

**Comment 1 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Molly  
Last Name: Pearson  
Email Address: mmp@sbcapcd.org  
Affiliation:

Subject: Clarification on something Rajinder Sahota just said  
Comment:

not sure if I heard right, but I believe Ms. Sahota just replied to a question by saying that projects should come up with a plan to mitigate at the "social cost of carbon". Can you please explain what is meant by the social cost of carbon?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 10:26:45

No Duplicates.

**Comment 2 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Darrell

Last Name: Clarke

Email Address: darrell@dclarke.org

Affiliation:

Subject: Scoping Plan Workshop: Incentives to reduce VMT?

Comment:

An important lever that I don't see in the list of potential measures toward the 2030 goal is incentives to reduce light vehicle VMT. I'd be interested in comments by the presenters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 11:40:50

No Duplicates.

**Comment 3 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Amy  
Last Name: Vanderwarker  
Email Address: amy@caleja.org  
Affiliation: California EJ Alliance

Subject: Carbon tax modeling  
Comment:

On behalf of the California Environmental Justice Alliance, I am writing to support ARB's detailed analysis of a carbon tax scenario, which is important from an EJ perspective. We will provide more detailed comments on our preferred design for a carbon tax, but want to ensure that ARB uses a revenue-generating model (as opposed to a revenue neutral tax).

We also look forward to more detailed information on the social cost of carbon and how ARB is going to assess that cost for California.

Finally, I do have a question on the refinery measure that was included in the scenarios. Is there more information on what ARB is thinking this measure will include?

Thank you very much,  
Amy Vanderwarker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 11:53:18

No Duplicates.

**Comment 4 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Kristin  
Last Name: Ralff-Douglas  
Email Address: krd@cpuc.ca.gov  
Affiliation: CPUC

Subject: question for workshop  
Comment:

I am wondering where the local government reductions that you mentioned at the start of the workshop show up in the reduction "wedges"?

In one of the slides, it calculates that the Scoping Plan Scenario calls for a total of 67% reduction in the electric sector from 1990 to 2030. Can you tell us how that number was calculated and what's in it (eg is the electric sector cap and trade responsibility included or is it just RPS and EE)?

Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 12:13:20

No Duplicates.

**Comment 5 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Virginia

Last Name: Matzek

Email Address: vmatzek@scu.edu

Affiliation:

Subject: need for shrub biomass data

Comment:

My take on the inventory reports is that the biomass figures for shrublands are really poorly constrained...and that's about 11% of California, in chaparral, coastal sage scrub, and other arid or semi-arid woody veg. Doing more LIDAR and running more models is not going to improve this, because the underlying base data for converting shrubland area to tons of biomass are just not there. ARB needs to fund the development of shrub allometrics or at the very least some groundtruthing of the remotely sensed data so that we can feed better info into the models. This would help not only to figure out fire emissions, but to understand carbon implications for land management activities like fuel thinning, ecological restoration, and utility veg management.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 14:07:32

No Duplicates.

**Comment 6 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Susan  
Last Name: Robinson  
Email Address: srmw@comcast.net  
Affiliation:

Subject: Working Lands  
Comment:

1. The current FIA data is outdated and does not reflect the impact of drought, recent fires or beetle kills on forest inventory . Also since FIA plots on private forest lands is done only with permission from the landowner - how can the public be assured that the limited FIA data is accurate and not biased - especially on private industrial timber lands?
2. What will ensure that soil and root carbon losses/emissions are accurately accounted for - especially in clearcut logging activities which include deep soil ripping and root disturbance?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 14:16:23

No Duplicates.

## **Comment 7 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Public Solar Power Coalition

Subject: scd aqmp 6/30/15 he/pspc 8/12/16comment 30+% ch4 inc.past 12 yrs=~7-800ppm co2e No  
Comment:

This is the first comment by me/pspc Harvey Eder ex.dir. pspc for self and for pspc Public Solar Powe Coalitiom. Nov 7,2016 carb scoping plan meeting comments.

First i we hereby/in incorporate by reference all of the comments and the records of the SCAQMD aqmp and all bod meetings and bd committiees advisory groups going back 30 year to1986 this also includes litigatgation in 1992 9 ALL COMMENTS IN PLANS/BACKSLIDING ETC. BC CASES and Jan.3 and 4 th etc 2013 Sc cases v scaqmd and appeals record as well as comments to the Federal Register etc. as well as all records of the CPUC.CEC and CARB going back to under chair of Dr. Alan Loyd etc ZEV hearings in Sacto etc.

Page 10-2 of the Draft june 30,2016 AQMP written by Dr. Arron Katzenstein on Energy and Climate states that "over the past 12 years there has been a world wide increase of at least 30% CH4 " After pointing this out to Dr. Katzenstein he worked out the numbers on todays best science (IPCC 2013 AR5) and ch4 comes to 274 ppm co2e for ch4 (methane)+-10% or with co2 now at 406 ppm aqdds to ~700-800 ppm co2e today not 2100 as was estimated. this is without n20 which is about 50 ppm co2e plus etc. This nocks out the ab1803 2006 20% reduction of ghgs co2e from 1990 levels by 2020 and 40% reduction by 2030 (cite 2015 ab350) Co2 levels in 1990 were 350 ppm minus 20 and 40% or 70 and 140 ppm co2 from 350 equals for 2020 co2 only 280 ppm co2 in 2020 and 210 ppm co2 in 2030 plus other ghg ch4 n20 etc,so with us now having apr plus of 700 to 800 ppm co23 plus we need ITSC Now ( Immediate Total Solar Conversion) as Expediently as Practiable (which is CAA CCAA law) etc. Solar is now cost effictive etc now....

This document is copyrighted by Harvey Mark Eder as well as all comments he.i submitted orwill submitt with all rights reserved Oc the little c is ment to be put into the big O...

The Perma Frost is Melting etc

Also in the record in

the journal Energy is the june 2014 article by Mark J. JaCOBSON et. al. Converting California to 80 to 85 % Solar/ Renewables by 2030.

This is part 1 of submitted by HE for self and for PSPC.

Solarly

Harvey Eder for self aand forex. Dir. PSPC

Public Solar Power Coalition

1223 Wilshire Bl. #667

Santa Monica, Ca. 90403

the sun makes the wind blow thw water flow and the plants grow  
its the engine of earth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-07 14:15:44

No Duplicates.

## **Comment 8 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation:

Subject: Comment on AB 32 Scoping Plan  
Comment:

Energy efficiency and conservation are the cheapest form of "new clean energy". But California's new energy efficiency standards have to be vigorously implemented and fully taken into account in any scoping plan. Electricity demand and should drop more than forecasters seem to acknowledge if full implementation succeeds. Conventional estimates of reduced demand have always proven to have been too high during recent decades.

Moreover, any scoping plan needs to reckon with the entire array of distributed renewable energy resources -- storage, behind the meter solar, advanced informational technology, advanced demand response and new strategies made possible by electric vehicles such as V2G. Pumped storage needs to be clearly supported now as a really vital asset needed as intermittent renewables become a large part of our electricity generation.

Former assumptions about the need for added natural gas generation are being shown to be invalid. State agencies should officially make it GHG policy that no new natural gas generation be allowed. Competitive cleaner alternatives now exist. More natural gas plants will soon be obsolete, adding to stranded costs. Such investment is unwise, given that myriad new cleaner alternatives have come to the fore.

Direct true costs for fossil fuel combustion should be accurately made part of all scenarios. These costs include all health impacts of conventional air pollution as well as truer costs of carbon pollution. Conventional analysis famously understates these costs. The potential damage of continued emission of fossil fuels is, in fact, incalculably large -- the climate disruption that unabated emissions entails amounts to an existential crisis for the economy, for society, for civilization and for the very biological systems that sustain us. Scoping needs to reflect the emergency nature of the decarbonization process so desperately required by the climate challenge.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-14 13:16:59

No Duplicates.

**Comment 9 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Will  
Last Name: Decker  
Email Address: wd@nfcrc.uci.edu  
Affiliation: National Fuel Cell Research Center

Subject: Scoping Plan Comments from the National Fuel Cell Research Center  
Comment:

Attached are the comments to the ARB Scoping Plan, submitted on  
November 14, 2016

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-sp2030scenarios-ws-BnVXMII8V3RXOARq.pdf>

Original File Name: Scoping Plan Workshop Comments II NFCRC 11-14-sg.pdf

Date and Time Comment Was Submitted: 2016-11-14 14:52:04

No Duplicates.

**Comment 10 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Yushuo

Last Name: Chang

Email Address: ychang@placer.ca.gov

Affiliation:

Subject: The proposed community-wide goal of 6 MTCO<sub>2</sub>e per capita by 2030

Comment:

Can you provide a detailed description how the proposed Community-wide goal of 6 MTCO<sub>2</sub>e per capita by 2030 be developed (on slide #11)? Is it based on the total projected statewide GHG emissions and population at 2030? Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-14 16:20:28

No Duplicates.

**Comment 11 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Joshua  
Last Name: Hanthorn  
Email Address: jhanthorn@defenders.org  
Affiliation: Defenders of Wildlife

Subject: Defenders of Wildlife Comment 2030 Scoping Plan Target NWL  
Comment:

Please see attached comments from Defenders of Wildlife. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-sp2030scenarios-ws-UzcBYlQzWG5SOgt.pdf>

Original File Name: Defenders Comment 2030 GHG Target Update NWL.pdf

Date and Time Comment Was Submitted: 2016-11-16 11:26:02

No Duplicates.

**Comment 12 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Sean  
Last Name: Armstrong  
Email Address: seanarmstrongpm@gmail.com  
Affiliation: Redwood Energy

Subject: All-electric with high performance heat pumps is less expensive to build and operate  
Comment:

Hi CARB Staff,

In our design practice of ZNE housing, our primary task is understanding the energy consumption of various design strategies, and the cost of each alternative. We have retrofitted 6000 residences with solar, 1500+ of them to 100% ZNE, in the last five years. Over that period the performance of heat pumps has improved from EF = 2.35 to EF = 3.4, and HSPF = 11 to HSPF = 14. Gas has not improved past EF/AFUE = .98, and absent the experimental gas fueled heat pump of EF =1.2, gas has reached its' theoretical limit of burn efficiency. Consequently we have found this year that all-electric utility bills are now cheaper than gas hybrid bills, and the higher costs with gas equipment vs. heat pumps will almost certainly grow next year, and into the future. Over our five years of ZNE consulting we have found uniformly that projects save \$2500/apt or more, and \$4500/house was documented by KB Homes. We have reached the point where even with historically low gas prices and high electricity prices, all-electric, high performance (e.g 2016 Code) houses are cheaper to build and cheaper to operate. Please focus on the cost-effectiveness of all-electric housing, which saves money for the builder/developer and the buyer or tenant, as well as supports 100% solar offset and uses a rapidly decarbonizing grid.

Sincerely,  
Sean Armstrong  
Managing Principal  
Redwood Energy

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-17 11:47:41

No Duplicates.

**Comment 13 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Ann  
Last Name: Edminster  
Email Address: ann@annedminster.com  
Affiliation: Design AVEnues LLC

Subject: Climate Change Scoping Plan: Electrification  
Comment:

ZNE design practitioners have found that all-electric utility costs are now less than utility costs for mixed-fuel homes, and all-electric installation costs are also lower due to the elimination of gas infrastructure.

All-electric homes are also very clearly most consistent with the State's climate change goals. Therefore, please pursue electrification immediately.

Sincerely,  
Ann Edminster  
principal, zero-energy consultant  
Design AVEnues LLC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-17 12:11:26

No Duplicates.

**Comment 14 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Indradeep

Last Name: Ghosh

Email Address: indraghosh@hotmail.com

Affiliation:

Subject: Building Electrification

Comment:

Please consider building electrification under Alternative 1 as top priority. I personally know of 5 cases in the South Bay where people have done this along with with roof top solar and net metering and now pay almost nothing in utility bills. It does not cost a huge amount of money and can be cash flow positive even with financing. This is the quickest way to get off natural gas in the residential sector.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-17 12:52:10

No Duplicates.

**Comment 15 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Lars

Last Name: Peters

Email Address: lars.peters@sfgov.org

Affiliation:

Subject: Support for CNBN design recommendations

Comment:

The San Francisco Department of the Environment is committed to expanding charging options for the growing number of Electric Vehicles on our roads. The ability to monetize GHG reductions based on fuel displacement will increase the financial attractiveness of both public and private investment. It will further our goals to offer convenient EV charging options anywhere to anyone.

We therefore would like CARB to consider the design recommendations proposed by the CNBN and strengthen our ability to continue to lead the nation on publicly available charging infrastructure.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-17 14:17:11

No Duplicates.

## **Comment 16 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Bret

Last Name: Andersen

Email Address: bretande@pacbell.net

Affiliation: Carbon Free Palo Alto

Subject: Regarding efficiency and electrification scenarios

Comment:

Thank you for including building electrification as a primary path forward. I would like to add to points:

1) More specifically, efficiency should be tied to the electrification of buildings pathway since it lowers the electric power demand, has similar fixed asset financing profile.

2) The target for efficiency and electrification should be retrofitting existing residential housing as the major GHG source in residential housing.

3) We need to include policies that address the known barriers to mass adoption. Carbon price signals and rebates and the like have not and cannot move the needle. Mandates and financing retrofit measures via the established utility tariff billing and financing models are the only way to address the cause of historical and continued under-investment in efficiency and electrification: high up front cost, long lifecycles and payback periods and information gaps.

Thanks for the good work and for listening to residents,

Bret Andersen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-17 16:24:48

No Duplicates.

**Comment 17 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Vanessa  
Last Name: Warheit  
Email Address: vwarheit@gmail.com  
Affiliation:

Subject: Building electrification  
Comment:

Thank you for looking seriously at building electrification; it is one of the most promising measures available to decarbonize our state and address climate change. Please include building electrification in your primary recommendations, as we need policy levers to encourage its implementation at scale. Neither cap + trade nor a carbon tax will provide the price signals necessary to create a significant market transformation, which is what we'll need in order to make efficient electric end uses available to the vast majority of Californians. Toward that end, please also remember to take the rental sector into consideration when designing these policies, as the market incentives for landlords will always be radically different from those of homeowners.

Thank you,

Vanessa Warheit  
Berkeley, Ca

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-18 09:34:34

No Duplicates.

## **Comment 18 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Karen  
Last Name: Maki  
Email Address: karenmaki@comcast.net  
Affiliation:

Subject: Comments on Natural and Working Lands Sector  
Comment:

Here are my comments:

1. The plan is not grounded in a clear picture of the current situation our forests face - and doesn't reveal whether California forests are sequestering more carbon dioxide than is released by harvesting, fire, and mortality. The inventory of forest lands being used covers the period from 2001-2010. It does not cover recent drought and beetle infestations. Other inventories listed in the materials provide very different results blurring the picture even further.

2. Although the presentation includes a goal of increasing the number of large trees and the diversity of trees, there is no actions mentioned that would result in this end result. Thinning and prescribed burns would remove some small trees, but no actions are suggested which would result in more large diverse trees being retained.

3. Clearcutting must be banned as a harvesting method from California forests as it results in dense small trees - just the situation that we now must use thinning and prescribed burns to correct. Clearcutting also increases fire risk. There are many recent examples in which natural or selectively logged forests burn in a mosaic pattern and plantations (the end product of clearcutting) are burn completely.

4. Scientific studies have shown that thinning is most effective when done in conjunction with prescribed burns. Thinning alone can increase fire risk.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-18 14:00:27

No Duplicates.

**Comment 19 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Taheri  
Email Address: staheri@scppa.org  
Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on November 7 Scoping Plan Workshop  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-sp2030scenarios-ws-BzYGMQYqVDUBNIR5.pdf>

Original File Name: 11-21-2016 SCPPA Comments for ARB 2030 Scoping Plan Overview.pdf

Date and Time Comment Was Submitted: 2016-11-18 15:43:32

No Duplicates.

**Comment 20 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Gary

Last Name: Hughes

Email Address: ghughes@foe.org

Affiliation: Friends of the Earth - US

Subject: Comment on Nov 7 Scoping Plan Update Public Workshop

Comment:

The attached document is our comment letter regarding the Nov 7 Scoping Plan Update Public Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-sp2030scenarios-ws-AGYCa1w4AH4BcgV2.pdf>

Original File Name: FOE-US\_carb\_commentltr\_scopingplannov7workshop.pdf

Date and Time Comment Was Submitted: 2016-11-18 17:09:07

No Duplicates.

**Comment 21 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Ara  
Last Name: Marderosian  
Email Address: ara@sequoiaforestkeeper.org  
Affiliation: Sequoia ForestKeeper

Subject: CARB 2030 Target Scoping Plan: Natural and Working Lands  
Comment:

Mary D. Nichols, Chair  
Members of the Board  
California Environmental Protection Agency  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Subject: CARB 2030 Target Scoping Plan Up-Date: Natural and Working Lands

Dear Chairperson Nichols, Members of the Board, and Staff;

Please accept the attached 2030 Target Scoping Plan Comments on behalf of Sequoia ForestKeeper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-sp2030scenarios-ws-UyBcPABqU19SNwVk.pdf>

Original File Name: SFK CARB Plan Scoping comment.pdf

Date and Time Comment Was Submitted: 2016-11-19 14:53:48

No Duplicates.

**Comment 22 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Yichao

Last Name: Gu

Email Address: ygu@sandiego.edu

Affiliation:

Subject: Question on Local Action & Recommended Local Plan Goals

Comment:

Can you provide more details on the "community-wide goal of 6 MT CO2e per capita by 2030 and 2 MT CO2e per capita by 2050 implemented through Climate Action Plan" for the following two questions:

- How are the community-wide per capita goals developed/calculated?

- What are the GHG emission sources included in the goals? For example, for local city/county climate action plans, should the local jurisdictions capture in their community-wide GHG inventories all emission sources in the California GHG emission inventory developed by ARB or the minimum emission sources (five required basic emissions generating activities) to comply with U.S. Community Protocol for Accounting and Reporting of GHG Emissions developed by ICLEI?

Thank you very much!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 10:09:01

No Duplicates.

**Comment 23 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Sue  
Last Name: Hall  
Email Address: sue@climateneutral.com  
Affiliation: EVCCC

Subject: Comment on Nov 7 2030 Target Scoping Plan workshop  
Comment:

Thank you for receiving comments regarding the 2030 Target Scoping Plan from the EV Charging Carbon Coalition (EVCCC), as submitted by the Climate Neutral Business Network (CNBN).

Please see attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-sp2030scenarios-ws-AGFcKFc0BQkFcAVw.docx>

Original File Name: ARB Submission from CNBN on behalf of EVCCC Nov 21.docx

Date and Time Comment Was Submitted: 2016-11-21 10:17:37

No Duplicates.

**Comment 24 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Ara  
Last Name: Marderosian  
Email Address: ara@sequoiaforestkeeper.org  
Affiliation: Mr.

Subject: CARB 2030 Target Scoping Plan Up-Date: Natural and Working Lands  
Comment:

November 21, 2016

Mary D. Nichols, Chair  
Members of the Board  
California Environmental Protection Agency  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Subject: CARB 2030 Target Scoping Plan Up-Date: Natural and  
Working Lands

BECAUSE ERRATA OCCURRED IN THE PREVIOUSLY SUBMITTED ATTACHMENT,  
PLEASE REPLACE IT WITH THE FILE ATTACHED TO THIS SUBMISSION.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-sp2030scenarios-ws-B3QFZVY8V1sEYQFg.pdf>

Original File Name: SFK CARB Plan Scoping comment.pdf

Date and Time Comment Was Submitted: 2016-11-21 11:41:45

No Duplicates.

**Comment 25 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments -- ARB Scoping Plan Scenarios\_11\_7\_16 Workshop  
Comment:

Attached please find comments on behalf of the Climate Change Policy Coalition [CCPC] in response to the ARB workshop conducted on November 11, 2016 focusing on 2030 Scoping Plan Policy Scenarios.

If you have any questions please feel free to contact Shelly Sullivan at (916) 858-8686.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-sp2030scenarios-ws-AGNWM1EgAjJXDgZn.pdf>

Original File Name: CCPC ARB Comments\_11\_21\_16.pdf

Date and Time Comment Was Submitted: 2016-11-21 11:58:15

No Duplicates.

**Comment 26 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: George  
Last Name: Leonard  
Email Address: gleonard@oceanconservancy.org  
Affiliation: Ocean Conservancy

Subject: Comments on November 7 ARB Scoping Plan Workshop  
Comment:

Please see our attached letter. Thank you for the opportunity to comment. Very truly yours, George H. Leonard

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-sp2030scenarios-ws-BWRTJwRnUFwBZAVq.pdf>

Original File Name: ARB Comments on Working Lands\_111816.pdf

Date and Time Comment Was Submitted: 2016-11-21 12:13:59

No Duplicates.

## **Comment 27 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Nicole  
Last Name: Vermilion  
Email Address: nvermilion@placeworks.com  
Affiliation: AEP Climate Change Committee

Subject: AEP Climate Change Committee Comments on the GHG Policy Scenarios  
Comment:

On behalf of the Association of Environmental Professionals (AEP), Climate Change Committee, we appreciate the opportunity to provide comments on the November 7, 2016, Public Workshop on the 2030 Target Scoping Plan Update: GHG Policy Scenarios, Natural & Working Lands, and Public Health Analysis. This supplements our comments provided to CARB on June 8, 2016 on the 2030 Target Scoping Plan Concept Paper.

AEP is a non-profit organization of California's environmental professionals. AEP's Climate Change Committee (Committee) members are actively involved in supporting California cities and counties in the evaluation of greenhouse gas (GHG) emissions impacts for new development subject to the California Environmental Quality Act (CEQA), preparing communitywide GHG emissions inventories and forecasts and developing Climate Action Plans (CAPs).

The update to the Scoping Plan to address the 2030 target in Senate Bill 32 (SB 32) and Executive Order B-30-15 is of great interest to the Committee and our CEQA and climate action planning work with California cities and counties, especially as it relates to local target setting for climate action plans/GHG reduction plans. The Committee supports CARB in its challenging work to establish a working framework for achieving the next milestone in GHG reductions for California. The Committee published two white papers in 2015 and 2016 (update attached) that examine in detail the challenges for both CEQA practice and local climate action planning related to post-2020 GHG reduction targets and many of us are already engage in developing local CAPs that include post-2020 GHG reduction goals. As a result, we are concerned that the proposed policies for local plan level goals extend too far into local policy decision-making by specifically identifying a local target for climate action plans. The committee is also concerned that establishing a community-wide goal for 2050 will immediately shift the focus of CEQA and Climate Action Plan target setting to the 2050 goal, for which no clear path is certain for local governments and which will result in an ineffective and speculative focus on 2050 at the expense of the real and urgent necessity to focus on meeting the ambitious 2030 goal.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-sp2030scenarios-ws-AGFXNFMiUGAHbgNu.zip>

Original File Name: AEPCCommentsPolicyScenarios.zip

Date and Time Comment Was Submitted: 2016-11-21 12:49:14

No Duplicates.

**Comment 28 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Chris

Last Name: Busch

Email Address: chrisb@energyinnovation.org

Affiliation: Energy Innovation: Policy and Technology

Subject: Comments and questions - Nov. 7, 2016 workshop

Comment:

Re-submission of comments delivered before the appointed deadline.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-sp2030scenarios-ws-VzJQOFYyACEHZlIr.pdf>

Original File Name: Energy Innovation - Scoping Plan comment (18 November 2016).pdf

Date and Time Comment Was Submitted: 2016-11-21 12:55:32

No Duplicates.

**Comment 29 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: EDF

Subject: EDF comments on SP alternatives analysis

Comment:

Attached are EDF's comments on the SP alternatives analysis. We are submitting comments on the natural and working lands presentation separately.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-sp2030scenarios-ws-VTBcPg dgVnYHYgFu.pdf>

Original File Name: EDFScopingPlanScenarioCommentsNov 212016.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:06:13

No Duplicates.

**Comment 30 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

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

Subject: California Compost Coalition Comments  
Comment:

Our comments are attached,.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-sp2030scenarios-ws-UzBWMwFjVloKPgc3.pdf>

Original File Name: CCC 2030 Target Scoping Plan Update Comments 112116.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:35:45

No Duplicates.

**Comment 31 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Jodean  
Last Name: Giese  
Email Address: jodean.giese@ladwp.com  
Affiliation: LADWP

Subject: LADWP Comments on Nov 7 Workshop - 2030 Scoping Plan  
Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-sp2030scenarios-ws-UT1TNAFkBCBRJ1MM.pdf>

Original File Name: LADWP Comments on Nov 7 2016 Workshop - 2030 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:37:28

No Duplicates.

**Comment 32 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Parkhurst  
Email Address: [rparkhurst@edf.org](mailto:rparkhurst@edf.org)  
Affiliation: Environmental Defense Fund

Subject: Public Workshop on the 2030 Target Scoping Plan Update: Natural & Working Lands  
Comment:

Please see comments attached. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-sp2030scenarios-ws-ViUAZQZoBSYLZARq.pdf>

Original File Name: Scoping Comments NWL Nov 2016 Final.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:38:53

No Duplicates.

**Comment 33 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: David  
Last Name: Townley  
Email Address: dtownley@ctcglobal.com  
Affiliation: CTC Global Corporation

Subject: Electric System Policy Option  
Comment:

CTC Global Corporation Comments on AB32 Scoping Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-sp2030scenarios-ws-UTJVPFU5WGYAYwdp.pdf>

Original File Name: Comments on AB32 Scoping Plan 2016 Update.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:41:51

No Duplicates.

**Comment 34 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: John

Last Name: Bloom

Email Address: laura@houstonmagnani.com

Affiliation: CSCME

Subject: Comments on the 11/7/16 Public Workshop on the 2030 Target Scoping Plan  
Comment:

Please accept the attached comments from the Coalition for Sustainable Cement Manufacturing & Environment (CSCME) relative to the November 7, 2016 Public Workshop on the 2030 Target Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-sp2030scenarios-ws-ATBTZAQoA2ICNVB9.pdf>

Original File Name: 11-21-16 v2 CSCME Comments on Nov 7 Scoping Plan Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-21 13:55:11

No Duplicates.

**Comment 35 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Jan  
Last Name: McFarland  
Email Address: jmcfarland@sonomacleanpower.org  
Affiliation: Sonoma Clean Power

Subject: Comments on the 2030 Target Scoping Plan Update Workshop Discussion  
Comment:

Dear Air Resources Board,

Please find the attached comments prepared by Sonoma Clean Power in response to the November 7, 2016 Public Workshop on the 2030 Target Scoping Plan Update and GHG Policy Scenarios. Thank you.

Sincerely,  
Jan McFarland

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-sp2030scenarios-ws-W2pTY1JiUjAFMQg5.pdf>

Original File Name: 161121\_SCP Letter to ARB on Scoping Plan\_SSS (00381994xBA8E1).pdf

Date and Time Comment Was Submitted: 2016-11-21 14:58:33

No Duplicates.

**Comment 36 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Damon  
Last Name: Franz  
Email Address: dfranz@solarcity.com  
Affiliation: SolarCity

Subject: SCTY Comments - GHG Policy Scenarios  
Comment:

Please find attached SolarCity's comments in response to the scoping plan update workshop regarding GHG policy scenarios.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-sp2030scenarios-ws-WjxUO10yADIFb1cI.pdf>

Original File Name: Final SCTY Comments ARB 2030 Scoping Plan Update 11 21 16.pdf

Date and Time Comment Was Submitted: 2016-11-21 15:14:42

No Duplicates.

**Comment 37 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Jackson  
Email Address: [ajackson@nrdc.org](mailto:ajackson@nrdc.org)  
Affiliation: NRDC

Subject: NRDC Comments on Nov 7 Scoping Plan Workshop  
Comment:

Please find attached NRDC's comments on the Nov. 7 Scoping Plan Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-sp2030scenarios-ws-VDpQJFI3V2cGXwJh.pdf>

Original File Name: NRDC Comments on Nov 7th Scoping Plan Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-21 15:37:44

No Duplicates.

## **Comment 38 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

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

Subject: Nov 7 workshop: Local Plan Level Goals  
Comment:

We assist our member agency local governments in Alameda County with GHG inventories and CAPs. We offer comments on the "Recommended Local Plan Level Goals" on slide 11 of the first presentation. We did not view the webinar, and some of these points may have been addressed in the discussion. While we recognize the rationale presented on the slide and the appeal of a simple and clear target, we anticipate the following concerns from local governments:

- 1) Some cities are already below the 2030 target of 6 MTCO<sub>2</sub>e per capita. For these cities the 6 MTCO<sub>2</sub>e goal sends a counterproductive message for climate action if they were already aiming for more aggressive targets similar to 40% below baseline for 2030.
- 2) We appreciate that a per person approach allows for population growth in cities in which growth would reduce regional emissions. However, it may also encourage growth in less sustainable geographies. The latter type of development could feasibly align with the 2030 goal, but would impede local and regional ability to meet the 2050 goal.
- 3) If per capita is only residential population, while community-wide emissions includes all sectors, per capita baselines range widely between cities, depending primarily on location and the mix of residential versus commercial. A uniform per capita goal across jurisdictions doesn't address the diversity of community types and their distinct roles in regional GHG reductions. It may be more appropriate to apply this target at a regional level. Alternatively, sector-specific normalized goals (e.g. MTCO<sub>2</sub>e per employee) could be established, but this detracts from the appealing simplicity of the recommended goals.

Thank you for the opportunity to comment. We welcome discussion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 15:36:51

No Duplicates.

**Comment 39 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on 2030 Target SP Update Workshop  
Comment:

Dear Staff

Attached, find IETA's comments on the 2030 Target Scoping Plan Update Workshop, held on 7 November.

We appreciate this opportunity to share input and recommendations.

Regards,  
Katie

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-sp2030scenarios-ws-AGldPIInBzVQCQhp.pdf>

Original File Name: IETA ARB Comments\_2030 Target Scoping Plan Workshop\_21Nov2016.pdf

Date and Time Comment Was Submitted: 2016-11-21 15:33:05

No Duplicates.

## **Comment 40 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Ed  
Last Name: Pike, P.E.  
Email Address: epike@energy-solution.com  
Affiliation: Energy Solutions

Subject: Energy Solutions comment on scoping plan development and fuel efficient replacement tires  
Comment:

Dear Ms. Sahota:

Thank you for the opportunity to provide comments in response to the Public Workshop on the 2030 Target Scoping Plan Update. Energy Solutions is a professional and engineering services firm whose mission is to create large-scale environmental impacts by providing market-based, cost-effective energy, carbon, and water management solutions to our utility, government and commercial customers. We strongly support ARB's innovative and critical work to reduce greenhouse gas (GHG) emissions.

We recommend explicitly including the benefits of fuel efficient passenger vehicle replacement tires in ARB's policy scenarios, emissions calculations, and economic modeling. Currently, replacement tires are substantially less efficient than tires on new vehicles and would undermine a significant portion of the expected emissions and economic benefits of GHG standards for passenger vehicle as they age and are equipped with replacement tires. Fortunately, ARB has found that "fuel efficient passenger vehicle tires can be utilized by both new and in-use vehicles in the near-term to achieve GHG emission reductions. Deployment of fuel efficient vehicle tires for in-use vehicles could include limited incentives, followed by ratings and then standard setting to permanently shift the market" (May 2014 AB32 Scoping Plan Update).

A 10% improvement in replacement tire efficiency will reduce GHG by 2.7 million metric tons and save consumers \$882 million annually according to the California Energy Commission. A study for the South Coast Air Quality Management District demonstrates that 20% or greater improvement is feasible and will especially benefit air quality in disadvantaged communities where used vehicles operating on replacement tires are more common. We also estimate that the average driver will save up to \$1000 in fuel costs.

We appreciate your consideration of our comments. Please feel free to contact me or have your staff contact me at epike@energy-solution.com or (510) 482-4420 x 239 if you wish to discuss our comments.

Sincerely,

Ed Pike, P.E.  
Senior Engineer

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-sp2030scenarios-ws-VjMBaVczVndVNFAp.pdf>

Original File Name: Energy Solutions 2030 GHG scoping plan letter.pdf

Date and Time Comment Was Submitted: 2016-11-21 15:42:54

No Duplicates.

## **Comment 41 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

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

Subject: Nov 7 workshop: Local Plan Level Goals  
Comment:

We assist our member agency local governments in Alameda County with GHG inventories and CAPs. We offer comments on the "Recommended Local Plan Level Goals" on slide 11 of the first presentation. We did not view the webinar, and some of these points may have been addressed in the discussion. While we recognize the rationale presented on the slide and the appeal of a simple and clear target, we anticipate the following concerns from local governments:

- 1) Some cities are already below the 2030 target of 6 MTCO<sub>2</sub>e per capita. For these cities the 6 MTCO<sub>2</sub>e goal sends a counterproductive message for climate action if they were already aiming for more aggressive targets similar to 40% below baseline for 2030.
- 2) We appreciate that a per person approach allows for population growth in cities in which growth would reduce regional emissions. However, it may also encourage growth in less sustainable geographies. The latter type of development could feasibly align with the 2030 goal, but would impede local and regional ability to meet the 2050 goal.
- 3) If per capita is only residential population, while community-wide emissions includes all sectors, per capita baselines range widely between cities, depending primarily on location and the mix of residential versus commercial. A uniform per capita goal across jurisdictions doesn't address the diversity of community types and their distinct roles in regional GHG reductions. It may be more appropriate to apply this target at a regional level. Alternatively, sector-specific normalized goals (e.g. MTCO<sub>2</sub>e per employee) could be established, but this detracts from the appealing simplicity of the recommended goals.

Thank you for the opportunity to comment. We welcome discussion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 15:36:51

No Duplicates.

**Comment 42 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Ryan  
Last Name: Kenny  
Email Address: ryan.kenny@cleanenergyfuels.com  
Affiliation: Clean Energy

Subject: Comments re: 2030 Scoping Plan  
Comment:

Please accept the attached comments from Clean Energy concerning the 2030 Target Scoping Plan Update. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-sp2030scenarios-ws-AWJRO1wzADYGXwBj.pdf>

Original File Name: CLNE Comments 2030 Scoping Plan November 2016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:03:23

No Duplicates.

**Comment 43 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: John  
Last Name: Larrea  
Email Address: john@clfp.com  
Affiliation: CA League of Food Processors

Subject: Comments on the 2030 Target Scoping Plan Workshop Nov 7th  
Comment:

Please find attached the CLFP Comments on the November 7, 2016 workshop on the 2030 Target Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-sp2030scenarios-ws-UTdVOgdoVWcKYFUK.pdf>

Original File Name: Final - CLFP\_comments\_11212016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:09:00

No Duplicates.

**Comment 44 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Nathan  
Last Name: Bengtsson  
Email Address: NXBZ@pge.com  
Affiliation:

Subject: PG&E Comments on Draft 2030 Target Scoping Plan Nov 7 Workshop  
Comment:

Please find PG&E's comments on the Draft 2030 Target Scoping Plan  
Nov 7 Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-sp2030scenarios-ws-UiJSMwFfAzUEXVU2.pdf>

Original File Name: PG&E Comments - 2030 Target Scoping Plan Workshop 11.7.2016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:13:51

No Duplicates.

## **Comment 45 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Rick

Last Name: Bettis

Email Address: rckbettis40@gmail.com

Affiliation: Sierra Club, LWV, CIPL, PSR. others volu

Subject: Scoping Plan comments

Comment:

1. The best alternative should include the Capm and Trade program. this is will provide funding and including a declining Capon emissions needed to achieve, the reduction in GHG to the new threshold of 40% below 1990m levels.
2. Renewable energy RPS can be achieve and enhanced to as much as 100% by modifying regulations and CEQU requirements tom expedite larger scale solar and wind projects.
3. Emphasis should be placed on land use pplanning that will helpt to facilitate compact transit oriented development. Enhanced public transit should be supported to reduce Vehicle Miles Traveled.
4. Support research in the battery and other storage technology to support the renewableenergyand electric vehilce improvements.
5. More support to implement battery electric and fuel cell charging and fueling stations.
6. Use Life Cycle analysis especially in the areas of residential and commercial and industrial building. this will aid in realistically assessing whether a building or other faciilty should be restored and possibly repurposed instead of being replaced.
7. Support building energy efficiency for both new and existing structures. help implement the PACE program.  
. Support water conservation and recycling using renewable e energy for treatment.
8. Support agricultural best management practices and the implementation of anaerobic digester project for dairies.
- 9 Support localization of agriculture to reduce transport.
- 10, Support energy projects in forest using dead and dying trees as a fuel source for low emisisions incineration. Reduce fire risk by thinning.
11. consider research at U. c. Berkeley for enhanced carbon sequestration in grassland by use of organic mulch.

Thank You Very Much for Your Consideration.  
rick Bettis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 15:45:49

No Duplicates.

## **Comment 46 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Goldamer

Last Name: Herbon

Email Address: Gherbon@sdewa.org

Affiliation: San Diego County Water Authority

Subject: Public Workshop on the 2030 Target Scoping Plan Update: GHG Policy Scenarios, Natural & W  
Comment:

Dear Chair Nichols:

The San Diego County Water Authority (Water Authority) participated in the November 7, 2016 Public Workshop on the 2030 Target Scoping Plan Update: GHG Policy Scenarios, Natural & Working Lands, and Public Health Analysis, and appreciates the opportunity to provide comments. The Water Authority is a regional wholesale water agency serving 24 member retail agencies in San Diego County. We sustain the region's \$222 billion economy and the quality of life for 3.3 million residents through a multi-decade water supply diversification plan, major infrastructure investments and forward-thinking policies that promote fiscal and environmental responsibility. The Water Authority supports the California Air Resources Board's (ARB) efforts to address climate change by reducing GHG emissions in California. In addition, the Water Authority voluntarily developed and adopted its first Climate Action Plan in March 2014, with a goal of minimizing greenhouse gas emissions (GHGs) in fulfilling its primary responsibility to provide a reliable, high-quality, and safe water supply to the San Diego region.

At the Public Workshop, ARB sought input on a carbon tax structure in-lieu of a post-2020 cap-and-trade. As ARB explores the concept of a carbon tax and potentially including other sectors that may contribute indirect emissions from electricity consumption, the Water Authority requests that you exempt critical water supply infrastructure from a carbon tax. These include facilities that provide a local, drought-resilient supply for our region and already have GHG mitigation measures as part of their operational plans. If critical water supply infrastructure was subject to a carbon tax it would lead to higher water rates, which in turn to would impact water customers including disadvantaged or underserved communities.

At the Public Workshop, ARB also sought comments on where to return carbon tax revenues. The Water Authority strongly believes that carbon taxes generated locally should be reinvested locally. We support the Natural and Working Lands Update draft goal for wetlands that promote healthy wetland and riparian ecosystems along streams, rivers, deltas, bays, and coastal zones to provide long-term carbon sequestration benefits. For example, local reinvestment could contribute to wetland creation regionally. Wetlands creation or restoration have the ability to improve water quality thus benefiting our regional water supplies. Wetlands also provide carbon sequestration benefits, habitat, and recreational opportunities.

The Water Authority appreciates the opportunity to comment and thanks ARB for its review and consideration of the comments. Please contact me with any questions at (858) 522-6743.

Sincerely,

Toby Roy, Water Resources Manager  
Water Resources Department

1 NIPP, 2006, Glossary of Key Terms, is the source for the definitions of critical infrastructure and key resources. These definitions are derived from the provisions of the Homeland Security Act of 2002 and HSPD-7.

2 Healthy Landscapes 2030: California's Climate Change Vision and Goals for Natural and Working Lands, Page 5

(Letter attached)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-sp2030scenarios-ws-BTRRZgZyUjNXYFUK.pdf>

Original File Name: 11\_21\_2016- SDCWA- TRoy ARB 2030 Target Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:23:37

No Duplicates.

**Comment 47 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: Comments on California Resources Board's Public Workshop on the 2030 Target Scoping Plan  
Comment:

See attached comments from Camco

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-sp2030scenarios-ws-UjFXMAFtWWkGbwZZ.pdf>

Original File Name: Camco Comments on ScopingPlan Nov 2016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:25:03

No Duplicates.

**Comment 48 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: William  
Last Name: Westerfield  
Email Address: william.westerfield@smud.org  
Affiliation:

Subject: Sacramento Municipal Utility District's Comments Re: The 2030 Target Scoping Plan Workshop  
Comment:

Sacramento Municipal Utility District's Comments Re: The 2030  
Target Scoping Plan Workshop (November 7, 2016).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-sp2030scenarios-ws-AGxSMVM1BQlXYwEx.pdf>

Original File Name: LEG 2016-0979 SMUD Comments on 2030 Scoping Plan Scenarios11212016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:27:13

No Duplicates.

**Comment 49 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation: TGG, Inc. on behalf of CCEEB

Subject: Scoping Plan Workshop

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-sp2030scenarios-ws-VzRQNVUxWG4BZQVa.pdf>

Original File Name: CCEEB CCP - Scoping Plan Nov 7 Workshop Comments - Final.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:29:14

No Duplicates.

**Comment 50 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Workshops

Comment:

The Center for Biological Diversity submits the following comments in response to the joint agency workshop hosted by the Air Resources Board (ARB) on November 7 regarding policy scenarios and associated reductions; the Natural and Working Lands (NWL) Sector, including carbon sequestration scenario modeling and ARB's NWL inventory; and public health implications of climate change and mitigation policies to inform development of the update to the State's AB 32 Scoping Plan to meet the 2030 target. The Center for Biological Diversity strongly supports the effort under way to develop the Scoping Plan Update.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-sp2030scenarios-ws-VzQFZIE+VXJSMQNx.pdf>

Original File Name: Center for Biological Diversity comments ARB scoping plan workshops 11 21 2016.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:33:45

No Duplicates.

## **Comment 51 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Shrayas

Last Name: Jatkar

Email Address: shrayas@ccair.org

Affiliation: Coalition for Clean Air

Subject: 2030 Scoping Plan: GHG Policy Scenarios

Comment:

The Coalition for Clean Air (CCA) favors Alternative 2 (Carbon Tax), combined with robust regulatory measures, among the policy scenarios outlined by the Air Resources Board (ARB) to comply with Senate Bill 32 (Pavley, 2016) requiring a 40% reduction of greenhouse gas (GHG) emissions below 1990 levels by 2030. We support a carbon tax and request ARB staff to explore the possibility of including a cap on GHG emissions along with the tax in order to ensure emissions decline from 2020 to 2030 and do so in a predictable manner. In addition, we strongly urge ARB to extend the carbon tax to cover emissions of criteria air pollutants and toxic air contaminants as well. All tax revenues should be invested in programs that reduce those emissions, especially to projects located within and benefitting individuals living in disadvantaged communities (DACs). CCA favors an emissions tax, with proceeds channeled into pollution-fighting programs, because of the environmental protection and justice principles and goals embodied in such a carbon pricing mechanism.

First, an emissions tax is based on the "polluter pays" principle that requires the entities responsible for generating emissions to pay for the cost of that pollution in order to mitigate or prevent damage to environmental and human health. Second, investing revenues from an emissions tax in pollution-reducing measures could help deliver important co-benefits that support additional environmental and public health goals, because the sources of GHG emissions and air pollutants are usually one and the same. Guaranteeing the use of emissions tax revenues for climate change and air pollution mitigation would also maintain a vital source of funding available for the Greenhouse Gas Reduction Fund (GGRF), which is an established and sound framework for certifying investments are balanced in a manner that complements and furthers California's environmental and sustainable development laws, regulations, and goals (e.g., SB 1275 and 1204 as well as SB 375, regarding low carbon transportation and reducing vehicle miles traveled, respectively). The demand for incentive funding is especially acute in the South Coast and San Joaquin Valley regions, where air quality is the worst in the nation, thus underscoring the basis for an emissions tax that addresses both GHG emissions and air pollutants. Furthermore, the State's carbon pricing system should continue to be used in ways that promote environmental equity and climate justice. Specifically, this means continuing to adhere to legal requirements (SB 535, 2012, and AB 1550, 2016) that ensure a significant share of revenues from the State's climate program is invested in and benefits people living in the communities where environmental pollution and contamination has been concentrated - communities in which residents are often predominantly and disproportionately low-income and/or people of color.

Coalition for Clean Air agrees that the category of "known commitments" will be responsible for delivering a majority of the reductions in GHG emissions needed to meet the 2030 target. CCA supports these measures that have proven effective at lowering levels of carbon pollution, such as renewable electricity,

clean-car and building energy efficiency standards. We also agree with the proposal in all three post-2020 policy scenarios to strengthen the Low Carbon Fuel Standard by lowering the carbon intensity of transportation fuels by at least 18% by 2030. Rapidly increasing the target for zero-emission vehicles (ZEVs), as proposed in all three policy scenarios, should also be pursued. California's transportation sector needs to move rapidly toward zero- and near-zero emission technologies to achieve federal health-protective air quality standards and California's climate change mandates, as noted in the 2012 "Vision for Clean Air." Accordingly, CCA recommends strengthening other existing measures in the transportation sector, which is expected to remain the largest contributor to carbon and air pollution in California. The Sustainable Freight Strategy measure should be strengthened, for instance, and CCA has and continues to recommend higher zero-emission technology and freight system efficiency targets than those outlined in the California Sustainable Freight Action Plan. Reducing the impact of California's freight industry is particularly important because goods movement is projected to grow in the coming years and disadvantaged communities located near freight hubs and facilities bear a disproportionate share of the negative effects of freight transport. In addition, ARB should consider enhancing implementation of the Sustainable Communities & Climate Protection Act of 2008 (SB 375, Steinberg) by strengthening the emission reduction targets Metropolitan Planning Organizations (MPOs) must meet and bolstering the review and enforcement of MPOs' Sustainable Communities Strategies. Examples of specific transportation planning measures that CCA supports include: increasing transit ridership and reducing GHG emissions by targeting funds to operate increased levels of transit service and implementing fare reduction strategies that incentive greater transit utilization.

Clear and firm regulatory standards have been the most effective tool for reducing emissions and driving technological innovation, the two most important results of the Global Warming Solutions Act of 2006 (AB 32). To that end, Coalition for Clean Air strongly supports the Refinery Measure concept, and recommends setting the target at a minimum of a twenty percent reduction in GHG emissions by 2030. We support this measure because it would begin addressing carbon pollution from the largest stationary source of GHG emissions in California within the leading sector of those same emissions (i.e., transportation). This measure, by helping lower emissions of criteria air pollutants and toxic air contaminants, would also offer meaningful environmental and public health co-benefits to the communities located adjacent to or near refineries in California. Likewise, ARB should also consider proceeding with measures to reduce emissions from oil and gas extraction, which should help rural areas of California in particular to experience meaningful improvements in air quality and public health, while helping the State meet its 2030 GHG target. CCA also urges ARB to begin developing measures to address other industrial sources of emissions - namely, cement plants and general fuel use by industry - because emissions from those segments are growing and are likely to continue to do so with greater construction and commercial activity in California. CCA would also like to comment on the Draft Scoping Plan scenario. If a post-2020 cap-and-trade program is enacted, then CCA urges ARB to adopt changes that would decrease emissions at the source as called for in AB 197 (E. Garcia, 2016). These changes include: limiting the use of offsets to meet the emissions cap; auctioning off nearly all emission allowances; and decreasing allocations to covered facilities that report increased onsite criteria or toxics emissions. Expert economists who advised ARB on establishing the cap-and-trade program now in place had recommended the auctioning of virtually all allowances. Moreover, free allocations only reward stalling, delay, and obstruction of necessary cleanup at major sources of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 16:27:55

No Duplicates.

## **Comment 52 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Chris

Last Name: Brown

Email Address: cbconserv@gmail.com

Affiliation:

Subject: AB 32 Scoping Plan comments

Comment:

It is clear that achieving the 2030 target will be substantially more challenging than achieving the 2020 targets. CARB is to be commended for looking at various scenarios for achieving the 2030 goals.

Previous assumptions about the needs for contracts for new natural gas generation must be re-examined since investments in additional gas generation capacity may be incompatible with the 2030 targets. Failure to do so This will result in stranded economic assets, and release of GHG in levels incompatible with meeting COP21 goals.

Local air district action can coexist with the cap and trade program. Encouraging and incentivizing regulatory actions is critical and essential. A lesson learned from the 2014 through 2016 drought enforcement in California is that the deepest cutbacks in water use were achieved when clear enforceable regulatory goals were set. This lesson should be incorporated into and adopted as a model for energy efficiency and alternative energy programs.

Economic analyses of the scenarios should incorporate accurate measurements of the direct costs of fossil fuel combustion including health impact of criteria and other toxic air pollutants, in addition to an appropriate range of values for the cost of carbon, reflecting GHG damages.

Should the scenario involving a carbon tax occur, revenue from the tax should be used for Greenhouse Gas reduction measures as currently occurs with the Cap and Trade program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-21 16:36:22

No Duplicates.

**Comment 53 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Craig  
Last Name: Thomas  
Email Address: craig@sierraforestlegacy.org  
Affiliation: Sierra Forest Legacy

Subject: CARB Scoping Plan Update  
Comment:

Please find Sierra Forest Legacy's comments on the Scoping Plan workshop presentations from November 7, 2016.

Thanks you for considering these comments and recommendations.

-Craig Thomas

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-sp2030scenarios-ws-BmVcOwFyBzZVDFck.docx>

Original File Name: CARB Scoping Plan Update Comments November 21, 2016.docx

Date and Time Comment Was Submitted: 2016-11-21 16:38:48

No Duplicates.

**Comment 54 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Amy  
Last Name: Vanderwarker  
Email Address: amy@caleja.org  
Affiliation: California EJ Alliance

Subject: Proposed Amendments to the 2030 Target Scoping Plan GHG Policy Scenarios.  
Comment:

Hello, attached please find the California Environmental Justice Alliance's comments on the 2030 Target Scoping Plan GHG policy scenarios.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-sp2030scenarios-ws-UzBWNQRvBDYFXFAj.pdf>

Original File Name: CEJA Scoping Plan Econ Modeling Comments V2.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:38:12

No Duplicates.

**Comment 55 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Morris

Email Address: jhmmorris@semprautilities.com

Affiliation: Southern California Gas Company

Subject: SoCalGas Comments on the 2030 Scoping Plan Workshop

Comment:

Please find attached SoCalGas comments on the 2030 Scoping Plan Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-sp2030scenarios-ws-BXZUMQNIVVkBZAhn.pdf>

Original File Name: SCG\_Comments on SPU Scenario Workshop 11-21-16.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:44:00

No Duplicates.

**Comment 56 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: University of California, Berkeley

Subject: Comments on Scoping Plan Workshop—Support for less offset use  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-sp2030scenarios-ws-AWldOgN7UGJSCwlq.pdf>

Original File Name: Haya comments-2030 Target Scoping Plan Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:42:07

No Duplicates.

**Comment 57 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Danny  
Last Name: Cullenward  
Email Address: dcullenward@nearzero.org  
Affiliation:

Subject: Comments from Michael Wara and Danny Cullenward  
Comment:

Please find our comments in the attached file. Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-sp2030scenarios-ws-VWcBN1RkA2ZWfVRI.pdf>

Original File Name: 2016-11-21 2030 Scoping Plan - Wara & Cullenward.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:44:19

No Duplicates.

**Comment 58 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Richard  
Last Name: Lyon  
Email Address: rlyon@cbia.org  
Affiliation: California Building Industry Association

Subject: November 7, 2016 - Draft 2030 Target Scoping Plan Overview  
Comment:

Please accept the attached comments on behalf of the California Building Industry Association for the Draft 2030 Target Scoping Plan Overview.

Let us know if you have any questions.

Thank you,  
Richard Lyon  
Senior Vice President  
California Building Industry Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-sp2030scenarios-ws-BmIAdFIyVmMEDlcI.pdf>

Original File Name: Draft 2030 Scoping Plan - CBIA November Comments.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:49:40

No Duplicates.

**Comment 59 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on November 7 Scoping Plan Workshop

Comment:

attached please find the Northern California Power Agency Comments on the November 7, 2016 Scoping Plan Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-sp2030scenarios-ws-VjhTNIUkVGZWDwBj.pdf>

Original File Name: NCPA comments re November 7 2016 Scoping Plan workshop (11-21-16).pdf

Date and Time Comment Was Submitted: 2016-11-21 16:52:03

No Duplicates.

**Comment 60 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Kerri  
Last Name: Timmer  
Email Address: ktimmer@sierrabusiness.org  
Affiliation: Sierra Business Council

Subject: comments on Nov. 7 2030 Target Scoping Plan Scenarios  
Comment:

please see attachment for detailed comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-sp2030scenarios-ws-VSZTN1EzV1sBZgFj.pdf>

Original File Name: SBC\_AB322030ScopingPlanScen&NWLCommentLtr\_2016\_11\_21.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:51:16

No Duplicates.

## **Comment 61 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Mark

Last Name: Roest

Email Address: MarkLRoest@gmail.com

Affiliation:

Subject: Joint agency workshop to discuss policy scenarios and associated reductions, NWL sector

Comment:

Context:

CARB laid out several potential scenarios to achieve the 2030 GHG targets mandated by SB32 and AB197. It is clear that achieving the 2030 target will be substantially more challenging than achieving the 2020 target (figure on slide 16, intro/local action, in ppt says 671 MMTCO<sub>2e</sub> cumulative reductions required to achieve 2030 limit) 671 million metric tons is 5.6 times the 120 MMT carbon lost to fires from 2001 through 2010. Controlling the fires may yield an even larger fraction of the target, because the carbon recruits oxygen to form CO<sub>2</sub>, adding to its weight.

Reducing fires and capturing the value inherent in excess fuels harvested from forests can support meeting these known commitments:

&#61604; SB 350-increase renewable energy and energy efficiency

&#61604; SB 1383 - reduce short-lived climate pollutants

&#61604; SB 375 - support sustainable community development

&#61604; Mobile Source Strategy- help State achieve its federal and state air quality standards

&#61604; Low Carbon Fuel Standard

&#61604; Short Lived Climate Pollutant Plan

Objectives for Scoping Plan

&#61604; Achieve 2030 target

&#61604; Provide direct GHG emissions reductions

&#61604; Facilitate sub-national and national collaboration \*\*\*

&#61604; Support cost-effective and flexible compliance

&#61604; Support US EPA Clean Power Plan

&#61604; Support climate investment for programs in disadvantaged communities

&#61604; Air quality co-benefits

&#61604; Protect public health

Therefore, I suggest, and include added support after my part:

The ARB Natural & Working Lands Inventory is the key report.

(Attached) Slide 16 is the key graph. It shows a huge amount of carbon lost to forest fires (almost 125,000,000 metric tons C), from 2001 through 2010, versus 5,000,000 metric tons C, plus or minus 2 MMT, for each of the other listed ways stock is lost, through prescribed fire, other mechanical, harvest, clear-cut, or thinning.

Most of the programs created by CARB create much smaller reductions in carbon lost to, or injected into, the atmosphere than 125 million metric tons in 10 years.

That is the lynchpin argument for a program of deliberate, ecologically selective mechanical thinning, with conversion to usable lumber, compost, humus, and pyrolysis-produced fuel / chemical feedstocks / electricity (processed within the forest, using All Power Labs' refineries-on-a-pallet, or sometimes its container-size version). If the values of the produced products are

acknowledged and processes for monetizing them are created, the total revenues will substantially exceed expenses, if it is done creatively.

If it is an indigenous-managed program that sees value in enabling cultures to return to their ancestral lands and traditions, and especially if it is operating on a national or larger scale, so that it can take advantage of equipment purchase (and if needed, development) economies of scale, the returned values can be far higher and more diverse, and the costs can be lower.

I'm basically thinking of recovering the ecosystem knowledge embedded in the language and culture of tribes which have historically been displaced, and strengthening the value with which it is held both there and among tribes still on their ancestral lands, while rapidly developing solid protection from major forest fires and their immediate conversion of stored carbon to CO2.

Then, in the path of Schumacher's Appropriate Technology and Small is Beautiful philosophy, bringing in mechanical harvesting and processing equipment to replace low-level burning, and incorporating the insights and management tools of ecosystem management science as practiced today, to create a synthesis which is in sufficient harmony with the old ways that it can support them in flourishing.

I imagine the old process of moving from camp to camp with the seasons, adapted to camps that are moved as each section of forest is thinned. Instead of dawn-to-dusk operations, the process could be paced so that other values are developed part of each day. In the spirit of dividing up the available jobs under automation, this could be about getting sufficient value, from doing sufficient work, and welcoming others to do similar work in neighboring ecosystems, or within the community's teams. It is a powerful opportunity to restore culture, and direct spiritual experience and connection with all of Life. It is likely to be able to afford potent opportunities for people to get back in communication with their ancestors, as well, and bring forth messages and teachings. As this is being planned and developed, the people, or those with a calling for it among them, could be training in the forest to know how to be its stewards, and to know exactly what to take where, and they could also go to the colleges to learn the formal science of ecology theory and ecosystems management.

Well planned tribal economic development initiatives can often leverage corporation status and structures that are UNIQUE to federally recognized tribes and might provide tax exemption on certain activities - thereby increasing profitability and economic sustainability of the efforts in ways not available from other 'mainstream' models. The initiatives could be both operated under the authority of and providing resources to the elders and others in need. They can be a useful legal protection for the purposes to which they're turned, and a mental stepping stone from this culture to the community values of old.

The project can also lead to development of industry, agriculture and business ecosystems that are part of sustainable economies.

Per Wanda Jean Lord:

Note that the other inter-relationships that could benefit from bringing a pyrolysis process led by tribes and cutting edge partners that creates a culturally, environmentally and economically appropriate development to reduce carbon emissions and protect lands near or within traditional tribal territories, include the California Offices for the:

Department of Interior BIA Natural Resources Office (Could be feed stock provider/partner with Tribes)

Department of Interior Bureau of Land Management (Could be feed stock provider/partner with Tribes)

US Department of Agriculture (Could be feed stock provider/partner and/or business model development funding)

US Department of Commerce (Could be Business Model Development funding and/or CEDS (Community Economic Development Strategies)

funding for Tribes to support initiatives development)

Along with:

Department of Energy Tribal-specific set-aside grants and/or HUD Community Development Block Grant funding around increasing alternative energy resources for communities (this might support a County/City/Tribal initiative for instance)

Also it is important to note that some tribes across the United States are already moving forward on researching, beta testing and implementing pyrolysis projects for their communities, and we could draw upon lessons learned and best practices from those projects to inform these developments to benefit California.

EPA connections:

It may be possible that the CA "CARB" would want to create a consistent and viable mechanism of consultation and project funding processes with those federally recognized tribal nations within the State of California that are recipients of US EPA Region 9 funding for "GAP" (Capacity Building) and other individual environmental protection media activities such as Air Quality, Water Quality and Municipal Waste, etc.

A framework from which to assess and propose such a collaboration - WITH ADDITIONAL STATE FUNDING - to appropriately carry out outreach/education and project implementation(s) is introduced here:

GAP Workgroup

Facilitate the development and Maintenance of Effective Core Tribal Environmental Programs

R9-tribal-caucus-workgroup-action-plans.pdf page 4 of 47

Strengthen Human Health and Environmental Protection in Indian Country

Under federal environmental statutes, EPA is responsible for protecting human health and the environment in Indian country. EPA's commitment to tribal environmental and human health

protection has been steadfast for nearly 30 years, as formally established in the Agency's 1984

Indian Policy. EPA works with over 560 federally recognized tribes located across the United

States to improve environmental and human health outcomes.

Approximately 56 million acres

are held in trust by the United States for various Indian tribes and individuals. Over 10 million

acres of individually owned lands are still held in trust for allottees and their heirs. Difficult

environmental and health challenges remain in many of these areas, including lack of

access to safe drinking water, sanitation, adequate waste facilities, and other environmental

safeguards taken for granted elsewhere.

In collaboration with our tribal government partners, EPA will engage in a two-part strategy

for strengthening human health and environmental protection in Indian country. First, EPA

will ensure that its environmental protection programs are implemented in Indian country

either by EPA or through implementation of environmental programs by tribes themselves.

Second, EPA will provide resources through grant funds and technical assistance for federally

recognized tribes to create and maintain effective environmental program capacity.

Page 34 of 47 Short-Term Activities (Within 1-3 Years)

\*\*Establish and facilitate the work of a committee of Tribal & EPA representatives to develop a regional implementation plan for EPA's national Climate Change Adaptation Plan.

Participate with USEPA Region 9 to develop a regional Climate Change Adaptation Implementation Plan.

Continue to gather information and document impacts of climate change on Tribal communities.

Facilitate the inclusion of Tribal representation in local, state, and federal multi-agency working groups addressing climate change issues.

Identify tribal access to funding sources to support resource management and mitigation strategies to address impacts of climate change on tribal communities.  
Provide information to Tribal representatives and facilitate Tribal input on any climate change regulations that may impact Tribal communities.  
Promote the inclusion of Tribal access to resources in any regulations, policy and/or guidance documents issue by EPA, and other federal agencies.

These are the tribes in CA which would qualify as appropriate collaborative partners under the above described criterion, whom each have federally designated 'service areas' for which they are responsible for the tribal enforcement of the Environmental Protection Act as it pertains to Pesticides, Water, Drinking Water, Zero Waste, Quality Assurance, and other items:

Northern California

Karuk Tribe  
Quartz Valley Tribe  
Yurok Tribe  
Alturas  
Berry Creek  
Big Lagoon  
Blue Lake  
Cedarville  
Colusa Indian Community Council  
Enterprise  
Fort Tidwell  
Greenville  
Grindstone  
Hoops  
Mechoopda  
Mooretown Rancheria  
Paskensa  
Pit River  
Quartz Valley  
Redding Resighini  
Rohnerville  
Round Valley  
Smith River  
Susanville  
Table Bluff (Wiyot)  
Trinidad

Central California

Keshia Bando of Pomo Indians, Stewarts Point Rancheria  
Guidiville Rancheria of California  
Habematolel Pomo of Upper Lake  
Auburn  
Big Sandy  
Big Valley  
Buena Vista  
Chat  
California Valley Miwok  
Chicken Ranch  
Cloverdale  
Cold Springs  
Cortina  
Coyote Valley  
Dry Creek Elem  
Graton Rancheria  
Hopland  
Ione  
Jackson  
Lower Lake  
Lytton  
Manchester  
Middletown  
North Fork  
Picayune

Pinolville  
Potter Valley  
Redwood Valley  
Robinson Rancheria  
Santa Rosa Rancheria  
Scotts Valley  
Sherwood Valley  
Shingle Springs  
Table Mountain  
Tejon Indian Tribe  
Tule River  
Tuolumne  
Wilton Rancheria  
Ramsey (Yocha Dehe)

Southern California  
La Jolla Band of Luiseno Indians of California  
Santa Ynez  
Santa Isabel  
Ague Caliente  
Augustine  
Barona  
Cabazon,  
Cahuilla  
Campo  
Cuyapaipe  
Ina  
James  
La Posta  
Los Coyotes  
Manzanita  
Mesa Grande  
Morongo  
Pala  
Pauma  
Pechanga Band of Luiseno Indians  
Ramona  
Rincon  
San Manuel  
Santa Rosa Reservation  
Soboba Band of Luiseno Indians  
Sichuan  
Torres Martinez  
Twenty Nine Palms  
Viejas

Eastern California  
Big Pine  
Utu Uto Benton  
Bishop Piaute  
Bridgeport  
Fort Independence  
Lone Pine  
Timbisha

Hope this info is a help.  
All good thoughts,  
Wanda

Wanda Jean Lord  
Principal Consultant LORD & ASSOCIATES  
Communications, Projects, Research & Development  
Member Association of Fundraising Professionals (AFP)  
Member Native Americans In Philanthropy (NAP)  
Kern County Council of the Green Party of California  
211 La Colina Drive Bakersfield CA 93305  
Email: lordwandajeon@gmail.com  
Cell: 661 348 2926

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-sp2030scenarios-ws-AjNQYFV5VDYCNQAt.pdf>

Original File Name: 16-11-21\_Stock-loss Attribution; slide 16, 120M tons C lost in CA fires 2001-2010.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:50:21

No Duplicates.

**Comment 62 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Sean

Last Name: Penrith

Email Address: [spenrith@climatetrust.org](mailto:spenrith@climatetrust.org)

Affiliation: The Climate Trust

Subject: Comments on CARB's 11/7 Public Workshop on the 2030 Target Scoping Plan  
Comment:

Please see attached.

Thank you.

Sean Penrith

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-sp2030scenarios-ws-VSEGY1EkVFhRNARr.pdf>

Original File Name: TCT Comments on ARB 2030 Target Scoping Plan Update -161121 - INF - FNL.pdf

Date and Time Comment Was Submitted: 2016-11-21 16:56:42

No Duplicates.

**Comment 63 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Tom

Last Name: Phillips

Email Address: tjp835@sbcglobal.net

Affiliation: Healthy Building Research

Subject: Public Health and Energy Efficiency in draft Scoping Plan

Comment:

Please consider these comments and information in order to optimize and actually reduce exposures of vulnerable populations to extreme heat in California.

Thank you in advance,  
Tom

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-sp2030scenarios-ws-AnJTPQBoU2wEbgNq.docx>

Original File Name: Phillips comments on Nov 7 Scoping Plan workshops Public Health.docx

Date and Time Comment Was Submitted: 2016-11-21 17:03:50

No Duplicates.

**Comment 64 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Phillips  
Email Address: tjp835@sbcglobal.net  
Affiliation: Healthy Building Research

Subject: Public Health and Economic Modeling in draft Scoping Plan  
Comment:

Please consider these comments and information in order to optimize and actually reduce exposures of vulnerable populations to extreme heat in California.

Thank you in advance,  
Tom

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-sp2030scenarios-ws-BWRQNFcJAGAANAZZ.pdf>

Original File Name: AB 32 Scoping Plan Update: Economic Analysis comments Phillips 1-29-16.pdf

Date and Time Comment Was Submitted: 2016-11-21 17:03:50

No Duplicates.

**Comment 65 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Abby  
Last Name: Halperin  
Email Address: ahalperin@pacificforest.org  
Affiliation: Pacific Forest Trust

Subject: Scoping Plan Workshop Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-sp2030scenarios-ws-WysAZ1U3BD4La1U8.pdf>

Original File Name: Pacific Forest Trust Comments on SPU Nov 7 Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-23 08:11:35

No Duplicates.

**Comment 66 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Katherine

Last Name: Stainken

Email Address: kstainken@pluginamerica.org

Affiliation: Plug In America

Subject: 2030 Scoping Comments from Plug In America  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-sp2030scenarios-ws-AnIAagN3VmJWD1Q9.pdf>

Original File Name: Plug In America Comments on 2030 Scoping Plans\_161122v2.pdf

Date and Time Comment Was Submitted: 2016-11-23 08:11:35

No Duplicates.

**Comment 67 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation:

Subject: Wonderful Company Comments on November 7th AB 32 Scoping Plan Workshop  
Comment:

Please find The Wonderful Company's comments to ARB's Scoping Plan Update and the November 7th workshop on AB 32 attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-sp2030scenarios-ws-AWJXPlA8UmxXNAhm.pdf>

Original File Name: comments.pdf

Date and Time Comment Was Submitted: 2016-11-23 08:11:35

No Duplicates.

## **Comment 68 for 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) - 1st Workshop.**

First Name: Amy

Last Name: Dryden

Email Address: amy@builditgreen.org

Affiliation:

Subject: Comment submission

Comment:

Electrification: We understand that we must decarbonize our fuel source in order to meet greenhouse gas emission goals. In this vein, it is recommended that ARB include additional measures to support the decarbonization of our buildings when carbon pricing itself will not be effective. The new policy in Alternative 1 is highly supported, but this option must be coupled with additional actions to have the intended impact on the market. While the technology in the market is increasing, there is a need to make the technology more accessible/affordable, less risky, and more available. In addition, the energy code and the CPUC rule set for fuels switching prevent the electrification of existing homes. ARB should evaluate the scenarios to ensure there are mechanisms to support intended outcomes of carbon reduction. The actions should support fuels switching in existing homes and all electric new homes that will be leveraging a cleaner source of electricity under the RPS.

Energy efficiency and co-benefits: The scoping plan should continue to set bold and aggressive targets for building standards for existing buildings to meet the 50% increase in energy efficiency called for in SB 350. Accelerating the improvements on these homes which provide a significant sources of GHGs will not only allow California to meet our goal sooner, but address critical health and environmental equity issues. Please consider the opportunity to set energy efficiency aggressive targets to address our existing housing stock and include co-benefits in the model. The recent national survey completed by ORNL found that low income households benefited not only from the reduced energy use in homes from weatherization but also a wide array of health and wellbeing improvement. In the SB 350 barrier report it is recommended that a common set of NEB's should be defined along with metrics to measure them and should be integral to delivery of energy services for low income communities.

Resiliency: Please consider the opportunity to include resilient design measures for extreme heat and other anticipated climate changes that will affect the most vulnerable populations. Our current building model does not take into account these future impacts and would not address the ability of a building to be thermally comfortable in an extreme heat wave or increased durations of heat waves, as an example.

Thank you,  
Amy Dryden

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-30 07:45:51

No Duplicates.

**There are no comments posted to 2030 Scoping Plan Public Workshop on GHG scenarios, NWL, public health (sp2030scenarios-ws) that were presented during the Workshop at this time.**