

## **Comment 1 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Ted

Last Name: Hart

Email Address: hartzig@sbcglobal.net

Affiliation:

Subject: Comments Draft of Cap-and-Trade Auction Proceeds

Comment:

Attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/148-lcfs2015-AWJdOlwxVG4Kaglm.docx>

Original File Name: California Air Resources Board.docx

Date and Time Comment Was Submitted: 2015-06-29 15:01:40

No Duplicates.

## **Comment 2 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Joe

Last Name: Metro

Email Address: jmetro@fargeo.com

Affiliation:

Subject: Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

Farallon Geographics, Inc. is a recognized Green Business of the City & County of San Francisco. We received technical assistance from our local San Francisco Green Business Program to become recognized by our local government. As a result, we saved water, electricity, increased recycling, switched to greener cleaning products, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates. Small businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become recognized Green to save resources, save money and attract customers. The San Francisco Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage your Board, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-07-22 10:16:53

67 Duplicates.

### **Comment 3 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Pamela

Last Name: Evans

Email Address: pamela.evans@acgov.org

Affiliation: Alameda County Green Business Program

Subject: SUPPORT Inclusion of a Small to Medium Sized Business Category in the GGRF Investment Plan  
Comment:

Alameda County Green Business Program provides technical assistance to small-to-medium sized businesses to provide multiple environmental benefits that help reduce GHGs, grow the green economy through adoption of best practices and create a marketplace for Certified Green Businesses.

Our program provides on-site assistance to businesses, helps businesses adopt leading edge greenhouse gas reduction practices, verifies practice improvements and generates reliable outcome metrics. The Green Business Program directly meets the GGRF funding priority of projects that result in measurable GHG emission reductions and multiple environmental benefits while providing economic benefits and extending program benefits to disadvantaged communities. We strongly encourage your Board, the Governor's office, and the State legislature to include a small business element in your investment plan so that programs like the GBP can truly grow the green economy throughout California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-07-22 12:29:31

8 Duplicates.

## **Comment 4 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Josephine

Last Name: Fleming

Email Address: info@greenbusinessca.org

Affiliation: California Green Business Network

Subject: California Green Business Network: Funding for Small Businesses to Reduce GHG Critical  
Comment:

On behalf of the California Green Business Network, a 501c.3 organization comprised of a partnership of local government agencies, utilities, non-profits, and Certified Green Businesses, we are submitting a comment to stress the importance of supporting small- to medium-sized businesses with Cap-and-Trade proceed Greenhouse Gas Reduction funds.

Small businesses are the backbone of this State, consuming 45% of the State's utilities and employing over 50% of the State's workforce. Yet these businesses do not have the in-house expertise, nor the resources or capital to carry out recommended practices, like energy retrofits, that conserve resources and reduce greenhouse gas emissions. They have trouble navigating the myriad of public and private programs to make lasting and effective changes, and rebate programs are nominal and lacking. Enter the California Green Business Program, a one-stop shop for small to medium sized businesses to go green and quantify their savings, both monetary and in terms of greenhouse gas emissions reductions, among other metrics.

An effective Greenhouse Gas Reduction Investment Plan for the state should have small businesses as a key element. The investment strategy should include significant funding toward small business greening programs, especially those that demonstrate significant, measurable, and verifiable reductions in GHG. The California Green Business Network, as it stands today, serves half of the State's population with 24 programs and nearly 3000 recognized businesses. Collectively, the network is responsible for the reduction of greenhouse gas emissions by 822,000 tons. We have a strategic roadmap that sets a goal to reduce emissions by up to 10 million metric tons by 2050.

Businesses in the Green Business network also saved over 100 million gallons of water, \$30 million in utility costs, and diverted over 400,000 tons of waste from the landfill. We are already demonstrating that small to medium sized businesses can make a difference. Imagine what we could do if we could provide rebates, fund more on-the-ground assistance to businesses, focus on partnerships to even the playing field in disadvantaged communities. This past year, the program was launched in the Central Valley and the Inland Empire and we are ramping up efforts to reach more businesses in disadvantaged communities.

Since we're quantifying our greenhouse gas reductions as we do this work, these successes could be readily highlighted in an investment fund. We strongly encourage your Board, the Governor's office, and the State legislature to consider a small business element to your investment plan.

Thank you for your consideration,  
Josephine Fleming,  
Director of the California Green Business Network

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-investplan2015-ws-VzRQN1w6UmNVDARh.pdf>

Original File Name: CAGB\_ecology\_action\_brochure\_4.0\_send.pdf

Date and Time Comment Was Submitted: 2015-07-22 16:14:34

No Duplicates.

## **Comment 5 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Barlow  
Email Address: Steve@designenergygroup.com  
Affiliation: PG&E

Subject: Small business  
Comment:

Please include small business element in your Cap-and-Trade  
Investment Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-07-22 17:42:44

No Duplicates.

## **Comment 6 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jordan  
Last Name: Rothstein  
Email Address: jordan@bodytechnician.com  
Affiliation:

Subject: Include a Small Business Category in the GGRF Investment Plan  
Comment:

I provide massage therapy for pain relief.

My one-person business benefitted from the guidance of the Green Business Program. It is essential that more businesses learn how to reduce their ecological footprint. Please give more support to the work of the Green Business Program.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-07-23 07:51:49

No Duplicates.

## **Comment 7 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jo

Last Name: Chamberlain

Email Address: jo@coastsidelandtrust.org

Affiliation: Coastside Land Trust

Subject: Green Business Program Certification

Comment:

This is a very important program. 100% of all businesses need to be in compliance. Please do all you can to support it success.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-07-31 15:08:20

No Duplicates.



## **Comment 8 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Janae

Last Name: Lloyd

Email Address: janael@worldcentric.org

Affiliation: World Centric

Subject: Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

World Centric is a California Benefit Corporation, using business as a force for good. As a green business, we've saved water, electricity, increased recycling, and switched to only all natural cleaners, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits. We could still do more with additional assistance and rebates. Small businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become Certified Green to save resources, save money and attract customers. The California Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment. We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage your Board, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

The World Centric Team

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-investplan2015-ws-AGhTOlQ4VmAHcVAX.jpg>

Original File Name: homepage\_Different.jpg

Date and Time Comment Was Submitted: 2015-08-03 09:54:12

No Duplicates.

## **Comment 9 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Dirk

Last Name: Jensen

Email Address: djensen61@comcast.net

Affiliation: San Mateo County Environmental Health

Subject: Green Business Program

Comment:

I believe that the Green Business Program is a great program that provides small local businesses with worthwhile incentives and excellent green business practices for a sustainable future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-03 10:50:19

No Duplicates.

**Comment 10 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Mike  
Last Name: Sandler  
Email Address: mike@carbonshare.org  
Affiliation: Carbon Share

Subject: Include Climate Dividends in the Auction Proceeds Concept Paper  
Comment:

Thank you for considering the attached comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17 Investment Plan. I encourage ARB to focus the next Investment Plan on directing auction proceeds back to people as a climate dividend. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities. Please see the attached comments for more information.

Sincerely,

Mike Sandler  
www.carbonshare.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-investplan2015-ws-UjFWP1A8AD5VNgVr.pdf>

Original File Name: CommenttoARB8-3-15MS.pdf

Date and Time Comment Was Submitted: 2015-08-03 19:05:49

No Duplicates.

## **Comment 11 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Lossy  
Email Address: ftlossy322@comcast.net  
Affiliation: physician in private practice

Subject: Include Climate Dividends in the Auction Proceeds Concept Paper  
Comment:

To: California Air Resources Board (ARB)

Comment: Thank you for considering the attached comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17

Investment Plan. I encourage ARB to focus the next Investment Plan on directing auction proceeds back to people as a climate dividend.

The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Sincerely,

Frank T.Lossy, M.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-03 22:45:11

No Duplicates.

**Comment 12 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Lossy  
Email Address: ftlossy322@comcast.net  
Affiliation: physician in private practice

Subject: Include Climate Dividends in the Auction Proceeds Concept Paper  
Comment:

To: California Air Resources Board (ARB)

Comment: Thank you for considering the attached comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17

Investment Plan. I encourage ARB to focus the next Investment Plan on directing auction proceeds back to people as a climate dividend.

The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Sincerely,

Frank T.Lossy, M.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-03 22:45:11

No Duplicates.

## **Comment 13 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sam  
Last Name: Herzberg  
Email Address: sherzberg@smcgov.org  
Affiliation: San Mateo County Parks Department

Subject: Certified Local Green Business Program  
Comment:

I am writing in support of San Mateo County to reestablish it's small businesses benefit from the Greenhouse Gas Reduction Fund (GGRF), which distributes Cap-and-Trade proceeds. San Mateo County had a very robust Certified Green Business Program until the recession when it was suspended due to lack of funding. If funds are available again it will quickly get up to speed and make be able to certify that local small businesses in San Mateo County can be certified Green Business' again. We in San Mateo County Parks Department are also interested in being certified a local Green Business.

Thanks,

Sam Herzberg, Senior Planner  
San Mateo County Parks Department

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-04 09:52:50

No Duplicates.

## **Comment 14 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Stacey

Last Name: Meinzen

Email Address: staceymeinzen@gmail.com

Affiliation:

Subject: Include Climate Dividends in the Auction Proceeds Concept Paper  
Comment:

Thank you for considering comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17 Investment Plan. I encourage ARB to focus the next Investment Plan on directing auction proceeds back to people as a climate dividend.

The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-investplan2015-ws-BWECdgNjV2JVJwUo.pdf>

Original File Name: draft-second-investment-plan-concept-paper-7-28-15.pdf

Date and Time Comment Was Submitted: 2015-08-04 12:38:13

No Duplicates.

## **Comment 15 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Meghan

Last Name: Demeter

Email Address: meghan@climateprotection.org

Affiliation: Center for Climate Protection

Subject: Include Climate Dividends in the Auction Proceeds Concept Paper

Comment:

In the next Investment Plan, I suggest that ARB return the proceeds back to California residents in the form of a climate dividend.

The state should expand on the twice-yearly climate credit to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

ARB should design the regulations in a manner that is equitable, maximize additional environmental and economic benefits for California, and consider overall societal benefits, including reductions in other air pollutants, diversification of energy sources, and other benefits to the economy, environment, and public health.

Thank you for your consideration.

Sincerely,

Meghan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-04 13:16:53

No Duplicates.



## **Comment 16 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Lee  
Last Name: Ayres  
Email Address: lee@treefresno.org  
Affiliation: Tree Fresno

Subject: Investment Plan  
Comment:

I attended the workshop in Fresno yesterday. Here are some written comments for your consideration.

- I support the remarks by Leticia Corona with Leadership Counsel for Justice & Accountability in respect to funding for technical assistance to prepare and implement the grants (beyond what grant-making departments provide).
- Funding for rural communities under 50,000 population to prepare a community tree planting plan as part of a tree planting grant - cost not to exceed \$25,000. Tree Fresno can provide information on what a Community Landscapes Plan looks like. lee@treefresno.org
- Funding for research on how trees can mitigate near road air pollution. Focus on corridors with high diesel truck traffic.
- Funding for research and demonstration forest management projects to sustain GHG sequestration and wildlife benefits, conserve water, create jobs, and reduce air pollution impacts of forest fires.

Thanks, Lee

Lee Ayres  
CEO  
Tree Fresno  
Cell 559-285-3906

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-05 08:08:50

No Duplicates.

## **Comment 17 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kirsten

Last Name: Liske

Email Address: kliske@ecoact.org

Affiliation: Ecology Action/CA Green Business Program

Subject: Specific Comments to Concept Plan/Funding Guidelines - California Green Business Program  
Comment:

Thank you for the opportunity to provide comment to the Concept Paper and Funding Guidelines. This set of comments provides written record of the verbal comments I provided at the 8/3/15 workshop in Sacramento on behalf of the California Green Business Program, and also lists the specific citations within the two documents we offer considerations for but did not have time to present in the three minutes allotted.

Ecology Action is the administrator for the California Green Business Program. The Program has provided technical assistance to over 10,000 small and medium businesses since 1996, helping them implement comprehensive green practices. Our onsite assistance, audits and certification leads to verified outcomes that are not currently captured in the GGRF program and creates a green economy where consumers can vote with their dollars by frequenting green businesses. The program is funded and implemented by 24 cities and counties around the state and serves over 50% of California's population. 17% of our currently certified businesses are located in disadvantaged communities as identified by the CalEnviroScreen 2.0 tool. The Program was authorized by the legislature as the official California Green Business Certification program model in 2011 (AB 913, Feuer). The program received some fiscal support from DTSC before the budget crisis and the legislation but due to fiscal challenges no financial support was tied to the bill or has come from agencies since.

Today we are here to strongly support the inclusion of a small businesses category in the Auction Proceeds Investment Plan. The 3.4 million small to medium businesses in California account for 99% of the state's employers, employ 52% of the workforce and represent 45% of the commercial energy use in our state. As such this sector provides a significant, if distributed, opportunity to reduce greenhouse gasses, strengthen local economies and through engaging employees, generate a commitment to climate protecting practices that can spread from business to customer, and from work to home.

As one example of what's possible with investment from the GGRF into small business programs, the California Green Business Program has a strategic plan to scale to serve 40,000 businesses by 2040, so that we can mainstream green in California's small business economy. Doing so would provide verified voluntary emission reductions of at least 900 thousand metric tons of greenhouse gasses annually and reduce 125 million gallons of water use each year. These, among the other environmental co-benefits of the program would save small businesses \$30 million annually in utility bills and rebates. Beyond these outcomes, which are based on our current program model, we estimate that as much as a doubling of energy efficiency outcomes would occur if we could offer funding for project implementation for the business, which the program is unable to provide now. Our 3,000 currently certified businesses are also keenly interested in solar, and we are currently

estimating the uptake potential and clean energy outcomes we could realize if funding were available to support financing and/or installation as part of our Green Business Certification process.

Based on these compelling facts, we respectfully request that the Investment Plan:

- Retains the priority of funding small business programs (Section H. Rural Comm./SBs, Page 7.)
- Includes more detailed information about the potential of small businesses (such as the number of small businesses in California and their energy and water use, etc) so that this category can generate and sustain broad support through the review process (Section H. Rural Comm./SBs, Page 7)
- We request that the plan considers small businesses as well as residents when referencing Disadvantaged Communities, since businesses can both contribute to outcomes and benefit from investments, such as referenced in the Disadvantaged community Section in the Clean Energy and Energy Efficiency chapter (Section 4. DACs, P. 16)
- We request that the plan also include nonprofits as potential recipients under the Energy Efficiency and Clean Energy category, as noted in Figure 5. Page 17.
- We request that small businesses are considered and listed as beneficiaries and potential programs under all applicable sections such as Water and Energy, Energy Efficiency and Clean Energy, and Sustainable Communities
- We additionally strongly support the themes other than the small business priority, (III. Overarching Themes ,Pages 4-6) including:
  - o Item A: Beyond 2020. While this is clearly important for the plan overall, it also can be realized with programs like the CAGBP that implements lasting retrofits and cultural changes in the businesses, which is reinforced by mandatory recertification audits every 3 years to ensure the business has sustained its practices.
  - o Item B. Extends Benefits to all Californians. While the CAGBP has a strong history of service to DACs (17% of our businesses are located in DACs), the numbers of businesses we serve are not representative of the population percentage of those communities in the state (25%) and additional resources are required to ensure services are provided with parity, using culturally appropriate methods. The CAGBP has a component of its strategic plan specifically addressing this issue.
  - o Item D. An integrated Systems Approach to funding projects. The California Green Business Program's strength is that it offers a comprehensive one-stop-shop systems approach for businesses, but due to that has had a challenges securing funding to support program operations from siloed agencies who prioritize only one environmental media area in their funding programs.
  - o Item E. Integrated Projects in Disadvantaged Communities to Support Local Climate Action. While the CAGBP is not an infrastructure project it does offer an integrated systems approach, and is frequently a pillar of local Climate Action Plans due to its verified carbon reduction outcomes.
  - o Item F. Efficient Financing. Whether we can deliver cost coverage, cost share or financing for projects, it will help businesses commit to energy efficiency, water efficiency, waste reduction and renewables retrofits that, while identified in our process now, are not financially within reach even with utility rebates and programs.
  - o

We additionally have comments specific to the Funding Guidelines, which include:

- Adding requirements for Program Agencies to include scoring preferences and selection criteria that consider the environmental co-benefits, job creation and economic benefits of projects in competitive solicitations, and
- That Agencies select projects that provide verified outcomes in these areas to realize the full breadth of AB 32 goals. (Solicitation Materials, 3. Quantification Methods, and 4.

Selection Criteria P. 39-40)

The comments I have provided in person represent many other voices. Over 54 small businesses and 5 local certified green business program implementation agencies have already submitted comments online supporting a small business category in the Investment Plan. On their behalf, I thank you for your time and consideration of the potential for small businesses to make a big difference in growing California's green economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-05 14:49:28

No Duplicates.

## **Comment 18 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Philip  
Last Name: Beard  
Email Address: phbeard@mac.com  
Affiliation: Sonoma County Go Local

Subject: Cap and Dividend proposal  
Comment:

Thank you for considering my comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17 Investment Plan.  
I encourage ARB to focus the next Investment Plan on directing auction proceeds BACKTO THE PEOPLE as a climate dividend.  
The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and inclusive of disadvantaged communities.

Sincerely,  
  
Philip Beard

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-05 16:29:26

No Duplicates.

## **Comment 19 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Rondal

Last Name: Snodgrass

Email Address: rondalsnodgrassconsultations@gmail.com

Affiliation: Conservation Land Consultant

Subject: Governor's and ARB Investment of GHGF cap and trade income

Comment:

Please review my submitted comment.

The comment was prepared for the August 5 symposium, but seems best directed to investment planning.

It has analysis of current situation and suggestions for strategies and stress importance for conservation of forestlands as the natural source for carbon sequestration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-investplan2015-ws-BmxdNF01Az4GdFMM.docx>

Original File Name: Joint Agency Symposiium.docx

Date and Time Comment Was Submitted: 2015-08-05 16:35:08

No Duplicates.

## **Comment 20 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Abbors

Email Address: sabbors@openspace.org

Affiliation: Midpeninsula Regional Open Space Distric

Subject: Comments - Draft Cap and Trade Auction Proceeds

Comment:

Attached please find the comments of the Midpeninsula Regional Open Space District in regards the Draft Cap and Trade Auction Proceeds.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-investplan2015-ws-WzhXPI0xAD5SMVI8.pdf>

Original File Name: Comments\_Draft of the Cap and Trade Auction Proceeds Funding Guidelines.pdf

Date and Time Comment Was Submitted: 2015-08-10 11:51:20

No Duplicates.

## **Comment 21 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Carlos  
Last Name: Lopez  
Email Address: clopez@cet2000.org  
Affiliation: Center for Employment Training

Subject: Inclusion of a Workforce Development Category in the GGRF Investment Plan  
Comment:

The Center for Employment Training (CET) a 501 (c) (3) is an accredited Job Training economic and community Development Corporation, founded to promote human development and education by providing people with "marketable skills" training and supportive services that contribute to self-sufficiency.

Our Primary Focus -Workforce Development including Energy Efficiency Training Programs.

CET's Contextual Training Model program design and accredited job training programs is nationally recognized and the foundation of our historical success is in providing "skills" training in demand occupations across ten (10) sites while targeting low-income communities in California.

Given the overall goal is to reduce greenhouse gas emissions, there is a growing need for a trained workforce to fill the "skills-gap" in the energy efficiency and clean energy industry sectors and the related occupations.

Thus, it is very important to include qualified accredited non-profit training organizations offering Energy Related Occupational Training for the Energy Related Job Sectors as investment partners. Co-Benefactors include low-income individuals currently residing in disadvantaged communities. Energy-efficiency related workforce education programs are especially useful and can significantly impact low income persons living in disadvantaged communities leading to full time employment in the Energy Efficiency Sectors.

Specific Recommendation to add - A Workforce Development Project Category & Employment and Training for the Energy Related Sector on Table B-1 under the Agency - Department of Community Services Development (CSD), which has an existing network of senior level non-profit training organizations located in many disadvantaged communities.

By adding the Project Category - Workforce Development and Employment and Training for Energy Efficiency and Clean Energy will expand the use of investments to provide in-demand energy related job training programs including, Photovoltaic (PV) Electrician, Solar Panel Technicians, Weatherization & Green Construction Skills, Retrofitting residential and commercial buildings and advance automotive electrical and emissions control systems and other energy efficiencies and reducing greenhouse emissions. The job training investments will produce a qualified workforce for the energy efficiency industry sector. Training residents in disadvantaged communities will bridge the gap of high unemployment and provide a career path to jobs created for the energy sector leading to the reduction to greenhouse Gas Emissions.



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-11 09:43:22

No Duplicates.

## **Comment 22 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: John  
Last Name: Brooks  
Email Address: jbrooksnp@gmail.com  
Affiliation: California Green Business Network

Subject: Support for Cap & Trade Funding for the California Green Business Network  
Comment:

I am writing to express my strong support for funds being allocated in the Cap & Trade investment plan to support the California Green Business Network (CaGBN). Additional funds would assist CaGBN to expand their assistance to small and medium sized businesses (SMBs) and assists the businesses in integrating sustainability into their operations.

The California Green Business Certification Programs provide technical assistance to small-to-medium sized businesses that provide multiple environmental benefits that help reduce GHGs, grow the green economy through adoption of best practices and create a marketplace for Certified Green Businesses. These programs now cover 40% of the states population and have certified over 2,800 businesses and the businesses have saved over 822,677 metric tons of CO2.

These programs provide on-site assistance to businesses, help businesses adopt leading edge greenhouse gas reduction practices, verify improvements, and generate reliable outcome metrics using state and federal GHG calculators.

Certification through this program assist California businesses in competing as part of the green economy and green supply chains. Certification by government agencies gives them credibility. For example, Conejo Awards, the first Certified Green Business in the City of Thousand Oaks used the certification to gain over \$100,000 in new business. Previously they did not qualify as a bidder, because the purchasers were only seeking bidders from sustainable businesses.

Please ensure that the new plan allocates funding to assist in expanding this program to enable CaGBN to reach more businesses and help us make our California businesses more competitive in the green economy. California's strong environmental regulations are our competitive advantage in the international economy. We need to support these businesses in gaining market share and becoming the new preferred supplier in the emerging green supply chains. They need CaGBN's assistance in making this transition, but local governments cannot fund this on our own - we need your help.

Respectfully,  
John Brooks, Chair  
California Green Business Network

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-11 20:21:18

No Duplicates.

## **Comment 23 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Blair

Last Name: Miller

Email Address: blairmiller1@yahoo.com

Affiliation: Ms.

Subject: Cap and Trade Auction Proceeds

Comment:

Hi there! I am a member of the Pasadena Complete Streets Coalition, and I support the following three uses for the Cap and Trade Auction Proceeds:

- 1) Allocate cap-and-trade funding directly into the CA Active Transportation Program, which provides incredibly cost-effective GHG reductions and is already set up with disadvantaged community set-asides consistent with SB 535.
- 2) Increase cap-and-trade funding levels for active transportation given the current over-subscription of the CA-ATP program, increasing demand for such investments across the state, and the many health co-benefits of more physically active lifestyles.
- 3) Better Integrate active transportation into appropriate programs so that significant walking and biking improvements are provided as part of housing and transit projects.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-12 11:46:10

No Duplicates.

## **Comment 24 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Nik

Last Name: Kaestner

Email Address: kaestnern@sfusd.edu

Affiliation: SF Unified School District

Subject: Schools Need To Be Included in Plan

Comment:

SFUSD has 55K students, 54% of which are on the federal free-and-reduced lunch program, and over 120 school sites. Our staff and students use and dispose of tons of food and supplies each day. Our buildings consumer 1,5M therms of gas, 32,5M kWh of electricity, and 125,000 CCF of water each year. In addition to our 25 school buses, parents are shuttling their kids to school via car, criss crossing our city due to the choice assignment system and generating 20-25% of the morning traffic. Our vast expanses of blacktop soak up the sun and reject stormwater instead of doing exactly the opposite.

Thankfully, the citizens and government in SF provide my Sustainability Office with the resources and support to make a difference:

1. Our Department of the Environment pays for my position, provides in-class environmental education, and works with schools to achieve our phenomenal 65% diversion rate.
2. Our public utilities commission (SFPUC) pays for a school conservation manager, bottle filling stations, rooftop solar projects, and grants for stormwater management.
3. Our municipal transit agency (SFMTA) is providing us with a transportation planner this year to help us reduce our 48% student drive-alone rate.

But what do other districts do with less funding and support at their disposal?

How can the State expect to reduce greenhouse gas emissions without educating the future (and current) users of energy?

How can the investment plan be silent on ways to reduce energy in the largest school system in the country?

That's why I'm calling on the CARB investment plan to beef up its funding for school-based projects that reduce energy usage while modeling conservation for students and the school community. Schools are a perfect place to reach disadvantaged citizens and to implement integrated projects that achieve benefits beyond GHG reductions:

- If you're planting trees, why not provide shade for students at lunch?
- If you're cleaning up tailpipe emissions, why not remove the carbon black from school buses that has such health impacts on poor communities?
- If you're upgrading buildings, why not start with schools so that our budget-starved school systems can spend money on supplies and programs instead of utilities.

Prop 39 has been a great catalyst for school energy projects but its SIR requirements have encouraged schools to cherry-pick the low-hanging fruit that will make future retrofits really expensive. Any funding mechanism you develop needs to encourage deep retrofits over simple fixes so that we truly keep our 2030 goals in mind.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-12 16:43:31

No Duplicates.

## **Comment 25 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Amisha

Last Name: Rai

Email Address: arai@aee.net

Affiliation: Advanced Energy Economy

Subject: AEE Comments on Draft Investment Plan

Comment:

Sending whitepaper as a separate attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-investplan2015-ws-UjFdNFQjBzELf1cI.pdf>

Original File Name: Cover Letter-CARB Concept Paper 8.13.15.pdf

Date and Time Comment Was Submitted: 2015-08-13 11:23:26

No Duplicates.

## **Comment 26 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Amisha

Last Name: Rai

Email Address: arai@aee.net

Affiliation: Advanced Energy Economy

Subject: AEE Comments (2nd attachment)

Comment:

Second document included in our comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-investplan2015-ws-B2ZXNFYyVigKbwdm.pdf>

Original File Name: aee-cap and trade revenue proposal 7.16.15.pdf

Date and Time Comment Was Submitted: 2015-08-13 11:30:54

No Duplicates.



## **Comment 27 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jodi

Last Name: Pincus

Email Address: Pincus@risingsunenergy.org

Affiliation: Rising Sun Energy Center

Subject: Investment in a green workforce and innovation fund

Comment:

Rising Sun Energy Center is a 501(c)3 non-profit organization and leading green workforce development and residential efficiency services organization. With a focus on under-served populations, Rising Sun provides youth and marginalized adults with meaningful training and employment opportunities in the growing construction, energy efficiency, and solar sectors, while delivering no-cost energy upgrades to thousands of households each year. Rising Sun's mission is to empower individuals to achieve environmental and economic sustainability for themselves and their communities.

Rising Sun agrees that significant investment is needed in renewable energy and energy efficiency to achieve the state's energy use and carbon emissions reduction goals and that there is significant opportunity for energy savings at the water-energy nexus. It is also imperative that two additional strategies be incorporated into the spending plan:

- Investment in workforce development programs targeting jobs created by support for energy efficiency and renewable energy program and projects, with a particular focus on green career pathways for residents of disadvantaged communities.
- Investment in an innovation fund to support new ideas and strategies that achieve broader community based impacts, particularly in disadvantaged communities. This investment should support projects that take an integrated approach to achieving savings at the water-energy nexus while creating jobs locally.

Given that the overall goal is to reduce greenhouse gas emissions, there is a growing need for a trained workforce to fill the skills gap in the energy efficiency and clean energy industry sectors and related occupations. To ensure that Cap-and-Trade investments help create energy-related career pathways, it is very important to include funding for community based workforce development organizations offering vocational training for construction and energy careers. Workforce development funds should particularly target organizations that serve residents of low-income and disadvantaged communities, and that provide strong case management and job placement assistance. Such investments will ensure that Cap-and-Trade funds support both environmental and economic sustainability.

In order to reach the ambitious goals laid out in AB32, Cap-and-Trade funds need to diversify beyond business as usual and support new and innovative strategies. A competitive and transparent process should be created to fund projects through innovation grants. The goal of this innovation fund should be twofold: To support existing successful local projects with potential for scale, as well as supporting new projects that take a community based approach. The emphasis of the innovation fund should be projects that embody true sustainability through the

integration of energy and water use reduction, renewable energy generation, job creation, and community economic benefits.

An example of the type of project the innovation fund might support and bring to scale is Rising Sun Energy Center's California Youth Energy Services (CYES) program. CYES is a youth employment and resource efficiency retrofit program that hires young people (15-22 years of age) and trains them to become Energy Specialists, serving their communities with FREE Green House Calls. Energy Specialists install free energy and water saving devices, and provide personalized recommendations and education for further savings. CYES provides services to all community members regardless of income. However, it focuses on hard-to-reach residents including renters, multi-unit dwellings, non-English speaking households, and low-moderate income households. CYES provides youth with opportunities for training and meaningful employment while saving residents money on their utility bills.

We strongly urge you to integrate these two components into the spending plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-investplan2015-ws-B3UHafQmV20FbQNk.pdf>

Original File Name: Rising Sun Comments on Draft of Cap-and-Trade Investment Plan 2.pdf

Date and Time Comment Was Submitted: 2015-08-13 17:30:14

No Duplicates.

**Comment 28 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Kumataka  
Email Address: kevin.kumataka@sonoma-county.org  
Affiliation: California Green Business Program

Subject: Letter of Support to Include Small-to-Medium Sized Businesses in Investment Plan  
Comment:

On behalf of the Sonoma County Green Business Program (SGBP), I request the Department of Finance and the State Agencies strengthen the language of support to small-to-medium sized businesses in the Second Investment Plan and consider creating a separate category for funding small-medium sized businesses.

Attached is my letter of support.

Thank you,

Kevin Kumataka  
Sonoma Green Business Coordinator  
Sonoma County Energy and Sustainability Division  
707-565-6455

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-investplan2015-ws-AGxRMgB1V3ADYAh6.docx>

Original File Name: Letter of Support to Include Small-to-Medium Sized Businesses in Investment Plan.docx

Date and Time Comment Was Submitted: 2015-08-14 11:04:26

No Duplicates.

**Comment 29 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Tokunaga  
Email Address: ktokunaga@countyofglenn.net  
Affiliation: Glenn County APCD

Subject: Wood Stove Change Out Program  
Comment:

See attached Glenn County Wood Stove change out concept paper

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-investplan2015-ws-BmEGbARgVWhROQJd.docx>

Original File Name: Glenn County Wood Stove Changeout Concept Paper.docx

Date and Time Comment Was Submitted: 2015-08-14 11:56:37

No Duplicates.

## **Comment 30 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Livingston  
Email Address: adam@sequoiariverlands.org  
Affiliation: Southern Sierra Partnership

Subject: Southern Sierra Partnership Comment Letter on GGRF Investments  
Comment:

Our comment letter on the Draft Investment Plan Concept Paper and Draft Funding Guidelines is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-investplan2015-ws-BnVRJAZ3V1tVPwht.pdf>

Original File Name: SSP Letter re Draft Investment Plan Concept Paper and Draft Funding Guidelines (2015-08-14).pdf

Date and Time Comment Was Submitted: 2015-08-14 12:22:56

No Duplicates.

**Comment 31 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Elliot

Last Name: Hoffman

Email Address: ellioth@revsustainability.com

Affiliation: REV

Subject: CARB - GGRF Allocations Oakland August 10, 2015

Comment:

please see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-investplan2015-ws-VyVdPl0qAw8EdgBl.docx>

Original File Name: REV Testimony - CARB-GGRF Oakland Workshop 8-10-15 F.docx

Date and Time Comment Was Submitted: 2015-08-14 13:15:59

No Duplicates.

## **Comment 32 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Elliot  
Last Name: Hoffman  
Email Address: [elliioth@revsustainability.com](mailto:elliioth@revsustainability.com)  
Affiliation: REV

Subject: CARB - GGRF Allocations Oakland August 10, 2015  
Comment:

Sending 2nd document in this note. This is summary of AB758 March 2015 Draft Implementation Plan that includes REV (True Market Solutions -TMS - at that time) as presented to the Calif. Energy Commission. REV (TMS) presented as an innovative, impactful and scalable model having potential for California's EBEE program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-investplan2015-ws-AGECZgBeWT0GNQA4.pdf>

Original File Name: AB 758 California's\_Existing\_Buildings\_Energy\_Efficiency\_Action\_Plan-Excerpt.pdf

Date and Time Comment Was Submitted: 2015-08-14 13:24:02

No Duplicates.

## **Comment 33 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Michael

Last Name: Vargas

Email Address: mvargas@myatlasproject.com

Affiliation: Atlas Project Support

Subject: Small Business/Investment Grant Programs

Comment:

As a practitioner of carbonizing business practices, I was very much intrigued by this opportunity. In alignment with the stated goal of providing opportunities for businesses, public agencies, nonprofits, and other community institutions to participate in and benefit from statewide efforts to reduce greenhouse gas emissions, I would like to add that universally the management process of this initiative would be best served with the inclusion of Federal and State grant-funded technology and business development programs such as CCAT, SDADT and NEST. This under-served segment of the training and education component of the investment plan is a main driver of solidifying our Cap and Trade program. Without the diffusion of knowledge by programs as such as these, the relevancy and objectiveness of the plan could come into question. As evidenced by the efficacy of performance for such programs, it makes perfect sense to continue the longstanding support of such programs. Please consider these programs as vital to the relevancy of the investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-investplan2015-ws-BWZcOwBxVylRNIA+.docx>

Original File Name: Cap-and-Trade Auction Proceeds Triennial Investment Plan.docx

Date and Time Comment Was Submitted: 2015-08-14 14:09:14

No Duplicates.



## **Comment 34 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Frank

Last Name: Steensnaes

Email Address: fsteensnaes@foundation.sdsu.edu

Affiliation: SDSU Research Foundation

Subject: Small Grant Program

Comment:

The Investment Plan would benefit from a small grants program aimed at small businesses, non-profits, individuals and academic institutions. Such a program would fund projects to establish the feasibility of new, innovative energy concepts similar to the California Energy Commission's Energy Innovations Small Grant (EISG) program. An EISG-style program could accelerate greenhouse emission reductions by leveraging State investments already made to build up this existing program. EISG has a proven track record of funding technologies that reduce greenhouse emissions and improve energy efficiency:

<https://www.youtube.com/watch?v=R0xkXdBSQtY>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-investplan2015-ws-VDEBblUnVGABWAhh.docx>

Original File Name: EISG Investment Plan comments.docx

Date and Time Comment Was Submitted: 2015-08-14 15:11:34

No Duplicates.

## **Comment 35 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jonathan

Last Name: Parfrey

Email Address: jparfrey@climateresolve.org

Affiliation: Climate Resolve

Subject: Scale-up cool roofs that bestow climate mitigation and adaptation benefits

Comment:

First of all, Climate Resolve, Los Angeles' climate advocacy organization, applauds CARB's groundbreaking work in reducing greenhouse gas emissions (GHG). Rolling out the California Climate Investments program is no small feat and the administration is off to a great start.

However, the greenhouse gas reduction fund (GGRF) has not fulfilled a key component of the program, namely preparing California for climate impacts. AB 1532 mandates that program dollars, in addition to reducing GHG, also "lessen the impacts and effects of climate change on the State's communities, economy, and environment." On adaptation, the first tranche of GGRF programs have substantively failed to provide resiliency benefits.

To be clear, climate resilience is not merely thematically related to the state's carbon reduction efforts, mitigation and resilience are profoundly interrelated. Curtailing greenhouse gas emissions will reduce the need for adaptation. And the benefits run both ways: attention to climate resilience provides meaningful proof to the people that climate change is a matter of life and death.

Climate Resolve proposes that CARB dramatically expand the Low-Income Weatherization Program, operated by the California Department of Community Services and Development, to promote a joint cool roofs and solar roofs program that would reduce GHG, help people adapt to warmer temperatures, and bestow public health and economic benefits for disadvantaged communities. These high-albedo roofing surfaces reflect solar radiation up to fifteen times more than traditional roofing materials, which means that during peak summer weather, cool roofs stay approximately 50° to 60°F cooler than traditional materials. Cool roofs reduce the need to draw on power for cooling buildings, which helps the state reach its ambitious energy efficiency goals and reduce greenhouses gas emissions from the power sector. By cooling ambient air temperatures, cool roofs also help combat the urban heat island effect, a promising approach for our state's urban communities to adapt to temperature increases resulting from climate change. Extreme heat currently claims more lives than all other natural disasters combined, so the public health benefits of scaling up cool roof installations is significant. The urban heat island effect is usually localized in disadvantaged communities that lack tree canopy cover, making a cool roofs program right in line with SB 535 requirements.

Cool roofs are not only compatible, but they are actually quite complementary to efforts to increase PV solar installation. Our experience partnering with Grid Alternatives, a program that puts PV on qualifying homes in disadvantaged communities, is that many of those roofs are not structurally sound enough to add PV on top of them. Replacing these roofs, that are at the end of their useful life anyway, with cool roofs, has all of the benefits listed above in addition to making these roofs viable and attractive candidates

for PV installation. That is because PV panels function most efficiently at 77°F, and also because many PV models can capture the light that is reflected by the cool roof surface.

Cool roofs are only marginally more expensive than traditional ones -- in most cases less than \$0.50/ft<sup>2</sup> more -- yet their widespread adoption has not yet taken off. By leading this movement with widespread investments in California, we would help mature the cool roofing industry and could ultimately set it as standard practice across the nation. The local cooling impacts are felt immediately, in terms of comfort and energy bill savings, which gets people and businesses on board with climate resiliency efforts -- and the potential of those dividends is tremendous. The project would also check the box in supporting small-size California businesses.

As it is now, the Low-Income Weatherization Program is tiny in comparison to the potential it could have to usher in the widespread adoption of cool roofs. We propose that either this program get significantly scaled up to meet potential demand and include specific guidance on cool roofs (by amending the Criteria for Evaluating Benefits by Project Type, Table 2.A-4 found in Appendix 2A on page 2.A-11 of the draft funding guidelines), or otherwise a new standalone program be created to target this high-potential California Climate Investment sweet spot.

Climate Resolve would very much welcome the opportunity to work with CARB on developing the proposed program guidelines, and I thank you for considering the potential of this proposal.

Best regards,  
Jonathan Parfrey, Climate Resolve

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-14 16:43:21

No Duplicates.

**Comment 36 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Patty

Last Name: Moore

Email Address: Patty@MooreRecycling.com

Affiliation: Moore Recycling Associates Inc.

Subject: Six Reasons Why A Portion of Cap and Trade Auction Proceeds Should be Directed Toward Non-Comment:

Please see attached document

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-investplan2015-ws-BmUHYF0DU2IROVUj.pdf>

Original File Name: CA\_Investplan2015.pdf

Date and Time Comment Was Submitted: 2015-08-14 18:17:54

No Duplicates.

**Comment 37 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Gerry  
Last Name: Barnaby  
Email Address: gerry.barnaby@gmail.com  
Affiliation: EGOpowerplus.com

Subject: ZERO emission Lawn and Garden  
Comment:

As California leads the way in lowering emission standards for Lawn and Garden tools, EGO is proud to be part of the movement with it's top rated line of 56V Li-Io power. Tests have proven that EGO tools have all the power and performance of gas in a battery powered platform. EGO also has the industry's fastest recharge time ( 30 min for a 4 A/H battery.)

EGO is working towards getting Certified by CARB and hopes to assist CARB going forward in it's mission of cleaner air for all.

egopowerplus.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-18 10:36:24

No Duplicates.

## **Comment 38 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: David  
Last Name: Johnston  
Email Address: dave.johnston@edcgov.us  
Affiliation: County of El Dorado

Subject: Support for Woodstove Change Out Concept  
Comment:

Please see attached letter from the El Dorado County Air Quality Management District.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-investplan2015-ws-AWRVNwZkVFhXJgdo.pdf>

Original File Name: EDC Wood Stove Change Out Support to Chair Nichols.pdf

Date and Time Comment Was Submitted: 2015-08-18 10:39:35

No Duplicates.

**Comment 39 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Bennitt

Email Address: gretchen@myairdistrict.com

Affiliation: Northern Sierra Air District

Subject: Support for woodstove changeout program in 2nd Investment Plan

Comment:

Letter attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-investplan2015-ws-UyBTPAdhUG1QMwFl.pdf>

Original File Name: Signed Cap and Trade Letter to Mary Nichols.pdf

Date and Time Comment Was Submitted: 2015-08-18 13:36:44

No Duplicates.

## **Comment 40 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Bennitt

Email Address: gretchen@myairdistrict.com

Affiliation: Northern Sierra Air District

Subject: Support for woodstove changeout program in 2nd Investment Plan

Comment:

Letter from City of Portola attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-investplan2015-ws-WjITNFQIUV0LbAdp.pdf>

Original File Name: cap and trade letter from Portola.pdf

Date and Time Comment Was Submitted: 2015-08-18 15:33:48

No Duplicates.



**Comment 41 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: David  
Last Name: Darlington  
Email Address: daviddarlington@att.net  
Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-investplan2015-ws-WzgAZ10uBzYELwJh.pdf>

Original File Name: CARB-Comment-1.pdf

Date and Time Comment Was Submitted: 2015-08-19 10:30:14

No Duplicates.

## **Comment 42 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Courtney  
Last Name: Lindberg  
Email Address: clindberg@cityofventura.net  
Affiliation:

Subject: Consider the inclusion of a SMB Category in the GGRF Investment Plan-Letter from Ventura  
Comment:

The City of Ventura's Green Business Program provides technical assistance to small-to-medium sized businesses to provide multiple environmental benefits that help reduce GHGs, grow the green economy through adoption of best practices and create a marketplace for Certified Green Businesses.

Our program provides on-site assistance to businesses, helps businesses adopt leading edge greenhouse gas reduction practices, we verify practice improvements, and generate reliable outcome metrics.

We had one businesses in the City of Ventura that was using highly inefficient lighting that were purchased for purely aesthetic purposes. Through the Green Business Certification Program, we were able to work with the business and offer them recommendations on more efficient lighting options that they could afford. In another example, a business couldn't afford the lighting retrofit, so we reached out to Edison and through the Direct Install program, Edison was able to swap the lights out, free of charge to the business.

We strongly encourage your Board, the Governor's office, and the State legislature to include a small business element in your investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-investplan2015-ws-UiBUNwZ3V2sFcQF1.xltx>

Original File Name: Report for State Letter.xltx

Date and Time Comment Was Submitted: 2015-08-19 11:39:36

No Duplicates.

**Comment 43 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Hall-Stein

Email Address: khall@tehcoapcd.net

Affiliation: Tehama County Air Pollution Control

Subject: County Of Tehama Support for Woodstove Chang Out Program

Comment:

County Of Tehama Support for Woodstove Change out Program in Second  
Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-investplan2015-ws-B2QGbwB0UG1SIAF4.pdf>

Original File Name: County of Tehama Support Letter Wood Stove Change Out Program.pdf

Date and Time Comment Was Submitted: 2015-08-20 17:02:38

No Duplicates.

**Comment 44 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: scott

Last Name: slavensky

Email Address: scott@skatetown.biz

Affiliation:

Subject: Cap and Trade Auctions Proceeds - Ice Rinks in California need help!

Comment:

See attached file

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/110-investplan2015-ws-BmdWlNgAg5QPwZo.doc>

Original File Name: ARB investplan2015-ws comment 082115.doc

Date and Time Comment Was Submitted: 2015-08-21 12:48:32

No Duplicates.

## **Comment 45 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: John

Last Name: Amodio

Email Address: jamodio@msn.com

Affiliation: Yosemite Stanislaus Solutions (YSS)

Subject: Draft Cap and Trade Auction Proceeds Triennial Investment Plan

Comment:

The attached comments are submitted on behalf of the YSS Collaborative which is comprised of diverse interests from timber companies to environmental organizations to local government representatives working together to assist public and private land managers in achieving healthy forests and watersheds. Please feel free to me if you have any concerns/questions. Thank you for the opportunity to submit comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-investplan2015-ws-UzAAZ1wtV1tQN1U7.pdf>

Original File Name: Cap and Trade Auction Proceeds 15-8-21.pdf

Date and Time Comment Was Submitted: 2015-08-21 18:57:46

No Duplicates.

**Comment 46 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Peter  
Last Name: Bell  
Email Address: pb@renewablefuelproducts.com  
Affiliation: Co-Founder

Subject: Cap-and-Trade Auction Proceeds Second Investment Plan - Comments  
Comment:

Dear Chair Nichols,

Renewable Fuel Products, Inc. appreciates the opportunity to provide comments regarding the concept paper developed by the Air Resources Board ("ARB"), Cap-and-Trade Auction Proceeds Second Investment Plan ("Second Investment Plan").

See enclosed PDF for comments letter.

Regards, Peter Bell

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/112-investplan2015-ws-Am4FYFA3BzdRCAJx.pdf>

Original File Name: LCFC Second Investment Plan Comment Letter from RFP.pdf

Date and Time Comment Was Submitted: 2015-08-24 14:06:19

No Duplicates.

**Comment 47 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Wes

Last Name: Bolsen

Email Address: Wes.Bolsen@coolplanet.com

Affiliation: Head of Business Dev & Public Affairs

Subject: Investment of CA Cap-and-Trade Auction proceeds Second Investment Plan  
Comment:

Cool Planet is supportive of ARB's Second Investment Plan and the proposed incentives for the production of low carbon intensity fuels. We agree with the Concept Paper's inclusion of low carbon fuels as an essential part of ARB's Second Investment Plan.

We look forward to engagement with ARB throughout the process to ensure that these GGRF funds are invested wisely and yield the highest possible dividends in terms of GHG reduction, other air quality benefits, petroleum reduction, benefits to Disadvantaged Communities, and the expansion of California's clean economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-24 17:25:42

No Duplicates.

## **Comment 48 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Alan

Last Name: Scott

Email Address: a\_scott1318@comcast.net

Affiliation: Private Citizen

Subject: Corrected submission of comments to 2nd investment plan

Comment:

I begin my submission with excerpts from an editorial item in The Irish Independent newspaper August 21, 2015, titled "Drip, drip, drip effect erodes all credibility". It begins "Successful politicians recognize the line between confidence and arrogance, and right now the Government is on the wrong side of (these are my replacement additions) AB32 and the current politically convoluted High-speed Rail Project originally known as Proposition 1A."

With that said, the absolute goal of government in the State of California is to focus on the massive damaging drought conditions. However, wasting valuable taxpayer contributions for silly legacy feel good projects baffles our minds. As noted in the opening and closing statements, it is incumbent on government to provide solid effective governance something that been missing especially when plastic bags have more importance than know water crisis. just amazing thought process - NOT!

Further, governments must abandon the lunacy of the continuation of any project or policy (especially the two noted above) that only create serious unintended consequences directly on the backs of over stressed taxpayers due political mismanagement for decades. In the meanwhile, politicians will only find ways to FURTHER abuse taxation and unapproved fees the legislative bodies never received approval from the voters. These are clear examples of serious nature that I and others have specifically regarding these two pieces of legislation.

At the outset, my initial thoughts revolve around a solid quantifiable issue 'the unintended consequences of this poorly executed legislation'. A review of your PowerPoint hand-out at the August 4, 2015 meeting in Fresno, it became very clear to me that this legislation had two primary are goals that regardless of how one spins it is directly related to uncontrolled growth of state government, while imposing abusive taxation and / or fees on everyone in California without the consent of the voters.

Furthermore, it now very clear that Governor Brown fully intend to generate funding for HIS financially busted high-speed rail (HSR) legacy debacle. Two-years ago, I made an observation when I (we) realized this project was doomed that the only resultant would be a 15' berm in the San Joaquin Valley making is a new landmark; however, not replacing the Great Wall of China but just a smaller version that one might see if they are orbiting the Earth. A recent example of a seriously mismanaged mega-project is the new 2.5 mile Bay Bridge with all the safety faults created by a politically induced environment. Support pylons for this structure should have been at the highest priority without exception and from current data that was not the case.

This concern is now being seen with the reduced Fresno to Bakersfield HSR alignment where 100,000 of thousands of pages created by the authority and their consultants are now in the process of revision by the prime contractor. Moreover, the residents of the San Joaquin Valley have been subject to aggressive and abusive tactics regarding land acquisition, which now may become null and void.



I bring forth the above because of one overriding concern and the two HSR construction bids awarded are for reduced distances in the respective alignments. Reason, lack of funding, hence the need to obtain funding from any source.

I was in the audience and witnessed speakers on the dais trip all over themselves stating the good they have done to date. We all heard monies were spent with significant results they stated; however, from my detailed notes taken during this public forum show no one ever provide solid validated results. Additionally, I have no clue why the ARB would even fund anything involving HSR when is well documented that HSR WILL BE A NET POLLUTER FOR THE NEXT 30++ YEARS. In my judgement, this is just another convoluted political machinated way of getting monies to the Governor's broken legacy project. I and others are firmly convinced this not an actual part of this legislations intent.

Nevertheless, from the Webinar in July and the August public forum, they were much appreciated; nevertheless, my (and others) entire take away that this is just another piece of unnecessary legislation, as noted previously, to only expand government and dole more monies to questionable agencies or departments with minimal oversight that seems to require, limited non-descript reporting. This my clear take away from both sessions.

Some of my other solid take-a-ways are:

Extremely questionable standards with the only to increase state employment for the unions with zero compliance to the actual legislation.

Furthermore, you are placing unacceptable burdens not only on the other 49 states and all nations doing business with California. That concept will surely create a net business decrease. The over ridding business communities displeasure with California is the state is extremely aggressive thus creating a very unfriendly business environment. I could site a perfect example; however, my previous employment standards require my compliance to confidential contract requirements.

I along with others in attendance thought and agreed there is a serious lack of confidence in effective management of this convoluted governance of this funding investment program.

Once again, we have another government agency over using buzz words or better named cliché statements with little or no quantifiable value leaving one to question the strengths of the accountability and the oversight certainly codify this comment.

Another key overlooked area is Environmental Justice (EJ) and like HSR who stated they were in total compliance with their Environmental Impact Reports only to perform an emergency action at their August 2012 board meeting because it was missing; however, they stated they were in compliance but that could not be proven. I have not had the time to review all documentation; therefore, I make this comment to address this is a very important aspect and typically EJ only gets attention when there is a complaint. In mine mind not so, it is the benchmark for all agency activities without reservation.

One the most igneous problems this legislation it seems to be another conduit for existing agencies to increase their funding base thus increasing staff most cases under union contracts. In other words, California's almost 600 existing departments / agencies need to be evaluated for duplication and really actual need are now required because we the taxpayers demand it and it is a solid requirement of superior governance that is sorely missing in Sacramento. Failure to adjust only ensures the demise of this state.

A comment from someone who viewed this public forum - they seemed to use a lot of buzz words or phrases.

This entire process seems too geared to the Agenda 21 program that was never approved by the voters California nor by the voters of The United States of America. That in its self appears to demonstrate that government running amuck without adherence to the laws of the land or individual states.

It seems to me that the major air quality issues in the San Joaquin Valley are significantly a creation from the Bay area. I firmly believe that penalties belong in the Bay area instead of here; nevertheless, I and others are firmly convinced the "Greenhouse Gas debacle" is just a methodology to scam the public into more silly and abusive controls along with unapproved taxation or fees. The one key factor that always over looked by these zealots is Mother Nature rules and conditions such the current drought is not due to greenhouse gases, it is due to extremely poor lack of legislative and political mismanagement. Failure to react to cyclical events, which is a requirement of superior governance, has resulted in absolutely draconian measures that should have been enacted regardless if it as the result of legislative or political machinations. The people's requirements demand effective and reactive solutions then not later when the disaster is just that! A vote from the voters would have overridden those objections. Another statement from The Irish Times -  
"It is remarkable that the Government should have come to such a pass through its rigidity of thought." Nothing in the world is as flexible and yielding solid governance, which is the missing component in Sacramento.  
In closing:  
Quote from President Thomas Jefferson  
"My reading of history convinces me that most bad government results from too much government."

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-investplan2015-ws-AGFTJwBjUFwBZAVq.docx>

Original File Name: ARB+Comments.docx

Date and Time Comment Was Submitted: 2015-08-25 08:31:52

No Duplicates.

## **Comment 49 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Rory  
Last Name: Bakke  
Email Address: rory@sustainableconceptsstudio.com  
Affiliation: Sustainable Concepts Studio

Subject: Support of SME category and funding in GGRF Investment Plan  
Comment:

I am writing to request that CARB and the GGRF Boards allocate significant funding from the GGRF to support California's small and medium-sized enterprises and communities to participate in sustainability education and training programs that help them design and implement initiatives that result in greenhouse emission reductions for California. I am a Sustainability Advisor that has been working with businesses, public agencies and communities in California for over 20 years to reduce waste and improve environmental performance overall.

The organizations that should be eligible for this funding include those who have been working diligently to embed best practices for environmental and social performance into their business and organizational models via action planning and use of key resources such as: energy utility programs and incentives, water program technical assistance, zero waste training and benefits, procurement and supply chain education and initiative toolkits and other similar project assistance. Currently, REV Sustainability and the CA Green Business Program are key organizations involved in educating SME's about their options in this arena and how they can make a real difference that will result in GHG emissions reductions statewide. I strongly encourage your Board, the Governor's office, and the State Legislature to include SME funding in the Investment Plan to reach this difficult-to-reach and potentially very valuable sector and enlist them in deeper GHG reduction efforts.

Thank you for your time.

Rory E. Bakke  
President  
Sustainable Concepts Studio

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-25 10:24:25

No Duplicates.

**Comment 50 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Eppa

Last Name: Rixey

Email Address: eppa.rixey5@gmail.com

Affiliation: Lagunitas Brewing Company

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

See attached letter from our CFO

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-investplan2015-ws-AWBRNVNhUzILIFcI.pdf>

Original File Name: AB32- Support Letter.pdf

Date and Time Comment Was Submitted: 2015-08-25 17:03:44

No Duplicates.

# **Comment 51 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Erich  
Last Name: Pfuehler  
Email Address: epfuehler@ebparks.org  
Affiliation:

Subject: East Bay Regional Park District Comments  
Comment:

August 26, 2015

The Honorable Mary D. Nichols  
Chair, California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols:

Thank you for your leadership and service to the State of California. Your vigilant work in advocating for our environment and public health has helped California play an international role in efforts to address climate change. On behalf of the seven elected members of the East Bay Regional Park District's Board, we wish to officially comment on the Cap-and-Trade Auction Proceeds Second Investment Plan.

The Park District is a steward of nearly 120,000 acres in the east San Francisco Bay - one of the most urbanized regions of California - and operates 200 plus miles of paved active transportation trails. The District is well positioned to support the State's efforts to achieve greenhouse gas reduction objectives.

The recent Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan highlights a number of promising synergisms with District operations. The Concept Paper clearly states more than once that "achieving the State's mid- and long-term climate targets and goals will not be possible without investing now in California's natural resources, particularly through protection and improved land management." On behalf of the Park District, we wholeheartedly agree.

Carbon Sequestration and Land Use Planning:

Based on an evaluation by ICF Jones & Stokes, the average amount of carbon sequestered by the Park District's lands is over 91,157 metric tons - the equivalent of removing 16,317 passenger cars and sport-utility vehicles from the road annually, saving approximately over 10.4 million gallons of gasoline. By preserving natural land in perpetuity, the District's parklands represent an important permanent carbon stock of over 2.8 million metric tons (estimates last updated in 2011). Additionally, our properties form natural boundaries encouraging more sustainable and higher density communities, which result in healthier lifestyles, increased transit ridership, and more walkable cities. When considering the stated goal of reducing greenhouse gases through improvements in land use planning in major urban areas, the Park District is a model example of what is possible. Directed financial incentives to protect and maintain additional open space would present the opportunity to expand the State's stated Sustainable Communities Strategies land use planning goal.

#### Urban Wildland Interface Fire Fuels Reduction:

District employees were first responders to the 1991 East Bay Hills fire when 25 people died and 4,000 homes were destroyed resulting in \$1.5 billion in damages. According to studies, from 2001-2010, annual carbon losses from forests and wildlands in California represented as much as five to seven percent of state carbon emissions - and the frequency of wildfires has intensified since 2010. The Park District's Fire Department and Wildfire Hazard Reduction and Resource Management Plan demonstrate our commitment to the best possible fire safety along the urban/wildland boundary, but it is a multi-million dollar on-going effort and worthy of Greenhouse Gas Reduction Fund (GGRF) investment. We agree with other natural resource agencies and advocates that increasing CAL FIRE funding for urban and rural forest conservation should be in the 7-8% percent range.

#### Urban Greening:

While thinning highly flammable, non-native vegetation such as eucalyptus is necessary in urban wildland interfaces like the East Bay Hills, funding for the Urban Greening for Sustainable Communities Program, overseen by the Strategic Growth Council and administered by the Natural Resources Agency, should be expanded. The planting of native, high sequestration value trees and other less flammable native vegetation should be incentivized. We also agree that, as will be expanded upon later in these comments, we need to make our communities more climate resilient. Including the Carbon-Smart Green Infrastructure concept - which includes parks, wetlands, watersheds and greenways - as part of the GGRF would be a significant benefit for our state's climate objectives. We support creating a 4-5% allocation for a Carbon-Smart Green Infrastructure Program to integrate more co-benefits into the Urban Greening for Sustainable Communities Program.

#### Coastal Resiliency:

The green infrastructure managed by the Park District on over 40 miles of Bay-Delta shorelines provides the first line of defense and resiliency against sea level rise for millions of people in the East San Francisco Bay region. Adequately managing District shoreline properties yields quantifiable greenhouse gas (GHG) benefits. In addition, multiple resiliency co-benefits are provided - adaptation to sea level rise, improved water quality and wildlife habitat, to name a few. The Park District has developed innovative, adaptive strategies to Bay and Delta shorelines - such as the multi-million dollar Breuner Marsh wetlands restoration investment in Richmond and the \$5.6 million sand replenishment effort along Shoreline Drive in Alameda - which provide buffer zones for homes and infrastructure while providing multiple co-benefits to the region. The Park District is restoring and creating tidal wetlands in anticipation of sea level rise. The development of "horizontal levees" and other adaptive ecosystem based strategies offer the best opportunities to protect shoreline communities from storms, flooding, and sea level rise. These co-benefits will become increasingly important in providing protection to billions of dollars of investment along the State's shorelines. We support meaningfully expanding the pilot concept of investing in restoration of wetlands areas to increase carbon sequestration and provide co-benefits such as increased native species populations and water quality improvement.

#### Economic Benefits:

A recent San Francisco Public Press report indicates builders plan to invest more than \$21 billion in offices and homes in flood-prone areas, where waters could climb 8 feet above today's high tide by the end of this century. This is in addition to the \$25 billion of vulnerable investment around the Bay already identified. Given the immense economic investment in need of natural, green infrastructure resiliency strategies, we believe more Cap-and-Trade auction proceeds should be allocated to wetland development,

enhancement, and restoration. As the Concept Paper indicates, "wetlands not only sequester carbon, they are the first line of defense against sea-level rise and storm surge." We further agree, "these co-benefits should be sought at every opportunity and pursued through innovative integration of natural resources into other GGRF investment priorities, such as energy and sustainable communities." Again, meaningful financial investment in wetlands management should be a high priority in the Second Investment Plan.

#### CalEnviroScreen:

East Bay cities such as Richmond, Oakland, and Pittsburg have genuine disadvantaged communities. Under the CalEnviroScreen criteria, however, disadvantaged communities near the Bay or Delta shorelines receive an oversimplified analysis. By way of example, the overly objective process could exclude projects like a fishing pier along the Richmond shoreline or in West Oakland since it would consider the San Francisco Bay as part of the "service area" and, by virtue of no population density in the water area, undervalue the project benefit. The reality in these communities, however, is that the fishing piers would be used by subsistence anglers from nearby neighborhoods. These shoreline parcels are also key in developing resiliency to sea level rise as mentioned in the previous paragraph. The CalEnviroScreen criteria need to reflect the diversity of California's landscape of disadvantaged communities. A regional approach to CalEnviroScreen should be adopted.

#### Paved Trail Active/Green Transportation Network:

In the mid-1970s, the Park District pioneered the concept of developing an integrated network of paved bicycle and pedestrian trails linking the 33 communities throughout the East Bay. Working closely with local and regional transportation planners and transit agencies, the Park District has developed over 200 miles of paved, non-motorized trails. These "Green Transportation" corridors provide "last mile" connections to transit, as well as access to schools, employment centers and businesses. Providing safe and convenient non-motorized alternatives for commuters, students, employees and shoppers reduces highway congestion, greenhouse gasses and our dependence on fossil fuel, creates livable communities, and provides the opportunity for a healthy lifestyle close to home. Due to the San Francisco Bay Area's mild climate, these transportation alternatives are used year-round. The Park District also has a history of working with communities along the Iron Horse Trail to develop, finance and manage overcrossings of key, busy intersections. Overcrossings, such as the Treat Boulevard bicycle/pedestrian bridge near the Pleasant Hill BART station, reduce the need to stop traffic below for bicycle/pedestrian crossings, thus reducing traffic idle times and, therefore, greenhouse gas emissions. Completing the remaining overcrossings and gaps in the paved trail network will require significant investment from multiple partners, including Cap-and-Trade proceeds. We support an increase of GGRF investment in Active Transportation.

As is stated in the Draft Concept Paper, "there is a strong history of land conservation in California [and particularly the East Bay] to protect wildlife, preserve agricultural viability, improve water supply and quality, and provide parks and open space for residents and visitors from around the world." The District concurs that "California's lands should be protected and managed holistically and in a way to systemically utilize natural and working systems to reverse carbon loss and to preserve and grow carbon stocks." To reach our collective goals, there must be significant investment from Cap-and-Trade proceeds in managing, maintaining and restoring our natural lands - including the parks, open space, wetlands, and rangelands of the East Bay.

Thank you again for your leadership on this issue. We look forward to continuing to work with you. Please feel free to contact us if

you have any questions or would like additional support documentation.

Regards,

Robert E. Doyle  
General Manager  
East Bay Regional Park District

cc:

Governor Edmund G. Brown, Jr.  
The Honorable Matthew Rodriguez, Secretary, California  
Environmental Protection Agency  
The Honorable John Laird, Secretary, California Natural Resources  
Agency  
The Honorable Michael Cohen, Finance Director, California  
Department of Finance  
East Bay California Legislative Delegation  
EBRPD Board of Directors

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-26 13:43:19

No Duplicates.



## **Comment 52 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Roxby  
Last Name: Hartley  
Email Address: rhartley@nsbfuels.com  
Affiliation: Agron Bioenergy LLC

Subject: Comments on Draft Plan  
Comment:

Please see the uploaded file for Agron Bioenergy's comments on the updated "Draft Cap and Trade Auction Proceeds Triennial Investment Plan"

Thanks you.

Roxby Hartley

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-investplan2015-ws-BjRTZV1tUjQANgU9.pdf>

Original File Name: 20150826 Comments on GGRF plan.pdf

Date and Time Comment Was Submitted: 2015-08-26 16:29:18

No Duplicates.

**Comment 53 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Nick

Last Name: Lee

Email Address: [nickl@revsustainability.com](mailto:nickl@revsustainability.com)

Affiliation: REV

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-investplan2015-ws-VDMGZwFyU2YLI1cz.docx>

Original File Name: GGRF.docx

Date and Time Comment Was Submitted: 2015-08-26 20:54:01

No Duplicates.

**Comment 54 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Allyn  
Last Name: McAuley  
Email Address: [allyn.mcauleyjr@gmail.com](mailto:allyn.mcauleyjr@gmail.com)  
Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-investplan2015-ws-WzZWM1AwWH4KYFA1.pdf>

Original File Name: McAuley\_Sustainability Advisor Letter to CARB.pdf

Date and Time Comment Was Submitted: 2015-08-27 16:07:13

No Duplicates.

**Comment 55 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Liz

Last Name: Whiteley

Email Address: liz.whiteley@nasrc.org

Affiliation:

Subject: Comments on Low-GWP Incentive Program for Supermarkets

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-investplan2015-ws-BmVUPQBsBzkAYwln.docx>

Original File Name: Comments on the Draft Second Investment Plan Concept Paper.docx

Date and Time Comment Was Submitted: 2015-08-27 16:32:12

No Duplicates.

## **Comment 56 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Ryan  
Last Name: Carney  
Email Address: carney16@gmail.com  
Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund.  
Comment:

REV provides sustainability education and training to small-to-medium sized enterprises (SMEs), organizations and communities. The REV Sustainability Circles® program provides multiple environmental and economic benefits that help reduce GHGs, grow the green economy through adoption of best practices, specific initiatives within the framework of a customized five year Sustainability Action Plan. This holistic six month Sustainability program brings together up to 10 local companies, organizations and communities into a powerful peer-learning community. REV support includes identifying and engaging local experts on all the relevant topics needed to develop the comprehensive 5 year Action Plan with all the metrics needed to make the right decisions for each participating organization.

Two REV coaches are dedicated to each Circle for the entire 6 months and provide one-on-one onsite coaching to all participants. An average of 30 and up to 115 initiatives are identified and key outcomes are metrics such as investments required, payback, ROI, energy savings, water reduction, cost savings and, most important, GHG reductions. Average metrics over 75 recent California Circle graduates are as follows:

- GHGs - 1059 tons reduced per year / participant
- Water reduction - 2.1 million gallons / year
- Energy savings- 1.5million kWh per year
- Cost savings: \$316,166 per year

The REV Circles help businesses adopt leading edge greenhouse gas reduction practices, verifies results and improvements and generates reliable outcome metrics and reports for REV's utility customers. REV's Sustainability Circles® program directly meets the GGRF funding priority of projects that result in significant measurable GHG emission reductions and multiple environmental benefits while providing economic benefits for Circle participants and extending program benefits to disadvantaged communities. We strongly encourage your Board, the Governor's office, and the State legislature to include major funding for small and mid-size businesses, organizations and communities in your investment plan so that programs like the REV Sustainability Circles®, the California Green Business Network, and others can truly grow the green economy and greatly reduce GHG emissions throughout California. The GHGs locked up in SMEs are enormous. The challenge has been that this sector is referred to as "the hard to reach sector" for good reason. REV is demonstrating its ability to unlock those doors and is beginning to make real impact.

I strongly recommend that you not only fund SMEs to engage in the REV Sustainability Circles® program and assist with the financing of the GHG related initiatives, but that you fund other programs focused on California's SMEs that are demonstrating significant reductions in GHGs while providing other relevant benefits.

Thank you for listening,  
Ryan Carney

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-27 16:35:08

No Duplicates.

**Comment 57 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Gaye

Last Name: Quinn

Email Address: gaye.quinn@westlakeurban.com

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

See Attached Letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-investplan2015-ws-VDAAaQBiV3FQJVU8.pdf>

Original File Name: DocuSigned\_Letter\_in\_Support\_of\_REV\_Sustaina.pdf

Date and Time Comment Was Submitted: 2015-08-27 18:02:39

No Duplicates.

**Comment 58 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Ken

Last Name: Eskenazi

Email Address: kene@revsustainability.com

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-investplan2015-ws-B2RXMABzBTRVNgZ1.pdf>

Original File Name: CARBeskenazi.pdf

Date and Time Comment Was Submitted: 2015-08-27 19:31:12

No Duplicates.



**Comment 59 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Porteshawver  
Email Address: [aporteshawver@ci.benicia.ca.us](mailto:aporteshawver@ci.benicia.ca.us)  
Affiliation:

Subject: Local Governments are instrumental to meeting state climate and energy goals  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-investplan2015-ws-B2QCbQdyWXMHblA2.pdf>

Original File Name: CityofBeniciaComments\_SecondInvestmentPlan.pdf

Date and Time Comment Was Submitted: 2015-08-28 08:25:50

No Duplicates.

## **Comment 60 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: Comments on the Cap and Trade Investment Plan

Comment:

Attached please find RCRC's comments on the concept paper and development of the second Cap and Trade Auction Proceeds Triennial Investment Plan. Please contact me with any questions or comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-investplan2015-ws-WjkAZ1MiU18GYQBu.pdf>

Original File Name: Cap\_and\_Trade\_Concept\_Paper\_Ltr\_08272015.pdf

Date and Time Comment Was Submitted: 2015-08-28 09:42:14

No Duplicates.

## **Comment 61 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Berg

Email Address: jennyb@abag.ca.gov

Affiliation: ABAG - BayREN

Subject: Comments of the San Francisco Bay Area Regional Energy Network

Comment:

Attached are comments submitted by the Association of Bay Area Governments, on behalf of the San Francisco Bay Area Regional Energy Network (BayREN). We thank you for this opportunity to provide comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-investplan2015-ws-UzJSNgFhWW0DWgAt.pdf>

Original File Name: ABAG - BayREN Letter Regarding GHG Investment 2015-08-28.pdf

Date and Time Comment Was Submitted: 2015-08-28 09:52:05

No Duplicates.

**Comment 62 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

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

Subject: Natural Resources Section, Second Investment Plan concept paper  
Comment:

Gentlepersons:

Attached please find comments from Endangered Habitats League.  
These comments are only submitted electronically.

Please let me know if additional information would be helpful.

With best regards,  
Dan Silver  
Executive Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-investplan2015-ws-UDVVOwdqUixRJAJn.pdf>

Original File Name: EHL-SecondInvestmentPlan-8.28.15.pdf

Date and Time Comment Was Submitted: 2015-08-28 11:12:32

No Duplicates.

**Comment 63 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jane

Last Name: DeLorenzo

Email Address: jane1delo@gmail.com

Affiliation: Sustainable Options

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter supporting SME funding of educational programs  
such as REV Sustainability Circles to reduce GHGs.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-investplan2015-ws-Wz9TMFA9VGhWlGfK.docx>

Original File Name: DeLorenzo letter GHG reduction in CA.docx

Date and Time Comment Was Submitted: 2015-08-28 11:20:13

No Duplicates.

**Comment 64 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Bryce  
Last Name: Gerritsen  
Email Address: bryceg@revsustainability.com  
Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-investplan2015-ws-AGdcMIM1V1sCbVc5.pdf>

Original File Name: GHG Initiatives Funding Letter to CARB.pdf

Date and Time Comment Was Submitted: 2015-08-28 11:30:36

No Duplicates.

## **Comment 65 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Haley

Last Name: Stewart

Email Address: hstewart@defenders.org

Affiliation: Defenders of Wildlife

Subject: Defenders of Wildlife Comments

Comment:

Please see the attached comments regarding the inclusion of desert lands in the cap and trade auction proceeds triennial investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-investplan2015-ws-UDQHbgF3AAxQN1Un.pdf>

Original File Name: DOW ARB Concept Paper Comments.pdf

Date and Time Comment Was Submitted: 2015-08-28 12:06:14

No Duplicates.

**Comment 66 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jeffrey

Last Name: Schub

Email Address: jeff@coalitionforgreencapital.com

Affiliation:

Subject: Support for Green Bank Financing

Comment:

Please find the attached comments in support of using cap and trade auction proceeds to fund green bank financing through a state financing authority. These comments are submitted by the Coalition for Green Capital, a non-profit organization supporting the creation of green banks across the country.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-investplan2015-ws-VzRdPAZkU18FYAhn.pdf>

Original File Name: CGC Comments on Concept Paper.pdf

Date and Time Comment Was Submitted: 2015-08-28 12:07:01

No Duplicates.



## **Comment 67 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Evan

Last Name: Reeves

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

Affiliation: Center for Creative Land Recycling

Subject: Comments on Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Please see attached comments on the Concept Paper for the  
Cap-and-Trade Auction Proceeds Second Investment Plan (Concept  
Paper) from Center for Creative Land Recycling.

Thanks,

-Evan Reeves

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/135-investplan2015-ws-UTJSN1U4U3JVDFU2.pdf>

Original File Name: CCLR Comments on Second Investment Plan Draft Concepts.pdf

Date and Time Comment Was Submitted: 2015-08-28 12:11:18

No Duplicates.

## **Comment 68 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Erin

Last Name: McNichol

Email Address: erin.mcnichol@presidio.edu

Affiliation: Presidio Graduate School

Subject: REV Sustainability & CARB

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/136-investplan2015-ws-AWJdOIUmUWACWwFt.docx>

Original File Name: CARB Letter\_McNichol\_Erin.docx

Date and Time Comment Was Submitted: 2015-08-28 13:28:35

No Duplicates.

**Comment 69 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jim

Last Name: Wagoner

Email Address: [jwagoner@bcaqmd.org](mailto:jwagoner@bcaqmd.org)

Affiliation: Butte County AQMD

Subject: Support for Programs Benefiting Rural Communities and Small Businesses

Comment:

Please refer to the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/138-investplan2015-ws-Uz5QOFA4VmYGaANs.pdf>

Original File Name: MNicholsLtr.pdf

Date and Time Comment Was Submitted: 2015-08-28 15:32:46

No Duplicates.

**Comment 70 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Mike

Last Name: Pruett

Email Address: mpruett@greendiamond.com

Affiliation: Green Diamond Resource Company

Subject: Support for Forest Conservation Funding

Comment:

see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-investplan2015-ws-B2ldMlc1Vm1XPgNv.pdf>

Original File Name: nicholsletter.pdf

Date and Time Comment Was Submitted: 2015-08-28 15:36:57

No Duplicates.

**Comment 71 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Thomas L  
Last Name: Rosenberg, MS, MBA  
Email Address: thomasr@revsustainability.com  
Affiliation: REV

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund.  
Comment:

Please see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-investplan2015-ws-Am5VNlciU3RSMQJw.pdf>

Original File Name: LETTER FROM SUSTAINABILITY CONSULTANT to CARB.pdf

Date and Time Comment Was Submitted: 2015-08-28 17:21:07

No Duplicates.

**Comment 72 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Ellen  
Last Name: Kappes  
Email Address: ellenkappes@live.com  
Affiliation: Independent Sustainability Consultant

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/141-investplan2015-ws-VDFXPQdqV2FWPgNc.pdf>

Original File Name: Ellen Kappes\_GGRF comment letter.pdf

Date and Time Comment Was Submitted: 2015-08-29 21:21:54

No Duplicates.

## **Comment 73 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Gail

Last Name: Horvath

Email Address: gail\_horvath@beaminc.com

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

I am writing to request that CARB and the GGRF boards allocate significant funds from the GGRF to support California's small and mid-size businesses, organizations and communities to participate in REV Sustainability Circles and the implementation of Sustainability Action Plan initiatives that result in greenhouse gas emission reductions in California. I'd also like to see additional funds allocated to other sustainability oriented organizations that have demonstrated their effectiveness and results in assisting SMEs to accelerate their sustainability journey with a major focus and strong results in reducing GHGs in our state.

REV provides sustainability education and training to small-to-medium sized enterprises (SMEs), organizations and communities. The REV Sustainability Circle program provides multiple environmental and economic benefits that help reduce GHGs, grow the green economy through adoption of best practices, specific initiatives within the framework of a customized five year Sustainability Action Plan. This holistic six month Sustainability program brings together up to 10 local companies, organizations and communities into a powerful peer-learning community with 2 participants from each organizations. REV support includes identifying and engaging local experts on all the relevant topics needed to develop the comprehensive 5 year Action Plan with all the metric needed to make the right decisions for each participating organization and reduce GHGs. Average metrics over 75 recent California Circle graduates are as follows:

- GHGs - 1059 tons reduced per year / participant
- Water reduction - 2.1 million gallons / year
- Energy savings- 1.5million kWh per year
- Cost savings: \$316,166 per year

We strongly encourage your Board, the Governor's office, and the State legislature to include major funding for small and mid-size businesses, organizations and communities in your investment plan so that programs like the REV Sustainability Circles, the California Green Business Network, and others can truly grow the green economy and greatly reduce GHG emissions throughout California. The GHGs locked up in SMEs are enormous. The challenge has been that this sector is referred to as "the hard to reach sector" for good reason. REV is demonstrating its ability to unlock those doors and is beginning to make real impact.

Thank you for listening  
Gail Horvath

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-30 12:32:11

No Duplicates.



**Comment 74 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Amanda

Last Name: Dolan

Email Address: adolan@gpresorts.com

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/143-investplan2015-ws-AGMAZ1wvBTRWD1Q4.pdf>

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2015-08-30 13:23:12

No Duplicates.

**Comment 75 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Meredith

Last Name: Beam

Email Address: meredith\_beam@beaminc.com

Affiliation: BEAM,inc

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund.”

Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/144-investplan2015-ws-WjldOlAjUWAAWVMw.pdf>

Original File Name: CARB Comment from BEAM 8.30.15.pdf

Date and Time Comment Was Submitted: 2015-08-30 16:45:14

No Duplicates.

**Comment 76 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Nancy  
Last Name: Skinner  
Email Address: ncskinner@gmail.com  
Affiliation: former State Assemblymember

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund.  
Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/145-investplan2015-ws-UzAGYVMgV2YLUUm.pdf>

Original File Name: CARB Submission N Skinner.pdf

Date and Time Comment Was Submitted: 2015-08-30 20:14:53

No Duplicates.

**Comment 77 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Cheryl

Last Name: Mitouer

Email Address: cheryl@transformationalbodywork.org

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund  
Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/146-investplan2015-ws-UTJVMgZ1ADEFXFU2.pdf>

Original File Name: CARB Comment from Mitouer 8.31.15.pdf

Date and Time Comment Was Submitted: 2015-08-31 07:35:43

No Duplicates.

## **Comment 78 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Peter

Last Name: Imhof

Email Address: pimhof@sbcag.org

Affiliation:

Subject: Comments on 2nd GGRF Investment Plan Concepts

Comment:

Please find attached the Santa Barbara County Association of Governments' initial comments on concepts for the Second Greenhouse Gas Reduction Fund Triennial Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/148-investplan2015-ws-UDNVMl0sUI4KU1MM.pdf>

Original File Name: CAP & TRADE COMMENT LETT\_001.pdf

Date and Time Comment Was Submitted: 2015-08-31 09:07:22

No Duplicates.

**Comment 79 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kate

Last Name: Meis

Email Address: kmeis@lgc.org

Affiliation:

Subject: Comments on Investment Plan Concept Paper

Comment:

please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/149-investplan2015-ws-VjIGcl09ADVRI1UK.pdf>

Original File Name: Draft\_InvestmentPlan\_Letter.pdf

Date and Time Comment Was Submitted: 2015-08-31 09:44:08

No Duplicates.

**Comment 80 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Sant'Anna

Email Address: jensantanna@gmail.com

Affiliation: Verde Village & REV

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/150-investplan2015-ws-B2AGZ1QnUGUAWQJj.pdf>

Original File Name: GGRF allocation comments to CARB.pdf

Date and Time Comment Was Submitted: 2015-08-31 10:20:12

No Duplicates.

## **Comment 81 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Georgia

Last Name: Dalheim

Email Address: gdalheim@carlilemacy.com

Affiliation:

Subject: Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

Carlile Macy is a small to medium sized business in the County of Sonoma. We received technical assistance from our local Sonoma Green Business Program to become certified by our local government. As a result, we saved water, electricity, increased recycling, switched to greener cleaning products, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates. Small and medium sized businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become recognized Green to save resources, save money and attract customers. The Sonoma Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage the panel for the Investment Plan, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 11:10:19

No Duplicates.



**Comment 82 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sheree

Last Name: Waterson

Email Address: shereewaterson@gmail.com

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund

Comment:

See attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/154-investplan2015-ws-AmFVMIUmVWRRNAJt.pdf>

Original File Name: CARBComment.pdf

Date and Time Comment Was Submitted: 2015-08-31 11:45:15

No Duplicates.

**Comment 83 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: John  
Last Name: Crouch  
Email Address: hpbamail@hpba.org  
Affiliation: Heath, Patio & Barbecue Association

Subject: Comments on Second Investment Plan  
Comment:

See attachment for comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/155-investplan2015-ws-Vz9WIFY1U2ECWwRt.pdf>

Original File Name: HPBA Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-08-31 11:51:10

No Duplicates.

## **Comment 84 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Alex

Last Name: Turek

Email Address: aturek@luskin.ucla.edu

Affiliation: UCLA Luskin Center for Innovation

Subject: GGRF Funding Gap for MOUs

Comment:

In consulting with the Los Angeles Department of Water and Power, the following gap in the Cap and Trade Investment Plan was communicated, as the public utility plans for the expansion of solar access to low-income customers and disadvantaged communities via proposed programs such as the Community Solar Program.

The identified gap is targeted at multi-family housing for all income segments and community solar for all income segments with a special need to support adoption of disadvantaged community households. Currently California investor-owned utilities (IOUs) have access to resources unavailable to municipal utilities, allowing the IOUs to contribute more effectively towards efforts in reducing greenhouse gas. Separate from the Greenhouse Gas Reduction Fund, the California Solar Initiative (CSI) began in January 2007, with a budget of \$2,367 million dollars. The CSI is overseen by the California Public Utilities Commission (CPUC) and provides incentives for solar installations to customers of California's three IOUs. Under this program, the CPUC established the Single-Family Affordable Solar Homes Program (SASH) and the Multifamily Affordable Solar Housing Program (MASH), targeting incentives for low-income residents. However, these programs and funding are ONLY available to residents living in IOU territory. Municipal utilities require similar funding to provide relief for residents in their districts and to contribute equally to GHG reduction efforts.

Less than 10% of Los Angeles residents are able to take advantage of current solar incentives. According to the US Census Bureau, less than 35% of residents in Los Angeles own their own homes and, according to the National Renewable Energy Laboratory, only 22 to 27% of residential rooftops are suitable for hosting solar systems. This percentage drops significantly for low-income residents. In addition, the Cap-and-Trade Second Investment Plan highlights California's goal of achieving Zero Net Energy for new residential construction by 2020. This goal becomes unfeasible when less than a quarter of residents can host rooftop solar.

Directed by SB 535, CalEPA, through the Office of Environmental Health Hazard Assessment (OEHHA), identified Los Angeles as the most pollution-burdened and vulnerable region in all five methods of study in its California Communities Environmental Health Screening Tool (CalEnviroScreen). Despite exhibiting the greatest need for restoration, the most burdened communities of Los Angeles are unable to access any funds specific for low-income renewable energy.

To fulfill the vision of a renewable California, we recommend that a portion of the Greenhouse Gas Reduction Fund be reserved for providing renewable energy to disadvantaged residents through community based solar programs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 11:53:19

No Duplicates.

## **Comment 85 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: nathan

Last Name: boemler

Email Address: gta\_mechanic@sbcglobal.net

Affiliation:

Subject: Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

GreenTech Automotive is a small to medium sized business in the County of Sonoma. We received technical assistance from our local Sonoma Green Business Program to become certified by our local government. As a result, we saved water, electricity, increased recycling, switched to greener cleaning products, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates. Small and medium sized businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become recognized Green to save resources, save money and attract customers. The Sonoma Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage the panel for the Investment Plan, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 12:12:23

No Duplicates.

**Comment 86 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Brian  
Last Name: Wilson  
Email Address: bwilson@ncuaqmd.org  
Affiliation: North Coast Unified AQMD

Subject: Support for Wood Stove Change Out Program  
Comment:

The attached letter is in support of a wood stove change out program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/159-investplan2015-ws-UjxWM1woBzVSJVM+.pdf>

Original File Name: NCUAQMD Support ltr for Wood Stove Changeout.pdf

Date and Time Comment Was Submitted: 2015-08-31 12:57:59

No Duplicates.

**Comment 87 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@lcfcoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Comment of Low Carbon Fuels Coalition RE: INVESTPLAN2015-WS  
Comment:

Attached please find the comment of the Low Carbon Fuels Coalition regarding the Draft Cap and Trade Auction Proceeds Triennial Investment Plan.

Thank you for the opportunity to provide comments to this proceeding.

Best Regards,

Graham Noyes  
Acting Executive Director  
Low Carbon Fuels Coalition  
980 Ninth Street, 16th Floor  
Sacramento, CA 95814

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/160-investplan2015-ws-VDhSO1QiBQIRNAhp.pdf>

Original File Name: Low Carbon Fuels Coalition INVESTPLAN2015-WS.pdf

Date and Time Comment Was Submitted: 2015-08-31 12:56:54

No Duplicates.

## **Comment 88 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Marybeth

Last Name: Vergara

Email Address: mvergara@rmc.ca.gov

Affiliation: Rivers & Mountains Conservancy

Subject: Cap and Trade Auction Proceeds Investment Plan

Comment:

Please see the attached letter from the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy.

Thank you.

Marybeth Vergara  
Project Analyst

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/161-investplan2015-ws-UiFRMgRmV2sEbAdj.docx>

Original File Name: Second Investment Plan Comment Letter\_Final.docx

Date and Time Comment Was Submitted: 2015-08-31 13:09:38

No Duplicates.



**Comment 89 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Celia  
Last Name: DuBose  
Email Address: [celia.dubose@cabiodieselalliance.org](mailto:celia.dubose@cabiodieselalliance.org)  
Affiliation: California Biodiesel Alliance

Subject: CBA Comments on the 2nd Draft Investment Plan Concept Paper  
Comment:

Thank you for the opportunity to submit these comments on the Second Draft Investment Plan Concept Paper. Our comments focus on encouraging low carbon biofuels for their GHG lowering properties.

Celia DuBose  
Executive Director  
California Biodiesel Alliance

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/165-investplan2015-ws-UzBSNIExUI4FYAJt.pdf>

Original File Name: CBA Comments\_2nd Investment Plan\_9.2.15.pdf

Date and Time Comment Was Submitted: 2015-08-31 13:47:45

No Duplicates.

## **Comment 90 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Tristam

Last Name: Coffin

Email Address: tristam.coffin@gmail.com

Affiliation:

Subject: Low GWP Refrigeration System Incentives

Comment:

Comments on DRAFT CONCEPTS FOR PUBLIC DISCUSSION: Cap-and-Trade  
Auction Proceeds Second Investment Plan

The following comments are in support of the CA Air Resources Board's suggestion to provide incentives to assist California businesses with installing low-GWP refrigeration equipment.

I can attest to the financial barriers that prevent supermarkets from choosing natural refrigerant systems for all newly constructed stores. While I have participated in several supermarket pilot projects with natural refrigerants, the high equipment costs and installation and maintenance costs prevent most from choosing these technologies. Even though natural refrigerants are the right choice for the environment, supermarkets have a duty to their shareholders that often prevents us from spending extra money on technologies that are not yet price competitive.

We are in a catch-22 situation. Supermarkets cannot pay the higher prices for natural systems, so they are waiting for prices to come down; yet equipment manufacturers cannot lower prices until they achieve more volume and economies of scale.

An incentive program would get us out of that catch-22. If cap-and-trade money is used for a short time period, approximately 3-5 years for instance, to stimulate volume, component manufacturers would invest in US operations, and equipment manufacturers would lower manufacturing costs. Service contractors would also have a market for technicians who are skilled in natural refrigerant systems, so they would invest in training to meet that market demand.

In summary, I feel that using cap-and-trade dollars to subsidize the additional costs related to natural refrigerant equipment is exactly what is needed to accelerate the uptake of these environmentally-friendly systems. Subsidies in CA would not only help CA achieve greenhouse gas reductions; they would lead to increases in the uptake of these technologies nationwide.

Sincerely,

Tristam Coffin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 14:57:14

No Duplicates.

## **Comment 91 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Steven

Last Name: MacWilliams

Email Address: smacwilliams@groomenergy.com

Affiliation: Groom Energy Solutions

Subject: CA's proposal for incentives for natural refrigerant use

Comment:

I am in favor of the proposal to provide funding for supermarkets to use natural refrigerants. Natural refrigerant systems are much more expensive than traditional supermarket systems, but that is mainly because there are so few of them that the cost of manufacturing is very high. With more volume, costs can come down.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:23:04

No Duplicates.

## **Comment 92 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Frank

Last Name: Leonard

Email Address: fleonard@keymechanical.com

Affiliation: Key Mechanical Co of Washington

Subject: Incentives for natural refrigerant use

Comment:

i am in favor of California developing incentives for grocers to use natural refrigerants. this would help stimulate their use and allow that state to be a leader in minimizing the effects of high GWP and ozone depleting refrigerants.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:31:45

No Duplicates.

## **Comment 93 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Coalition for Clean Air Comments on Investment Plan Concept Paper

Comment:

- We have just started to see money from California's climate protection programs come to our communities to reduce pollution and help our underserved communities; we support these programs and want to see expanded investment.
- We agree with the Governor's 5 pillars of climate action.
- We support the themes in the draft paper, especially:
  - a. Investing in disadvantaged communities - go higher than the 10% and 25% minimums required by law, because these are the neighborhoods most hurt by pollution and with the least resources - and providing them technical assistance to apply for funding;
  - b. Integrated projects in disadvantaged communities to support local climate action, similar to the Senate's budget proposal - projects designed by local residents who understand community needs;
  - c. Reducing short-lived climate pollutants, like the black carbon in diesel exhaust that damages our health and also rapidly warms the planet.
- Clean up our transportation system and give us more safe and reliable transportation choices by expanding funding for:
  - a. Replacing older gross-polluting vehicles with hybrids and electric cars;
  - b. Improved bus service and bike and pedestrian access;
  - c. Van-pools for farmworkers;
  - d. Cleaner trucks and other freight equipment to reduce diesel emissions from goods movement.
- Clean up our air and reduce our home energy costs by funding:
  - a. Solar for low-income families;
  - b. Weatherization, insulation, and energy efficiency improvements;
  - c. Cleaner, more efficient heating systems to replace inefficient fireplaces and woodstoves.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:33:04

No Duplicates.

## **Comment 94 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Randy  
Last Name: Walthers  
Email Address: rwalthers@raleys.com  
Affiliation: Raley's Stores

Subject: CA's proposal for incentives for natural refrigerant use  
Comment:

I am in favor of the proposal to provide funding for supermarkets to use natural refrigerants.

Our new site in Sacramento will be our first attempt to use all natural refrigerants if feasible, otherwise we will need to do a cascade system using a R449a type refrigerant as the primary.

This has been discussed with Ken Bowers already.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:20:01

No Duplicates.

## **Comment 95 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Joe

Last Name: Kokinda

Email Address: jakokinda@prohvacr.com

Affiliation: Pres/CEO Professional HVAC/R Services, I

Subject: CA Incentives For Natural Refrigerant Use

Comment:

I am in favor of moving forward so that CA again leads the way in sustainability efforts relative to CO2 emissions. I am also in favor of other venues besides supermarkets seeing the advantage of Natural Refrigerants Technology, and look forward to the future. Once there are more end users, the cost of production comes down. In addition, other utilities will follow the lead and the rest of the US will become involved. This will further lower the costs of the equipment.

Kind Regards

J A Kokinda

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:39:15

No Duplicates.



## **Comment 96 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Tim

Last Name: Anderson

Email Address: tim.anderson@scwa.ca.gov

Affiliation: Sonoma County Water Agency

Subject: Recommendations - AB-32 Investment Plan

Comment:

Please find attached recommendations from the Sonoma County Water Agency regarding the Second Cap-and-Trade Auction Proceeds Triennial Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/173-investplan2015-ws-BmdWIIU2VlpVOgBu.pdf>

Original File Name: ARB INVESTMENT PLAN COMMENT LETTER 083115.pdf

Date and Time Comment Was Submitted: 2015-08-31 15:41:23

No Duplicates.

## **Comment 97 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Lee

Last Name: Alexanderson

Email Address: lalexanderson@dpw.lacounty.gov

Affiliation: Los Angeles County Department of Public

Subject: Comments on the Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

To whom it may concern,

The Los Angeles County Department of Public Works (Public Works) thanks you for the opportunity to review the Draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Plan) for Fiscal Years 2016-17 to 2018-19.

Public Works operates and maintains water conservation facilities within the Los Angeles region including dams, spreading grounds, and open channels which provide stormwater to support our local water supply. Public Works understands the importance of locally derived water resources and has been conserving local stormwater for nearly a century. On average, Public Works recharges 200,000 acre-feet of stormwater each year which is enough for nearly 1.6 million residents. Public Works is leading the way to a more sustainable future by promoting low energy-intensive water such as stormwater.

We understand that the Plan identifies Low-Carbon Water Systems (such as improved energy efficiencies, including pumps, turbines, and existing desalination plants) as one of the draft investment concepts for the investment of cap and trade auction proceeds. The Plan should also clarify that the capture, treatment, and use of stormwater are eligible for cap and trade auction proceeds. An increase of projects related to stormwater capture could result in an increased net reduction of water-related GHG emissions.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:58:04

No Duplicates.

**Comment 98 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Locci

Email Address: blocci@chulavistaca.gov

Affiliation:

Subject: All State Agencies Receiving Appropriations from the Greenhouse Gas Reduction Fund.

Comment:

Please see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/175-investplan2015-ws-WjlUM1MgUGEDWIA8.pdf>

Original File Name: CARB Letter Chula Vista 08\_31\_2015.docx.pdf

Date and Time Comment Was Submitted: 2015-08-31 16:04:33

No Duplicates.

## **Comment 99 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Keilly

Last Name: Witman

Email Address: keilly@kwrms.com

Affiliation: KW Refrigerant Management Strategy

Subject: Support for Incentive Program for the Use of Natural Refrigerants

Comment:

I am writing in support of the proposal to offer incentives for food retailers to use natural refrigerants. It has been clear for the past three years that the main barrier to widespread uptake of natural refrigerant technologies is the additional cost of these systems. Just like many other environmentally friendly products, like LED lightbulbs for example, natural refrigerant equipment is more expensive to start. Once manufacturers achieve economies of scales with increased volumes, costs come down. An incentive program that helps food retailers afford natural refrigerant equipment would stimulate volume, creating a virtuous cycle where the price of this advanced technology is eventually on par with traditional technologies, and the environmentally friendlier equipment choice also becomes the better financial choice.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 16:11:20

No Duplicates.

## **Comment 100 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Lance  
Last Name: Durr  
Email Address: lancedurr@gmail.com  
Affiliation:

Subject: ARB proposal for incentives for natural refrigerant use in supermarket refrigeration  
Comment:

The first time costs for natural refrigerant system can be 20% to 50% more than a base direct expansion system.

The new low GWP refrigerant cost is significantly more than existing HFCs.

A great model for initiating change towards increased sustainability/efficiency is the model the utilities use to incentivise energy reduction measures. Hopefully measures can be developed to incentivise the use of natural refrigerant and convert to the lower GWP greater energy efficiency refrigerants.

A point that should be remembered is that any costs that are realized from regulation are always passed on to the customer. Often, the very people that regulations were designed to help, are the folks who pay the greatest price.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 15:52:57

No Duplicates.

**Comment 101 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Nina

Last Name: Babiarz

Email Address: babiarz@scrttc.com

Affiliation: SCRTTC

Subject: SCRTTC 2nd Investment Plan Input

Comment:

The Southern California Regional Transit Training Consortium (SCRTTC) appreciates ARB's consideration to this relevant input to ensure that ARB's Zero-Emission Bus Deployment Project Objectives of 'Training/Workforce Development' can be effectively achieved.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/179-investplan2015-ws-AXIFYAd0V3BXJVMw.zip>

Original File Name: SCRTTC ARB Zipped Files.zip

Date and Time Comment Was Submitted: 2015-08-31 16:25:45

No Duplicates.

## **Comment 102 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Peter

Last Name: Dee

Email Address: deepeter@danfoss.com

Affiliation:

Subject: "CA's proposal for incentives for natural refrigerant use

Comment:

I am in favor of the proposal to provide funding for supermarkets  
to use natural refrigerants

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 17:03:25

No Duplicates.

## **Comment 103 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: John

Last Name: Hopkins

Email Address: ieh@cal.net

Affiliation: Cal Habitat Conservation Planning Coalit

Subject: Cpmment on Concept Paper, Natural Resources & Waste Division

Comment:

The Natural Resources and Waste Division should take a broader approach than that spelled out in the Needs Assessment.

In particular, it needs to include the full suite of ecosystems that may or may not fall under ARB's definition of rangelands (oak woodlands and savanna, grasslands, shrublands including chaparral and desert scrub and coastal scrub.) For example mature chaparral ecosystems in southern California can be a significant carbon sink (Luo et al, 2007, Oechel, 2013), oak woodlands are a carbon sink and grasslands can be a carbon sink (Liu et. al., 2012; Silver, 2009; DeLonge et. al., 2014, Baldocchi 2009.) It also needs to take into account soil carbon already sequestered and the potential to store additional soil carbon in the future.

Page 20 paragraph 1 "Targeting investments towards private landowners with easements on forest and agricultural lands that are at risk of conversion" would seem to preclude important opportunities with the broader suite of "rangelands" lands in southern California that are threatened by development but not used for livestock grazing. Investments should include both conservation easements and fee title acquisition, depending on the local situation.

The penultimate paragraph on page 19 states "California's lands should be protected and managed holistically" and in the next paragraph calls for a "landscape-level approach." This is an important way to go and should include use of existing conservation programs for strategic investments. The Wildlife Conservation Board's oak woodlands and rangeland conservation programs are an excellent opportunity.

County-scale Natural Community Conservation Plans and regional Habitat Conservation Plans being prepared or implemented across the state will, when completed, provide permanent conservation of over 2 million acres with both fee simple acquisition and conservation easement approaches. This includes significant acreage in addition to acres protected to mitigate for impacts of economic activities. Until protected, most of these lands are threatened by development or conversion. The conservation protects existing sequestered carbon, and provides opportunities for additional carbon sequestration. The requirement for management plans and adaptive management programs will, in many cases, provide opportunities for habitat-friendly management that increases carbon sequestration. This conservation planning takes a landscape scale approach and is holistic in that it provides many of co-benefits. Including opportunities for investment in these conservation plans through appropriate competitive grant programs needs to be a significant part of the next three-year plan.

Recognize that the loss of natural ecosystems is severe and ongoing. Liu et al (2012) projected that 17 percent of the grassland and shrubland areas in California's Mediterranean climate region will be lost to conversion between 2005 and 2050. The major



causes are urban/suburban/rural development and conversion to orchards and vineyards. Essentially all of the remaining coastal sage scrub habitat in southern California that is not protected as conservation land (primarily through Natural Community Conservation Plans) will be lost to suburban and rural development. All of these conversions will result in substantial release of CO<sub>2</sub> into the atmosphere. For example, conversion of natural ecosystems to agricultural land results in loss of 25 to 50 percent of the original organic carbon (Lal, 2001).

When natural and working lands are converted to urban / suburban or rural development there are two carbon impacts. The first is loss of vegetation and soil carbon from land clearing and grading. The second is long term increased carbon emissions by vehicles and other uses in the developed areas. For example, a recent UC Davis study of Yolo County shows that the annual carbon emissions level of urban lands is 219-fold higher than rangelands and 70-fold higher than irrigated croplands (Jackson et al, 2012).

Recognize the full variety of co-benefits from the conservation of natural and working lands and which are an essential part of the holistic, landscape scale, approach. These include protection and restoration of healthy watersheds, groundwater recharge, retention of floodwaters in natural and agricultural floodplains, protection and restoration of healthy ecosystems with their essential ecosystem function and processes, recreation and nature appreciation opportunities for urban dwellers, tourism, sustaining family ranches and farms and rural communities.

#### References

Baldocchi D. (2009) Carbon and Water Exchange of an Oak-grass Savanna and Peatland Pasture Ecosystem. Berkeley Faculty Roundtable on Environmental Services in Rangeland Production Systems. March 20 2009. University of California, Berkeley.

DeLonge MS, Owen JJ and Silver WL. (2014) Greenhouse Gas Mitigation Opportunities in California Agriculture: Review of California Rangeland Emissions and Mitigation Potential. Nicholas Institute GGMCA R 4. Durham, NC: Duke University

Jackson L. et.al. (2012) Adaptation Strategies for Agricultural Sustainability in Yolo County, California. California Energy Commission Publication number: CEC-500-2012-032.

Lal R. (2001) World Cropland Soils as a Source or Sink for Atmospheric Carbon, *Advances in Agronomy*. 71:145-191.

Liu S. et. al. (2012) Baseline and Projected Future Carbon Storage and Greenhouse-Gas Fluxes in Ecosystems of the Western United States. In Zhu S and Reed BC, eds. Baseline and Projected Future Carbon Storage and Greenhouse-Gas Fluxes in Ecosystems of the Western United States. Chapter 5. U.S. Geological Survey Professional Paper 1797. Reston VA.

Luo H. et.al. (2007) Mature Semiarid Chaparral Ecosystems can be a Significant Sink for Atmospheric Carbon Dioxide. *Global Change Biology*. 13:386-396.

Oechel W. (2013) The Effects of Climate Change: Elevated CO<sub>2</sub>, Climate Variability, and Fire, on the Functioning and Atmospheric Feedbacks of Chaparral of Southern California and the Desert of Baja California, Mexico. Powerpoint presentation. February 6 2013.  
[www.otmed.fr/IMG/pdf/Walter\\_Oechel\\_06\\_February\\_2013.pdf](http://www.otmed.fr/IMG/pdf/Walter_Oechel_06_February_2013.pdf)

Silver WL (2009) Soil Carbon Pools in California Rangeland Soils: Implications for Carbon Sequestration. Berkeley Faculty Roundtable on Environmental Services in Rangeland Production systems. March 6 2009. University of California, Berkeley.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 17:01:53

No Duplicates.

## **Comment 104 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Scott  
Last Name: Martin  
Email Address: scott.martin@hillphoenix.com  
Affiliation: Hillphoenix

Subject: Proposal for incentives for use of natural refrigerants  
Comment:

Hillphoenix is in favor of this proposal to incentivize the use of natural refrigerants, in lieu of traditional chemical refrigerants for commercial refrigeration. The standard supermarket refrigerant has a very high GWP around 4000. An incentive program like this could push the use of natural refrigerants, which have a GWP from 0 to less than 10, across the United States as retailers could use these funds to offset the cost of natural refrigerant systems. Currently, these systems are a premium over traditional refrigerant systems, due to the lower volume. However, a program to offer incentives for their use would increase the volume and lower the premium making them affordable for all. Many retailers have stated that if these systems were the same price as standard systems they would switch immediately.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 16:58:09

No Duplicates.

**Comment 105 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Alan

Last Name: Abbs

Email Address: alan@capcoa.org

Affiliation: CAPCOA

Subject: Support for Wood Stove Change Out Program

Comment:

Please consider the attached letter of support for a wood heating device change out program from the California Air Pollution Control Officers Association.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/183-investplan2015-ws-AWIGYQNYADBQOQBh.pdf>

Original File Name: CAPCOA Letter - Support for Inclusion of Wood Heating Device Change Out Program 8.31.2015 - FINAL.pdf

Date and Time Comment Was Submitted: 2015-08-31 20:18:33

No Duplicates.

## **Comment 106 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Cohen

Email Address: jcohen@eosclimate.com

Affiliation:

Subject: Incentive for low GWP refrigeration equipment

Comment:

Our company is focused on reducing emissions of fluorochemicals used in refrigeration and air conditioning (R/AC) and in other applications. In addition to California's refrigerant management program to reduce leaks of fluorinated gases from refrigeration equipment, there are several important ways that California can reduce emissions of these gases and promote transitions to low GWP alternatives. However, we believe subsidizing installation of low-GWP refrigeration systems for California businesses would have limited impact and would not be a cost-effective use of cap-and-trade revenue. First, beginning in the 3rd quarter of 2015, there will be "incentives" for installation of such systems via carbon credits. Direct subsidies by California would fail to provide a scalable solution given the capital expense involved, i.e., unless the State decides to invest tens of millions of dollars into this, there would likely only be enough funds for a handful of new systems. Also, defining a "California business" based on location of its corporate headquarters would unfairly exclude many businesses who have supermarkets, food production facilities, etc in the state, resulting in an uneven allocation of funds. A more efficient approach would be for California to recognize verified GHG credits generated via 3rd party standards for installation of advanced, low-GWP refrigeration systems, and for use of reclaimed HFC refrigerants for servicing of the thousands of existing HFC systems that will continue to operate in the State for decades to come.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 21:02:14

No Duplicates.

## **Comment 107 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Broome  
Email Address: cvbroome@gmail.com  
Affiliation: 350 Bay Area

Subject: Woodsmoke reduction--replacements should be GHG emissions free  
Comment:

Comments on draft Cap and Trade Auction Proceeds Investment Plan

350 Bay Area is a 7,500 member climate activist organization working for deep reductions in carbon pollution in the nine San Francisco Bay Area counties and beyond. We applaud the draft Cap and Trade Auction Proceeds Investment Plan for addressing wood smoke pollution, but strongly suggest that GHG Reduction funds should only be used to replace wood-burning stoves and fireplaces with clean alternatives that are efficient and zero-emission on site, such as electric heat pumps. Programs should not be funded if they replace wood-burning devices by other carbon-producing or greenhouse gas emitting devices.

Page 15 of the draft investment plan describes the target of reducing residential wood smoke from home heating. We agree with the importance of this target: According to the Bay Area Air Quality Management District's data, wood smoke from fireplaces and wood stoves is the major source of particulate matter pollution in the Bay Area in the winter months, causing significant public health impacts, especially to children, the elderly, and the one in seven residents who suffer from respiratory illnesses, such as asthma and bronchitis. These impacts are the most apparent to disadvantaged communities as they live in areas without natural gas service and in areas where generalized wood smoke pollution is augmented by localized industrial and transportation emissions, increasing the likelihood that residents of these communities will develop a respiratory illness.

The current investment plan suggests (p 15) "there are climate and air quality benefits to be gained by aiding the replacement of inefficient fireplaces and wood stoves with natural gas heating (if available) or the most efficient lowest polluting wood stoves."

We urge that the investment plan require that wood-burning stoves and fireplaces are replaced with clean alternatives that are efficient and zero-emission on site, such as electric heat pumps.

While EPA-certified wood-burning devices generate lower particulate emissions than non-certified devices, laboratory performance of EPA-certified devices do not mirror real-world performance because testing procedures do not mirror in-home conditions. Moreover, EPA-certified devices still emit significant levels of particulate pollution, consume large amounts of wood fuel, and have not been shown to effectively reduce emissions of toxics, such as dioxins and furans.

Using EPA-certified wood-burning devices as the replacement would also run counter to efforts, such as the Marin Carbon Project, to accelerate carbon sequestration, as burning wood can actually result in higher carbon emissions than burning coal as it takes much longer to regrow a large tree than to burn it.

Natural gas may burn cleaner than wood, but it still emits a significant amount of carbon dioxide and is a major contributor to climate change. As a fossil fuel, natural gas has significant climate-disruption impacts due to the methane and carbon dioxide that is emitted during its extraction, transport, and burning.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/187-investplan2015-ws-BjUBMgc2VlpWMIQ1.docx>

Original File Name: 350 Bay Area woodsmoke pollution reduction.docx

Date and Time Comment Was Submitted: 2015-08-31 22:41:54

No Duplicates.

## **Comment 108 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Broome  
Email Address: cvbroome@gmail.com  
Affiliation:

Subject: Investment plan--public transit comments  
Comment:

Success in meeting California GHG reduction transportation goals requires more than low emission vehicles. One objective should be a public transit system that truly meets the public needs and provides an acceptable substitute for individual vehicle use. A system which is not overcrowded, seamlessly integrates across geographic areas, and which operates during the hours that users need. In return for receipt of greenhouse gas reduction funds, transportation districts should be required to make commitments for integration in regional transportation systems and be held accountable for specific improvements in public service.

GHG Reduction Fund investments should also be directed to communication campaigns to educate the public that public transit is a public good; one doesn't expect to pay to use a building elevator--why not consider a viable public transit system in the same way. Public transit is necessary for municipal areas to function, especially with the urgent need to decrease use of internal combustion engines. The cost should be covered from public funds, including GHG Reduction Funds, and there should be no expectation that fares will be sufficient.

Innovation funds could be used to encourage pilots of use of autonomous vehicles to address the "last mile problem" in improving public transit systems.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-08-31 22:59:43

No Duplicates.



## **Comment 109 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Deborah

Last Name: Moore

Email Address: deborah@greenschools.net

Affiliation: Green Schools Initiative

Subject: K-12 public schools should be included in Investment Plan

Comment:

On behalf of the 31 undersigned organizations and individuals, Green Schools Initiative is submitting comments to recommend that K-12 public schools be included as an urgent investment priority for Greenhouse Gas Reduction Fund investments in ARB's draft Three Year Investment Plan. We recommend that a new "Sustainable Schools" goal be established and supported by a new "Healthy & Sustainable Schools" grant program aligned with the California Department of Education's existing Green Ribbon Schools recognition program.

One in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's greenhouse gas emissions from energy and water use, transportation, waste, heat island effects, and more. We support the ARB's goals for sustainable communities and reducing greenhouse gas emissions 40% below 1990 levels by 2030. We believe that California cannot achieve its goals for sustainable communities and greenhouse gas reductions without the participation of the state's 10,300 public K-12 schools. Schools are the heart of our communities, housing more than 6 million children and thousands of teachers and staff every day. Schools are responsible for about 5% of municipal solid waste or about 763,817 tons per year, about half of which is food waste (contributing to landfill methane emissions) and about one-third is paper waste. Schools have enormous roof and asphalt-covered acreage contributing to heat island effects and polluted stormwater runoff. Dirty diesel school buses spew black carbon, increasing vulnerable children's exposures, according to ARB's own studies.

We urge ARB to include "Sustainable Schools" as an investment element in its Three Year Investment Plan 2016-2019 and to ensure that K-12 public school districts - especially those in disadvantaged communities designated by CalEPA - are eligible to receive GGRF funds via existing or new grant programs. While we recognize that K-12 schools do not fall under the Administration's jurisdiction, sustainable, healthy schools are critical to achieving the State's greenhouse gas reduction goals. Currently, the barriers for K-12 school districts to pursue greenhouse gas reduction funds are too high, requiring separate complex applications and reporting to different agencies, and managing separate partnerships in order to be eligible.

We recommend the establishment of a "Healthy & Sustainable Schools" integrated grant program for school-based climate action projects that would align with and be coordinated by the California Department of Education's existing Green Ribbon Schools award and recognition program.

ARB can also consider other means of including K-12 schools and districts in its investment priorities, whether through strengthening existing programs, changing eligibility requirements of existing programs, and/or including schools in other programs aimed at achieving Sustainable Communities.

Green Schools Initiative is a non-profit that works to reduce the environmental footprint of K-12 schools and promote environmental literacy. The 31 organizations and individuals signing this letter support schools and students in reducing the carbon footprint and improving the sustainability of K-12 school buildings, grounds, and operations; promoting healthy, resilient communities; and teaching environmental and outdoor education and climate literacy. We believe that sustainable schools and environmental literacy are fundamental to California's health, prosperity, and security. Thank you for your consideration of our comments to include schools as part of California's solution for mitigating climate change.

The attached letter has more information about how many tons of GHG emissions reductions are possible via green, sustainable schools and lists all the signatories of the letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/189-investplan2015-ws-VTIAYQd0U2YKUwBp.pdf>

Original File Name: GGRF Investment Plan GSI Comment Ltr (8-31-15).pdf

Date and Time Comment Was Submitted: 2015-08-31 23:20:35

No Duplicates.

## **Comment 110 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Paul

Last Name: Bevington

Email Address: paul.bevington@cartersynergy.com

Affiliation: Carter Group

Subject: California proposal to give incentives for the use of natural refrigerants

Comment:

I am in favor of the proposed encouragement and funding for the use of low GWP natural refrigerants. It is great that CA is looking to take a lead with this and I hope this example will be followed nationwide soon.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 03:32:22

No Duplicates.

**Comment 111 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Linida

Last Name: Rudolph

Email Address: linda.rudolph@phi.org

Affiliation: Center for Climate Change & Health PHI

Subject: Concept paper on triennial investment plan

Comment:

Please see the attached comments on the Draft Cap and Trade Auction Proceeds Triennial Investment Plan concept paper, submitted on behalf of the Center for Climate Change and Health at the Public Health Institute. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/191-investplan2015-ws-UDMFZgNsUnVXNAh6.docx>

Original File Name: Center for CLimate Change and Health Investment Plan Concept Paper comments.docx

Date and Time Comment Was Submitted: 2015-09-01 03:57:51

No Duplicates.

## **Comment 112 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Geoff

Last Name: Amos

Email Address: geoff.amos@cre-ltd.co.uk

Affiliation:

Subject: CA's proposal for incentives for natural refrigerant use

Comment:

I am in favor of the proposal to provide funding for supermarkets to use natural refrigerants. Spearheaded by the state of California this will stimulate the use of natural refrigerants across the USA. This will enable a capital cost realization in volume as natural alternatives become the norm as is already the case in the European Union where similar initiatives have been the driver to this market.

The incentives will significantly aid the reduction of direct greenhouse emissions from supermarkets noting that 40% of CA's HFC emissions are currently emanating from supermarket refrigeration activity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 04:55:44

No Duplicates.

**Comment 113 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Rob  
Last Name: Arthur  
Email Address: roba@ctagroup.com  
Affiliation:

Subject: CA's proposal for incentives for natural refrigerant use.  
Comment:

I am in favor of the proposal to provide funding for supermarkets to use natural refrigerants.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 07:11:50

No Duplicates.

## **Comment 114 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: john

Last Name: davis

Email Address: recyclingjpa@gmail.com

Affiliation: Mojave Desert and Mountain Recycling Aut

Subject: recycled materials manufacturing

Comment:

The Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Fiscal Years 2016-17 through 2018-19) includes investment concepts focusing on reducing methane release from organic waste. Thank you for addressing this important short lived GHG pollutant by expanding composting and anaerobic digestion infrastructure. However the Concept Paper does not include recycled materials manufacturing support, which is a key Waste Sector Scoping Plan concept. Taking ownership of waste generated in California means expanding that remanufacturing infrastructure using 21st century technology fueled by California's increasingly renewable energy sources. Continuing to rely on out-of-state markets not only means higher greenhouse gas emissions but loss of jobs, wealth and business opportunities. California should not be relying on uncertain foreign markets when recycled materials can be used here more beneficially. Please include recycled manufacturing as a concept in the Second Investment Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 07:25:25

No Duplicates.

## **Comment 115 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Daphne  
Last Name: Ferguson  
Email Address: dferguson@enerkem.com  
Affiliation:

Subject: Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Dear Chair Nichols,

Enerkem appreciates the opportunity to provide comments regarding the concept paper developed by the Air Resources Board (ARB), Cap-and-Trade Auction Proceeds Second Investment Plan (Second Investment Plan).

Enerkem is a leading waste-to-biofuels and chemicals company. We produce clean fuels and green chemicals from non-recyclable municipal solid waste, thus helping diversify energy sources while offering a sustainable alternative to landfilling and incineration. Converting residual wastes into renewable low-carbon liquid fuels reduces greenhouse gas (GHG) emissions by displacing the use of fossil fuels in transportation, and reduces emissions of methane—a potent greenhouse gas—resulting from the landfilling of organic wastes.

Our facility in Edmonton, Alberta (Canada) is the world's first commercial biorefinery to use municipal solid waste (MSW) to produce biomethanol and ethanol. We are currently developing biorefineries in North America and globally using our proprietary biofuels technology, developed in-house since 2000. We are actively exploring opportunities to invest in future waste-to-biofuels and renewable chemicals facilities in the State of California.

Enerkem supports ARB's Second Investment Plan and believes that investment of Greenhouse Gas Reduction Fund (GGRF) funds in the concepts outlined in the Plan will make a significant contribution to reducing GHG emissions in California. We have a number of specific comments and recommendations in relation to the areas of Enerkem's business and technical expertise: the potential for emissions reductions and economic development relating to waste diversion and the production of low carbon fuels and chemicals.

Incentivizing in-State production of low carbon fuels:

Given that the transportation sector is the economic sector with the greatest emissions in California, responsible for 37% of all of State GHG emissions, we strongly agree with the Concept Paper's inclusion of low carbon fuels as an essential part of ARB's Second Investment Plan. Low carbon liquid fuels such as those produced by Enerkem can be added to the gasoline pool and used in today's vehicles and with existing storage, blending and distribution infrastructure. They can be blended into gasoline at levels of up to 15% for most existing conventional passenger vehicles and up to 85% for use in Flex-Fuel vehicles, of which there are an estimated one million vehicles on the road in California today.

Currently, much of the renewable fuel used in California is imported. With the right policy signals however, California can encourage the build-out of in-State production capacity for low carbon renewable fuels. Growing in-State production capacity for



these fuels will help to achieve the deep emissions reductions that California is targeting—by increasing the supply of low-carbon fuels on the California market—as well as drive economic development in California’s Disadvantaged Communities. Enerkem therefore supports the inclusion of incentives for in-State production of low carbon renewable fuels in the Second Investment Plan, as proposed in the draft Investment Concepts for Transportation and Sustainable Communities (Figure 3, p. 12) in the Draft Concept Paper.

Such incentives, to be effective, should be designed to instill investor confidence and overcome the significant challenges associated with financing of innovative technology projects. Programs and policies that address project financing—including capital grants, loans and loan guarantees, as well as tax and production incentives—are the most effective approaches for attracting private investment. In addition, such programs need to have sufficient time frames to allow for the planning, permitting and construction of commercial-scale facilities.

The Draft Concept Paper further recognizes the importance of investing in waste-to-fuel technology in the list of draft Investment Concepts for Natural Resources and Waste Diversion (Figure 7, p. 21). Enerkem supports the proposal to reduce methane emissions from organic waste by investing in equipment and infrastructure to create transportation fuel from residual biomass. However, to ensure that the opportunity for reducing GHG emissions through the conversion of urban wastes is captured, we recommend that the Second Investment Plan specifically identify the use of mixed non-recyclable MSW, and industrial and commercial wastes, for such ends.

#### Economic and environmental benefits for Disadvantaged Communities:

Waste-to-biofuels facilities are uniquely positioned to co-locate with existing waste management and/or petroleum refining infrastructure. Because conventional waste treatment and refining infrastructure generates air pollution and carries other environmental risks that can negatively impact public health, many potential sites for developing new waste-to-biofuels facilities are located in areas designated as Disadvantaged Communities—communities that are disproportionately affected by environmental pollution and home to low-income and vulnerable populations.

Siting new innovative waste-to-biofuels facilities in such communities will have numerous positive impacts locally on public health and economic development, including:

- Diversion of waste from landfills decreases air pollution as well as other environmental nuisances that negatively impact public health including odours, noise and dust;
- Siting of waste-to-biofuels facilities near waste transfer stations reduces the volume of waste being sent to landfill and thereby reduces the transportation emissions associated with transportation of wastes;
- Waste-to-biofuels facilities generate high quality jobs and stimulate the local economy. For example, an independent study by Doyletech Corporation evaluated that 610 direct and indirect jobs were created during the construction of the Enerkem Alberta Biofuels facility in Edmonton, Canada, while 152 direct and indirect permanent jobs are created during operations. Net local economic benefit is estimated at \$50 million USD annually.

Beyond the communities where facilities are located, growth in clean domestic infrastructure for waste conversion and production of biofuels and renewable chemicals will bring economic advantages for all of California. Benefits include securing inward investment, developing new industry expertise in a range of existing and emerging technologies and providing security of supply. Once a California-based industry is established, these companies will be

able to export this technology and its associated service sector elsewhere in the United States and around the world, maximising the return on the initial investment.

Technology and end-use neutrality to maximize GHG emissions reductions and economic benefits:

Enerkem supports the use of GGRF funds to drive further reductions in GHG emissions. The Draft Concept Paper indicates that organic waste is responsible for more than half of the State's methane emissions and rightly identifies the importance of diverting waste from landfill to reduce emissions of methane. However, on p. 20 of the Concept Paper, only composting and anaerobic digestion are mentioned as available technologies for redirecting organic matter from landfill for generation of energy and other useful products. As other technologies exist for converting organic material to biofuels and renewable chemicals and bioproducts—including Enerkem's proprietary thermochemical technology—we wish to stress the importance of technology neutrality in the Second Investment Plan. Programs to incentivize organic waste diversion and conversion of wastes to biofuels and other useful products should be technology and end-use neutral, and prioritize projects solely on the environmental benefits that can be delivered, in order to maximize the emissions reductions achieved by the Plan.

Technology and end-use neutrality is particularly important in the context where we see a growing convergence of the biofuels and chemicals industries. Increasingly, companies are developing integrated biorefineries that can produce a range of end-products, including biofuels, biobased chemicals, electricity and a variety of co-products. The multi-product approach allows to capture greater value from wastes and residues and to mitigate market risk, thereby increasing the potential for waste conversion and the associated emissions and other environmental benefits.

We look forward to further engaging with ARB over the process to develop the Second Investment Plan, to ensure that GGRF funds are invested wisely and yield the highest possible dividends in terms of GHG reductions, other air quality benefits, petroleum reduction, benefits to Disadvantaged Communities, and the expansion of California's clean economy.

Sincerely,

Marie-Helene Labrie  
Senior Vice-President, Government Affairs and Communications

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/195-investplan2015-ws-VDFVPVUxWHISP1cy.pdf>

Original File Name: Enerkem comments ARB funding plan\_20150801.pdf

Date and Time Comment Was Submitted: 2015-09-01 07:41:05

No Duplicates.

## **Comment 116 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Charles

Last Name: Hon

Email Address: chon@truemfg.com

Affiliation: True Manufacturing Co

Subject: CAs proposal for incentives for natural refrigerants use

Comment:

We at True Manufacturing strongly support the incentive proposal for natural refrigerants. We see the need to reduce the use of high GWP refrigerants.

Markets do not move without drivers. The EPA SNAP regulations will drive the Self-contained Commercial Refrigeration to low GWP refrigerants, but will not drive the markets away from the "F" gases, which are questionable at best. The regulations allow the high GWP equipment to be manufactured and marketed for up to 4 1/2 more years.

Many customers do not want to change gases because of market acceptance of the traditional refrigerants that have high GWPs. Without some reason to change before the 2019/2020 deadlines, they will continue to use the "known technology," until they are forced by regulation, to buy alternates.

Many manufacturers claim that there will be no supply of equipment, if the SNAP and/or California proposals goes forward. We disagree with these comments. We have completed the design and listing of a relatively complete line of glass door and solid door commercial units.

R-290 and R-600A refrigeration units are much more energy efficient than the R-134a or R-404A equipment in the market today. (10% to 40% less power)

The California proposal would do several things. It could help cover any additional costs for the new technologies, it would get buyers to notice that there are alternates available and it would reduce the total electrical load of the equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 07:29:22

No Duplicates.

## **Comment 117 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Lynch

Email Address: danielle@caleec.com

Affiliation:

Subject: CALCC Comments - ARB Investment Concepts

Comment:

Attached below is a comment letter for the ARB Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan on behalf of the California Association of Local Conservation Corps.

Thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/197-investplan2015-ws-AWICZQZrVGQLblIN.pdf>

Original File Name: CALCC Comments - ARB Investment Concepts.pdf

Date and Time Comment Was Submitted: 2015-09-01 08:51:42

No Duplicates.

## **Comment 118 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Carrie  
Last Name: Hendrickson  
Email Address: carrie@guayaki.com  
Affiliation: Guayaki SRP Inc.

Subject: : Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

Guayaki is a small to medium sized business in the County of Sonoma. We received technical assistance from our local Sonoma Green Business Program to become certified by our local government. As a result, we saved water, electricity, increased recycling, switched to greener cleaning products, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates. Small and medium sized businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become recognized Green to save resources, save money and attract customers. The Sonoma Green Business Program is a successful one-stop shop for small to medium sized businesses like Guayaki to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage the panel for the Investment Plan, the Governor's office, and the State legislature to consider including a small business element in your investment plan.

Thank you,  
Carrie Hendrickson  
Guayaki SRP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 09:14:55

No Duplicates.

**Comment 119 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Andrea

Last Name: Mackenzie

Email Address: amackenzie@openspaceauthority.org

Affiliation: Santa Clara Valley Open Space Authority

Subject: Santa Clara Valley Open Space Authority Comments

Comment:

Attached are SCVOSA's comments on the Draft Concept Paper for the  
Second Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/199-investplan2015-ws-B2hTJgFhWFQCKQNc.pdf>

Original File Name: OSA - Investment Plan Comments 2015 08 31.pdf

Date and Time Comment Was Submitted: 2015-09-01 09:29:33

No Duplicates.

**Comment 120 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Roberson  
Email Address: lroberson@crpd.com  
Affiliation: Cordova Recreation and Park District

Subject: Draft Cap and Trade Auction Proceeds Investment Plan Comments  
Comment:

Please see attached comment letter.  
Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-investplan2015-ws-BWZSNVIjAg5XMA dp.docx>

Original File Name: Cap and Trade\_Round 2 Comments to ARB.docx

Date and Time Comment Was Submitted: 2015-09-01 09:47:54

No Duplicates.

## **Comment 121 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Coats

Email Address: coatsd@emwd.org

Affiliation: Eastern Municipal Water District

Subject: Water Investments - Comments on the Cap-and-Trade Auction Proceeds - Draft Concepts  
Comment:

Eastern Municipal Water District (EMWD) would like to express its appreciation for the opportunity to provide comments to the California Air Resources Board (CARB) on the Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts for the appropriation of moneys from the Greenhouse Gas Reduction Fund (GGRF). EMWD is pleased that water use efficiency continues to be prioritized within the Draft Concepts for the Investment Plan, and we further support the recognition that water use efficiency measures have a direct impact on greenhouse gas (GHG) emissions reductions.

We would kindly like to refer staff and interested individuals to the attached comment letter for a fuller discussion on potential water related opportunities for GGRF investment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-investplan2015-ws-USdQZAdZUGYFblcg.pdf>

Original File Name: V2 EMWD Cap and Trade Second Investment Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-09-01 09:39:48

No Duplicates.



## **Comment 122 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Andrea

Last Name: Mackenzie

Email Address: amackenzie@openspaceauthority.org

Affiliation: Santa Clara Valley Open Space Authority

Subject: Comments on Draft Concept Paper

Comment:

Attached are SCVOSA's comments on the draft concept paper for the second investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/202-investplan2015-ws-BWoFcAZmVVkKIQZZ.pdf>

Original File Name: OSA - Investment Plan Comments 2015 08 31.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:13:47

No Duplicates.

**Comment 123 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Miya  
Last Name: Kitahara  
Email Address: miya@stopwaste.org  
Affiliation: StopWaste

Subject: Local Government Integrated Programs, Recommended Investment Concepts  
Comment:

Please see attached PDF.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-investplan2015-ws-AmFQOVQ7BTVRMgd3.pdf>

Original File Name: Concept Paper Comments StopWaste.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:18:40

No Duplicates.

## **Comment 124 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sandy  
Last Name: Larson  
Email Address: slarson@vending.org  
Affiliation: CAVC

Subject: Comments from Vending Industry  
Comment:

Comments on Investment Plans:

CAVC is an affiliated state council of the National Automatic Merchandise Association (NAMA), representing hundreds of large and small businesses that provide vending and refreshment services to thousands of customers in California each day and employing hundreds of workers in the state. Members of the CAVC represent a full range of on-site food and refreshment service companies in California including vending and refreshment services operators, suppliers, machine manufacturer, brokers and distributors.

We strongly encourage the panel for the Investment Plan, the Governor's office, and the State legislature to consider including a small and medium business element in your investment plan. The vending industry in California would appreciate consideration in this plan. The conversion to new refrigerants for vending machines will have a major impact on the vending industry. It would create the need for facility changes, new charging, recovery and handling equipment, training, tooling changes and new parts inventory. There will be costs incurred at both the manufacturing level and also for the businesses in California that purchase this equipment.

The average vending machine costs approximately \$6,000.00 which is a significant capital outlay for a small business. It is unclear whether existing machines can be retrofitted to use the new refrigerant or if they will need to be replaced completely. In both situations an incentive or rebate program for the vending companies would enable them to move forward with replacing or retrofitting equipment.

Attachment:

Original File Name: Comments on CARB Investment Plans.docx

Date and Time Comment Was Submitted: 2015-09-01 10:21:29

No Duplicates.

## **Comment 125 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Marc  
Last Name: Chasserot  
Email Address: marc.chasserot@shecco.com  
Affiliation: shecco America

Subject: Proposal for incentives for low GWP natural refrigerant technology  
Comment:

shecco America welcomes and supports the suggestion to provide incentives to California businesses to install low-GWP natural refrigerant-based refrigeration and air conditioning technology thereby reducing the use of f-gases, as suggested in the Draft Investment Plan Concept Paper.

The upfront cost of equipment using natural refrigerants (ammonia, CO2, hydrocarbons, water and air) is often higher in certain sectors, where these refrigerants are not yet the standard technology, even though the overall life-cycle cost is lower than for conventional technology that relies on f-gases, thanks to better energy performance, lower maintenance costs and other factors.

From the end-user perspective, especially for small and medium-sized businesses and individuals, the 'price tag' is often the decisive factor when purchasing new equipment. Subsidies can alleviate the barriers and provide support to California businesses while maximizing ozone and climate benefits. Subsidies would accelerate economies of scale, which would have impact on reduction of cost of such technology over a certain period of time.

Subsidies to purchase natural refrigerant equipment in California will help the state accelerate the adoption of this technology in line with its goal to reduce the use of HFCs in new refrigeration and air-conditioning equipment at least by 80% by 2030. This would in turn have effect on the adoption of natural refrigerants across the country.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 10:28:53

No Duplicates.

**Comment 126 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: GEORGE

Last Name: LANGE

Email Address: glange@crpd.org

Affiliation: MTN. RECREATION & CONSERVATION AUTHORITY

Subject: Comments on Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

See attached. Please send follow-up correspondence to  
spencer.eldred@mrca.ca.gov.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/208-investplan2015-ws-VzpTJ1AyAjBQCQFt.pdf>

Original File Name: MRCA Letter.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:27:19

No Duplicates.

**Comment 127 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: California ReLeaf Network Written Comments on Draft Investment Plan Concept Proposal  
Comment:

Please see attached, and thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/209-investplan2015-ws-UDMGYQNwVGUCWwFz.pdf>

Original File Name: CARB ReLeaf Network written comments 8-31-15.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:34:41

No Duplicates.

**Comment 128 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: JOSEPH

Last Name: EDMISTON

Email Address: edmiston@smmc.ca.gov

Affiliation: Santa Monica Mountains Conservancy

Subject: Comments on Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/210-investplan2015-ws-WilUPwZqVGRRCARo.pdf>

Original File Name: SMMC Letter 1.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:37:51

No Duplicates.

**Comment 129 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Tammy  
Last Name: Cronin  
Email Address: tammy.cronin@valleyvision.org  
Affiliation: Cleaner Air Partnership

Subject: SUPPORT Cap-and-Trade Investment for California Businesses in the GGFR Investment Plan  
Comment:

Please see attached letter of support from the Cleaner Air Partnership.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/211-investplan2015-ws-AGNdNwZiBDYHb1I3.pdf>

Original File Name: CleanerAirPartnership\_SUPPORT\_InvestmentPlan.pdf

Date and Time Comment Was Submitted: 2015-09-01 10:35:50

No Duplicates.



## **Comment 130 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Lautze  
Email Address: slautze@oaklandnet.com  
Affiliation: President, CARMDZ

Subject: Include Recycled Materials Based Manufacturing  
Comment:

I am writing on behalf of the Calif. Assn. of Recycling Market Development Zones (CARMDZ), which represents 36 special districts covering over half of the state -- with at least 15 of those zones including disadvantaged communities. RMDZs partner with CalRecycle to offer specialized assistance to processors and manufacturers utilizing recycled materials collected in California, cutting GHGs and landfilling, and generating sustainable, high quality jobs with materials that would otherwise be landfilled or go off shore. The priority of such work has been recognized in CalRecycle's strategic plans, but these programs have been under-resourced for nearly a decade.

The clear and continuing commitment in the DRAFT Second Investment Plan to prioritize infrastructure development for organic materials is "right on the money", since proper management of organics is undoubtedly critical to reducing generation of methane. That said, CARMDZ feels that it should also be a continuing priority of the next investment plan to support infrastructure development for other recycled materials (carpet, plastics, mattresses, etc.), particularly since this was a key Waste Sector Scoping Concept previously established by ARB.

Currently, up to 80% of recycled materials are exported to China or other offshore markets, and Chinese factories are still up to 70% coal fired. Investing now and through the next investment plan in domestic facilities for recycling-based manufacturing will significantly reduce GHGs generated from California materials; will create stable jobs in disadvantaged and other communities; and will help to implement California's ambitious 75% recycling by 2020 goal, which is a structural pathway to institutionalized GHG reduction statewide.

Investing GHG dollars in recycling AND compost facilities will also leverage private investment in innovative, evolving technologies, and can utilize a variety of funding mechanisms besides grant programs, including GHG Reduction and RMDZ loans, and broader incentives such as "recycling incentive fees", which reward recycling based manufacturers on a per pound basis for incorporating recycled materials into finished products.

Thank you for the opportunity to give input to the Second Investment Plan, and for your consideration of this feedback.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 10:26:19

No Duplicates.

**Comment 131 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Matt

Last Name: Levesque

Email Address: mlevesque@santa-clarita.com

Affiliation: City of Santa Clarita

Subject: City of Santa Clarita Comments on Draft Investment Plan  
Comment:

Please accept the City of Santa Clarita's comments on the Second Investment Plan Draft Concept provided by Mayor Marsha McLean.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/214-investplan2015-ws-Uj9SOQEtAz0DK1cI.pdf>

Original File Name: MM-M. Nichols - CA Air Resources Board.pdf

Date and Time Comment Was Submitted: 2015-09-01 11:01:09

No Duplicates.

## **Comment 132 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Molly  
Last Name: Richardson  
Email Address: molly@ganauamerica.com  
Affiliation:

Subject: Inclusion of a Small to Medium Business Category in the GGRF Investment Plan  
Comment:

Ganau America is a cork supplier located in Sonoma County with customers throughout North America. As a business that relies on a renewable resource, we are committed to long-term sustainable practices. Ganau America obtained a Sonoma Green Business Program Certification in November 2011 and, with technical assistance provided by our local Sonoma Green Business Program, we have worked hard to lower our carbon footprint. We could still do more with additional assistance and rebates. Small and medium-sized businesses like ours make up a large part of the economy in California. The Sonoma Green Business Program is an excellent resource for businesses like ours to go green; saving both money and resources. We highly recommend any business to go through the program. If more of these businesses began making the changes that we did, there would be huge environmental and economic benefits. We strongly encourage the panel for the Investment Plan, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 11:34:09

No Duplicates.

## **Comment 133 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Bryan  
Last Name: Beitler  
Email Address: bbeitler@sourcerefrigeration.com  
Affiliation:

Subject: Calif. proposal for incentives for natural refrigerant useage  
Comment:

It is my belief that promoting use of low GWP or natural refrigerants is in the best interest of all Californians, and that providing funding or incentives for supermarket owners or other commercial operators to install these natural or low GWP refrigerants is essential. Also, operators of cold storage facilities, or other refrigerated spaces where there are choices to use either traditional high GWP HFC refrigerants versus low GWP or natural refrigerants should also be included.

One of the main reasons I am supporting these sorts of programs would be to get the ball rolling for more installations to take place, which in turn should reduce the cost of these alternative means of refrigeration. By installing more locations, the potential for greenhouse gas emission reductions is significant, and presents an environmental benefit. These systems can also be very energy efficient, which defers power plant construction or strain on the electrical grid.

Therefore, I am in support of any proposals within the state of Ca. that would provide funding or incentives for end users to use natural refrigerants. These end users may be grocery retailers, convenience stores or small food retail, cold storage or other non food retail refrigeration operators, etc.

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 11:30:16

No Duplicates.

## **Comment 134 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jim

Last Name: Vannan

Email Address: jvannan@sourcerefrigeration.com

Affiliation:

Subject: CA's proposal for incentives for natural refrigerant use

Comment:

I am in favor of the proposal to provide funding for supermarkets to use natural refrigerants. Without funding, and with the higher costs of natural refrigerant refrigeration systems, many supermarket chains will continue down the path of "that's the way we always do it" by remaining with HCFC's. This funding, will help turn the tide.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 11:35:40

No Duplicates.

## **Comment 135 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Stacey  
Last Name: Sullivan  
Email Address: [ssullivan@suscon.org](mailto:ssullivan@suscon.org)  
Affiliation: Sustainable Conservation

Subject: Second Investment Plan Concept Paper comments  
Comment:

Please see attached document for Sustainable Conservation's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/218-investplan2015-ws-UiEFdgd1BSJWMVI7.docx>

Original File Name: Sustainable Conservation comments on Investment Plan Concept Paper.docx

Date and Time Comment Was Submitted: 2015-09-01 11:54:36

No Duplicates.

## **Comment 136 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Christina  
Last Name: Lokke  
Email Address: ChristinaL@cda.net  
Affiliation: CSDA

Subject: Comments on 2nd Investment Plan Concept Paper  
Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/219-investplan2015-ws-UzAAdVE0AjBSC1Az.pdf>

Original File Name: CSDA Cap-and-Trade Auction Proceeds Second Investment Plan Concept Paper Comment Letter 9.1.2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 11:49:47

No Duplicates.



## **Comment 137 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Charles A.

Last Name: Smith

Email Address: chuck@integratesustainabilityinc.com

Affiliation: Technology Companies

Subject: Cap & Trade Auction

Comment:

I spoke at the 8/12/2015 LA Public meeting requesting that a separate funding budgeted line item be used to create a Technology Demonstration Site enabling new technologies the ability to support their claims. We are involved with a Waste to Energy Technology which addresses clean air, landfill elimination, 100% recycled & 100% repurposed, recapture of water to potable status and does so with ZERO emissions together with other benefits. The technology can not get a hearing in California. There are technologies which have given up on California and gone out of state with success. This demonstration site together with a 90 day Administrative Operating Permit for a limited period could be evaluated by the state to all claims which would enhance and expedite California's Environmental and Climate change goals. The current process is complicated and discouraging and we as a state are losing out. Our companies work with numerous technologies out of state and are confident of their contributions to California goal achievements. Please consider the formation of a demonstration site using Cap & Trade Funds to create such. Thank you for your consideration and I am available to assist. Charles A. Smith CEO, Integratde Sustainability Solutions, Inc & Hotel Sustainability Solutions, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 12:06:44

No Duplicates.

**Comment 138 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Margie

Last Name: Gardner

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

Affiliation: CEEIC

Subject: Letter from California Energy Efficiency Industry Council re Cap-and-Trade  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/221-investplan2015-ws-BmUFZl05ADpWM1QL.pdf>

Original File Name: CEEIC Letter to CARB on investment plan 9-1-2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 12:21:56

No Duplicates.

## **Comment 139 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Katherine  
Last Name: Valenzuela Garcia  
Email Address: kgarcia@sacbreathe.org  
Affiliation: Breathe California

Subject: Cap and Trade Auction Proceeds Triennial Investment Plan for 2016-2019  
Comment:

Dear Chairman Mary D. Nichols and Executive Officer Richard Corey,

Thank you for the hard work that ARB staff has done to make the Auction Proceeds Triennial Investment Plan for 2016-2019 possible. We are writing as a coalition of groups serving the Sacramento Region to recommend changes to the 2016-19 draft Investment Plan. As a region, we have formed a coalition of public agencies and organizations working together to support and advance applications for key Greenhouse Gas Reduction Fund grants, and have complimented that effort with a robust public engagement process in disadvantaged communities. Our comments are directly informed by those efforts.

### **Expansion of Energy and Weatherization Programs**

Funds for the Energy Efficiency and Low-Income Weatherization Program are currently limited to income eligible, single-family households in target census tracts. Since implementation of this program is spread across several grantees, an income-eligible household that receives one program benefit is not automatically enrolled to receive other program benefits from the Urban Forestry, Low-Carbon Transportation, WET, and Water Efficiency Programs. Further, funding does not allow grantees to make home improvements conducive to the goals of the program, like repairing a roof so solar panels can be installed, or in lieu of solar installing a cool roof. Finally, the program does not include business owners or community centers in targeted neighborhoods, even though the sustainability of those buildings is critical for the environmental, social, health, business resiliency and economic benefits they can provide to those neighborhoods.

Programs should create project teams that can automatically enroll income-eligible households in all program benefits as appropriate. The project team should consult with MPOs and local government officials to ensure maximum efficiency in program delivery, with the opportunity to leverage other local resources for improved co-benefits and outcomes.

Funds should be allowed to make home improvements (such as a roof repair or insulation replacement) related to energy efficiency, weatherization, and tree planting. Funding should also be able to be used for technologies like cool roofs, radiant barriers, wind energy, and gray water systems.

Multi-family housing units within targeted census tracts should be eligible for all programs.

Small businesses and community centers in targeted census tracts should also be eligible if they can demonstrate that the owners, at least one of their employees, or at least 10% of their patrons live in the surrounding neighborhood.

If nearby homes are not suitable for solar panels, businesses and community centers can have them installed to generate renewable energy to serve the facilities' electricity needs as well as the needs of surrounding income-eligible households. Solar panels could also be allowed on vacant land or to

cover parking.

#### Inclusion of Streetscape Improvements

Many residents of disadvantaged communities will attribute poor streetscapes as one of the primary reasons they do not walk, bike, or take transit to their destinations. In Sacramento, as in many regions throughout the state, our air quality is heavily impacted by those transportation choices. There are not sufficient funds dedicated to streetscape improvements as larger infrastructure projects generally take priority. Streetscape projects are low-budget and high-impact, providing great opportunities for community involvement.

Funding for streetscape improvements to improve the ability to safely walk and bike, while calming traffic, should be allocated to metropolitan planning organizations throughout the state. These funds can be used for land acquisition, LED lighting installations, "Complete Streets" construction, tree planting and drought-tolerant landscaping, road overlay (as related to slowing traffic, adding and/or separating bike lanes, road diets and increasing alternative transportation), bus stop infrastructure, and bike parking facilities.

#### Inclusion of Urban Agriculture

Urban agriculture is growing in popularity in our state as a viable means to increasing access to healthy food while providing people with a source of income. The City of Sacramento, along with several other jurisdictions, has recently passed an urban agriculture ordinance to make growing and selling food easier for residents. The Urban Forestry program should be expanded and clearly allowed to fund creation of new and maintenance/expansion of existing urban agriculture spaces. All sources of carbon reduction should be taken into account in project scoring criteria, not just carbon sequestration.

#### Expansion of EV Charging Station Resources

Electric Vehicle Charging Stations are expensive to install in existing communities, in particular disadvantaged communities and multi-family complexes. While a new incentive program for businesses was just released, the cost for infrastructure and the chargers is very expensive and not cost-effective for most small businesses. Cities and Counties can advance more public charging stations in key locations if there were incentive funds, rather than loans, to offset these costs.

Funding for Electric Vehicle Charging Stations should be expanded to include grants for infrastructure and charging station equipment, particularly in disadvantaged communities and multi-family units. New affordable multi-family developments and business complexes should be particularly targeted for electric vehicle charging to avoid retrofit costs in the future.

There should be special measures taken to ensure that access to EV fleet and charging station monies are available to small businesses.

Funding for electric vehicle charging stations in multi-family housing should be an eligible element of this program, especially in existing multi-family low-income housing projects.

#### Green Jobs as a Priority Co-Benefit

The source of much pollution in our state rests on the fact that our industries are not all "green." To address this, California needs to put a high priority on training people to start careers in green industries. As awardees administer their various grant programs, they should be required to train and employ residents from targeted communities to ensure the maximum benefit of that investment.

All agencies and grant awardees must demonstrate that they train and employ residents of targeted communities in green jobs as

much as possible. To the extent feasible, awardees should explain how jobs for these residents will be sustained after the project is complete. For example, if a project will build affordable housing, the applicant should write its budget to allow for the training and employment of residents to build that housing, and address how residents will continue to be employed either on-site, in future projects, or in other positions.

#### Ensuring Equitable Access to Funds by Creating Better Accountability

SB 535 prioritizes funding to the most disadvantaged communities in our state, but competition for those funds may inadvertently prevent funding from going to communities with the most need. Competition also discourages collaboration and transparency, which makes it hard for community members to track and influence applications. Assembly Bill 32 requires that public and private investment be directed toward the most disadvantaged communities in California to provide an opportunity for community institutions to "participate in and benefit from statewide efforts to reduce greenhouse gas emissions." Measures should be taken to ease public access to this process.

• The ARB and administering agencies should require at least three weeks for review of new policy documents before closing public comment or holding public meetings.

• Administering agencies should post all grant review criterion and applications received on one, central website to promote transparency and public engagement.

• All agencies administering GGRF should provide technical assistance to community based organizations to promote the engagement of disadvantaged communities. When necessary, ARB should exercise its authority to distribute cap and trade revenues to fund grants that will help agencies adhere to AB 32's "participation" requirement via agency- or board-level technical assistance. Agencies should also make provisions to reduce or waive match funding requirements for applicants that may not have the means to provide that funding.

• Grant recipients should conduct data collection and report on the realization of proposed project co-benefits. Data collection should also be an eligible expense from grant funding. The ARB and administering agencies should require applicants to provide the contact information (in accordance with privacy considerations) for residents within the census tract their project targets to illustrate community support for the application, in addition to outlining their community engagement process in the development of the application.

• The ARB and administering agencies should require applicants to get at least one letter of support from the local jurisdictions where the project will occur to ensure alignment with local initiatives and planning efforts and delivery of a quality project.

Thank you for your time and consideration of these comments.

Sincerely,

Chris Brown, Organizer  
350Sacramento

Elaine Hebert, President  
Southside Park Neighborhood Association

James Shelby, President & CEO  
Greater Sacramento Urban League

Jesse Reese, President  
Meadowview Neighborhood Association

Linda Roberson, Park Planner and Urban Designer  
Cordova Recreation and Park District

Matt Read, Director of Government Relations  
Breathe California

Michael Blair, President  
South Oak Park Community Association

Michelle Pariset, Organizer  
Capital Region Organizing Project

Rachel Rios, Executive Director  
La Familia Counseling Center

Rick Bettis, Natural Resources Director  
League of Women Voters Sacramento County

Attachment:

Original File Name: ARB Investment Plan\_FINAL.pdf

Date and Time Comment Was Submitted: 2015-09-01 12:43:20

No Duplicates.

**Comment 140 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Michelle  
Last Name: Passero  
Email Address: mpassero@tnc.org  
Affiliation:

Subject: Comments from The Nature Conservancy on the Three Year Investment Plan  
Comment:

Please accept the attached comments from The Nature Conservancy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/223-investplan2015-ws-AXVXPwBiUnJWNQJh.pdf>

Original File Name: TNCSecondInvestmentPlanComments\_final.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:17:33

No Duplicates.

## **Comment 141 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Mark

Last Name: Menzer

Email Address: markmenzer@danfoss.com

Affiliation: Danfoss

Subject: CA's proposal for incentives for natural refrigerant use

Comment:

Danfoss, is a leading global manufacturer of compressors, valves, heat exchangers sensors, and variable speed drives used in refrigeration and air-conditioning equipment. Danfoss has been a leader in the use of natural refrigerants and other low-GWP refrigerants around the world.

Danfoss supports California incentives for the use of natural refrigerants. The adoption of natural refrigerants in the United States trails that of Europe and other parts of the world. The equipment is tested and proven: it works safely and efficiently. It's higher initial cost can be defrayed all or in part by a state rebate program, removing one of the major barriers to its use. California could thus become a leader in the use of low-GWP, natural refrigerants.

Sincerely,  
Mark Menzer  
Danfoss

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 13:08:43

No Duplicates.



**Comment 142 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

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

Subject: Draft Concept Paper  
Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/226-investplan2015-ws-BmECY1UmBTAAWQhh.pdf>

Original File Name: GGRF Investment Plan comment letter.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:33:48

No Duplicates.

**Comment 143 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Eileen  
Last Name: Tutt  
Email Address: eileen@caletc.com  
Affiliation: CalETC

Subject: Draft Cap and Trade Auction Proceeds Triennial Investment Plan  
Comment:

Please consider the attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/227-investplan2015-ws-AGMBZIU4VGIKeFQ3.pdf>

Original File Name: CalETC Comments on Cap-and-Trade Auction Proceeds Second Investment Plan Concepts FINAL.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:41:29

No Duplicates.

## **Comment 144 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Judy

Last Name: Robinson

Email Address: Robinsonju@saccounty.net

Affiliation:

Subject: Comments on the Draft Cap and Trade Auction Proceeds Triennial Investment Plan  
Comment:

Thank you for the opportunity to comment on the draft cap and trade auction proceeds triennial investment plan. My comments and suggestions are in the attached comment letter. Thank you again.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/228-investplan2015-ws-BXZSPVw6BDkGZQFl.pdf>

Original File Name: Signed comment ltr ARB 9-1-15.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:45:42

No Duplicates.

**Comment 145 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jeff  
Last Name: Stump  
Email Address: jstump@malt.org  
Affiliation:

Subject: MALT Comments on Second Investment Plan  
Comment:

Attached are the Marin Agricultural Land Trust's comments for the second investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/229-investplan2015-ws-B2pRNgrpACcFLgVs.docx>

Original File Name: MALT-InvestmentPlanCommentsJS9.1.2015.docx

Date and Time Comment Was Submitted: 2015-09-01 13:51:12

No Duplicates.

**Comment 146 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jessica  
Last Name: Olson  
Email Address: olsonj@ayreslawgroup.com  
Affiliation: Ayres Law Group LLP

Subject: Honeywell Comments  
Comment:

Dear Ms. Livingston,

Please find attached comments from Honeywell International Inc. on the Draft Cap and Trade Auction Proceeds Triennial Investment Plan.

Regards,  
Jessica Olson

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/230-investplan2015-ws-V2YGNV1xAmFXaFd6.pdf>

Original File Name: 15-09-01 Honeywell comments on draft investment plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:49:16

No Duplicates.

## **Comment 147 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Melanie

Last Name: Schlotterbeck

Email Address: [greenvision@fhbp.org](mailto:greenvision@fhbp.org)

Affiliation: Friends of Harbors, Beaches and Parks

Subject: Investment Plan Comments

Comment:

Please find the attached letter outlining comments from Friends of Harbors, Beaches and Parks on the Draft Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/231-investplan2015-ws-VTNdMwZIU3AFXAJj.pdf>

Original File Name: FHBP ARB Investment Plan Comments 090115.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:14:38

No Duplicates.

# **Comment 148 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Chase  
Email Address: cchase@sor.timberproducts.com  
Affiliation: Michigan-California Timber Company

Subject: Forest Conservation Funding in Cap & Trade Investment Plan  
Comment:

September 1, 2015

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

Re: Forest Conservation Funding in Cap-and-Trade Second Investment Plan

Dear Ms. Nichols,

Thank you for the opportunity to comment on the Cap-and-Trade Auction Proceeds Second Investment Plan.

-----The family-owned Michigan-California Timber Company (MCTC) owns & sustainably manages 114,800 acres of timberland in Siskiyou, Trinity and Shasta Counties. Logs from our timberlands support the Timber Products Company veneer mill in Yreka, an affiliated company. Our lands are third-party certified to the Sustainable Forestry Initiative standard and we are strong supporters and leaders of forest conservation in the state. As you are aware, there is a great deal of pressure on California timberland to provide a wide array of goods and services. The timber industry forms the backbone of the economy for many communities in the North State. In addition to forest products, our timberlands provide clean water, wildlife habitat, recreational opportunities, scenic vistas and sequester carbon. Given all these competing demands, landowners such as MCTC need tools to ensure that the capabilities of the land are aligned with the objectives of the landowner. Land acquisition/disposition, conservation easements, avoided conversion and sustainable management of forested properties are important vehicles to ensure proper stewardship and enhance the carbon sequestration naturally occurring in our forests.

Existing funding levels for forest conservation fall far short of the demand. We respectfully urge you to increase the allocation of auction proceeds to forest conservation (both acquisition and conservation easements) in the upcoming Investment Plan. Thank you for the opportunity to comment on this Plan.

Sincerely,

Chris Chase  
Timberland Manager

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 14:14:49

No Duplicates.



## **Comment 149 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Laurie-Ann

Last Name: Barbour

Email Address: laurie-ann@climateprotection.org

Affiliation: Center for Climate Protection

Subject: Direct Auction Proceeds to Climate Dividend

Comment:

Thank you for considering the attached comments on the Cap-and-Trade Auction Proceeds Concept Paper and for the 2016-17 Investment Plan.

I encourage Air Resources Board to focus the next Investment Plan on directing auction proceeds back to people as a climate dividend. The California Climate Credit showing up twice a year on electricity bills is a good start. The state should expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities. I believe that the majority of the revenue should be used for dividends as they are equitable and maximize the environmental and economic benefits to California. The atmosphere belongs to all of us, and so we should all be compensated for its use.

See 180 attached signatures from California residents.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/233-investplan2015-ws-AGNdOgNyAAwGYVA+.xlsm>

Original File Name: Cap and Trade Petition Signers.xlsm

Date and Time Comment Was Submitted: 2015-09-01 14:12:22

No Duplicates.

**Comment 150 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Ryan  
Last Name: Wiggins  
Email Address: ryan@transformca.org  
Affiliation: TransForm & Sustainable Communities for

Subject: Draft IP Concept Paper Letter  
Comment:

Please find the attached comment letter on the IP Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/234-investplan2015-ws-UyBRNFJnVmQLUgE0.pdf>

Original File Name: SC4A\_535\_IP.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:19:35

No Duplicates.

**Comment 151 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Graham  
Last Name: Noyes  
Email Address: gnoyes@kfwwlaw.com  
Affiliation: Keyes Fox Wiedman LLP

Subject: Sierra Energy Comment RE: INVESTPLAN2015-WS  
Comment:

Attached please find Sierra Energy's comment to this proceeding.  
Thank you for the opportunity to provide this comment. Please  
advise regarding any questions or problems in transmission.

Best Regards,

Graham

Graham Noyes  
Keyes, Fox & Wiedman LLP  
980 Ninth Street, 16th Floor  
Sacramento, CA 95814  
(916)668-4636 Direct  
(206)856-8784 Cell

Licensed to Practice in California, Washington and the District of  
Columbia

gnoyes@kfwwlaw.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/235-investplan2015-ws-ViVcM1YyU3JRJBh.pdf>

Original File Name: SierraEnergyARBcomment090115.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:19:58

No Duplicates.

**Comment 152 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Megan

Last Name: Scott

Email Address: megan.scott@berkeley.edu

Affiliation:

Subject: UC Berkeley Don Vial Center comments

Comment:

Thank you for the opportunity to submit comments--see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/236-investplan2015-ws-VTECclQ2V1tVMARr.pdf>

Original File Name: DVC comments on second investment plan FINAL.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:23:11

No Duplicates.

# **Comment 153 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: David  
Last Name: Rosenheim  
Email Address: drosenheim@theclimateregistry.org  
Affiliation: The Climate Registry

Subject: Groundwork for post-2020 Reductions  
Comment:

September 1, 2015

California Air Resources Board  
Sacramento, California

To Whom It May Concern:

The Climate Registry (TCR), a non-profit organization that helps hundreds of public and private organizations measure, report and reduce their greenhouse gas emissions with integrity and operates the only carbon footprint registry in North America supported by states, provinces, territories and tribes, would like to offer the following comments in response to the Air Resources Board's (ARB) Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan.

TCR applauds ARB's prioritization of laying the groundwork to support the ongoing transition toward a low-carbon economy post 2020. Investing in education and systems now to drive carbon reductions over the long term will support California's mid and long term climate targets and goals.

As part of this strategy, TCR encourages ARB to consider supporting programs that will help organizations measure and better understand their impacts on climate change in order to identify innovative approaches to reducing emissions. Providing these resources to businesses and sectors, such as small and medium sized business, who will not be subject to many of the state's direct regulations, will help drive complementary reductions to help California meet its climate targets.

TCR has seen proof that what gets measured gets managed within our own membership base. In a recent study of 50 organizations across a wide variety of sectors we saw an average GHG emission reduction of 20 percent over just 5 years of continued public, verified carbon footprint reporting. Continuous public reporting is an especially strong driver for ongoing emission reductions that require changes in behavior, as the impacts of that behavior are reviewed and publicly documented annually.

Multi-year subsidies to California-based organizations to participate in TCR and secure third party verification of their carbon footprints will enable more public and private organizations to find opportunities to reduce GHG emissions within their operations and in their supply chains. This ongoing support of public verified carbon footprint reporting is often needed to first educate organizations about their carbon footprints and then ingrain low-carbon behaviors in standard business operations.

We greatly appreciate this opportunity to provide feedback on the Concept Paper for the Cap-and Trade Auction Proceeds Second Investment Plan. Please do not hesitate to contact us if we can be

of any additional assistance.

Sincerely

David Rosenheim  
Executive Director  
The Climate REgistry

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/237-investplan2015-ws-Wi5WM1AjAAwCZwFu.pdf>

Original File Name: TCR Comments on Second CA Cap and Trade Invenstment Plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:26:28

No Duplicates.

## **Comment 154 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: SDeslauriers@carollo.com  
Affiliation: CASA/CWCCG

Subject: CASA/CWCCG Comments  
Comment:

The CA Association of Sanitation Agencies (CASA) and the CA Wastewater Climate Change Group (CWCCG) very much appreciate the opportunity to comment on the Cap-and-Trade Auction Proceeds Draft Concept Paper for the Second Investment Plan. We strongly support the inclusion of wastewater related projects as part of the Second Investment Plan, and recommend that wastewater projects (and their co-benefits) be made more explicit in the listed Investment Concepts. We provide examples of projects to consider as Investment Concepts, as well as recommended text edits to the Concept Paper as part of our comment letter.

Please contact us if you have any questions at (916) 446-0388 or via email at gkester@casaweb.org and sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position and help ARB proactively achieve the commendable State goals and mandates for 2020 and beyond.

Regards,  
Sarah Deslauriers  
CWCCG Program Manager

Greg Kester  
CASA Director of Renewable Resources Program

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/238-investplan2015-ws-Bj8FL1tB3kCNQM2.pdf>

Original File Name: 9-1-15 CASA-CWCCG Comments FINALInvestmentPlan.pdf

Date and Time Comment Was Submitted: 2015-09-01 13:50:38

No Duplicates.

**Comment 155 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Gardner  
Email Address: chris-gardner@carcd.org  
Affiliation:

Subject: CARCD - Investment Plan Comments  
Comment:

Attached are CARCD's comments on the second investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/239-investplan2015-ws-UjFdOIeIBDQKaAdY.docx>

Original File Name: CARCD - Investment Plan Comments.docx

Date and Time Comment Was Submitted: 2015-09-01 14:46:34

No Duplicates.



**Comment 156 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Mary  
Last Name: Creasman  
Email Address: mary.creasman@tpl.org  
Affiliation: The Trust for Public Land

Subject: The Trust for Public Land's Comments on the Cap and Trade Second Investment Plan  
Comment:

Please see attached for The Trust for Public Land's comments on the Cap and Trade Auction Proceeds Second Investment Plan. Thank you for the opportunity to provide comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/240-investplan2015-ws-UTYAYVYIADVQNVU6.pdf>

Original File Name: GGRFConceptInvestmentPlanletter\_TPL\_final\_9.1.2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:44:03

No Duplicates.

**Comment 157 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@crrcnorth.org

Affiliation: California Refuse Recycling Council

Subject: Draft Cap and Trade Auction Proceeds Triennial Investment Plan

Comment:

Thank you for the opportunity to comment on the Draft Cap and Trade Auction Proceeds Triennial Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/241-investplan2015-ws-AmFSNVUkAjAEbABk.pdf>

Original File Name: CapandTradeCRRC Comments.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:49:42

No Duplicates.

**Comment 158 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Rachel  
Last Name: Saunders  
Email Address: rsaunders@bigsurlandtrust.org  
Affiliation:

Subject: Big Sur Land Trust's Comments  
Comment:

Attached are Big Sur Land Trust's comments for the second investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-investplan2015-ws-UTNV0lw6BQkDdlAl.pdf>

Original File Name: Big Sur Land Trust Comments on ARCB Cap and Trade Investment Plan 9.1.15.pdf

Date and Time Comment Was Submitted: 2015-09-01 14:58:15

No Duplicates.

**Comment 159 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kim  
Last Name: Boyd  
Email Address: kboyd@tahoercd.org  
Affiliation:

Subject: Second Investment Plan Comments - Tahoe RCD  
Comment:

Attached are Tahoe Resource Conservation District's comments for the second investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/243-investplan2015-ws-BnJQN1Q9WGRSMVUK.pdf>

Original File Name: Tahoe RCD CARB Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:01:05

No Duplicates.

## **Comment 160 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jeff  
Last Name: Darlington  
Email Address: jeffd@placerlandtrust.org  
Affiliation: Placer Land Trust

Subject: Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concept comments by PLT  
Comment:

Thank you for accepting our comments on the Cap-and-Trade Auction Proceeds Second Investment Plan.

Please contact us if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/244-investplan2015-ws-VjVcO1UkVloKbQdp.rtf>

Original File Name: Cap and Trade revenue letter \_ Placer Land Trust \_ Final.rtf

Date and Time Comment Was Submitted: 2015-09-01 14:57:22

No Duplicates.

**Comment 161 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Ag Energy Consumers

Subject: Comments on Investment Plan Concept Paper

Comment:

Please see attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/245-investplan2015-ws-UjNUN1Q2UWNQCVQ3.pdf>

Original File Name: AECA comments Cap&Trade Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:06:42

No Duplicates.

**Comment 162 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kate

Last Name: Meis

Email Address: kmeis@lgc.org

Affiliation: Local Government Coalition

Subject: Local Government Coalition Comments

Comment:

On behalf of a coalition including the Local Government Commission, the California State Association of Counties, California Special Districts Association, Local Government Sustainable Energy Coalition, Bay Area Regional Energy Network and Sonoma County Water Agency we submit the following comments asking for the creation of an Integrated Climate Funding Market and Targeted Local Training and Assistance.

This letter supports comments previously submitted by the Local Government Commission.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/247-investplan2015-ws-VTIWP1Q2BDZROwFe.pdf>

Original File Name: Local Govt Coalition Letter RE Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:13:15

No Duplicates.

**Comment 163 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Karen  
Last Name: Gaffney  
Email Address: kgaffney@sonoma-county.org  
Affiliation: Sonoma County Ag & Open Space

Subject: Investment Plan Comment Letter - So Co Ag & Open Space  
Comment:

please see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-investplan2015-ws-B3RWP10yU29WPVc2.pdf>

Original File Name: Sonoma Ag & Open Space Dist - Investment Plan Comments\_9-1-15.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:15:13

No Duplicates.



## **Comment 164 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jerilyn Lopez  
Last Name: Mendoza  
Email Address: jmendoza5@semprautilities.com  
Affiliation: SoCalGas

Subject: SoCalGas Comments - Concept Paper for Cap-and-Trade Auction Proceeds 2nd Investment Plan  
Comment:

SoCalGas is pleased to submit these written comments on ARB's Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan. Please contact me with any questions or concerns about these written comments. Please confirm receipt as soon as possible. Thank you for your time and attention.

Jerilyn López Mendoza  
SoCalGas  
Environmental Affairs Program Manager - CARB  
Energy and Environmental Affairs  
555 W 5th St., GCT 17E5  
Los Angeles, CA 90013  
Jmendoza5@semprautilities.com  
(desk) 213-244-5235  
(cell) 213-700-0095  
(fax) 213-244-8257

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/249-investplan2015-ws-BXZUPQBiADJVPwRj.pdf>

Original File Name: SoCalGas Investment Plan Comments 9-1-15.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:15:28

No Duplicates.

## **Comment 165 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: The Pacific Forest Trust

Subject: Pacific Forest Trust comments on GGRF Concept Paper

Comment:

Please see attached comments on the GGRF Investment Plan Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/250-investplan2015-ws-Bz5cdFdnAg4CdABm.pdf>

Original File Name: 9.1 PFT Concept Paper Comments.pdf

Date and Time Comment Was Submitted: 2015-09-01 15:41:08

No Duplicates.

# **Comment 166 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Bridget  
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Email Address: [bridget@sierrafoothill.org](mailto:bridget@sierrafoothill.org)  
Affiliation: Sierra Cascade Land Trust Council

Subject: Draft Cap & Trade Auction Proceeds Plan  
Comment:

August 31, 2015

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

Re: Cap-and-Trade Auction Proceeds Second Investment Plan Draft  
Concept

Dear Ms. Nichols,

Thank you for the opportunity to comment on the Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concept Proposal (Investment Plan). The Sierra Cascade Land Trust Council is a network of land trusts that provides a collective voice for this diverse region by fostering collaboration to protect the natural, historic and agricultural resources for present and future generations.

We would like to provide comments on several areas of the Investment Plan, particularly spanning the Transportation and Sustainable Communities and Natural Resources and Waste Diversion concepts. Specifically, we propose a new program to fill a gap we perceive in current GGRF investments and we also recommend that ARB direct more support for several existing programs with great greenhouse gas reduction potential. Note that below references to current levels of investment are from 2014/15.

&#61656; Building Sustainable Communities - the Case for Carbon-Smart Green Infrastructure

The Strategic Growth Council's Affordable Housing and Sustainable Communities program supports housing or transit-oriented development to reduce greenhouse gases but does not lead to the development of complete carbon-smart communities. A multi-benefit green infrastructure approach to community development is missing in the current GGRF expenditure plan, and it is not incentivized under existing programs. These strategies are critical to the long-term sustainability of our state - they will help us meet our 2030 and 2050 climate goals, while tackling other critical statewide issues like the drought.

We propose the development of a new Carbon-Smart Green Infrastructure program as an essential strategy to greening our cities, and incentivizing innovative, carbon-smart development. We need to make our communities more climate resilient through a connect, cool, absorb, and protect approach to green alleys, school yards, parks, riverways and greenways - greenhouse gas reduction strategies that are well documented by research (see Attachment A

for background and details of proposed program). Through innovative development and restoration, these projects reduce greenhouse gases in our communities by providing multiple benefits – enhancing the tree canopy, lowering VMTs, reducing energy usage from water conveyance and treatment, and decreasing the urban heat island effect. The Investment Plan stresses a need for integrated projects that support energy and transportation solutions, smart growth, and urban forestry within communities (Investment Plan, III.E, p. 5) – a green infrastructure program would cut across GGRF investment areas while catalyzing much needed integration at a local level, incentivizing local jurisdictions to coordinate across agencies for investment decisions and planning. Investments can be targeted toward our disadvantaged communities, where they are needed most.

The 2012 Urban Greening for Sustainable Communities Program, overseen by SGC and administered by Natural Resources Agency is a great example of a multi-benefit approach to building sustainable, resilient, low-carbon communities. With the foundation and infrastructure for the program already established, the state is well on its way to adding this missing piece to the puzzle. Revamping the 2012 Urban Greening Program will create a crosscutting program to complement current investments in forestry, wetlands, and other natural resources. We recommend this program be funded through the GGRF, based on evidence showing the potential these strategies have to play in statewide carbon reduction. We recommend that ARB consider adapting the Urban Greening program to become a vital and complementary tool for meeting and exceeding GGRF goals.

Recommendation – Create a 4-5% allocated new program for Carbon-Smart Green Infrastructure by revamping the 2012 Urban Greening for Sustainable Communities program through the Strategic Growth Council and California Natural Resources Agency.

#### Recommendations for Enhancing Existing Investments

¶ Increase funding to CALFIRE for urban and rural forest conservation to 7-8%

- The largest vehicle for greenhouse gas reduction through large-scale carbon storage is the protection and management of large tracts of intact forest. The world's forests are estimated to sequester up to 30% of annual global anthropogenic carbon emissions.
- In California, approximately 113,000 acres of forest were converted to other uses between 1969 and 1998.
- Protection of forests with conservation easements, with management to maximize carbon storage, is essential to meeting our greenhouse gas reduction goals.
- Urban forestry in California sequesters 4.5 MMT of carbon annually. In San Francisco, it is estimated that the city's trees sequester nearly 200,000 tons of carbon and filter 260 tons of atmospheric pollutants each year.
- There is currently a \$4.2 million allocation to CALFIRE's Forest Legacy program for forestland threatened by conversion. The initial 3-year investment plan does not represent the critical role forest conservation plays in achieving our long-term greenhouse gas reduction goals, and should be increased. The current \$15.7 million investment through CALFIRE in urban forestry projects should also be increased.

¶ Increase funding for agricultural conservation easements and management incentives to 2%

- Agricultural conservation easements are an essential tool to store carbon, help cities combat sprawl and maintain working lands close to where people live. With careful management, rangelands and cropland sequester carbon in soils – through the growth of vegetation and accumulation of organic matter. Appropriate

incentives can help landowners achieve these results.

- Agricultural lands provide a myriad of climate and public benefits – food security, jobs, long-term carbon storage in soils, and decrease of greenhouse gas production from long distance commutes and food transportation.
- In California, approximately 40,000 acres of working lands are lost to development and other uses each year , particularly when close to urban areas with rapid population growth and increasing land value. Moreover, conversions of agricultural land to urban development in California results in a 57 times increase in greenhouse gas emissions per acre of land converted.
- The Strategic Growth Council's Sustainable Agricultural Lands Conservation Program is insufficiently funded at \$4.75 million annually, and should be increased.

&#10146; Increase and broaden funding for wetland and watershed protection and restoration to 3%

- The ecological and economic benefits of wetlands are well understood. Notably, wetlands have the ability to sequester and store large amounts of carbon over long time periods.
- California has lost 91% of wetlands since the 1780s (compared to 53% for the lower 48 states).
- Protection of wetlands on private land, in combination with restoration, is essential to ensure durability of restoration efforts and to realize the greenhouse gas benefits of wetland conservation. The Department of Fish and Wildlife's Wetlands Restoration for Greenhouse Gas Reduction program funds restoration, but does not enable the permanent protection of wetlands. Funding for this program should be increased and expanded to include conservation easement or fee title acquisition of key watershed and wetland areas for durability.

&#10146; Remove barriers to funding for disadvantaged communities

Currently many GGRF programs are not set up to be user-friendly for communities with fewer resources, less capacity, or experience in applying for highly competitive public funds. The Investment Plan stresses that disadvantaged communities should be able to compete themselves for GGRF funds (III.B, p.4). To be accessible by communities hit first and worst by climate impacts, we recommend the following:

Technical assistance should be provided early in the process in order to assist applicants in making their projects more competitive. This includes technical support for the required greenhouse gas calculations to ensure broad participation in the program. This will also assist ARB and agencies implementing GGRF programs to ensure consistency with greenhouse gas quantification as well as in gathering defensible, and comparable data across the state.

- Bonus points should be awarded for applications that demonstrate a multiple-benefits strategy;
- Prioritization of qualitative processes to support the success of applicants who need additional direction, information, and technical assistance;
- Incentives for grant applicants to directly engage members of disadvantaged communities in project selection, design, and prioritization.
- The timeline between the NOFA and the concept proposal deadline should be increased to 60 days to provide more lead time to applicants.
- Funding, through set-asides within GGRF programs, for planning, decision-making tools, and community engagement, with the intent that the planning would lead to projects resulting in greenhouse gas reduction.
- Set-asides in GGRF programs for rural disadvantaged communities.
- Matching funds requirements should be waived for projects located within disadvantaged communities.

- Nonprofits should be eligible applicants for these funds - in order to increase the variety of projects that are brought forward and to encourage a greater diversity of partnerships.

Sincerely,

Ellie Routt  
President, Sierra Cascade Land Trust Council

#### Attachment A: The Creation of a Carbon-Smart Green Infrastructure Program

Here we provide relevant research to support the development of a Carbon-Smart Green Infrastructure Program as well as recommendations for the revision of the 2012 Urban Greening for Sustainable Communities Program.

A carbon-smart green infrastructure approach increases mobility options in communities to ensure transportation mode shifts, capture and cleanse our water, reduces energy usage connected with urban heat island effect, and sequesters greenhouse gases through natural infrastructure. These strategies provide important co-benefits for our communities by cleaning the air, promoting active transportation, and reducing heat related illness and death, providing outdoor recreation opportunities, and increasing community connection. Applicants will be asked to carefully project the effectiveness and cost-benefits of their approach for carbon reduction and measure actual performance post-implementation. This will increase the impact of funding through this program by helping to advance knowledge within the field of carbon-smart green infrastructure while also helping to promote replication.

A Carbon-Smart Green Infrastructure Program seeks proposals that utilize a multiple-benefit approach to maximize carbon gains and other co-benefits from green infrastructure. To help guide applicants, this program has five base layers of carbon-related green infrastructure benefit for applicants to consider. The scientific framework is as follows:

Connect: In 2012, transportation emissions represented 37% of California's total emissions, with more than 90% attributable to on-road vehicles. Personal passenger vehicles account for 78% of emissions from this sector. For many suburban and exurban communities, transportation is responsible for an even higher percentage of emissions. California communities have many opportunities to reduce on-road vehicle use by leveraging green infrastructure investment to help fill gaps in active transit networks. While California communities are leading in bicycle commuting, such as Davis at a nationally leading 24.5% of its population, many communities have room for active transit growth. Los Angeles is second nationally for the raw number of daily cyclists on its streets, but this number represents only 1.5% of the city's population. Other major cities, including San Francisco, are over 3% bicycle commuting. One study found that achieving a 50% mode shift to active transit for short trips (less than 1.5 miles) and medium trips (1.5 to 5 miles) in Bay Area communities from the 2000 baseline would reduce carbon emissions by 14.5% while also producing a 14% reduction in cardiovascular disease and diabetes. Green infrastructure proposals under this program should demonstrate how the proposed activities will promote active transit by increasing user accessibility and decreasing safety concerns. Proposals should use a research-based methodology such as The Trust for Public Land/ICF International carbon benefits quantification model to calculate the specific carbon benefits and air quality that are projected from the green infrastructure being proposed. Other data should also be used to demonstrate the co-benefits of the project, such as spatial data showing the demographic, social, and health-related risk factors for adjacent

populations (affordable housing developments, etc.) to the new active transit connections being created. These data should be used to show the impact of the project on transit equity, economic benefits of enhanced transit alternatives, and health benefits. The Connect strategy supports the State's goal of reducing petroleum use in cars

**Cool:** Energy use for cooling buildings is a major segment of carbon emissions in communities during warm weather months. Energy use is elevated 5-10% during peak summer periods due to the urban heat island effect. Shade trees and other heat island reduction measures can reduce building emissions by 5-20%. An analysis by the University of California at Berkeley's Heat Island Group developed in response to the passage of A.B. 32 estimated that full implementation of a "cool communities" strategy using green infrastructure and closely related approaches could reduce California emissions by 4 million metric tons of carbon dioxide equivalent per year. This is equivalent to 5% of the 80 million tons in annual reductions required for the State of California to meet its 2020 target under A.B. 32. Additional carbon gains can be found in direct sequestration by urban trees and other vegetation used to reduce urban heat islands. Urban forests account for approximately 8% of forest-based sequestration in the U.S. annually. Green infrastructure proposals under this program should demonstrate how the proposed activities will advance heat island reduction, including how siting and design of the proposed green infrastructure will maximize cooling of buildings within the proposal area for reduced carbon emissions. Other carbon benefits through direct sequestration should also be quantified. Proposals should use a research-based tool such as the U.S. Forest Service I-Tree model to calculate the specific heat island benefits of proposed green infrastructure. Other data can be used to demonstrate the impact of the project, such as spatial data showing the magnitude of the urban heat island being addressed and information on demographic, social, and health-related risk factors for adjacent populations. The Cool strategy supports the State's goal of reducing energy use in homes and businesses.

**Absorb:** Energy use for imported water supplies and wastewater treatment represent an important segment of California's carbon emissions. The State Water Project is the single largest energy user in the state, and 20% of electric use in the state is attributable to water. Deploying green infrastructure to manage stormwater on-site through an integrated water management approach increases potential for communities to use local water supplies through aquifer recharge. Green infrastructure that promotes infiltration also lessens the water load for treatment, and thereby reduces associated energy use and carbon emissions. The City of Los Angeles and Los Angeles County, among other actors in California, have assessed the potential water and energy savings of an integrated water management approach. One recent analysis concluded that the City of Los Angeles has potential to meet 30-45% of its water supply needs by implementing a full green infrastructure plan, such as the activities envisioned as part of the Los Angeles Department of Water and Power's Stormwater Master Plan. The City of Los Angeles has set a goal in its Sustainability Plan to reduce imported water purchases from the State Water Project and Metropolitan Water District of Southern California 50% by 2025. ICF International analysis found that the carbon footprint of the Metropolitan Water District imports to Los Angeles during one year (2007) was 548,000 metric tons of carbon dioxide equivalents. If LID techniques were applied in southern California and the San Francisco Bay area, between 40,400 MG and 72,700 MG per year in additional water supplies would become available by 2020. The creation of these local water supplies would result in electricity savings of up to 637 million kWh per year and annual carbon emissions reductions would amount to approximately 202,000 metric tons by offsetting the need for inter-basin transfers and desalinated seawater. Statewide, for instance, water-related energy use in 2001 was estimated at 48 million MWh (or 48 thousand

GWh) of electricity, plus 4.3 billion Therms of natural gas and 88 million gallons of diesel fuel. This energy use results in approximately 38.8 million metric tons of carbon dioxide emissions annually. The carbon emissions embedded in California's water as a result of these energy demands is equivalent to the carbon emissions of 7.1 million passenger vehicles, and would require approximately 9 million acres of pine forest to offset California's water-related carbon footprint. Green infrastructure proposals under this program should demonstrate how the proposed activities will advance energy savings through integrated water management, including specific description of the volume of water impacted by the proposal and how the water management achieved will impact existing water management activities and the energy impact of those activities. Proposals should utilize a research-based model such as the Local Government Commission's tool to demonstrate the aggregate energy impacts and related carbon savings from the integrated water management benefits that will be achieved through the proposal. The Absorb strategy supports the State's goals to capture and save water.

**Protect:** Consistent with California's Climate Action Plan, proposals should integrate explicit climate resilience considerations into green infrastructure design and development. California-relevant considerations include vulnerability of key populations to extreme heat events, repetitive loss flooding from increasingly intense rainfall patterns, seismic threats, and increased risk of coastal and riverine inundation. Additional credit will be given to applications that reflect consideration and pursuit of these adaptation co-benefits as part of carbon-oriented green infrastructure. Applicants will be asked to use diverse data sources to demonstrate the risk being addressed and the related resilience benefits of the green infrastructure proposal.

**Disadvantaged Communities:** Further, the consideration of California's most impacted communities should be integrated into the design considerations for each plan. Which populations will most greatly benefit from the economic benefits of energy savings and increased access to active transit? Which populations are most at risk from pollution, extreme heat, and natural disasters? Low-income populations are disproportionately impacted by energy costs as a percentage of household income, and will uniquely benefit from the potential for economic savings generated by reduced energy use. Further, these communities will uniquely benefit from reduced vulnerability to climate risks like extreme heat and household flooding given their reduced resources for dealing with these challenges, and the presence of elevating risk factors such as health conditions that exacerbate heat related illness. Applicants must detail the specific communities served, connect to affordable housing residents where appropriate, and show the direct and indirect climate benefits to these communities from the proposal.

#### Carbon-Smart Green Infrastructure: Revising the 2012 Urban Greening Program

This funding is intended to engage the capabilities of experts from across California and the nation to advance greater carbon efficiency through green infrastructure in California communities, with a particular emphasis on supporting strategies that are implemented at larger scales, such as a neighborhood or watershed, and that can be replicated across that community or even the state. These replicable "super projects" represent green infrastructure typologies such as green alleys that combine multiple benefits and have potential application within a variety of different California communities and geographic contexts across the state, and are able to leverage a diversity of local, state, and federal funding through the multiple benefits approach. As such the program has a planning and development component to invest in carbon-smart innovation and incentivize research and decision-making tools to



inform investments that provide the greatest multiple-benefit return.

The 2012 Urban Greening Project and Planning Grant Program defined urban greening as a community-based effort to plan, plant, care, and manage flora, structures and spaces, which lead to increased forest canopy, reduced stormwater runoff, improved air and water quality, energy conservation, open space and ultimately, more sustainable communities. The program was administered through the Natural Resources Agency in consultation with the Strategic Growth Council, to ensure optimal integration of sustainable community strategies including transportation, affordable housing and low-income transit-oriented development projects. Guidelines were developed through a cross-functional effort between Public Health, DWR, CALFIRE, DFW, Caltrans, the Strategic Growth Council, and regional boards, and the Strategic Growth Council was the final decision-maker on grant applications.

The 2012 Urban Greening Program description: because of the built-out nature of California's urban areas, the Urban Greening for Sustainable Communities Program provides funds to preserve, enhance, increase or establish community green areas such as urban forests, open spaces, wetlands and community spaces (e.g., community gardens). The goal is for these greening projects to incrementally create more viable and sustainable communities throughout the State.

The 2012 Urban Greening Project and Planning Grant Program eligible projects:

- Use natural systems, or systems that mimic natural systems, or create, enhance, or expand community green spaces.
- Provide multiple benefits including, but not limited to
  - o Decrease in air and water pollution
  - o Reduction in the consumption of natural resources and energy
  - o Increase in the reliability of local water supplies
  - o Increased adaptability to climate change
- Be consistent with the State's planning policies specific to the following statewide priorities
  - o Promote infill development and invest in existing communities
  - o Protect, preserve and enhance environmental, agricultural and recreational resources
  - o Encourage location and resource efficient new development
- Reduce; on as permanent a basis that is feasible, greenhouse gas emissions consistent with the California Global Warming Solutions Act of 2006.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/251-investplan2015-ws-AmEAZ1IjAAwGXwdY.doc>

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No Duplicates.

**Comment 167 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Philip  
Last Name: Gibbons  
Email Address: pgibbons@portofsandiego.org  
Affiliation: San Diego Unified Port District

Subject: Draft Concept Paper for the Cap-and-Trade Auction Proceeds for the Second Investment Plan  
Comment:

The San Diego Unified Port District is pleased to provide these comments regarding the California Air Resources Board's Draft Concept Paper for the Cap-and-Trade Auction Proceeds for the Second Investment Plan. Please see the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/252-investplan2015-ws-WygCZVI9WVUGZAlg.pdf>

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**Comment 168 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kerri  
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Email Address: ktimmer@sierrabusiness.org  
Affiliation: Sierra Business Council

Subject: SBC comments on 2nd Investment Plan concept paper  
Comment:

Please see attached letter with SBC's comments on the 2nd C&T Investment Plan concept paper for public discussion.

All best,  
Kerri Timmer  
Sierra Business Council  
ktimmer@sierrabusiness.org  
530-414-8247

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/253-investplan2015-ws-UCMGYgBiUFwHZgBn.pdf>

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## **Comment 169 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

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

Subject: Comments on the Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts  
Comment:

September 1, 2015

Chairman Mary D. Nichols and Executive Officer Richard Corey  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chairman Nichols and Executive Officer Corey:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts.

### About ARCCA

ARCCA is a network comprised of existing regional collaboratives from across California. ARCCA's members represent leading regional collaboratives that are already coordinating and supporting climate adaptation efforts in their own regions in order to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives have come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information among regions on best practices and lessons learned; identify each region's most innovative and successful strategies; and then determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member regional collaboratives and empowers those interested in forging new regional partnerships.

### Current State of Affairs

California has been tremendously successful in developing and executing mitigation strategies to respond to the challenge of climate change. In recent months, the urgency and opportunity of addressing climate change through accelerated mitigation and adaptation activities have become even more clear, as Governor Brown outlined in his recent Executive Order (B-30-15). We are grateful to see the administration's key principles and concepts reflected in the current draft, especially those related to climate impacts and resiliency. We are also very appreciative that the guidelines recognize the importance of coordination with local governments and rural communities. It is clear to us that ARB is listening closely, learning from the experience of the first year of GGRF funding and working to provide guidance that helps the state and local participants realize the full intent of the program.

As you are aware, even the most effective reductions in emissions would not be able to prevent further climate change impacts in the

state, given that global changes have already been set in motion. Thus, undertaking climate adaptation strategies will be unavoidable to reduce our risk and increase our capacity to respond to build resilient societies and to foster sustainable development. Additionally, an unprecedented degree of collaborative action throughout California is critical to respond to climate change quickly, effectively, and equitably. Climate change adaptation and mitigation conversations must occur at scales above city and county footprints to be relevant and most effective as an integrated, landscape-scale approach; engage key stakeholders from all sectors - urban and rural, public and private, from decision-makers to implementers; and bridge the divide between California's regions to fully capture the critical role that rural communities play in advancing climate adaptation and mitigation efforts.

## Recommendations

To realize success, we want to see the GGRF program, within the limits allowed, empower local communities and regional entities in all parts of the state - urban and rural - and across sectors to implement investments that strengthen the state's overall economic, environmental, and social resilience. Within this context, we offer a few broad comments that might strengthen the ability of local governments to participate in the program and meet our shared goals. We encourage the ARB to:

1. Prioritize adaptation and resilience at the state, regional, and local levels to accurately convey the imperativeness of pursuing adaptation and resilience strategies in conjunction with mitigation strategies. Climate change is having, and will have, more widespread impacts on California's people, economy, and environment, and steps must be taken to protect against climate impacts that are already occurring. Because uncertainty is a strong factor and climate change adaptation requires an iterative process that needs to be informed on an ongoing basis, it is critical for the state to escalate the importance of adaptation and resilience by providing necessary support and resources. We recommend that the ARB allocate funds for adaptation planning, as well as for initiatives that aim to build resilience at all levels and across all sectors.

2. Adopt an inter-regional approach and framework for climate change adaptation and mitigation that prioritizes collaboration and cross-sectoral partnerships, especially with sectors that are not as engaged but play a critical role in achieving state goals and building California's resiliency, such as the business sector. Climate impacts will vary in severity and nature between regions, as will each region's ability to cope and approach to adapting, making regional efforts more likely to have shared priorities, common goals, and a more holistic impact that addresses the region's specific needs. Communities are already bound together at a landscape-level scale by shared geography and mutual reliance on resources that span across jurisdictions, such as watersheds, forests, agricultural lands, rangelands, and grasslands. We recommend that the ARB prioritize investment in projects that focus on working within regions and across regions that also engage key stakeholders from all sectors.

3. Prioritize investments to support rural and underserved communities to enable a wider population of communities to participate in this program, especially for regions that steward important resources that the state relies upon. The well-being of all Californians is inextricably tied to the goods and services, such as clean water, clean air, carbon storage, and recreation, that are provided by resource-rich, rural areas; thus protecting California's rural areas, particularly the upper watershed, is equally important to urban adaptation strategy and meeting long-term urban sustainability goals. We recommend that the ARB make greater efforts to acknowledge and leverage the value of rural areas in achieving the state's climate goals, and in engaging rural

and underserved communities more effectively and regularly to empower action. We encourage the ARB to consider more substantive guidance on technical assistance processes, such as by providing more details on outreach approaches that provide more direct support for participants to develop suitable projects.

4. Expedite the development of methodologies for quantifying co-benefits, since such co-benefits will enable the state to achieve multiple goals with these programmatic dollars. Climate impacts on some projects could directly impact long-term GHG reductions, but may not be strictly considered a co-benefit. In light of this, we recommend that the ARB explore quantification methods for climate impacts where they might directly affect GHG reductions distinctly from quantifications of climate impacts as general co-benefits, such as social and economic co-benefits. Such an approach would represent risk management strategy for ensuring funded reductions are realized and that different types of co-benefits were assessed to ensure consistency of this statewide program with the Governor's direction as outlined in his Executive Order.

We hope these comments are helpful to your efforts, and welcome the opportunity to provide additional clarification or support development of specific language as desired.

Sincerely,

Krista Kline  
ARCCA Chair  
The Los Angeles Regional Collaborative for Climate Action &  
Sustainability

Larry Greene  
ARCCA Vice-Chair  
Capital Region Climate Readiness Collaborative

Cody Hooven  
The San Diego Regional Climate Collaborative

Allison Brooks  
Bay Area Regional Collaborative and the Alliance for Climate  
Resilience

Kerri Timmer  
Sierra Climate Adaptation & Mitigation Partnership

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/254-investplan2015-ws-UzJQJAFjBzdSNQZZ.pdf>

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## **Comment 170 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Robyn

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Affiliation: San Diego Association of Governments (SA

Subject: Comments on the Draft Cap and Trade Auction Proceeds Triennial Investment Plan  
Comment:

Please see SANDAG's comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/255-investplan2015-ws-WjYAYwN2BCMCYQd1.pdf>

Original File Name: Letter to Chair Nichols and Director Cohen\_comments on draft CAP and Trade Auction proceeds.pdf

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## **Comment 171 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jessica  
Last Name: Goodheart  
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Affiliation: LAANE

Subject: Investment Plan 2015  
Comment:

September 1, 2015

Chairman Mary D. Nichols and Executive Officer Richard Corey  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Nichols:

Re: Comments on the Draft Second Investment Plan Concept Paper for  
California Climate Investments

Thank you for the opportunity to submit comments on the Draft Second Investment Plan Concept Paper. The Los Angeles Alliance for a New Economy is a non-profit organization that for more than two decades has successfully advocated for policies and projects that promote thriving communities, environmental benefits and good jobs. We have worked in coalition for policies and programs to raise living standards, create career opportunities, improve communities and reduce Greenhouse Gas emissions and toxic pollution. This includes our work to clean up the trucks at the Ports of Los Angeles and Long Beach, to expand investment in energy efficiency and solar programs at the Los Angeles Department of Water and Power, and to increase recycling in the City of Los Angeles. We believe that our state's transition to a clean energy economy can and should be tied to the creation of good, middle class jobs that can support families and build strong communities.

We are interested in the Energy Efficiency and Renewable Energy components of the Draft Second Investment Plan. This is due to our long-standing partnership with the Los Angeles Department of Water and Power and IBEW Local 18 to develop programs that provide the triple benefit of reducing Greenhouse Gas emissions, benefiting low income communities through lower utility bills and providing high quality training and employment opportunities to disadvantaged communities.

We are particularly proud of our work with the Utility Pre-Craft Trainee program. Trainees are paid \$16 per hour while they gain the experience to access careers in the utility industry. Very few training programs offer this earn-as-you-learn approach that is essential to maximizing benefits for disadvantaged communities. This program's trainee workforce reflects LA's ethnic diversity, has a large percentage of women and a majority of participants report a barrier to employment such as a criminal conviction,



long-term unemployment or being a single parent. We feel that this incredibly successful program has a role to play in ensuring monies invested from the GHGRF maximize benefits to disadvantaged communities.

Given this experience, we respectfully offer some suggestions for changes to the Draft Second Investment Plan:

- The section that addresses disadvantaged communities under Energy Efficiency and Renewable Energy (pg. 16), mentions "household clean energy generation", but does not include renewable energy generation projects that are community based and not household based. It is essential that this definition be expanded to include community based energy generation projects as they have the potential to reach residents who do not meet requirements for household based systems. Household clean energy generation is important, but it makes sense to define projects as widely as possible in the Investment Plan. This will ensure that all innovative projects that provide the highest reduction in GHG emissions and the best benefits to disadvantaged communities are eligible.

An example of this exciting opportunity is the 40MW Community Solar Program currently being developed by the Los Angeles Department of Water and Power. Developed on public land, these projects have the potential to bring solar power and reduced energy bills to households locked out of the current residential solar model like some renters and those whose homes do not qualify. This is especially important because many residents in disadvantaged communities do not own their home. A coalition of more than 30 community, labor and environmental organizations, including LAANE, IBEW Local 18, SCOPE, Communities for a Better Environment and Sierra Club, supports such a program and is working to ensure that it truly serves disadvantaged communities.

- Similarly, Figure 5, which describes "Draft Investment Concepts" under Energy Efficiency and Renewable Energy (pg. 17), also focuses on residential projects. Again, this excludes the exciting potential to create community renewable energy projects. Many of these community renewable energy projects can be located in disadvantaged communities, employ the residents of these communities in projects that are visible to them and benefit the neighbors of the project with reduced energy bills.

- Another recommendation involves the reference to "clean energy manufacturing and service jobs" in section 5, "Co-Benefits" (pg. 16). Rather than simply referring to "jobs" as a co-benefit, we would like to recommend using language that prioritizes high-quality jobs. In addition, we recommend language that supports providing access to these high-quality jobs to residents of disadvantaged communities.

- The money allocated for energy efficiency and solar in municipal, university, school and hospital buildings offers one of the best opportunities to provide high quality job opportunities for disadvantaged communities while reducing energy use and greenhouse gas emissions. For this reason, we feel the current funding for energy efficiency for public buildings, set at only \$20 million per year, should be increased and be made available for all types of public buildings, not just state-owned buildings.

We appreciate your consideration of these comments. We look forward to working together in the future to develop exciting and innovative approaches to a clean energy future that benefits all Californians.

Sincerely,

Roxana Tynan  
Executive Director  
Los Angeles Alliance for a New Economy

Jessica Goodheart  
Director of the RePower LA Project  
Los Angeles Alliance for a New Economy

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/256-investplan2015-ws-V2ZTYFRIVjxQZgMy.pdf>

Original File Name: 150901LAANE Comments to CARB re Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 16:02:39

No Duplicates.

## **Comment 172 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Kaylon

Last Name: Hammond

Email Address: khammond@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Comments on Concept Paper for Second Investment Plan

Comment:

Please find our comments attached. We have also attached two other comment letters, on the Funding Guidelines and the Supplemental Material, as they are referenced in this letter. Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/257-investplan2015-ws-WjlXPgdrVGoCYQnt.zip>

Original File Name: Comment.zip

Date and Time Comment Was Submitted: 2015-09-01 16:01:14

No Duplicates.

## **Comment 173 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Charles  
Last Name: Cormany  
Email Address: CCormany@efficiencyfirstca.org  
Affiliation: Executive Director

Subject: Cap and Trade Auction Proceeds Proposal  
Comment:

Please refer to the up loaded PDF document.  
File name - ARB Tariff Proposal - EFCA\_2015\_9\_1.pdf

Any issues please contact via email or phone

Thank you,  
Charles Cormany  
Executive Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/258-investplan2015-ws-UzIGclMwAAwBcwZn.pdf>

Original File Name: ARB Tarrif Proposal - EFCA\_2015\_9\_1.pdf

Date and Time Comment Was Submitted: 2015-09-01 16:16:44

No Duplicates.

**Comment 174 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

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

Subject: PG&E Comments on ARB Concept Paper for Second Investment Plan  
Comment:

PG&E Comments on ARB Concept Paper for Second Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-investplan2015-ws-BnYCY1I2UFwHYgBv.pdf>

Original File Name: PGE Comments on ARB Concept Paper.pdf

Date and Time Comment Was Submitted: 2015-09-01 16:22:32

No Duplicates.

**Comment 175 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Nick

Last Name: Lapis

Email Address: nicklapis@cawrecycles.org

Affiliation: Californians Against Waste

Subject: Draft Cap and Trade Auction Proceeds Triennial Investment Plan

Comment:

Comments attached. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/260-investplan2015-ws-VDddOgF3WFQDdlQx.docx>

Original File Name: CAW Second Investment Plan 09-01-15.docx

Date and Time Comment Was Submitted: 2015-09-01 16:06:22

No Duplicates.

**Comment 176 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Richard  
Last Name: Solbrig  
Email Address: rsolbrig@stpud.dst.ca.us  
Affiliation: South Tahoe Public Utility District

Subject: Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Attached are South Tahoe Public Utility District's comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/261-investplan2015-ws-VjVdOIUkAg5RNgNt.pdf>

Original File Name: Cap and Trade.pdf

Date and Time Comment Was Submitted: 2015-09-01 16:41:34

No Duplicates.

**Comment 177 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Joyce  
Last Name: Dillard  
Email Address: dillardjoyce@yahoo.com  
Affiliation:

Subject: Comments ARB Concepts for Second Investment Plan due 9.1.2015  
Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/262-investplan2015-ws-UjFTOGNvVGpWNQdp.pdf>

Original File Name: Comments ARB Concepts for Second Investment Plan due 9.1.2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 16:44:13

No Duplicates.



**Comment 178 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jean-Pierre  
Last Name: Cativiela  
Email Address: dairycares@aol.com  
Affiliation: Dairy Cares

Subject: Dairy Cares comments  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/263-investplan2015-ws-VjIGYV01AiMHeAlq.pdf>

Original File Name: DairyCares.GGRF.FINAL.9.1.2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 17:12:43

No Duplicates.

## **Comment 179 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Birdlebough  
Email Address: affirm@friendshouse.org  
Affiliation:

Subject: Disadvantaged Communities  
Comment:

The greatest need of disadvantaged communities is a steady source of income, and so I suggest that some or all of cap and trade proceeds should be widely distributed to offset higher energy costs to families. Such a dividend would tie the price of carbon price to equity and climate justice. If used to establish a State Earned Income Tax Credit it would eventually assure people who need it most a basic income, and become an important source of buying power at the base of the economy.

The long-term strength of the Cap-and-Trade program depends upon the ways that proceeds are spent. It is difficult to produce quantitative analyses of ways that projects will assist disadvantaged communities by geography or income or a showing of ways that recipients will effect emission reductions, yet without convincing data the program will be vulnerable. Already there are concerns that the Cap-and-Trade funds are turning into a slush fund for politicians.

California is leading the nation in carbon pricing. It is important to build a strong economic constituency for the program.

Sincerely, Steve Birdlebough  
Santa Rosa

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 17:17:19

No Duplicates.

**Comment 180 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Angie  
Last Name: Manetti  
Email Address: amanetti@calretailers.com  
Affiliation: CA Retailers Association

Subject: Comments on Cap-and-Trade Auction Proceeds Second Investment Plan: Refrigerants  
Comment:

Please see comments on behalf of the California Retailers Association attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-investplan2015-ws-AGMAaVQ4UW9QMwZo.pdf>

Original File Name: Comments on CARB 2ND Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-09-01 17:28:30

No Duplicates.

**Comment 181 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Humberto

Last Name: Lugo

Email Address: humberto@ccvhealth.org

Affiliation: Komite Civico del Valle

Subject: Comment Letter Draft Concepts

Comment:

Submitting comments on behalf of  
Comite Civico del Valle  
San Joaquin Valley Leap  
IVAN

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/267-investplan2015-ws-VTYBaF0xV2kAYwdp.docx>

Original File Name: Comment Letter Second Investment 2.docx

Date and Time Comment Was Submitted: 2015-09-01 17:36:14

No Duplicates.

**Comment 182 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Tom

Last Name: Jordan

Email Address: tom.jordan@valleyair.org

Affiliation: San Joaquin Valley APCD

Subject: Draft Triennial Investment Plan Comments

Comment:

SJVAPCD comment letter attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/268-investplan2015-ws-WilRPQB3UmALfVQ3.pdf>

Original File Name: SJVAPCD Comments on the Draft Second Investment Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2015-09-01 17:34:45

No Duplicates.

## **Comment 183 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Kotin  
Email Address: adam@calclimateag.org  
Affiliation:

Subject: CalCAN Comments on Draft Investment Plan Concept Paper  
Comment:

On behalf of the California Climate & Agriculture Network (CalCAN) and our member groups, including California Certified Organic Farmers (CCOF), Community Alliance with Family Farmers (CAFF), Ecological Farming Association (EFA), Occidental Arts & Ecology Center (OAEC), and Center for Food Safety (CFS), we are pleased to provide the following comments regarding CARB's draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan.

California's agricultural landscapes, which cover nearly a third of the state's landmass, hold tremendous potential for carbon sequestration, greenhouse gas reduction, and avoidance of future emissions. At the same time, improved management of these landscapes can produce significant co-benefits, most notably in the form of greater climate change resiliency and improved air and water quality.

Our overarching interest is to ensure that sustainable and organic agricultural solutions to climate change are sufficiently encompassed in the next 3-year Investment Plan. As the Concept Paper notes, Governor Brown has emphasized the role of carbon storage on farms and rangelands in his 2030 climate and energy goals for the state. The challenges to achieving this vision cannot be overcome without robust investments that demonstrate how farmers, ranchers, and landowners can benefit from implementing climate-friendly agricultural practices and farmland protection.

The attachment to this message includes our specific comments on the Concept Paper. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/269-investplan2015-ws-WzhdOgBtUmJRNgNt.pdf>

Original File Name: CalCAN Comments on 2nd Invest Plan Concept Paper.pdf

Date and Time Comment Was Submitted: 2015-09-01 17:42:02

No Duplicates.

## **Comment 184 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: William  
Last Name: Orr  
Email Address: borr@chps.net  
Affiliation: CHPS

Subject: Support Establishment of a Healthy & Sustainable Schools Grant Program  
Comment:

Dear California Air Resources Board:

On behalf of the Collaborative for High Performance Schools (CHPS) I am submitting comments to recommend that K-12 public schools be included as an investment priority for Greenhouse Gas Reduction Fund investments in ARB's draft Three Year Investment Plan. We recommend that a new "High Performance Schools" goal be established and supported by a new "Healthy & Sustainable Schools" grant program.

One in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's greenhouse gas emissions from energy and water use, transportation, waste, heat island effects, and more. We support the ARB's goals for sustainable communities and reducing greenhouse gas emissions 40% below 1990 levels by 2030. We believe that California cannot achieve its goals for sustainable communities and greenhouse gas reductions without the participation of the state's 10,300 schools. Schools are the heart of our communities, housing more than 6 million children and thousands of teachers and staff every day. Schools are responsible for about 5% of municipal solid waste or about 763,817 tons per year, about half of which is food waste (contributing to landfill methane emissions) and about one-third is paper waste. Schools have enormous roof and asphalt-covered acreage contributing to heat island effects and polluted stormwater runoff. Dirty diesel school buses spew black carbon, increasing vulnerable children's exposures, according to ARB's own studies.

In contrast, healthy, high performance schools reduce carbon footprints substantially, save scarce funds, and engage millions of students, teachers, staff, parents, and school board members in learning about and practicing environmental sustainability, and preparing students for green careers and civic responsibility. For a modest size school district with 9,600 students, the EPA WARM model predicts that switching the bus fleet to biodiesel can save 582 M tons CO<sub>2</sub>, increasing the recycling rate from 30% to 35% can save 461 MT CO<sub>2</sub>, and adding 32,000 square feet of photovoltaics can save 441 MT CO<sub>2</sub>, for a total of 1,484 MT CO<sub>2</sub> for one school district. If all 1,000 California school districts invested in integrated projects to reduce greenhouse gas emissions, they would contribute millions of tons of savings.

Schools are the perfect local venue to invest in integrated projects that produce numerous co-benefits, including: active transportation (Safe Routes to School); zero emission school buses; recycling and composting; tree planting and asphalt removal to reduce heat island effects and create green schoolyards and outdoor classrooms; cool roofs; energy and water conservation; stormwater capture; and other measurable greenhouse gas reduction projects. And these projects can also serve as visible, hands-on sustainability learning tools for students and the community. Several school districts and individual schools in California are

leaders in sustainability. But the majority of schools - and especially those in disadvantaged communities - have outdated, inefficient, unsustainable buildings, grounds, and operations that contribute to climate change.

ARB's Draft Three Year Investment Plan does not include K-12 schools as an investment priority for greenhouse gas reductions - a big gap. The word "schools" appears only once on page 11 of the draft Plan. There is one existing program under ARB's Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP) that includes grants for rural school districts to invest in lower-emission school buses, and should be continued. Other grant programs, such as the Organics and Recycling programs managed by CalRecycle and the Urban Forestry tree planting programs managed by CalFire, do not include school districts as eligible applicants (though they could apply with non-profit or local government partners; in reality school participation has been low). Proposition 39 provides funding for energy efficiency and renewables at existing K-12 schools, but does not cover other greenhouse gas reduction projects like transit, composting, tree planting, or asphalt removal. And the estimated funds needed to fully achieve "zero net energy (ZNE)" and "zero emission" schools are an order of magnitude beyond the funds available and scope of Proposition 39.

We urge ARB to include "High Performance Schools" as an investment element in its Three Year Investment Plan 2016-2019 and to ensure that K-12 public school districts - especially those in disadvantaged communities designated by CalEPA - are eligible to receive GGRF funds via existing or new grant programs. While we recognize that K-12 schools do not fall under the Administration's jurisdiction, healthy, high performance schools are critical to achieving the State's greenhouse gas reduction goals. Currently, the barriers for K-12 school districts to pursue greenhouse gas reduction funds are too high, requiring separate complex applications and reporting to different agencies, and managing separate partnerships in order to be eligible.

We recommend the establishment of a "Healthy & Sustainable Schools" integrated grant program for school-based climate action projects with a single coordinating agency that could coordinate the review of particular school district greenhouse gas grant applications with the other relevant state agencies (ARB, CalRecycle, CalFire, etc) and administer funds to public school districts. Priority would be given to support greenhouse gas reduction projects at school districts in disadvantaged communities. This program could build on existing partnerships between ARB (like the HVIP), California Department of Education, California Energy Commission (partnering on Prop 39), California State Water Board (Drought Response Outreach Program for Schools/DROPS), and others.

ARB can also consider other means of including K-12 schools and districts in its investment priorities, whether through strengthening existing programs, changing eligibility requirements of existing programs, and/or including schools in other programs aimed at achieving Sustainable Communities.

CHPS is a national non-profit headquartered in Sacramento, dedicated to making every school an ideal place to learn. The California CHPS (CA-CHPS) Criteria has been the standard for healthy, high performance schools in California since 2002. The new 2014 CA-CHPS Criteria [www.chps.net/california](http://www.chps.net/california) embraces a design toward ZNE paradigm and creates a pathway toward ZNE for new schools and 50 percent of existing schools by 2030. Thank you for your consideration of our comments to include schools as part of California's solution for mitigating climate change.

Sincerely,

William R. Orr



Executive Director  
Collaborative for High Performance Schools

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 17:46:53

No Duplicates.

**Comment 185 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sahara  
Last Name: Saude-Bigelow  
Email Address: [sahara@sierrafoothill.org](mailto:sahara@sierrafoothill.org)  
Affiliation: Central Sierra-San Joaquin Valley Partne

Subject: Draft Comments  
Comment:

Thank you for your consideration of our comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/272-investplan2015-ws-VDNUNQd0VGEHXgdr.pdf>

Original File Name: GGRF Letter\_CS-SJV Partnership\_2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 17:49:12

No Duplicates.

**Comment 186 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Elsa  
Last Name: Tung  
Email Address: [etung@lanlt.org](mailto:etung@lanlt.org)  
Affiliation: Los Angeles Neighborhood Land Trust

Subject: LA Neighborhood Land Trust - Comments on Investment Plan Concept Paper  
Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/273-investplan2015-ws-Uz8CZQZYUG0EZwFo.pdf>

Original File Name: LA Neighborhood Land Trust - Comments on Investment Plan Concept Paper 09.01.2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 18:15:30

No Duplicates.

**Comment 187 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Bridget  
Last Name: Fithian  
Email Address: [bridget@sierrafoothill.org](mailto:bridget@sierrafoothill.org)  
Affiliation:

Subject: Draft Comments  
Comment:

Thank you for your consideration of Sierra Foothill Conservancy's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/274-investplan2015-ws-AGdVNAd0AzYBWFQ4.pdf>

Original File Name: GGRF Letter\_SFC\_2015.pdf

Date and Time Comment Was Submitted: 2015-09-01 18:21:50

No Duplicates.

## **Comment 188 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Dennis

Last Name: Murphy

Email Address: dennis@usgbc-california.org

Affiliation: USGBC California

Subject: Comments on Second Investment Plan: Metrics

Comment:

USGBC California supports energy data transparency, whole building reporting, better use of data in decision-making, performance-based building code and attacking the growing code compliance problem (CEC estimates HVAC replacement permitting at 5-10%). The software behind the LEED Dynamic Plaque is an example of initial development in this area. We need Monroney stickers for project evaluation.

Public money spent on GHG reduction should actually be evaluated by GHG reduction potential. Energy, water, waste & transportation effects can resolve to a number and projects can be ranked accordingly. One example of this approach is the Strategic Growth Council's Affordable Housing Sustainable Communities multifamily development program, which weighted Vehicle Miles Traveled (VMTs) as 55% of their scoring criteria.

The recent Eisenstein/CARB paper on the GHG impacts of water and waste laid out approaches to GHG evaluation. We forward to upcoming GHG metric efforts at OPR. We hope to see an emphasis on GHG data (as well as health metrics) across the board in assessing projects, whether they are GGFRF, ratepayer-funded IOU programs, general fund or Prop 39; the decision-making process is more similar than different.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 19:04:40

No Duplicates.

## **Comment 189 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Dennis

Last Name: Murphy

Email Address: dennis@usgbc-california.org

Affiliation: USGBC California

Subject: Making Monees Longer Through CO2toEE

Comment:

Regarding Section F (Efficient Financing Mechanisms to Maximize Investment) and stretching GGRF monies further and delivering greater climate benefits, we will never have enough funding if the outer limits of innovative financing remain revolving loan funds.

Consideration should be given to establishing a market mechanism that would create an asset class for building energy efficiency. The CO2toEE framework would add another powerful incentive for investing in energy efficiency, harness the power of the Cap & Trade market and reduce dependence on exotic out-of-state offsets deals.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/276-investplan2015-ws-VzRROAc0VHMAaQBl.pdf>

Original File Name: CO2toEE 27.pdf

Date and Time Comment Was Submitted: 2015-09-01 19:05:50

No Duplicates.

## **Comment 190 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Steve

Last Name: Troth

Email Address: Steve.Troth@QualityInteriors.net

Affiliation: Add Insulation

Subject: "Disadvantaged communities" is a broader concept than "low-income"

Comment:

Please see the attached comments from Add Insulation and Johns Manville

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/277-investplan2015-ws-UjEAaVwwVWsCYQFv.docx>

Original File Name: Comments of Johns Manville and Add Insulation to CARB Investment Guidelines; 9-1-2015.docx

Date and Time Comment Was Submitted: 2015-09-01 19:40:58

No Duplicates.

**Comment 191 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: William  
Last Name: Orr  
Email Address: borr@chps.net  
Affiliation: CHPS

Subject: Support Establishment of a Healthy & Sustainable Schools Grant Program  
Comment:

Letter copy of comments previously submitted.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/278-investplan2015-ws-UjFcO1ckUmNRelIz.pdf>

Original File Name: CARB-AB32\_Cap-Trade\_CHPS150901-signed.pdf

Date and Time Comment Was Submitted: 2015-09-01 20:02:08

No Duplicates.



## **Comment 192 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sharon

Last Name: Danks

Email Address: sharon@greenschoolyardsamerica.org

Affiliation: Green Schoolyards America

Subject: "Sustainable Schools Grant Program" in CA ARB's Greenhouse Gas Reduction Fund Inv. Plan  
Comment:

Support a "Sustainable Schools Grant Program" in the California Air Resources Board's Greenhouse Gas Reduction Fund Investment Plan 2016-2019

September 1, 2015

Dear California Air Resources Board,

We are writing to express support for Green Schools Initiative's recommendation that "K-12 public schools be included as an urgent investment priority for Greenhouse Gas Reduction Fund investments in ARB's draft Three Year Investment Plan." Green Schoolyards America signed a group letter submitted by Green Schools Initiative, and we wish to add additional information to further explain the value of directing a portion of your green infrastructure investments to school grounds in a "Sustainable Schools Grant Program".

Green Schoolyards America's mission is to inspire and enable communities across the United States to enrich their school grounds and use them to improve children's well-being, learning and play while promoting community engagement and contributing to the ecological health and resilience of cities.

Public school districts are one of the largest landowners in almost every city and town across the United States and around the world. In California alone, over 10,300 schools in more than 1,000 school districts serve more than 6 million pre-kindergarten to 12th grade students each year. Choices made by school districts about how they manage their landscapes profoundly impact their cities and generations of residents across our state whose perspectives are shaped through daily, outdoor experiences at school.

The green school ground field is gaining momentum around the world, weaving the ideas of urban sustainability, climate change mitigation, and ecological design together with academic achievement, public health, children's wellbeing, sense of place, and community engagement. Green schoolyards bring nature back to cities and suburbs by transforming barren asphalt and ordinary grass into vibrant places for learning and recreation, set within the context of the rich, local ecosystems that nurture wildlife and the natural processes that underlie and sustain our urban environment.

The California state government passed a resolution in 2014 (ACR-128, Ting), recognizing the importance of improving ecological infrastructure on land managed by public schools and connecting it to children's academic achievement and health. The resolution urges "the State Department of Education, school districts, county offices of education, and charter schools to continue to prioritize the design and construction of student-accessible green space on school campuses and to integrate use of this space into the

teaching of standards based curriculum." We believe that investments from the Greenhouse Gas Reduction Fund should be used to help public school districts comply with this resolution, and build green infrastructure on their campuses to benefit both the environment and children.

Most of California's urban school grounds are covered with asphalt and concrete that have high surface temperatures, often 20 to 40 °C hotter than vegetated areas. Heavily paved campuses—most common in disadvantaged communities—contribute directly to urban heat island effects and atmospheric warming, and create unhealthy conditions for children. Paved, impermeable surfaces also carry polluted runoff into our natural water systems. By removing schoolyard asphalt, planting trees, and allowing stormwater to infiltrate onsite, surface temperatures can be decreased, carbon can be sequestered in the soil, and financial savings can be achieved through reduced reliance on municipal water and sewage treatment. These improvements, if placed in student-accessible locations on school campuses, also greatly improve children's experience at school.

Investing in green infrastructure on school grounds is also a way to address climate change equitably, while bringing nature to parts of our cities that lack green space. Studies have shown that exposure to nature reduces stress, aids social cohesion and helps students' concentration and academic achievement. Air quality problems are also of particular concern for schools since children's smaller body size, faster metabolism and weaker immune systems leave them particularly vulnerable to ozone, carbon and particulate matter (PM10). Several studies correlate the increased presence of these elements with increased sick days for local school children.

Green school grounds benefit students, their schools, and their communities in the short-term by increasing physical activity, promoting healthy food choices, and providing valuable hands-on experiences in outdoor classroom settings, while making the physical environment more resilient, healthy, comfortable, and enjoyable. The long-term benefits of green schoolyards multiply over time: Not only are they highly visible community hubs, but by incorporating stewardship and environmental education into the physical school grounds and school curricula, students grow up to become adults who care for their environment.

Our future needs citizens who understand complex environmental issues and can help to find solutions to ongoing problems. Investing in climate change mitigation measures on school grounds will help solve the growing climate problems we now face, while also preparing our children to be the environmental leaders of tomorrow.

Thank you for considering our perspective on including schools as part of California's solution for mitigating climate change.

Sincerely,

Sharon Danks  
CEO, Green Schoolyards America  
Berkeley, CA  
sharon@greenschoolyardsamerica.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/279-investplan2015-ws-AmNWlgdkWVUAYQV3.pdf>

Original File Name: ARB\_GreenSchoolyardsAmerica-Comments.pdf

Date and Time Comment Was Submitted: 2015-09-01 20:20:29

No Duplicates.

## **Comment 193 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Kotin  
Email Address: adam@calclimateag.org  
Affiliation: Natural and Working Lands Coalition

Subject: Re: Natural and Working Lands Coalition Comments on Draft Concept Paper  
Comment:

On behalf of the Natural and Working Lands Coalition (NWLC), we are pleased to provide our comments on the draft Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan ("Concept Paper"). The NWLC seeks to ensure that natural and working landscapes are part of California's climate solution. Our groups include Audubon California, California Climate and Agriculture Network, California ReLeaf, Defenders of Wildlife, The Nature Conservancy, Pacific Forest Trust, and the Trust for Public Land.

California's natural and working lands are one of the largest and most cost-effective solutions to curbing greenhouse gas emissions (GHGs) and supporting millions of jobs. These landscapes are the state's only asset that actually removes greenhouse gases from the atmosphere, locking up carbon in trees, soils, and vegetation.

Improved management and conservation of our forests, wetlands, farms, rangelands, local parks, green alleys and urban forests pay huge dividends in other ways, including cleaner water, cleaner air, healthier and more productive farmland, and expanded green spaces for urban and underserved communities. These landscapes define California, covering over 70 million acres - nearly three-quarters of the state's landmass. They are a vital part of reaching our climate goals.

The Concept Paper includes a valuable set of themes and a framework that sets the stage for powerful action in these sectors. By recognizing that investments in our natural and working lands now can continue to yield benefits long into the future, the Investment Plan can lay the groundwork for truly transformative programs.

The attached letter contains our Coalition's general principles for the Second Cap-and-Trade Auction Proceeds Investment Plan, followed by some specific recommendations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/281-investplan2015-ws-UD5WMVciACYHcwRl.pdf>

Original File Name: Natural and Working Lands Coalition Comments.pdf

Date and Time Comment Was Submitted: 2015-09-01 21:51:21

No Duplicates.

## **Comment 194 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Josephine

Last Name: Fleming

Email Address: info@greenbusinessca.org

Affiliation: California Green Business Network

Subject: Energy, Water Conservation Upgrade Potential in Small Businesses with GGRF Funds

Comment:

The California Green Business Network provided verbal comments supporting inclusion of a small to medium business category at the 3 August 2015 GGRF Concept Plan Workshop in Sacramento. Our comments included reference to the potential for small businesses in our program that, with additional funding, would significantly increase their environmental performance to save more water and energy and reduce CO2 emissions. Panel Chair Cliff Rechtschaffen requested we follow up and submit specific comments about what that potential was specifically.

What we can tell you today is that 54% of small businesses decline energy efficiency upgrades after a free audit and consideration of the project costs minus available utility rebates (see below for related emission reductions and costs). An additional percentage of businesses only implement a portion of recommended upgrades but would do more with additional funding. Further, there are many businesses that the CAGBN serves that completely unserved by the utilities or third party providers because programs are not available in their area or they don't compete well for program attention because they are not larger businesses. The California Green Business Network is already serving these businesses so with additional project specific funds from GGRF we could avoid the loss of GHG emissions reduction opportunities that we experience now for these under/unserved businesses.

This data comes from one of the numerous partnerships the California Green Business Network has with public agency and third party energy efficiency service providers who implement energy efficiency upgrades and manage utility rebate processes for our businesses. One of those third party providers is Ecology Action who provides small to medium business energy efficiency services throughout northern California on behalf of dozens of clients ranging from PG&E to local government partnerships to municipal utilities.

Since 2010 Ecology Action has audited 12,020 small to medium businesses for energy efficiency opportunities. They offer a free on-site audit for the business. During the audit process they assess lighting, HVAC and other measures to identify the upgrade potential, including energy savings and projected reductions to utility bills. They then apply set job costs from a preselected contractor pool and gather the potential rebates from the utilities to assess what the customer co-pay would be to make the recommended upgrades. The auditor recommends an upgrade list, along with total costs, potential rebates and projected utility savings in a report that is presented to the customer. Upon seeing the project costs after rebates, over half (54%) of the small businesses they audit decline to proceed with completing upgrades.

The specific audit results from those 6,505 businesses who declined upgrades show a potential total energy savings of over 256 Million kWh per year. Applied to a conservative average equipment life estimate of 8 years, this would result in 487,425 metric tons of

Co2 reduction if upgrades were implemented. To make these upgrades free to these businesses would cost \$29M over that 5-year period, but Ecology Action anticipates that if just half of the customer co-pay could be covered by GGRF fund, 75% of businesses would complete the recommended upgrades. In that case if GGRF funds covered an equipment/contractor budget of \$10,881,546.64 the GGRF program would gain 365,569.11 metric tons of voluntary CO2 reduction for a per metric ton reduction cost of \$29.77.

Additionally, more than half of the businesses that have applied to be a part of the California Green Business Network find they cannot achieve certification because they cannot afford the water saving fixtures or the lighting upgrades as mentioned above. Many local Green Business Program coordinators say that their businesses would consider renewable energy with additional incentives. Funding from the GGRF would be able to allow SMBs to do more, and the Green Business Program would provide the framework and the incentives.

The California Green Business Network is continuing to work on analyzing additional water, energy, green chemistry and composting potential at businesses. We will do this assessment and provide a more detailed list shortly to ARB staff and panel members directly.

Thank you very much for the opportunity you have provided to the public for a very transparent feedback process for the GGRF investment plan.

Yours truly,

Josephine Fleming,  
Executive Director,  
California Green Business Networ

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-01 22:08:24

No Duplicates.

**Comment 195 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Glenn  
Last Name: Kramer  
Email Address: bki@cruzio.com  
Affiliation: Burgstrom/Kramer, Inc.

Subject: small business benefit from the Greenhouse Gas Reduction Fund (GGRF) Comment:  
Comment:

As a small business who has participated in PG&E programs, Ecology Action programs and Green Business programs here in Santa Cruz county, I very much support the inclusion of small businesses in GGRF.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:03:15

No Duplicates.

## **Comment 196 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Melvin

Last Name: Cooper

Email Address: cooper.melvin@gmail.com

Affiliation:

Subject: Needed Help

Comment:

Chevrolet of Watsonville is a California Certified Green Business, recognized by the City of Watsonville. We received technical assistance from our local Green Business Program to become recognized by our local government. As a result, we saved water, electricity, increased recycling, switched to greener chemistries, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates. Small businesses are a large part of the economy of this State. Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become Certified Green to save resources, save money and attract customers. The California Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage your Board, the Governor's office, and the State legislature to consider including a small business element in your investment plan.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:03:15

No Duplicates.



## **Comment 197 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Vanessa

Last Name: Cornejo

Email Address: vanessa@casaofsantacruz.org

Affiliation:

Subject: Green Business Support Letter

Comment:

CASA of Santa Cruz County is a California Certified Green Business, recognized by the City of Watsonville. We received technical assistance from our local Green Business Program to become recognized by our local government. As a result, we saved water, electricity, increased recycling, switched to greener chemistries, all of which reduce greenhouse gas emissions and provide multiple environmental and economic benefits.

We could still do more with additional assistance and rebates.

Small businesses are a large part of the economy of this State.

Most of us do not have environmental staff to focus on conservation and greening our business but if we are provided technical assistance, we are eager to become Certified Green to save resources, save money and attract customers. The California Green Business Program is a successful one-stop shop for small to medium sized businesses like mine to go green and quantify their efforts, and get a return on investment.

We highly recommend any small business go through the program, and believe that many small businesses making changes like we did can have a big impact. We strongly encourage your Board, the Governor's office, and the State legislature to consider including a small business element in your investment plan. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:11:26

No Duplicates.

## **Comment 198 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Edward

Last Name: Banks

Email Address: edbanks@kbkinsurance.com

Affiliation: Partner/Principal - KBK Insurance Agency

Subject: Greenhouse Gas Reduction Fund

Comment:

A letter from our business in support of additional assistance for local businesses to reduce their/our carbon footprint and help the environment.

Thank you for your consideration.

Ed Banks

Attachment:

Original File Name: 55-ggrf-guidelines-ws-B2RWMVY7VGIDdVAX.pdf

Date and Time Comment Was Submitted: 2015-09-02 08:11:26

No Duplicates.

## **Comment 199 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: William  
Last Name: Gloege  
Email Address: oflibertysons@yahoo.com  
Affiliation: Californians for Green Nuclear Power

Subject: Nuclear power - We must have it to meet goals  
Comment:

Dear Governor Brown,

We should put nuclear power at the top of our energy generating means. It produces 63.3% of America's emission free electricity with only 100 reactors out of 6,000 total energy plants.

Nuclear power, by actual numbers, is the safest of all other forms, including accidents much ballyhooed by Big Media who are largely supported by fossil fuel ads. (Forbes, "How Deadly is Your Kilowatt?" 6/10/2012).

The US Navy has had about 100,000 crew serving on nuclear ships since 1955 without a single reactor injury or fatality. Follow up on these crew show no long term effects.

Sadly, California has cut its nuclear power generation to one plant Diablo Canyon. That extremely well run plant provides 3 million Californians with emission-free electricity with the 2 billion, 300 million watts the reactors create.

New reactor designs are nearly to market and these will be even safer than present designs.

False fears has been whipped up about nuclear's safety, by groups like the "environmentalist" Sierra Club, for example. But Time Magazine caught the Club in 2012 quietly talking millions from Chesapeake Energy. Club members never were told. All the while the Sierra Club worked to shut more nuclear plants with false fears - but zero evidence of harm or fatality.

The UN reports (UNSCEAR) on Fukushima say no one died from the accident and no one will be likely to become ill from released radiation, and if they are "...it will be too small to detect."

Get the facts on nuclear power, then build more reactors in our state to fight climate change - and desalinate sea water for our State caught in dire drought, itself caused by global warming. (Diablo Canyon will begin furnishing desalinated water to nearby communities soon).

William Gloege  
Californians for Green Nuclear Power  
(all volunteer group of citizens supporting nuclear power and Diablo Canyon) CGNP.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:20:31

No Duplicates.

## **Comment 200 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Tammie

Last Name: Helmuth

Email Address: thelmuth@conejoawards.com

Affiliation: Small Business Owner

Subject: Funding for SMBs in the Cap & Trade program

Comment:

This is a request that you allow Funding for SMB's in the Cap and Trade Program. SMBs play a critical role in California and we do not have the luxury of large budgets to hire environmental consultants, do energy efficiency retrofits, or reduce GHG emissions without financial funding assistance.

In addition to the above, I would like for you to consider startup companies may need additional support with seed money to help with solutions and that will help grow the green economy.

Should you need any additional information or have questions for me, please let me know.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:29:17

No Duplicates.

## **Comment 201 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Abas  
Last Name: Goodarzi  
Email Address: abas@ushybrid.com  
Affiliation: US Hybrid Corporation

Subject: US Hybrid for greater emphasis on Zero Emission MDV/HDV and infrastructure funding  
Comment:

Dear Cap-and-Trade committee,

Thank you very much for inviting US Hybrid to attend the Los Angeles workshop for the Second Investment Plan for Fiscal Years 2016-17 through 2018-19. We appreciate the state focusing appropriations towards vehicle projects through CARB and CEC. The combined efforts by both state entities have rightly been directed towards curbing environmental pollution in disadvantaged communities through zero emission (ZE) technologies. However, US Hybrid feels there are several issues that need to be addressed by Cap-and-Trade allocations.

Challenges posed by how the Cap-and-Trade funding is allocated:

1. Much of the ZE focus today is on light-duty vehicle (LDV) projects still and not enough on medium- and heavy-duty vehicles (MDV/HDV) in spite of the fact that more than 23% of the global warming pollution is attributed to MD/HD vehicles.
2. Any ZE vehicle projects that are successfully funded by the limited MDV/HDV pots are immediately handicapped by lack of funding for MDV/HDV infrastructure.
3. Presently, OEMs are not fully committed to resources and planning to support pre-commercial deployment of ZE technology. State should be aware of this fact in ZE planning.
4. ZE goals for MDVs/HDVs are not clear enough. There is a lack of state pressure through powerful mandates such as executive orders for MDVs/HDVs.

Proposed solutions to meet above challenges:

1. State should push for greater emphasis on the potential for ZE MDVs/HDVs to solve emission problems throughout all communities, especially those with high local pollution concentration. Such areas have been identified by CalEnviroScreen.
2. State should consider widening the breadth of mandates for ZE MDV/HDV targets.
3. State should consider allocating higher amounts to ZE vehicle projects routes so that they can include funding for ZE MDV/HDV infrastructure. This lack of funding limits the ability of ZE MDV/HDVs of becoming widely adopted and re-introduces the "chicken-and-egg" problem previously and still being faced by the ZE LDV industry.
4. State should consider the 3rd party vehicle integrator model instead of the OEM model for technology development. 3rd party integrators can bridge this gap in both experience and their own relationships with OEMs. This model would provide confidence for OEMs and limit their fear of liability.
5. State should consider adding more language stating that ZE projects will be support of local supply chain for emerging technology companies and that such projects will ensure sustainable products. The projects will service and support and growth of local economy. This language becomes more important when considering

smaller 3rd party vehicle integrators and their supply chain partners.

6. State should provide more language on service and support of technology. Such activities are critical to new technologies. State should have funding allocations devoted to such needs as either explicitly called out in projects or in a distinct Operation and Maintenance (O&M) pot, the latter of which is similar to what state funding has provided for hydrogen station development.

Sincerely,

Abas Goodarzi

Abas Goodarzi, Ph.D., P.E.  
President, CEO  
US Hybrid Corporation  
445 Maple Ave., Torrance, CA 90503-3807  
Tel: 310-212-1200, Fax: 310-212-1102

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/290-investplan2015-ws-UmRQYwEtWGxVNAJw.pdf>

Original File Name: 65-ggrf-guidelines-ws-B3JdKAdZWGMKdQJg.pdf

Date and Time Comment Was Submitted: 2015-09-02 08:29:17

No Duplicates.

## **Comment 202 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Williamson  
Email Address: chris.williamson@ci.oxnard.ca.us  
Affiliation: City of Oxnard

Subject: Comment on 2nd Investment Plan for GHG Fund  
Comment:

In my city of 206,000 we have a large disadvantaged community, five 95%+ Calenviro screen census tracts, and are 80% non-White - just the population and circumstances for which you want to reserve GHGRF grants. But, we have NO staff to prepare applications that may, or may not, be granted. Consultants help, but they eventually need staff review and signoff and may not know the area well enough to do an accurate competitive grant.

My suggestion is to take an annual small amount of the GHGRF and allocate it annually to the cities and counties that are HUD CDBG Entitled, based on a per capita formula with a minimum and maximum amount, to be used to prepare GHGRF grant applications.

The community has three years to use these funds, which can accumulate, to prepare grants OR use the funds for actual GUG-reducing projects from a pre-approved list - something like CDBG programs - with your permission.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:50:27

No Duplicates.



## **Comment 203 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Derek  
Last Name: Mazzeo  
Email Address: Derek.Mazzeo@lacity.org  
Affiliation: Office of Los Angeles Mayor Eric Garcetti

Subject: Formal Comments on Greenhouse Gas Reduction Fund Guidelines from City of Los Angeles  
Comment:

Please see the attached file for communication from Los Angeles Mayor Eric Garcetti.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/292-investplan2015-ws-BTIGMV1xWGwEZQFz.pdf>

Original File Name: 71-ggrf-guidelines-ws-WihTOlM2VndWOVM0.pdf

Date and Time Comment Was Submitted: 2015-09-02 08:55:14

No Duplicates.

## **Comment 204 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Maureen

Last Name: Hart

Email Address: hartmo@sonic.net

Affiliation:

Subject: Fund prototpes of new greentech compaies with carbon auction money

Comment:

Hello

Support and take the responsibility of funding products that could be game changers in energy efficiency. Help to make the leap to better products that deliver great reductions of energy use. Greentech.

Also small and medium size business should be gettin a good share of this.

This auctions money should not just turn into a feeding frenzy for big corporation.

Support innovation and that is what CA is all about.

Support projects that were not planning to go ahead without your money. Show support for where we need to be with new energy efficient motors and more

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 08:59:47

No Duplicates.

## **Comment 205 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Burnet D.

Last Name: Brown

Email Address: burnet@greentechmotors.com

Affiliation: Gree

Subject: Allocation of Cap-and-Trade Auction Proceeds

Comment:

GreenTech Motors (GTM) submits these comments to express strong backing for proposals to allocate AB 32 Cap and Trade Auction Proceeds to support funding of cleantech startups and small business enterprises. Specifically, GTM recommends that proceeds be dedicated to support the funding of 1) high efficiency clean energy prototype technologies being developed by small businesses, 2) marketplace demonstration of these technologies, and 3) programs to build a bridge over the 'Valley of Death' that currently prevents promising startup technologies from successful entry into the marketplace.

From Hewlett Packard to Apple, small businesses and garage-borne startups have engineered breakthrough technologies that have played a crucial role in making California the largest economy in the U.S. and equivalent to the 8th largest in the world. California cleantech small businesses and startups, however, are facing a trending decline in cleantech investment, do not have the financial resources, the pre-existing revenue streams that large industrial enterprises enjoy or the luxury of large budgets necessary to develop prototypes and validate, integrate and demonstrate them. Nor do they have the large industry legacy of networking access to infrastructure, distribution channels or utilities.

At a recent Growth Capital Conference in Los Angeles, venture capital and angel investors advised cleantech startups in the audience that the U.S. has reached the end of the current investment cycle - similar to the period following the Dot Com bubble. Clean energy startups were advised that cleantech had lost much of its luster over the past few years and that it would be an unlikely proposition as well as extremely difficult to secure angel or venture capital investments for cleantech companies.

As a result of these obstacles, funding of prototype and demonstration of clean energy technologies presents a critical opportunity to fill this gap. Providing seed money and a framework to overcome these barriers will go far toward more rapidly developing solutions for reducing greenhouse gas (GHG) emissions and achieving AB 32's 2020 objectives in the rapidly narrowing timeline that the State of California faces.

A summary of GTM's key points are as follows:

1. Valley of Death Barrier. In the State of California, there is no single statewide mechanism in place specifically for small startup companies (that GTM is aware of) that addresses the 'Valley of Death' barrier faced by startups. Given the scale of the climate instability challenge, filling this gap presents a critical opportunity to enlist the innovative capabilities of California startups and small businesses and leverage them to solve this problem and accelerate market penetration.
2. Prototype Development and Demonstration. Given the policy demands for clean energy technology solutions, the inability to secure sufficient funding to develop prototypes and demonstrate

them is preventing more rapid entry into the marketplace. In GTM's case, a half-dozen potential demonstration projects (U.S. Air Conditioning Distributors, City of Thousand Oaks water pumping stations and the TAG Forum water utility districts) remain in waiting due to the shortage of prototype development dollars. 3. Priorities. GTM urges that special attention be given to energy efficiency startups and small businesses for the following reasons:

&#61496; Energy efficiency is the fastest deployable energy source (AAAS Holdren) and offers the most rapid route to attainment of GHG emissions objectives.

&#61496; Energy efficiency is the cheapest, easiest, fastest, safest, largest and least risky energy resource.

&#61496; Energy efficiency is the single most important lever in addressing the climate change issue. (McKinsey)

&#61496; No other energy resource matches the compelling economics offered by energy efficiency. (McKinsey) Electric motors represent one of the largest untapped energy efficiency opportunities.

Electric motor-driven systems are the single largest consumer of electricity worldwide, accounting for 46% of global power use and consuming more than twice as much electricity as lighting, the next largest end-use. In the U.S., at a cost between \$70 - \$90 billion per year, electric motor-driven systems account for more than 50% of the total electricity used nationwide - meaning, that half of all power plants in the U.S. exist exclusively to generate electricity to operate electricity motor-driven systems. In the words of John Malinowski, Senior Product Manager at Baldor Electric and Chairman of the National Electrical Manufacturers Association (NEMA) Motor and Generator Section, for a single product category, electric motors place a "staggering" amount of demand on the electricity grid.

The global market is dominated by aging and inefficient motors. Nearly two-thirds of the existing global stock of running electric motors are inefficient (classified as falling under IE1 or IE0/Eff3 efficiency standards). In addition, the global stock of electric motors is aging as many old motors installed into the infrastructure in the 1970s and '80s are approaching the end of their useful life while industries continue to operate less efficient motors beyond their rated life.

As a result, high efficiency motor systems present enormous opportunities for cutting electricity consumption, capturing cost savings and reducing greenhouse gas emissions.

The potential savings of transitioning from inefficient to high efficiency electric motor-driven systems by the year 2030, according to the International Energy Agency (IEA), are on the order of \$2.8 trillion in reduced electricity costs, 42,000 terawatt hours (TWh) of electricity consumption and 29 gigatonnes of reduced greenhouse gas (GHG) emissions.

GTM is based in Westlake Village, California. Our company uses aerospace engineering to develop clean energy solutions. GTM's Large Air Gap Electric Ring (LAGER) technology was developed in the garage of a Boeing engineer in Westminster, California. It is an extremely efficient, extremely compact and extremely lightweight advanced electric motor. The technology has been modeled at 63% more heat loss efficient, 80% smaller and 85% lighter than conventional motors. Finite element analysis (FEA) efficiency simulation findings indicate a motor efficiency of 97.7% for a 20 horsepower (HP) motor. This efficiency level exceeds the efficiency of any other induction motor currently covered by DOE and NEMA up to 500 HP. Its efficiency density (efficiency per unit of weight or volume) surpasses all same size electric motors currently available in the marketplace and measured to date.

Originally designed by aerospace engineers to endure the harsh extremes of space and meet the exacting demands of the lighter weight and smaller dimensions required for space-bound payloads,

the technology has been developed for data center cooling, commercial HVAC as well as wastewater, groundwater, desalination and freshwater pumping applications.

Small business startups with garage-borne technologies like the LAGER technology present a significant opportunity to the State of California. They represent a highly valuable State treasure, resource and asset. GTM strongly supports initiatives to leverage this asset to the service of attaining California's greenhouse gas reduction emissions initiatives.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/294-investplan2015-ws-WmJTZVB8BzNVNAZ0.pdf>

Original File Name: 80-ggrf-guidelines-ws-UW1VflZmAmULIAk7.pdf

Date and Time Comment Was Submitted: 2015-09-02 09:03:02

No Duplicates.

## **Comment 206 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Livingston  
Email Address: adam@sequoiariverlands.org  
Affiliation: Southern Sierra Partnership

Subject: Southern Sierra Partnership Comments re: GGRF Investments  
Comment:

Our comment letter on the Draft Investment Plan Concept Paper and Draft Funding Guidelines is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/295-investplan2015-ws-VGNTZgMvWGwGZwh6.pdf>

Original File Name: 73-ggrf-guidelines-ws-AnFcKQNYAw8KYAht.pdf

Date and Time Comment Was Submitted: 2015-09-02 09:12:49

No Duplicates.

## **Comment 207 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Torri  
Last Name: Estrada  
Email Address: testrada@carboncycle.org  
Affiliation: Carbon Cycle Institute

Subject: Comments of Investment Plan, Working and Natural Lands Comment:  
Comment:

Dear Ms. Livingston,

The Carbon Cycle Institute (CCI) appreciates this opportunity to comment on the California Air Resources Board's (ARB's) Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Investment Plan). CCI is committed to stopping and reversing global warming by advancing science-based solutions that remove atmospheric carbon, while promoting environmental stewardship, social equity and economic sustainability. We are pleased by ARB's increased focus on Working and Natural Lands in the Investment Plan and would like to provide comments on how the State can support land managers, landowners, and resource organizations to deploy carbon farming and climate-beneficial land and resource management practices throughout California. Please find attached our comments on the Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/297-investplan2015-ws-UzBTNIY+BwsGY1M8.docx>

Original File Name: CCI\_comments.docx

Date and Time Comment Was Submitted: 2015-09-02 09:23:17

No Duplicates.

## **Comment 208 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Sigrid  
Last Name: Wright  
Email Address: aprice@cecmail.org  
Affiliation:

Subject: Specific Comments to Concept Plan/Funding Guidelines - California Green Business Pro  
Comment:

Thank you for the opportunity to provide comment to the Concept Paper and Funding Guidelines.

The Community Environmental Council (CEC) is a founding member of the Santa Barbara County Green Business Program. The Santa Barbara Green Business Program has certified over 80 local businesses , helping them implement comprehensive green practices through energy audits and technical assistance.

We strongly support the inclusion of a small businesses category in the Auction Proceeds Investment Plan. 3.4 million small to medium businesses in California account for 99% of the state's employers, employ 52% of the workforce and represent 45% of the commercial energy use in our state. Given the potential impact of energy reduction within this sector, an effective Greenhouse Gas Reduction Investment Plan for the state should have small businesses as a key element. The investment strategy should include significant funding toward small business greening programs, especially those that demonstrate significant, measurable, and verifiable reductions in GHG.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-09-02 13:31:50

No Duplicates.



**Comment 209 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

First Name: Jacqui

Last Name: Irwin

Email Address: Assemblymember.Irwin@assembly.ca.gov

Affiliation: Assemblymember, 44th District

Subject: Re: Support for Cap & Trade Funding for the California Green Business Network  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/299-investplan2015-ws-WzhTOgRoVmhVNgdp.pdf>

Original File Name: Comment Letter\_Jacqui Irwin.pdf

Date and Time Comment Was Submitted: 2015-09-15 13:03:13

No Duplicates.

**Comment 210 for Auction Proceeds Investment Plan Public Process (investplan2015-ws) - 1st Workshop.**

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

Subject: Natural Resources Section, Second Investment Plan concept paper  
Comment:

Gentlepersons:

Attached please find comments from Endangered Habitats League.  
These comments are only submitted electronically.

Please let me know if additional information would be helpful.

With best regards,  
Dan Silver  
Executive Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/300-investplan2015-ws-VWRTZVZ6WXpVOII+.pdf>

Original File Name: 10-pillarsnatworklds-ws-AGVQPgZrUy0LflM2.pdf

Date and Time Comment Was Submitted: 2015-09-24 13:12:59

No Duplicates.

**There are no comments posted to Auction Proceeds Investment Plan Public Process (investplan2015-ws) that were presented during the Workshop at this time.**