

## **Comment 42 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Oaxaca

Email Address: [doaxaca@sgvcorps.org](mailto:doaxaca@sgvcorps.org)

Affiliation: San Gabriel Valley Conservation Corps

Subject: Community Outreach Regarding EJAC Meetings

Comment:

I would like to take this time to comment on recent EJAC meetings that have taken place around the State and in which I was not informed of nor invited to attend any of them. Climate change is of the upmost importance to the Conservation Corps given that we work to ensure that our children are given opportunities and have a clean environment to live in. When it came to my attention that there had been a meeting in San Bernardino I began to question the type of outreach that was conducted and how the EJAC staff determined whom they would target to attend. I would also like to know why there weren't any EJAC meetings held in the San Gabriel Valley? Moving forward I would like to see more outreach done to communities that are impacted by these policies so that we can voice our concerns and share our ideas. Climate change is a very complicated and multi-faceted issue and I believe EVERYONE impacted (businesses, community members, non-profit organizations, residents, students, etc) should have a seat at the table.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 14:31:09

No Duplicates.

## Comment 43 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Chad  
Last Name: Sublet  
Email Address: chad@vervenetworks.net  
Affiliation:

Subject: AB 32 Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Stockton, Ca. My company employs 20 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-income families already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a critically important source of upward mobility and job creation in low-income communities. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Chad Sublet

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 15:04:10

No Duplicates.

## Comment 44 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Teresa  
Last Name: Carlos  
Email Address: teresacarlos87@yahoo.com  
Affiliation: Angeleno Taxi Co.

Subject: Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Lynwood. My company employs 12 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!  
Teresa Carlos  
Angeleno Taxi Co.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 15:21:37

No Duplicates.

## Comment 45 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: William

Last Name: Baum

Email Address: lindabaum@att.net

Affiliation:

Subject: ARB Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in South Gate. My company employs 4 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!  
William Baum

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 15:24:47

No Duplicates.

## **Comment 46 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Mike

Last Name: Jackson

Email Address: CaliRetroPlates@yahoo.com

Affiliation:

Subject: Gas and Electricity

Comment:

I would like to express my concern regarding the current Environmental Justice Advisory Committee - Community Meetings. As I understand these community meetings are meant to inform all community stakeholders on the scoping plan for the reduction of green house gas emissions. These meetings are also intented for committee members to receive input from stakeholders, unfortunately this is not the case.

As a community stakeholder I would like my comments to be put on record as this important piece of legislation moves forward. This legislation provides no assurances that an extension of California's current energy programs will be effective, affordable or have protections in place for consumers and businesses. In addition, this bill will grant the California Air Resources Board (ARB) more authority to mandate new programs, when the current programs have not been resolved, nor a comprehensive accounting of the costs and effectiveness of the programs has been provided.

As the Environmental Justice Advisory Committee (EJAC) meetings continue throughout the next few weeks, we need to guarantee that both the industries and the local residents are providing their feedback in order for California to have a comprehensive policy that protects affordability and reliability, and works in symmetry with existing climate programs, while providing appropriate legislative engagement and oversight.

I urge you to keep all community stakeholders in mind as this process moves forward.

Thank you for your consideration of my views and concerns.

Sincerely,  
Mike Jackson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 15:32:25

No Duplicates.

## Comment 47 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Larry  
Last Name: Cook  
Email Address: jimcookmachine@gmail.com  
Affiliation: Jim Cook Machine Shop

Subject: Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Carson, California. My company employs 2 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!  
Larry Cook

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 15:50:52

No Duplicates.

## Comment 48 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Craig  
Last Name: Walters  
Email Address: craig@premierfinishing.com  
Affiliation:

Subject: AB32 Scoping Plan

Comment:

Thank you for allowing me the opportunity to give feedback on the recent EJAC community workshops. I, Craig Walters, along with my business partner, Thom Foulks, own a small business located in Stockton, CA. My company, Premier Coatings, employs approximately 140 workers, who depend on their job to support their families and provide for the education of their children.

Through the years, we have found it increasingly difficult to keep up with the rising costs of fuel and utilities. These increases have been very much related to existing environmental and climate change laws that are much stricter than those in other states.

But I am not just a business owner, along with my employees, my family and I also live and work in the community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. Premier strongly supports regulations to improve our air quality that are reasonable, but also believe these regulations must be cost-effective and provide measurable environmental improvements that can demonstrate justifying the cost.

California already has developed and moved to provide the cleanest energy and the lowest emitting industrial facilities in the country. But with these advancements, small businesses and low-to-moderate income communities now spend a higher than average percentage of their budgets on utilities and energy compared to other parts of the country.

Small businesses are a very important component of California's economy and is the largest job-creating sector in the state. Before EJAC advocates for more costly regulations which may lead to putting small businesses like mine out of business, and not to mention thousands of employees, including mine, out of work; please reconsider your measures and the cost to implement and maintain them. Please promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Craig Walters  
President  
Premier Coatings, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 17:11:24

No Duplicates.

## **Comment 49 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Stuart

Last Name: Waldman

Email Address: elizabeth@vica.com

Affiliation:

Subject: Comment on EJAC process - VICA

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. The Valley Industry and Commerce Association (VICA) represents the business community in the San Fernando Valley.

Our members have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

Our members and staff live and work in this community, so we all have a vested interest in a clean and safe environment. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 18:53:57

No Duplicates.

## Comment 50 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Sophia

Last Name: Garcia

Email Address: Only1sophia@gmail.com

Affiliation:

Subject: RE: Comment

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I live in Sacramento. I live and work in a community where people work hard to support their families and provide education for their children.

It is increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

Not only have I made this community my home, but I pay taxes that help support the needs of this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. I support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses like the ones in my community are a critically important source of upward mobility and job creation in minority and low-income regions. Before EJAC advocates for more costly regulations that could close the doors of many small businesses and make it harder for me to afford the things I need, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 21:45:03

No Duplicates.

## Comment 51 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Alex

Last Name: Castaneda

Email Address: topentt@gmail.com

Affiliation: Top Entertainment

Subject: ARB Scoping Plan

Comment:

I own a small business located in Downey. My company employs 4 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!  
Alex Castaneda  
Top Entertainment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-11 22:28:26

No Duplicates.

## Comment 52 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation:

Subject: Cut MH4 60%; anticipate federal price on C; soil C rewards; hold every county responsible

Comment:

I have four recommendations for the ARB 2030 Scoping:

1. Increase the methane reduction goal from 40% to 60% by 2030,
2. Include in the economic analysis that improvement in the state's carbon pricing system take into account the inevitable enactment of a federal revenue neutral carbon tax and direct ARB to run scenarios for how that will best integrate with California's suite of climate programs,
3. Develop simple models for local soil carbon sequestration goals and targets in Climate Action Plans, and
4. Require that Ventura County's transportation plan be accountable to the state's emissions reduction goals and targets independent of SCAG.

### EXPLANATORY REMARKS:

1. Increase the methane reduction goal from 40% to 60% by 2030  
A meaningful price on methane must match its social cost of \$4700 per ton. Refer to the attached discussion paper on methane costs and pricing. The largest source of uncaptured, unburnt methane is enteric ruminant digestion in California's dairy industry, by far the largest dairy industry in the nation.

As a Public Health Nutritionist I look at the refusal of the dairy industry to reduce its emissions not just in terms of the social cost and injustice of radiative forcing explained in the attached discussion paper, but also the chronic disease and inflammation associated with consumption of dairy products especially by people with less access to education about the truth of these negative health impacts. I am also concerned about unbalanced U.S. trade arrangements favoring export of cow's milk products that have put small dairies in poor countries around the world out of business.

Finally I question subsidies for the dairy industry to manufacture dry milk and dairy-based ingredients such as casein powder for global industrial food manufacturing with a high carbon and methane footprint, displacing low carbon, low methane vegetable based alternatives that can and should be grown close to where they are manufactured and consumed. The California dairy industry wants a free pass to pollute so that it can continue to profit from an unjust global food system that undermines food localization and food security in a warming climate.

Regarding public health impacts, the only people in the U.S. who can digest lactose are those of northern European descent. People of Asian, Mexican and African descent have various degrees of lactose intolerance. People of Mexican descent traditionally obtain enough dietary calcium from the hydrated calcium hydroxide used to treat corn to make masa for tortillas and tamales. Mexicans do not

need dairy products as a source of calcium when they follow their traditional diet. Southern ethnic and Asian traditional diets are also rich in the minerals that the dairy industry claims they must get from eating cow's milk products.

As a former Registered Dietitian I have watched for decades the compromises by the dietetics profession and the USDA to the powerful dairy industry. There is now a group of professionals called Dietitians for Professional Integrity objecting to the corporate food and dairy industry dictating what constitutes a healthy diet. The dairy industry's promotion of the health benefits of cow's milk is not based in science. ARB must stop bending to dairy industry and farm bureau lobbyists threatening to leave the state if ARB properly internalizes the pollution costs of animal agriculture. Environmental justice requires in fact that people with less access to knowledge about truly healthy diets be provided effective public education programs about the climate and health benefits from avoiding dairy products.

Vegetarian and vegan food consumption patterns are trending in California. The first Cow-Con planned for next month (<http://cow-con.com/>) signals growing awareness about the climate costs of eating animal products. It appears to me that Californians are very ready to accept a rising cost of ruminant animal and dairy products to more quickly stop global warming. The market is making space for continuing innovation of ever more delicious, nutritious, and inexpensive vegetable protein beverages and non-dairy cheese, yogurt, and frozen desserts.

Not only is California the largest dairy producer, but 40 percent of production is exported to other countries. According to analysis by the United Nations Conference on Trade and Development in its 2013 publication 'Wake up before it is too late—make agriculture truly sustainable now for food security in a warming climate', it suggests that trade policies must favor sustainable ecological agriculture practices on all available land in all regions around the world. Justice is preeminently about food security and food security is "preeminently local food complemented by traded goods."

Specifically among a list of policy recommendations, it recommends that trade agreements include mechanisms to internalize transportation and other costs to favor local food in every community with exports focused on specialties and surpluses. It is immoral for the U.S. to subsidize agricultural commodities like dairy in order to destroy local dairy production in developing nations while exempting the dairy industry from emissions reduction regulation.

Finally, California policy to reduce methane emissions to reverse the extreme radiative forcing is an obvious way to raise revenue for investment in EJ communities. Unlike the political atmosphere at the national level, California can pioneer in setting up significant new revenues from a price on methane. Polls show that Californians and a majority of the elected do not require revenue neutral programs to price pollutants. If state politics requires an unlikely two-thirds vote for policies that target carbon and methane pricing revenues for innovation and EJ communities, revenues can be swapped for income and sales tax reductions using the British Columbia model until a ballot initiative establishes the mandate for the kinds of climate investments Californians take pride in supporting.

In short, some form of aggressive cap and tax program on enteric methane and all uncaptured, unburnt methane can help meet EJ goals locally as well as globally on many levels, as well as within the state in terms of quality of life, sustainability, public health, and enhanced food security in dairy counties.

2. Take into account an inevitable federal revenue neutral carbon

tax.

While this comment does not represent Citizens' Climate Lobby (CCL), it is based on my knowledge of the organization's progress among members of Congress. Their systematic strategy and methodology is based on that of Results that for over 25 years has achieved its goals for federal anti-poverty legislation. Its legislative proposal called Carbon Fee and Dividend is very quick and cheap to set up and has the immediate result of a progressive economic stimulus. It is called a fee because when the revenues are distributed 100% into the economy as 'rebates' to all households, conservative economists agree it is not a tax.

This is a prerequisite element only for Congress and in states with similar political orientation-NOT California. CCL's advocacy is strictly focused on the U.S. Congress that will favor a carbon fee that is simple, transparent, and easily integrated with all kinds of state and other national programs for maximum harmonization and speedy implementation and absolutely must be revenue neutral to receive a majority of votes. CCL has no position on the best carbon or methane pricing policy or priorities for any other jurisdiction in the U.S.

The economic impacts of a federal Carbon Fee and Dividend system have been the subject of two studies described in the attached summary and discussion. The greatest economic benefits go to all low income, minority and rural households, regardless of where they live or whether they are citizens or documented workers. It is thus a national comprehensive and inclusive platform that comes close to guaranteeing economic justice while driving the entire nation off of all fossil fuels. It includes a global price trigger achieved by a border adjustment provision that only Congress can exercise, in case any U.S. trading partner does not implement a comparable price on carbon.

As summarized in the attached paper, the Pacific Region is forecast by the REMI study to fare better than any other region of the U.S. because it already has a lower carbon footprint. The federal program will create jobs, increase GDP, real income, and assure a financial cushion for the poor and minorities during the transition. These studies suggest where more study is needed so that ARB can best plan for the state impacts of the federal program.

Anticipating the speed of implementation of a federal program is important. The British Columbia carbon tax was set up in less than five months from being enacted. ARB needs to do begin now to do its own study to replicate REMI's forecast of annual reduction in fossil fuel pollutants from a federal Carbon Fee and Dividend. There is room for more strategic visioning among EJ leaders to achieve policies for EJ in a sequential focused campaign that maximizes the potential synergy between quite different models of state and federal programs.

EJ leaders who oppose a federal price on carbon because they want California to maintain those revenues for their priority investments are probably so busy they haven't kept up with the horrifying daily news about how our planet is being torn apart by climate change. There is no room to be cynical or want to bargain about Congress leading to establish an effective global price on carbon.

Yes, a federal program will eventually decrease state revenues from California's carbon credit program (as fossil fuels move faster out of the economy). However, the enteric methane tax revenues may immediately bolster funding in the state. A creatively tailored mix of benefits may best be achieved by a revenue neutral federal program starting on just carbon with the continuation of a non revenue neutral state program on carbon and the addition of an aggressive cap and tax on methane.

3. Support speedy development of local goals and targets for carbon sequestration.

We know that to sequester more carbon as well as conserve water and survive drought and flood, the vast majority of acreage must be weaned off of chemicals and transitioned to biologically active soil. Modeling including a new study about to be released from Cornell University shows that, as in the rest of the economy, the transition is most easily achieved by the comprehensive foundational driver of averaged trends created by market forces and not by a smorgasbord of targeted regulatory or trading programs. Regulatory and targeted programs are best stacked onto a steady predictable market-driven transition off of fossil fuels. The most supportive market-based carbon pricing system for farmers is Carbon Fee and Dividend, a comprehensive steadily rising, staged, transparent, upstream fee that can scale up carbon farming and emissions reduction on all farms and landscapes. Those who don't take action to reduce the carbon footprint of their products will slowly, eventually fail.

My career in public health took a turn when I had an opportunity to take over an ecologically based pest management company. Over the past thirty years that I have been marketing biological methods to conventional farmers, I find generally that farmers, like most business owners, change practices to save money or make money. Some farmers change in order to stop polluting soil, air and water, but those are not the values that guide corporate industrial managers of most conventional farmland. There is a chemical agriculture mindset cultivated since the 1950's by the dominant messaging from chemical companies that is largely antithetical to biological agriculture. Biological methods are the prerequisite for truly game-changing levels of carbon sequestration.

While a federal revenue neutral carbon tax is a steady driver to scale up of carbon farming by conventional farms, parallel programs must be set in motion at the local level to motivate and reward farmers that respond to the rising price of fossil fuels by sequestering carbon, not just in perennial crops, but in soil. There are currently no guidelines or models for establishing protocols, baselines, metrics and rewards for higher soil carbon content. Simplification is the key to rapid mobilization of carbon sequestration practices that should also help farmers to diversify, localize, and survive the transition off of fossil fuels.

To this end I recommend support for development of at least one four-year pilot project to reward those practicing biological soil management. Such a program in partnership with a local agricultural county like Ventura County and a local community college Agriculture Department like the one that is being re-established at Ventura Community College can engage under-employed young professionals who have studied soil ecology and environmental science.

The human resources are available to carry out baseline and performance soil sampling and partner with expert scientists and local growers to analyze the data and devise a program that motivates all land managers to participate in the paradigm shift away from chemical to biological agriculture. The potential for biologically living soil to hold carbon is well documented and must be given top priority for the development of simple metrics with meaningful rewards.

4. Require accountability for emissions reduction in Ventura County's transportation sector.

Ventura County ranks in the worst 10 percent of counties nationwide for most criteria air pollutant emissions and exposures. We have 43 unhealthful air quality days per year for sensitive populations and 7 such days annually for everyone. The main sources are mobile, yet the VC Transportation Commission has no goals for emissions

reductions. In fact, county leadership is moving in the opposite direction with a ballot initiative to levy a Transportation Sales Tax with half of the revenues promised for the widening of highway 101 and state highway 118, primarily with HOV lanes that CalTrans has confirmed lead to induced traffic and no reduction in emissions. The VC Transportation Commission refuses to discuss other ways to reduce traffic congestion that will also improve air quality and reduce GHG emissions. Apparently this is because the state does not require that the county set emissions goals and targets.

Ventura County is a member of the Southern California Association of Governments that I am told is an overall high net achiever, at least on paper, for emissions reduction goals and targets. Therefore, Ventura County can ride the coattails of the rest of SCAG and pretend to its citizens that we do not have to make any changes in how we get around. Reducing GHG emissions is absent from any policy discussion anywhere in this county. This is partly because being an oil producing county, Western States Petroleum Association is actively lobbying public officials and leaders of thought with talking points like "the moral case for fossil fuels" and false scare tactics about loss of jobs and tax revenues.

Unless ARB requires Ventura County to establish independent goals and targets that match those of the state, the heavy influence of the oil industry will block leaders from taking responsibility for supporting the transition away from combustion engines. The ten cities are largely following the county's absence of leadership. Accountability should include a website where everyone can see Ventura County's and each city's goals and progress in emissions reductions from all sources.

#### Summary:

The subsidization of pollution by the state's dairy industry is not in the public interest. It is time for ambitious slashing of SLCPs. Next, it is essential to recognize the potential of Congressional action and stop discounting it; otherwise the climate is going to run away in unthinkable destruction and there is nothing ARB can do to prevent it. Next, cities and counties urgently need a template for carbon sequestration programs. ARB should try to be at the table advocating for a succession of federal programs and encouraging a set of local programs that best integrate or support what ARB wants to do, beginning with a federal revenue-neutral Carbon Fee and Dividend followed by systematic rewards for soil carbon sequestration and county mandates for emissions reductions from mobile sources, and including maintenance of revenue streams to fund programs for adaptation, localization and resilience in EJ communities.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-ejac-comm-mtgs-ws-UTBWPVc0AjqHdQVs.zip>

Original File Name: Ambitious methane tax & Impacts CF&D on CA EJ.zip

Date and Time Comment Was Submitted: 2016-08-12 00:32:10

No Duplicates.

## Comment 53 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: David

Last Name: Arganbright

Email Address: darganbright@omnitrax.com

Affiliation: Stockton Terminal & Eastern Railroad

Subject: 2030 greenhouse gas reduction goals

Comment:

As the state continues to pursue more restriction emission standards and goals, funding should be included to invest in shortline railroad infrastructure that can also help achieve these goals by keeping more freight in fuel efficient rail mode instead of being hauled by over-the-road trucks. Almost all of the shortline railroads operating in CA have a backlog of state-of-good-repair work that could be made more effective and efficient through targeted public-private partnership investment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 08:09:38

No Duplicates.

## Comment 54 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Nati

Last Name: Martinez

Email Address: mami.nati64@gmail.com

Affiliation:

Subject: Affordable Energy Costs

Comment:

Sample Email for an INDIVIDUAL:

"Thank you for the opportunity to comment on the recent EJAC community workshops. I live in Stockton, California. I live and work in a community where people work hard to support their families and provide education for their children.

It is increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

Not only have I made this community my home, but I pay taxes that help support the needs of this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. I support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-income families already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses like the ones in my community are a critically important source of upward mobility and job creation in low-income regions. Before EJAC advocates for more costly regulations that could close the doors of many small businesses and make it harder for me to afford the things I need, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Nati Martinez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 08:13:44

No Duplicates.

## Comment 55 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Nicolas

Last Name: Perez

Email Address: perezng@ft.newyorklife.com

Affiliation: Chamber Of Commerce, Inland Empire Area

Subject: Scoring Plan

Comment:

I would like to express my concern regarding the current Environmental Justice Advisory Committee - Community Meetings. As I understand these community meetings are meant to inform all community stakeholders on the scoping plan for the reduction of green house gas emissions. These meetings are also intended for committee members to receive input from stakeholders, unfortunately this is not the case.

As a community stakeholder I would like my comments to be put on record as this important piece of legislation moves forward. This legislation provides no assurances that an extension of California's current energy programs will be effective, affordable or have protections in place for consumers and businesses. In addition, this bill will grant the California Air Resources Board (ARB) more authority to mandate new programs, when the current programs have not been resolved, nor a comprehensive accounting of the costs and effectiveness of the programs has been provided.

As the Environmental Justice Advisory Committee (EJAC) meetings continue throughout the next few weeks, we need to guarantee that both the industries and the local residents are providing their feedback in order for California to have a comprehensive policy that protects affordability and reliability, and works in symmetry with existing climate programs, while providing appropriate legislative engagement and oversight.

I urge you to keep all community stakeholders in mind as this process moves forward.

Thank you for your consideration of my views and concerns.

Sincerely,

Nicolas G. Perez,  
Director Greater Riverside Hispanic Chamber of Commerce &  
Director & CO-Founder Black Chamber of Commerce, Inland Empire

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 08:51:26

No Duplicates.

## **Comment 56 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Jorge

Last Name: Carrillo

Email Address: [carrillophotography@hotmail.com](mailto:carrillophotography@hotmail.com)

Affiliation: Carrillo Printing

Subject: Opportunity to comment

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. As a small business owner, our company employees rely on their jobs to support their families. We have found it increasingly difficult to keep up with the rising costs of fuel and energy, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

My family and my employees live and work in this community, so I have a vested interest in a clean and safe environment. I support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

Small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy. Before EJAC advocates for costlier regulations that could put a huge burden on our employees and potentially out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Attachment:

Original File Name:

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

No Duplicates.

## Comment 57 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: EJAC Community Meetings Comments

Comment:

To whom it may concern:

On behalf of the California Chamber of Commerce, we appreciate the opportunity to comment on the Environmental Justice Advisory Committee (EJAC) Workshops. We attended numerous workshops throughout the state and enjoyed learning about and hearing input from the people within communities.

CalChamber is the largest broad-based business advocate in the state, representing the interests of over 13,000 California businesses, both large and small. Many of CalChamber's larger members are directly covered by regulations under the Global Warming Solutions Act of 2006 (AB 32) and the cap-and-trade regulation, while many other smaller members will likely experience indirect impacts in the form of new costs passed down from upstream fuel and energy providers. California is at the forefront of climate policies and is working diligently to achieve the goals of AB 32.

Businesses in the state have a very strong interest in the way in which we implement our climate policies. They want to be innovative, efficient and provide jobs. While much of the discussion in the community meetings has surrounded the emissions from industry within the communities, there was very little credit given to them for the reduction in their emissions, willingness and participation in complying with the law and the benefits they bring to the state and communities they operate in. Businesses located in disadvantaged communities provide jobs, tax base as well as many programs and partnerships which benefit the communities they operate in.

In addition, industry has every incentive to reduce emissions, waste, water and energy. California already has the cleanest energy and lowest emitting industrial facilities in the nation. Small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy. As California has among highest per kilowatt hour energy rate, there is a huge incentive to reduce usage in order to reduce bills.

Unfortunately, there was not the ability to express these perspectives of businesses and industry at many of the community meetings. When providing recommendations to the CARB, the EJAC should focus on greenhouse gas emissions reductions and the scoping plan update as directed under AB 32. While there has been a push at these meetings to confuse air pollution and GHGs, AB 32 specifically directs the CARB to reduce GHG emissions to 1990 levels by 2020. Much of the focus of recommendations are outside the purview of the CARB and the direction given to the EJAC.

We have been participating in the implementation of AB 32 since its inception and will continue participating to ensure that our

climate policies are implemented in the most cost effective and technologically feasible manner as described in AB 32.

Thank you again for the opportunity to provide comments. Please do not hesitate to contact me with any questions.

Sincerely,

Amy Mmagu

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 09:47:12

No Duplicates.

## Comment 58 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Ricardo

Last Name: Villarreal

Email Address: ricardovillarreal708@yahoo.com

Affiliation:

Subject: ARB Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I own a small business located in Maywood. My company employs 20 workers, who rely on their jobs to support their families and provide for the education of their children.

We have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

I'm not just a business owner, my family and my employees live and work in this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations under the AB 32 Scoping Plan. We support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small businesses and low-to-moderate income communities already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses are a vital contributor to California's economy and make up the largest job-creating sector in the state. Before EJAC advocates for more costly regulations that could put a small business like mine out of business and our employees out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you!

Sincerely,  
Ricardo Villarreal

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 11:56:13

No Duplicates.

## Comment 59 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Ed

Last Name: Ward

Email Address: warde@scfuels.com

Affiliation: CIOMA

Subject: Response to Environmental Justice Comments

Comment:

Response to Concerns from Environmental Justice Comments

8/12/16

My name is Ed Ward, I am Northern regional environmental health and safety manager for SC Fuels. SC Fuels provides fuel and oil to customers and municipalities throughout all of California.

I am writing because of concerns that the collection of comments and issues in the recent Environmental Justice Advisory Committee community meetings may not represent all viewpoints. Since SC Fuels provides essential services to my community and many others, I want to make sure there is a balance in comments being developed in and through this process.

A major concern is that policies and regulations developed under the larger "AB 32" umbrella have created costs for fuel consumers and that those costs impact the disadvantaged communities especially hard. Right now gasoline consumers are paying about 10¢/gallon in Cap & Trade assessments. Although we are enjoying relatively low fuel costs due to low crude oil pricing, Californians pay, typically 50¢ - \$1/gallon higher than the national average. This hits consumers with limited discretionary spending harder.

In addition, some programs such as the Low Carbon Fuel Standard may in the near future interfere with reliable supply of fuel to my customers, and have additional price impact. The disadvantaged being the most impacted.

The independent fuel marketers spend significant dollars on reduction of air pollution. Examples are the purchase of new, expensive diesel tractors that meet tough air quality standards. We also provide state-of-the-art emission controls on fueling dispensers and fuel delivery systems. We provide quality employment and wages that generate a substantial tax base throughout California.

Environmental legacy is critically important to us. We want our families and generations to come to be able to enjoy clean air and water. So we do not shy away from our responsibilities in making this state a better place to live.

AB 32 has had some good results regarding our air quality. Unfortunately no studies have been done to validate what has been accomplished. Without having scientific data regarding air quality reductions, there is a tidal wave of new air quality indicatives looming that will put additional economic strain on those disadvantaged families.

To be successful in the future and to develop a strong environmental legacy, we are going need a reliable fuel supply, at

competitive prices. The state greenhouse gas regulations need to better incorporate a balanced approach to further air quality while not impacting the disadvantaged community economically. AB 32 needs to be studied and accurate science will assist in making the best air quality decisions. Measured air technology and continuing economic improvement will allow all Californian's to benefit from air quality initiatives.

Ed Ward  
SC Fuels  
Northern regional EHS&S Manager  
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Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-ejac-comm-mtgs-ws-U2tVfgMzUjNSeVRl.pdf>

Original File Name: 8-12-16 Environmental Justice Letter Signed.pdf

Date and Time Comment Was Submitted: 2016-08-12 13:29:03

No Duplicates.

## **Comment 60 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Jay

Last Name: McKeeman

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

Affiliation: California Independent Oil Marketers Asn

Subject: Need for balance

Comment:

I represent small, family-owned businesses in this state. My members have companies, in many cases, that have been passed down through generations. As such, my members have a real and local concern for a quality environment. But they also face the need to make payroll, pay taxes and invest in cleaner technology. So a balance between business survival and a desire to make things always better is involved.

It is important, if not crucial, that state policies and regulations involve this essential balancing test. Unfortunately, recent regulatory endeavors, especially those involving GHG requirements, have not benefited from adequate review and consumer impact analysis.

It is our belief that the impacts of AB 32 should be thoroughly evaluated before any new measures are put in place.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:07:27

No Duplicates.

## Comment 61 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Jose

Last Name: Ayala

Email Address: jose@tuleburg.co

Affiliation:

Subject: Post-2020 AB 32 Scoping Plan

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. I live in Stockton, CA. I live and work in a community where people work hard to support their families and provide education for their children.

It is increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

Not only have I made this community my home, but I pay taxes that help support the needs of this community. EJAC was created to be a voice for vulnerable communities like my region and make recommendations to the AB32 scoping plan. I support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

California already has the cleanest energy and the lowest emitting industrial facilities in the country. And small and minority-owned businesses, low-income families, and communities of color already spend a higher than average percentage of their budgets on utilities and energy.

Small businesses like the ones in my community are a critically important source of upward mobility and job creation in minority and low-income regions. Before EJAC advocates for more costly regulations that could close the doors of many small businesses and make it harder for me to afford the things I need, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:18:00

No Duplicates.

## **Comment 62 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Chris

Last Name: Bambury

Email Address: chris@bamburyinc.com

Affiliation:

Subject: AB32

Comment:

My name is Chris Bambury and I am a 4th generation small operator working for Bambury, Inc flying the Bonneau retail brand. Our operations include two gas stations and a gourmet deli. It is important that CARB understand all viewpoints and be especially mindful of impacts to small businesses, like mine, that create important tax and employment base for my community.

I too encourage the path to cleaner air, but it must be a balanced approach. In the past, we have seen complex systems that are often released before they are proven solid and stable. This creates frustration for our customers, employees and management as well as higher levels of maintenance and technical support.

AB32 proposals need to be studied thoroughly and proposed actions or regulations must be balanced, or many citizens may see a negative impact.

Thank you for the time to hear my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:03:57

No Duplicates.

## Comment 63 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Marco  
Last Name: Soto  
Email Address: msoto@layellowcab.com  
Affiliation: Fiesta Taxi

Subject: Concerns with SB 32

Comment:

Policies to improve our air quality and combat global climate change are too important to be rushed through the process. Thankfully, there are levelheaded legislators like Assemblymembers Hadley and O'Donnell here in Los Angeles who are willing to take a stand and prioritize accountability over a harried rush. SB 32 is a bill that lacks important details, which would hand a blank check to an unelected group of bureaucrats to craft regulations that directly affect our daily lives. For some reason, special interests and some lawmakers in the Legislature feel it's okay to push forward with bad legislation just to say we continue to "lead the nation." Feel-good headlines shouldn't be the priority, especially when we are all stuck paying the consequences. Let's take our time and make sure that the Legislature, with the help of Legislators like Mr. Hadley and Mr. O'Donnell, craft meaningful legislation with true accountability and metrics.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:32:28

No Duplicates.

## **Comment 64 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Luis

Last Name: Hernandez

Email Address: louhernan01@yahoo.com

Affiliation: Precision Auto

Subject: Opportunity to comment

Comment:

Thank you for the opportunity to comment on the recent EJAC community workshops. As a small business operator, who rely on my business to support my family. We have found it increasingly difficult to keep up with the rising costs of fuel, much of which are related to existing environmental and climate change laws that are much stricter than those in other states.

My family and my employees live and work in this community, so I have a vested interest in a clean and safe environment. I support reasonable regulations to improve our air quality, but strongly believe these regulations must be cost-effective and provide measurable environmental improvements that demonstrably justify the cost.

As a small businesses I already spend a higher than average percentage of my budget on utilities and energy. Before EJAC advocates for costlier regulations that could put a huge burden on our employees and potentially out of work, please consider the costs, and promote only those that are affordable and will deliver truly meaningful air quality benefits for our communities.

Thank you for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:35:20

No Duplicates.

## Comment 65 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: EJAC Community Workshop Comments

Comment:

Thank you for the opportunity to comment on the recent Environmental Justice Advisory Committee community meetings.

The Climate Change Policy Coalition [CCPC -- formerly AB 32 Implementation Group] is a diverse group representing California's large and small employers, cap-and-trade regulated entities, taxpayer groups, agriculture interests and building and planning experts. We advocate for policies to reach AB 32 greenhouse gas [GHG] emission reduction goals in a cost-effective and technologically feasible manner to protect jobs and the economy.

We have been participating in the AB 32 implementation process since its inception. As part of that participation, we have attended most of the Environmental Justice Advisory Committee [EJAC] Community Workshops throughout the state during July and August. We want to thank ARB for holding these meetings - we resolutely support the idea of gathering as much information as possible from communities around the state. Our goal in attending these meetings was to learn more from the community about what they consider to be the most pressing issues.

We believe ARB staff worked diligently to help provide a structure for community input to be provided. However, we have deep concerns about the overall integrity of this information gathering process. More specifically, we're concerned that the end result will not truly represent the communities but instead will reflect a predetermined narrative and agenda that the EJAC was endeavoring to justify.

We believe it's important for us to share with you our overarching concern regarding the community meeting process. Multiple times we witnessed scenarios where a member of the public would offer a comment, and the meeting facilitator would reshape that comment to fit a predetermined EJAC recommendation. Reshaping community feedback to validate a narrative is not what this information gathering process should be about. Rather, it should be geared toward really understanding what communities want and need.

One of the goals of successful AB 32 implementation should be assuring local California communities that our climate change policies are and will continue to reduce GHG emissions while maintaining local jobs, keeping energy prices low, and providing affordable food and housing.

This process has unfortunately come across as a contentious event where there is an 'us versus them' mentality. It doesn't have to be that way. The truth of the matter is that a number of the 'programs and requests' of the EJAC to 'benefit' EJAC recommendations would be funded by cap-and-trade funds, yet cap-and-trade and its necessary program design mechanisms -- such as off-sets and allowances -- are at the heart of EJAC's recommendations to eliminate in its 2030 Scoping Plan

recommendations. Invariably, state consumers will pay the costs of increased regulation. Consumers from economically disadvantaged communities are affected disproportionately by these assessments.

A state with lofty environmental co-benefit goals but without jobs, higher energy costs, and increasing food costs will be a state that is doing a disservice to all residents...and especially those in disadvantaged communities. We should all do a better job to work together rather than against each other.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 14:56:40

No Duplicates.

## **Comment 66 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Mike

Last Name: Rohrer

Email Address: mike.rohrer@qmi.care

Affiliation:

Subject: AB32 is too expensive!

Comment:

I am providing comments about the possibility of more expensive greenhouse gas regulations. I think it is crucial to understand the existing impacts of AB 32 regulations, especially to poor and disadvantaged communities before any additional regulations are adopted. For example, California motorists are paying an addition 13 cents per gallon on gasoline for GHG purposes. No one has evaluated how that impacts discretionary spending by consumers paying that fee. Nor has there been any study to look at whether those least able to afford such a fee are impacted unequally.

Let's see how the existing programs are working before making the next leap of faith.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 15:15:22

No Duplicates.

## **Comment 67 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Ken

Last Name: Liebman

Email Address: info@regionalchambersgv.com

Affiliation:

Subject: Post 2020 AB 32 Scoping Plan

Comment:

On behalf of the thousands of businesses and job creators in the Regional Chamber of Commerce - San Gabriel Valley area, we are writing to express our concerns and ask for our involvement in the process as we determine how to reduce green house gas emissions and work toward providing quality of life for disadvantaged communities across the state.

As Environmental Justice Advisory Committee (EJAC) meetings are taking place in local communities across the State we want to make certain that our industries are kept in mind and are invited to attend so that our voices are also heard. We share the goals of a clean environment and support achievable policies. We believe that a portion of revenue that is collected through these policies should be returned to affected businesses and industries in order to assist in achieving greenhouse gas emission goals. We must ensure that said businesses are not driven out of the State and help keep California in a competitive business climate.

As the EJAC local meetings continue throughout the next few weeks, we want to guarantee that both the industries and the local residents are providing their feedback as to the best way to move forward with regard to climate change policies. We want to work with you to make sure these policies will truly benefit this community and that we have a balanced approach.

Thank you for your consideration of our views and concerns.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 16:11:15

No Duplicates.

**Comment 68 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clf.com

Affiliation:

Subject: CLFP - EJAC Community Meeting Comments

Comment:

CLFP Comments on EJAC Community Meetings

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-ejac-comm-mtgs-ws-AGNQ0IA3AyALUgZl.pdf>

Original File Name: CLFP Comments on EJAC meetings.pdf

Date and Time Comment Was Submitted: 2016-08-12 16:36:30

No Duplicates.

## **Comment 69 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Ag Council

Subject: EJAC Community Meetings

Comment:

Thank you for the opportunity to comment on the recent Environmental Justice Advisory Committee community meetings.

Ag Council is a member-supported organization advocating for more than 15,000 farmers across California, ranging from farmer-owned businesses to the world's best-known brands. Ag Council works tirelessly to keep its members productive and competitive, so that agriculture can remain California's number-one industry and members can continue to produce the highest quality food for the entire world.

Ag Council has been participating in the AB 32 implementation process since its inception. We support developing climate change policies that are best for reducing greenhouse gas (GHG) emissions yet allows businesses to continue serving our communities and grow.

This formula provides the necessary economic and environmental balance for California.

The goals of these EJAC community meetings are to hear ideas from the community about how they believe EJAC can best inform ARB in the update of the Scoping Plan for 2030. It is imperative that the true community is accurately being represented and their suggestions are being accounted for. It would be unfortunate if ARB only received predetermined EJAC recommendations and not the true concerns on the individuals in these communities.

It is important to note that the EJAC voice is not always the voice of the community and when ARB is developing the update to the Scoping Plan it should take into account that AB 32 is intended to reduce GHG emissions at the least cost and in a technologically feasible manner. Assuring local California communities that our climate change policies will reduce GHG emissions while maintaining local jobs, keeping energy prices low, and providing affordable food will go a long way in continued community support and participation.

Local businesses and consumers must be convinced that California's future climate change policies are implemented in a manner that are fiscally and environmentally analyzed to assure we are receiving the best programs and GHG reductions that are equitable, cost-effective and technologically feasible.

California already has the cleanest energy and lowest emitting industrial facilities in the country. Our members already spend a higher than average percentage of their budgets on utilities and energy.

A state with lofty environmental co-benefit goals but without jobs, higher energy costs, and increasing food costs will be a state that is doing a disservice to all residents - not only those in disadvantaged communities.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 16:52:36

No Duplicates.

## Comment 70 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.

First Name: Dennis

Last Name: Tristao

Email Address: dtristao@jgboswell.com

Affiliation: City of Corcoran Planning Commission

Subject: Disadvantaged Community Comments Regarding ARB's Scoping Plan Updat

Comment:

### COMMENTS:

I had the opportunity to attend the Fresno workshop and while I did not offer comments there I found the meeting very informative. I thought Kevin Hamilton did an excellent job in coordinating the public comments and summarizing testimony in the context of addressing the scoping plan. My comments here are to address what I think is a broader breath of concerns from a disadvantaged community, which the City of Corcoran is classified as. One our major concerns is that CARB assure local California communities, like Corcoran, that our climate change policies will reduce GHG emissions while maintaining local jobs, keeping energy prices low, and providing affordable food and housing. This will assure continued community support and participation.

To that end, our local industries have found it increasingly difficult to keep up with the rising costs of fuel and utilities, much of which are related to existing environmental and climate change laws that are much stricter than those in other states. The food processing industry in particular is a major employer in our City, and many of our citizens are employed by that facility and other agricultural related industries in our community.

One aspect that I wanted to stress here is the need for incentives and distribution of cap & trade proceeds to the industries within disadvantaged communities, and the community itself, to assist with generating actual direct GHG emission reductions. Incentives have proven to be a vehicle to drive emission reductions with related regulatory programs and have proven in some cases to result in earlier emission reductions than would have been required by regulatory measures. The incentive programs administered by the San Joaquin Valley Unified Air Pollution Control District are a prime example. These incentive program have are a proven means to keep our industrial sector competitive and garner support for emission reductions. Thank you.

Dennis Tristao

"X

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 16:30:52

No Duplicates.



## **Comment 71 for EJAC Community Meeting Comments (ejac-comm-mtgs-ws) - 1st Workshop.**

First Name: Robert

Last Name: Jefferson

Email Address: thermobo@gmail.com

Affiliation:

Subject: Education to low-income families about diet

Comment:

Low-income people, such as my family and friends, live in a culture that promotes eating animal, dairy and processed foods without knowledge about the effects on the climate and our health. I suggest that ARB implement a statewide outreach program including free education about nutrition choices that are better for health and the climate. For many people, they must have samples of alternative foods. The program must include distribution of alternative food choices at low or not cost. For example, minimally processed, locally produced non-dairy beverages, cheeses, and protein foods. The program can include recipes and demonstrations for how to make your own high protein vegetable-based foods.

The program can be carried out by qualified nutritionists and local food programs, like Food Share in Ventura County, to provide free or low-cost samples.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-08-12 16:58:36

No Duplicates.

**There are no comments posted to EJAC Community Meeting Comments (ejac-comm-mtgs-ws) that were presented during the Workshop at this time.**