

**Comment 1 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Michael

Last Name: Becker

Email Address: mbecker@sbcag.org

Affiliation: SBCAG

Subject: Comment on VMT Base Year

Comment:

CARB Staff:

The 2020 calendar year represents an anomaly for VMT - and just about everything else. It is not appropriate to use 2020 as a VMT base year being that VMT was severely depressed due to the pandemic. Please consider using 2019 or another year even if it requires adjustment to the targets. This will avoid confusion and enable planners to more simply explain the targets.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-23 14:00:56

No Duplicates.

## **Comment 2 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Cathy  
Last Name: Chandler-Klein  
Email Address: cathyck@sbcglobal.net  
Affiliation:

Subject: CARB feedback  
Comment:

I would like to support the earliest and strongest targets possible for all categories. We are in a dire race against time. Setting the bar as high and strong as we can is urgent. We have one last chance not to stop climate change (that window is closed) but to mitigate against the worst effects. We need all avenues pursued-wind, solar, big installations AND distributed on homes, we need sequestration, EV charging stations, public transit. We need it all, ASAP! The planet and humanity is at stake. Take strong action NOW

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-29 19:05:16

No Duplicates.

**Comment 3 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Emily  
Last Name: Siegel  
Email Address: hannahsenesch@yahoo.com  
Affiliation:

Subject: crucial to reduce emissions by 2030  
Comment:

It is crucial to do everything possible to reduce emissions from climate pollutants, particularly methane, refrigerants and black carbon. Science is calling for carbon neutrality by mid-century and it is past time to do as much as we can to be able to meet that goal. These pollutants will have the biggest benefit in slowing global warming since they have a greenhouse warming effect many times higher than even CO2. I support making climate goals more ambitious and sooner. It is the only thing that makes sense to me.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-29 19:45:26

No Duplicates.

## **Comment 4 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Deanne

Last Name: Moore

Email Address: Deanne@bajadesigns.com

Affiliation:

Subject: Portable generators and diesel motorhomes

Comment:

I have read that CARB wants to outlaw the sale of portable generators. I am against this as long as we have electric grid issues and wildfire power shut offs. I think it is irresponsible to leave people with zero means of keeping medical units and refrigerators working. Even in Southern California in a very minorly rural area we have had our power out for over 3 days at a time due to wildfires.

Diesel motorhomes. I have read that CARB wants to require smog tests on diesel motorhomes. Most motorhomes are driven well under 5000 miles per year with much of that out of the state. I fell like this is just a money making proposal that will have negligible benefits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-31 09:06:56

No Duplicates.

**Comment 5 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Muriel  
Last Name: Strand  
Email Address: ecoengr@comcast.net  
Affiliation:

Subject: model scenarios workshop aug 20  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/5-sp22-concepts-ws-AHMBZFc5AyACbQln.pdf](http://www.arb.ca.gov/lists/com-attach/5-sp22-concepts-ws-AHMBZFc5AyACbQln.pdf)

Original File Name: scoping comments Aug20 workshop.pdf

Date and Time Comment Was Submitted: 2021-09-01 21:30:42

No Duplicates.

**Comment 6 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Amanda

Last Name: DeMarco

Email Address: amanda@csgcalifornia.com

Affiliation: Conservation Strategy Group

Subject: CSG et al - Comments on 2022 Scoping Plan Update (Scenario Concepts) - September 2021  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/6-sp22-concepts-ws-WzgBdAZgWFQGZQh8.pdf](http://www.arb.ca.gov/lists/com-attach/6-sp22-concepts-ws-WzgBdAZgWFQGZQh8.pdf)

Original File Name: CSG et al - Comments on 2022 Scoping Plan Update (Scenario Concepts) - September 2021.pdf

Date and Time Comment Was Submitted: 2021-09-02 11:32:32

No Duplicates.

**Comment 7 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Angus  
Last Name: McLean  
Email Address: amclean@pacificforest.org  
Affiliation: Pacific Forest Trust

Subject: Prioritizing Integration of Natural and Working Lands  
Comment:

Please see attached file for comments from Pacific Forest Trust regarding the 2022 Scoping Plan Update - Scenario Concepts Technical Workshop.

Thank you,  
Angus McLean  
Policy Associate  
Pacific Forest Trust

Attachment: [www.arb.ca.gov/lists/com-attach/7-sp22-concepts-ws-VydQMFAIWVUEYQFu.pdf](http://www.arb.ca.gov/lists/com-attach/7-sp22-concepts-ws-VydQMFAIWVUEYQFu.pdf)

Original File Name: PFT Comments ARB 2022 Scoping Plan Update Technical Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-02 11:59:52

No Duplicates.

**Comment 8 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for Gevo

Subject: Scenario Concepts Technical Workshop Scoping Plan Comment of Gevo  
Comment:

Dear Executive Officer Richard Corey,

Attached please find the comment of Gevo regarding the Scenario Concepts Technical Workshop. In particular, the comment draws attention to what appears to be a shortfall in the modeling framework: the lack of recognition of the vast potential for the agricultural sector to sequester carbon in soil. The comment recommends that CARB review the modeling on this specific point, and, in the event that soil carbon is overlooked or minimized, make necessary improvements to the modeling approach. Through recognition of the potential CO2 reduction opportunities that soil sequestration presents, CARB will facilitate achievement of California's goal of carbon neutrality by 2045. Gevo and other low carbon fuel industry leaders are already sourcing feedstocks from low carbon farms to produce fuels but there is great potential to expand these activities.

If there are any problems with transmission or requested follow up, please contact me. Thank you for your assistance.

Best Regards,

Graham Noyes

Noyes Law Corporation for Gevo

Attachment: [www.arb.ca.gov/lists/com-attach/8-sp22-concepts-ws-VWddBFYkVmBSJARw.pdf](http://www.arb.ca.gov/lists/com-attach/8-sp22-concepts-ws-VWddBFYkVmBSJARw.pdf)

Original File Name: 2 Sept 2021 Gevo Comment RE Scoping Plan Modeling.pdf

Date and Time Comment Was Submitted: 2021-09-02 13:24:30

No Duplicates.



**Comment 9 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Michael

Last Name: Kleist

Email Address: mkleist@sierraenergy.com

Affiliation:

Subject: Sierra Energy Comments to 2022 Scoping Plan Update

Comment:

Please see attached for letter and comments from Sierra Energy.

Thank you

Michael

Attachment: [www.arb.ca.gov/lists/com-attach/9-sp22-concepts-ws-VCcGaVE1WXgLf1Q1.pdf](http://www.arb.ca.gov/lists/com-attach/9-sp22-concepts-ws-VCcGaVE1WXgLf1Q1.pdf)

Original File Name: Sierra Energy Response to CARB 2022 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2021-09-02 16:59:43

No Duplicates.

## **Comment 10 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Steven  
Last Name: Brink  
Email Address: steveb@calforests.org  
Affiliation: California Forestry Association

Subject: 2022 Scoping Plan Update - Scenario Concepts Technical  
Comment:

California Forestry Association's comments are focused on the impact of the 2020 and 2021 wildfires in CA and the opportunity for restoration by providing power purchase agreements for idle biomass powerplants (DG Fairhaven, Blue Lake, Loyalton, Mt. Lassen Power, Oroville, Buena Vista, Madera, Dinuba, Delano and Mendota). These plants can produce about 200 MW when the State needs the power (hydroelectric shutdown due to lake levels too low to run the generators).

The 2020/2021 wildfires in CA caused high severity burn on about 1 million acres. If these acres were restored, they would generate about 5 million bone dry tons of forest biomass. As the Forest Service and State move toward 1 million acres/year of fuels reduction, millions of Bone Dry Tons of additional forest biomass will be produced. 200 MW of additional power could consume about 1.6 million bone dry tons of forest biomass per year. The CPUC was recently seeking new opportunities for additional MWs that can be developed new or at existing facilities by next year. Idle Biomass power plants can be part of the solution.

Forest biomass continues to be an eligible renewable resource that helps balance the grid. Consuming biomass at a powerplant and generating electricity is a reasonable option compared to leaving the forest biomass in the forest to decay and release methane along with the carbon dioxide.

Other than 3 BioRam biomass powerplants, none of the other biomass power plants have power purchase agreements at a high enough rate to cut, skid, pile, chip, load and haul the forest biomass to a powerplant economically.

An infusion of funding would be needed along with reasonable power purchase agreements to incentivize utilization of forest biomass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-02 17:17:23

No Duplicates.

**Comment 11 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Ashley

Last Name: Remillard

Email Address: ashley.remillard@hexagonagility.com

Affiliation: Hexagon Agility

Subject: 2022 Scoping Plan Update - Scenario Concepts Technical Workshop

Comment:

Please see attached for Hexagon Agility's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/12-sp22-concepts-ws-UTJSOwBsBzlRMgFv.pdf](http://www.arb.ca.gov/lists/com-attach/12-sp22-concepts-ws-UTJSOwBsBzlRMgFv.pdf)

Original File Name: Comment Letter re Scoping Plan (9-2-21).pdf

Date and Time Comment Was Submitted: 2021-09-02 21:24:25

No Duplicates.

**Comment 12 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Alex

Last Name: Breckel

Email Address: acbreckel@energyfuturesinitiative.org

Affiliation: Energy Futures Initiative

Subject: The Importance of Engineered Carbon Removal for Achieving California's Climate Goals  
Comment:

The Energy Futures Initiative (EFI) is submitting the attached letter in support of including engineered carbon removal in the 2022 Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/13-sp22-concepts-ws-BWAFZVA4UI4EYQRr.pdf](http://www.arb.ca.gov/lists/com-attach/13-sp22-concepts-ws-BWAFZVA4UI4EYQRr.pdf)

Original File Name: EFI Comments on CARB Scoping Plan Update Workshop 09.03.21.pdf

Date and Time Comment Was Submitted: 2021-09-03 06:59:06

No Duplicates.

**Comment 13 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Busch  
Email Address: [chrisb@energyinnovation.org](mailto:chrisb@energyinnovation.org)  
Affiliation: Energy Innovation

Subject: Recommendations for 2022 Scoping Plan analysis  
Comment:

Energy Innovation is grateful to the California Air Resources Board (CARB) for managing the complex task of developing California's 2022 Scoping Plan.

We support CARB's initiatives to better quantify public health benefits and identify pathways to 2035 carbon neutrality in the analysis underpinning 2022 Scoping Plan development.

While we welcome these encouraging steps, initial plans for the Scoping Plan analysis still fall short of global best practices. To better realize the 2022 Scoping Plan's potential to inform California's decarbonization strategy, Energy Innovation offers four recommendations as detailed in the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/15-sp22-concepts-ws-VDFXPwNnACEFZAB5.pdf](http://www.arb.ca.gov/lists/com-attach/15-sp22-concepts-ws-VDFXPwNnACEFZAB5.pdf)

Original File Name: Energy Innovation recommendations (Scenario Concepts Workshop).pdf

Date and Time Comment Was Submitted: 2021-09-03 09:10:06

No Duplicates.

**Comment 14 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: OBrien

Email Address: rebeccaobrien@tnrenewableenergy.com

Affiliation: TNRE

Subject: True North Renewable Energy, LLC Comments on Scoping Plan Scenarios

Comment:

See attached file - True North Renewable Energy, LLC's Comments on  
Scoping Plan Scenarios.

Attachment: [www.arb.ca.gov/lists/com-attach/16-sp22-concepts-ws-UiZWPIYlBzEEXQdk.pdf](http://www.arb.ca.gov/lists/com-attach/16-sp22-concepts-ws-UiZWPIYlBzEEXQdk.pdf)

Original File Name: TNRE Comments\_Scoping Plan Scenarios 9.03.21.pdf

Date and Time Comment Was Submitted: 2021-09-03 09:16:37

No Duplicates.

**Comment 15 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Ignacio  
Last Name: Fernandez  
Email Address: ignacio.m.fernandez@sce.com  
Affiliation: Southern California Edison

Subject: SCE comments on AB 32 2022 Scoping Plan Update Scenario Concepts Workshop  
Comment:

Dear Sir/Madam,

Please find attached Southern California Edison's comments on AB 32  
2022 Scoping Plan Update Scenario Concepts Workshop that took place  
on August 17, 2021.

Best regards

Attachment: [www.arb.ca.gov/lists/com-attach/17-sp22-concepts-ws-UiFSN1E1Aw9VMAJt.pdf](http://www.arb.ca.gov/lists/com-attach/17-sp22-concepts-ws-UiFSN1E1Aw9VMAJt.pdf)

Original File Name: SCE\_comments\_CARB\_SPU\_ScenarioConcepts\_20210903.pdf

Date and Time Comment Was Submitted: 2021-09-03 10:04:28

No Duplicates.

**Comment 16 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation: CIPA

Subject: CIPA Comments  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/18-sp22-concepts-ws-BWZcM1AhUmAKUwV2.pdf](http://www.arb.ca.gov/lists/com-attach/18-sp22-concepts-ws-BWZcM1AhUmAKUwV2.pdf)

Original File Name: CIPA SP Scenarios Workshop Comments Sept 3 2021 -final.pdf

Date and Time Comment Was Submitted: 2021-09-03 10:01:34

No Duplicates.



**Comment 17 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Marc

Last Name: Jaruzel

Email Address: mjaruzel@catf.us

Affiliation:

Subject: CATF Comments on the Scenario Concepts Technical Workshop

Comment:

Please see attached for CATF's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/19-sp22-concepts-ws-VGYHMAQ1VD4EMIBj.pdf](http://www.arb.ca.gov/lists/com-attach/19-sp22-concepts-ws-VGYHMAQ1VD4EMIBj.pdf)

Original File Name: 210903 CATF Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 11:30:31

No Duplicates.

**Comment 18 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Leeor  
Last Name: Alpern  
Email Address: lalpern@worldenergy.net  
Affiliation:

Subject: World Energy Comments on the Scenario Concepts Technical Workshop  
Comment:

Please see attached for World Energy's comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/20-sp22-concepts-ws-UiVXPgd0UW5QMgRb.pdf](http://www.arb.ca.gov/lists/com-attach/20-sp22-concepts-ws-UiVXPgd0UW5QMgRb.pdf)

Original File Name: World Energy CARB Scoping Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-09-03 11:41:32

No Duplicates.

**Comment 19 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on Climate Change Scenario Concepts

Comment:

Thank you for considering BAC's comments on the Climate Change  
Scoping Plan Scenario Concepts.

Attachment: [www.arb.ca.gov/lists/com-attach/21-sp22-concepts-ws-VTcGYVEzUV0CZwZp.pdf](http://www.arb.ca.gov/lists/com-attach/21-sp22-concepts-ws-VTcGYVEzUV0CZwZp.pdf)

Original File Name: BAC Comments on Scoping Plan Scenarios.pdf

Date and Time Comment Was Submitted: 2021-09-03 11:57:47

No Duplicates.

**Comment 20 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Titus

Email Address: ttitus@burbankca.gov

Affiliation:

Subject: BWP comment letter to CARB 2022 Scoping Plan Update - Scenario Concepts  
Comment:

Burbank Water and Power's comment letter to CARB 2022 Scoping Plan  
Update.

Sincerely,

Dawn Roth Lindell

Burbank Water and Power General Manager

Attachment: [www.arb.ca.gov/lists/com-attach/22-sp22-concepts-ws-UCMHYIM9UnEDbANt.pdf](http://www.arb.ca.gov/lists/com-attach/22-sp22-concepts-ws-UCMHYIM9UnEDbANt.pdf)

Original File Name: Scoping Plan Comment Letter - BWP.pdf

Date and Time Comment Was Submitted: 2021-09-03 11:55:57

No Duplicates.

**Comment 21 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Greg

Last Name: Kester

Email Address: gkester@casaweb.org

Affiliation: California Association of Sanitation Age

Subject: Comments on 2022 Scoping Plan Scenarios

Comment:

Please find attached comments from the California Association of  
Sanitation Agencies (CASA) on the 2022 Scoping Plan Update  
Scenarios.

Attachment: [www.arb.ca.gov/lists/com-attach/23-sp22-concepts-ws-VDdUMwByUmBSC1c0.docx](http://www.arb.ca.gov/lists/com-attach/23-sp22-concepts-ws-VDdUMwByUmBSC1c0.docx)

Original File Name: CASA Comments on 2022 Scoping Plan Scenarios 090321.docx

Date and Time Comment Was Submitted: 2021-09-03 12:07:30

No Duplicates.

**Comment 22 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Robert

Last Name: Ehlers

Email Address: robert.ehlers@valero.com

Affiliation: Valero Energy Corporation

Subject: Comments on CARB's Scoping Plan Update Scenario Concepts Technical Workshop  
Comment:

Valero hereby submits its Comments on CARB's Scoping Plan Update -  
Scenario Concepts Technical Workshop from August 17, 2021.

Attachment: [www.arb.ca.gov/lists/com-attach/24-sp22-concepts-ws-VyFcOwFsBzEEcFM8.pdf](http://www.arb.ca.gov/lists/com-attach/24-sp22-concepts-ws-VyFcOwFsBzEEcFM8.pdf)

Original File Name: Valero CARB Scoping Plan 9-3-21.pdf

Date and Time Comment Was Submitted: 2021-09-03 11:28:40

No Duplicates.

**Comment 23 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Floyd  
Last Name: Vergara  
Email Address: FVergara@biodiesel.org  
Affiliation: NBB and CABA

Subject: NBB & CABA Comments on 2022 GHG Scoping Plan Update Modeling Scenarios  
Comment:

Please see attached comments from the National Biodiesel Board and  
California Advanced Biofuels Alliance.

Attachment: [www.arb.ca.gov/lists/com-attach/25-sp22-concepts-ws-VzkAZFIxUV0CZwJj.pdf](http://www.arb.ca.gov/lists/com-attach/25-sp22-concepts-ws-VzkAZFIxUV0CZwJj.pdf)

Original File Name: NBB\_CABA Comments on CARB 2022 GHG Scoping Plan Modeling Scenarios  
(FINAL).pdf

Date and Time Comment Was Submitted: 2021-09-03 12:42:03

No Duplicates.

## **Comment 24 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: John  
Last Name: Blue  
Email Address: blue@ieta.org  
Affiliation: IETA

Subject: IETA COMMENTS ON CARB SCENARIO CONCEPTS TECHNICAL WORKSHOP (2022 SCOPING PLAN UPDATE)

Comment:

3 September 2021

The International Emissions Trading Association (IETA) welcomes this opportunity to submit feedback to the California Air Resources Board (CARB) on the 17 August 2021 workshop "2022 Scoping Plan Update - Scenario Concepts Technical Workshop."

As the leading international business voice on climate markets and finance, IETA's non-profit organization represents over 180 companies, including many facing climate risks and opportunities across California. IETA's market expertise is regularly called upon to inform market-based policies that deliver measurable greenhouse gas reductions and removals, address economic competitiveness concerns and balance economic efficiencies with social equity and co-benefits. Our mission is to support broad and functional carbon markets, guided by the principles of efficient, low-cost, measurable climate outcomes while ensuring environmental integrity.

As stated in our 8 July 2021 letter, IETA recommends that CARB's 2022 Scoping Plan explicitly model a cap-and-trade scenario with caps declining to net zero by 2045. This scenario, further outlined in IETA's 2020 Paper "Achieving Carbon Neutrality in California", would center cap-and-trade as the "workhorse" measure and strategy for achieving most of the abatement required to achieve carbon neutrality in California. If CARB does not consider cap-and-trade to be this cornerstone measure, it relegates the state to choosing from a suite of second-best, less efficient options. This would unnecessarily increase California consumer costs and ultimately lower the probability of measurably achieving carbon neutrality. Continued reliance on alternative direct policies would also forego opportunities that higher allowance prices afford, including more revenue for the State to spend on addressing the climate challenge while protecting its disadvantaged communities. For these reasons, we were disappointed to see that CARB did not discuss any cap-and-trade scenarios during its recent technical workshop.

In addition, the "Scenario Design Options" that CARB staff presented for consideration in developing modeling scenarios did not include cap-and-trade or other market-based solutions. Instead, scenarios were limited to sectoral/engineering-based options and other direct regulations. An economy-wide approach like cap-and-trade achieves climate targets at least-cost - because they do not rely on government intervention, the broad market approach directs investment into sectors and technologies that can reduce emissions most affordably. To that end, a cap-and-trade scenario would illustrate the viable, least-cost option for California to achieve its climate targets. Such an approach should serve as a baseline or reference case, with any deviation from the least-cost option requiring additional justification based on factors unrelated to costs. Instead, the costs of the current scenarios cannot be compared against the least-cost option, thereby forcing



stakeholders to subjectively pick their preferences for sectoral reductions or engineered solutions.

California should not be required to fight for carbon neutrality with one hand tied behind its back. Nor should stakeholders be put in a situation to compare scenarios without complete information on relative costs. IETA therefore urges CARB to explicitly model an aggressive cap-and-trade scenario in the development of California's 2022 Scoping Plan.

We look forward to close and frequent engagement with CARB staff and other stakeholders over the coming months. Please direct comments or questions to IETA's West Coast Representative, John Blue (blue@ieta.org).

Attachment: [www.arb.ca.gov/lists/com-attach/26-sp22-concepts-ws-UjsHZFciAzEHXIU2.pdf](http://www.arb.ca.gov/lists/com-attach/26-sp22-concepts-ws-UjsHZFciAzEHXIU2.pdf)

Original File Name: IETA Comments-CARB Scenarios Workshop-3Sep.pdf

Date and Time Comment Was Submitted: 2021-09-03 12:40:29

No Duplicates.

**Comment 25 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Gloria  
Last Name: Ohland  
Email Address: gloria@movela.org  
Affiliation: Move LA

Subject: scoping plan letter  
Comment:

Scoping Plan letter is attached. Thank you all for your good work!

Attachment: [www.arb.ca.gov/lists/com-attach/27-sp22-concepts-ws-BmtXPIIIVGIBa1My.docx](http://www.arb.ca.gov/lists/com-attach/27-sp22-concepts-ws-BmtXPIIIVGIBa1My.docx)

Original File Name: MoveLAScopingPlanLetter.docx

Date and Time Comment Was Submitted: 2021-09-03 12:44:54

No Duplicates.

**Comment 26 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: david

Last Name: bezanson

Email Address: bezanpsy3506@hotmail.com

Affiliation:

Subject: SCOPING PLAN 2022 TECHNICAL WORKSHOP Aug. 2021

Comment:

See the attached docx file.

Attachment: [www.arb.ca.gov/lists/com-attach/28-sp22-concepts-ws-UiFSN10zUnEEawBu.docx](http://www.arb.ca.gov/lists/com-attach/28-sp22-concepts-ws-UiFSN10zUnEEawBu.docx)

Original File Name: SCOPING PLAN 2022.docx

Date and Time Comment Was Submitted: 2021-09-03 12:56:09

No Duplicates.

**Comment 27 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Peter

Last Name: Reinhardt

Email Address: peter@charmindustrial.com

Affiliation: Charm Industrial

Subject: Charm Industrial -- Comments on Scenario Concepts Technical Workshop

Comment:

Please find attached Charm's comments to the Scoping Plan workshop held on August 17, 2021.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/29-sp22-concepts-ws-W2tTbF1yBWZVYAEv.pdf](http://www.arb.ca.gov/lists/com-attach/29-sp22-concepts-ws-W2tTbF1yBWZVYAEv.pdf)

Original File Name: 09.03.2021 Charm\_CARBSPWKSHp.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:08:36

No Duplicates.

**Comment 28 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Eli  
Last Name: Lipmen  
Email Address: eli@movela.org  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/30-sp22-concepts-ws-UD0BaAB3WW9VDAdr.docx](http://www.arb.ca.gov/lists/com-attach/30-sp22-concepts-ws-UD0BaAB3WW9VDAdr.docx)

Original File Name: Move LA Letter to CARB on 2022 Scoping Plan.docx

Date and Time Comment Was Submitted: 2021-09-03 13:10:50

No Duplicates.

**Comment 29 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Brundage

Email Address: kathleen.brundage@californiasteel.com

Affiliation:

Subject: 2022 Scoping Plan - GHG Reduction Strategies

Comment:

Thank you for the opportunity to discuss GHG reduction strategies as we move forward with the 2022 Scoping Plan. We appreciate CARB's staff time and welcome continuing dialog.

Attachment: [www.arb.ca.gov/lists/com-attach/31-sp22-concepts-ws-UzRcMI07BAhQJAZj.pdf](http://www.arb.ca.gov/lists/com-attach/31-sp22-concepts-ws-UzRcMI07BAhQJAZj.pdf)

Original File Name: GHG Reduction Strategies - California Steel Industries.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:21:16

No Duplicates.

**Comment 30 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: John  
Last Name: Schaefer  
Email Address: jcschaef@igc.org  
Affiliation: 350 Humboldt

Subject: Carbon pricing is the key to CARB success  
Comment:

Thanks for opening up the process to all of us.  
First, no science supports "carbon neutrality by 2050." Look around and observe what's happening today. We need to reach carbon neutrality much sooner.  
Second, EJ issues aren't a reason not to take steps I describe below. People near fossil fuel facilities will benefit most from fossil fuel elimination.  
Third, any reliance on CCS is fraudulent because adequate technology neither to capture nor store has been demonstrated. Projections of cost are well into the hundreds of dollars per tonne.  
Fourth, greening the grid, reducing VMT, promoting EVs, and reduction of SLCP will work much better and with less angst if we make economics support them. The way to make that happen is to include (not just "consider") the real social cost of CO2 in cap and trade fees. We've given a free ride to CO2 for far too long. If cap and trade fees are high enough (hundreds of dollars per tonne), all the other programs like decarbonization will follow.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-03 13:01:03

No Duplicates.

**Comment 31 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Denny  
Last Name: Zane  
Email Address: dennyzane@aol.com  
Affiliation: Move LA

Subject: scoping plan letter  
Comment:

Here is our letter about the 2022 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/33-sp22-concepts-ws-VTgAaVYhADYCaFQ1.docx](http://www.arb.ca.gov/lists/com-attach/33-sp22-concepts-ws-VTgAaVYhADYCaFQ1.docx)

Original File Name: MoveLAScopingPlanLetter.docx

Date and Time Comment Was Submitted: 2021-09-03 13:30:32

No Duplicates.



**Comment 32 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: JULEE

Last Name: MALINOWSKI BALL

Email Address: julee@ppallc.com

Affiliation:

Subject: CARB 2022 Scoping Plan Update - Scenario Concepts Technical Workshop CBEA Comments  
Comment:

CARB 2022 Scoping Plan Update - Scenario Concepts Technical  
Workshop CBEA Comments

Attachment: [www.arb.ca.gov/lists/com-attach/34-sp22-concepts-ws-UzBVmlwvVmdVDFJg.pdf](http://www.arb.ca.gov/lists/com-attach/34-sp22-concepts-ws-UzBVmlwvVmdVDFJg.pdf)

Original File Name: CARB 2022 Scoping Plan Update CBEA Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:31:58

No Duplicates.

**Comment 33 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Joshua

Last Name: Greene

Email Address: jcgreene@aosmith.com

Affiliation: A. O. Smith

Subject: A. O. Smith Comments - 2022 Scoping Plan Update Workshop

Comment:

Attached is A. O. Smith's comments to CARB 2022 Scoping Plan Update  
- Scenario Concepts Technical Workshop held on August 17, 2021.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/35-sp22-concepts-ws-BTVVagAvBGcDNgkn.pdf](http://www.arb.ca.gov/lists/com-attach/35-sp22-concepts-ws-BTVVagAvBGcDNgkn.pdf)

Original File Name: 09.03.2021 AO Smith\_Scoping Plan Scenario Options Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:43:00

No Duplicates.

**Comment 34 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Prashanthi

Last Name: Raman

Email Address: prashanthi.raman@getcruise.com

Affiliation:

Subject: Cruise, LLC Comments - 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
Comment:

Please find attached Cruise's comments to CARB 2022 Scoping Plan Update workshop held in August.

Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/36-sp22-concepts-ws-BTUCPVN8AGMHMgQq.pdf](http://www.arb.ca.gov/lists/com-attach/36-sp22-concepts-ws-BTUCPVN8AGMHMgQq.pdf)

Original File Name: 09.03.2021 Cruise\_ AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:49:44

No Duplicates.

**Comment 35 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Katharine

Last Name: Larson

Email Address: klarson@scppa.org

Affiliation:

Subject: Joint POU Comments on Scoping Plan Scenario Concepts Workshop  
Comment:

Please see attached joint comments from the Southern California  
Public Power Authority, Northern California Power Agency, and  
California Municipal Utilities Association.

Attachment: [www.arb.ca.gov/lists/com-attach/37-sp22-concepts-ws-AmhXPlw0UWxVJ1cI.pdf](http://www.arb.ca.gov/lists/com-attach/37-sp22-concepts-ws-AmhXPlw0UWxVJ1cI.pdf)

Original File Name: Joint POU Comments - 9.3 Technical Workshop on Scenario Concepts.pdf

Date and Time Comment Was Submitted: 2021-09-03 14:03:08

No Duplicates.

**Comment 36 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Dylan  
Last Name: Jaff  
Email Address: dylan@caleec.com  
Affiliation: CR&R Environmental Services

Subject: CR&R Environmental Services - Scoping Plan Comments on August 17th Workshop  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/38-sp22-concepts-ws-UjEFcQR3VVIXIgBj.pdf](http://www.arb.ca.gov/lists/com-attach/38-sp22-concepts-ws-UjEFcQR3VVIXIgBj.pdf)

Original File Name: CRR Scoping Plan Letter 9.3.21.pdf

Date and Time Comment Was Submitted: 2021-09-03 13:57:26

No Duplicates.

**Comment 37 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Laurence

Last Name: Swan

Email Address: Laurence.Swan@usda.gov

Affiliation: USDA Forest Service

Subject: Comments, Scenarios Proposed by CARB Staff, 8/17/2021

Comment:

Please see attached letter from Jennifer Eberlien, Regional Forester, USDA Forest Service, Pacific SW Region (R-5).

Attachment: [www.arb.ca.gov/lists/com-attach/39-sp22-concepts-ws-VmQBN1RnVDZVflNj.pdf](http://www.arb.ca.gov/lists/com-attach/39-sp22-concepts-ws-VmQBN1RnVDZVflNj.pdf)

Original File Name: 2021-08-03\_LTR\_RF\_544414\_Comments\_CA\_Air\_Resource\_Board\_esign.pdf

Date and Time Comment Was Submitted: 2021-09-03 14:08:05

No Duplicates.

**Comment 38 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Scott

Last Name: Murtishaw

Email Address: scott@iepa.com

Affiliation: Independent Energy Producers Association

Subject: Comments on Scoping Plan Scenarios

Comment:

Independent Energy Producers would like to submit the attached  
comments for ARB's consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/40-sp22-concepts-ws-AGlRMgNyVFhSNwZp.pdf](http://www.arb.ca.gov/lists/com-attach/40-sp22-concepts-ws-AGlRMgNyVFhSNwZp.pdf)

Original File Name: IEP comments on Scoping Plan Scenarios 09 03 21.pdf

Date and Time Comment Was Submitted: 2021-09-03 14:34:14

No Duplicates.

## **Comment 39 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Nancy  
Last Name: Ihara  
Email Address: nancyihara@gmail.com  
Affiliation: n/a

Subject: 2022 Scoping Plan Update  
Comment:

In general I support measures that accelerate California's transition to renewable energy and reduce as quickly as possible greenhouse gas emissions in the state.

Carbon Neutrality Timeframe. I support Option A, exceeding the 2030 SB 32 target and achieving carbon neutrality by 2035. The most effective way to do this is to aggressively work to eliminate short lived climate pollutants such as methane, HFCs, and black carbon.

Role of Engineered Carbon Removal. Option A. The Air Resources Board should not have a role or participate in any way in engineered carbon removal produced by fossil fuels. Doing so only extends the time period in which the state depends on these fuels. HFCs contribute an inordinate amount of CO<sub>2</sub>e in the short term. There should be a concentrated focus on transitioning to natural refrigerants.

Carbon Free Electricity Grid. We should accelerate the Renewable Portfolio Standard, a goal of 100% by 2035 at the latest with 85% by 2030.

Vehicle Miles Traveled. In order to reduce VMTs housing needs to be built in city centers and public transit expanded considerably. There needs to be a focus on pedestrian and bike infrastructure.

Vehicle Fleet Electrification. I support Option A.

Petroleum Fuel. Option A is the more aggressive route to take.

Woody Biomass and Solid Biomass Waste. Option A. The burning of woody biomass for energy produces more greenhouse gases than burning coal and releases toxic pollutants. In the past year over 500 scientists decried the notion that biomass might be considered renewable.

Residential and Commercial Building Decarbonization. Option A.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-03 14:59:49

No Duplicates.



**Comment 40 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Caelin

Last Name: MacIntosh

Email Address: cmacintosh@ajw-inc.com

Affiliation:

Subject: Comments on the Scenario Concepts Technical Workshop from Ethanol Groups

Comment:

Please see attached for the comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/43-sp22-concepts-ws-VGYCNVxtA2kKPAk6.pdf](http://www.arb.ca.gov/lists/com-attach/43-sp22-concepts-ws-VGYCNVxtA2kKPAk6.pdf)

Original File Name: 210903 Scoping Plan Ethanol Groups Comment.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:00:33

No Duplicates.

**Comment 41 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation:

Subject: RNG Coalition Comments on Scenario Concepts Workshop

Comment:

Please see our attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/44-sp22-concepts-ws-ATNXYAc2UjgHNVBj.pdf](http://www.arb.ca.gov/lists/com-attach/44-sp22-concepts-ws-ATNXYAc2UjgHNVBj.pdf)

Original File Name: 210903 CARB 2022 GHG Scoping Plan Scenarios - RNG Coalition Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:00:28

No Duplicates.

**Comment 42 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Steven

Last Name: Frisch

Email Address: sfrisch@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: Comments on 2022 Climate Change Scoping Plan Scenarios

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/45-sp22-concepts-ws-AXIGYgRmV1tRZVJi.docx](http://www.arb.ca.gov/lists/com-attach/45-sp22-concepts-ws-AXIGYgRmV1tRZVJi.docx)

Original File Name: SBC\_2022 Scoping Plan.docx

Date and Time Comment Was Submitted: 2021-09-03 15:15:31

No Duplicates.

**Comment 43 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: sdeslauriers@carollo.com  
Affiliation: California Association of Sanitation Age

Subject: CASA Comments on 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
Comment:

Hello,  
The California Association of Sanitation Agencies appreciates the opportunity to provide comments on the Climate Change Scoping Plan scenarios presented on August 17th. Our comments are attached. Please feel free to contact us with any questions. We look forward to collaboratively working with you on this critical issue.  
Regards,  
Sarah A. Deslauriers

Attachment: [www.arb.ca.gov/lists/com-attach/46-sp22-concepts-ws-VjVQNwByAzFXDlc0.pdf](http://www.arb.ca.gov/lists/com-attach/46-sp22-concepts-ws-VjVQNwByAzFXDlc0.pdf)

Original File Name: CASA Comments on 2022 Scoping Plan Scenarios 090321.pdf

Date and Time Comment Was Submitted: 2021-09-03 14:58:45

No Duplicates.

**Comment 44 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Law Offices of Susie Berlin

Subject: Golden State Power Cooperative Comments on Scoping Plan Scenarios  
Comment:

Re: Golden State Power Cooperative Comments on 2022 Scoping Plan  
Update; Scenarios Concepts Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/47-sp22-concepts-ws-AmFQOQFtVWtWNVI8.pdf](http://www.arb.ca.gov/lists/com-attach/47-sp22-concepts-ws-AmFQOQFtVWtWNVI8.pdf)

Original File Name: comments re scoping plan scenario workshops (090321 final).pdf

Date and Time Comment Was Submitted: 2021-09-03 15:21:32

No Duplicates.

**Comment 45 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation:

Subject: Support for Renewable Fuels

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/48-sp22-concepts-ws-BXYAZVY4VHcFalM9.pdf](http://www.arb.ca.gov/lists/com-attach/48-sp22-concepts-ws-BXYAZVY4VHcFalM9.pdf)

Original File Name: Scoping Plan Scenarios Comments Supporting Renewable Fuels 9-3-21.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:24:50

No Duplicates.

**Comment 46 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Connell

Email Address: nconnell@ghcoalition.org

Affiliation: Green Hydrogen Coalition

Subject: GHC Comments on 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
Comment:

GHC Comments on 2022 Scoping Plan Update - Scenario Concepts  
Technical Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/49-sp22-concepts-ws-AWZSPAdIU14GYwhn.pdf](http://www.arb.ca.gov/lists/com-attach/49-sp22-concepts-ws-AWZSPAdIU14GYwhn.pdf)

Original File Name: GHC Comments on CARB 2022 Scoping Plan Update - Scenario Concepts Technical Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:30:12

No Duplicates.

**Comment 47 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: John

Last Name: O'Donnell

Email Address: john@rondo.energy

Affiliation:

Subject: Comments on 2022 Scoping Plan Update process

Comment:

Rondo is pleased to submit the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/50-sp22-concepts-ws-U2ECNQQ1BW9WYQAQ3.pdf](http://www.arb.ca.gov/lists/com-attach/50-sp22-concepts-ws-U2ECNQQ1BW9WYQAQ3.pdf)

Original File Name: 210903 Rondo SP Scenario Comments 9-3-2.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:37:01

No Duplicates.



**Comment 48 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on 8-17-21 Workshop on 2022 Scoping Plan Scenario Concepts  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/51-sp22-concepts-ws-Wj5dOgRsWXgDfARb.pdf](http://www.arb.ca.gov/lists/com-attach/51-sp22-concepts-ws-Wj5dOgRsWXgDfARb.pdf)

Original File Name: Dairy Cares Comments on CARB 8-17-21 WS on Scoping Plan Scenario Concepts 210903  
(00555764xBA8E1).pdf

Date and Time Comment Was Submitted: 2021-09-03 15:35:35

No Duplicates.

**Comment 49 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Katelyn  
Last Name: Roedner Sutter  
Email Address: kroedner@edf.org  
Affiliation: Environmental Defense Fund

Subject: EDF comments on Scoping Plan scenarios  
Comment:

Hello,

Attached please find comments from Environmental Defense Fund regarding Scoping Plan scenario development.

Thank you for your consideration,  
Katelyn Roedner Sutter  
Senior Manager, US Climate

Attachment: [www.arb.ca.gov/lists/com-attach/52-sp22-concepts-ws-BWBTMQBnUV1WM1c4.pdf](http://www.arb.ca.gov/lists/com-attach/52-sp22-concepts-ws-BWBTMQBnUV1WM1c4.pdf)

Original File Name: EDF Comments\_ SP Scenario Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-03 15:36:53

No Duplicates.

**Comment 50 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency

Subject: NCPA Supplemental Comments on Scoping Plan Scenarios

Comment:

NCPA Supplemental Comments on Scoping Plan Scenarios

Attachment: [www.arb.ca.gov/lists/com-attach/53-sp22-concepts-ws-UD5dOAFwVGYPDWlc0.pdf](http://www.arb.ca.gov/lists/com-attach/53-sp22-concepts-ws-UD5dOAFwVGYPDWlc0.pdf)

Original File Name: NCPA Comments re scoping plan scenario concepts supplement (090321).pdf

Date and Time Comment Was Submitted: 2021-09-03 15:42:43

No Duplicates.

**Comment 51 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: BJ

Last Name: Johnson

Email Address: BJ@clearflameengines.com

Affiliation:

Subject: ClearFlame Comments on the Scenario Concepts Technical Workshop

Comment:

Please see the attached for our comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/54-sp22-concepts-ws-VDcFb1I2ADJQJFUz.pdf](http://www.arb.ca.gov/lists/com-attach/54-sp22-concepts-ws-VDcFb1I2ADJQJFUz.pdf)

Original File Name: ClearFlame Engine Technologies comment letter - Submitted 09-03-21.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:08:05

No Duplicates.

**Comment 52 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Roger  
Last Name: Lin  
Email Address: roger@caleja.org  
Affiliation:

Subject: CEJA Comments  
Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/55-sp22-concepts-ws-WzgAY1E6ADJV DARh.pdf](http://www.arb.ca.gov/lists/com-attach/55-sp22-concepts-ws-WzgAY1E6ADJV DARh.pdf)

Original File Name: CEJA et al Scoping Plan Comment 4 090321.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:12:31

No Duplicates.

**Comment 53 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

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

**Comment 54 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Colby  
Last Name: Morrow  
Email Address: clmorrow@socalgas.com  
Affiliation: SoCalGas

Subject: SoCalGas Comments on Scoping Plan Scenarios Workshop  
Comment:

Thank you to all staff and hope you have safe and healthy labor day weekend! Cheers - Colby Morrow

Attachment: [www.arb.ca.gov/lists/com-attach/57-sp22-concepts-ws-AHNVPFY0UmBVP1M0.pdf](http://www.arb.ca.gov/lists/com-attach/57-sp22-concepts-ws-AHNVPFY0UmBVP1M0.pdf)

Original File Name: SoCalGas Comments on CARB 2022 Scoping Plan Scenario Concepts Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:14:18

No Duplicates.

**Comment 55 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Mark

Last Name: Rigby

Email Address: mark.rigby@dteenergy.com

Affiliation: DTE Energy

Subject: DTE Energy Comments on 8/17/21 Scoping Plan meeting

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/58-sp22-concepts-ws-UjZVJ1A0V1sEcQNg.pdf](http://www.arb.ca.gov/lists/com-attach/58-sp22-concepts-ws-UjZVJ1A0V1sEcQNg.pdf)

Original File Name: DTE Scoping Plan comments 9.3.21 FINAL1.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:45:13

No Duplicates.



**Comment 56 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Miles

Last Name: Heller

Email Address: hellermt@airproducts.com

Affiliation: Air Products

Subject: 2022 Scoping Plan Update 8-17 Scenarios Workshop Comments

Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/59-sp22-concepts-ws-BmcGaV0uVHcBdVc4.pdf](http://www.arb.ca.gov/lists/com-attach/59-sp22-concepts-ws-BmcGaV0uVHcBdVc4.pdf)

Original File Name: AirProduct Comments August 17 2021 Scoping Plan scenarios workshop final.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:49:29

No Duplicates.

**Comment 57 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: 2022 Scoping Plan Scenarios

Comment:

The Center for Biological Diversity strongly supports California's climate goals and appreciates this opportunity to provide input regarding the analysis of scenarios in the development of the 2022 Scoping Plan Update to Achieve Carbon Neutrality by 2045.

Attachment: [www.arb.ca.gov/lists/com-attach/60-sp22-concepts-ws-UWNWYVIMB2QFOIAP.pdf](http://www.arb.ca.gov/lists/com-attach/60-sp22-concepts-ws-UWNWYVIMB2QFOIAP.pdf)

Original File Name: 21 09 03 Center comments on Scoping Plan Scenarios.pdf

Date and Time Comment Was Submitted: 2021-09-03 16:52:21

No Duplicates.

**Comment 58 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Cheng

Email Address: nicole@climateplanca.org

Affiliation:

Subject: ClimatePlan and Partner Organizations' Comment on Scenario Concept Workshop  
Comment:

ClimatePlan and the undersigned organizations want to submit the  
attached letter with regard to the Scenario Concept workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/61-sp22-concepts-ws-UjFVI1ULWHhVMAlm.pdf](http://www.arb.ca.gov/lists/com-attach/61-sp22-concepts-ws-UjFVI1ULWHhVMAlm.pdf)

Original File Name: CP Scoping Plan Scenario Comment Letter.docx (1).pdf

Date and Time Comment Was Submitted: 2021-09-03 16:58:02

No Duplicates.

**Comment 59 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Shayda

Last Name: Azamian

Email Address: [sazamian@leadershipcounsel.org](mailto:sazamian@leadershipcounsel.org)

Affiliation: Leadership Counsel for Justice and Accou

Subject: Initial Response to Scenario Concepts Technical Workshop

Comment:

Comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/62-sp22-concepts-ws-UDlSOgdvUnVRPgRl.pdf](http://www.arb.ca.gov/lists/com-attach/62-sp22-concepts-ws-UDlSOgdvUnVRPgRl.pdf)

Original File Name: Initial Response to Scenario Concepts Technical Workshop.pdf

Date and Time Comment Was Submitted: 2021-09-03 17:08:45

No Duplicates.

**Comment 60 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Tom

Last Name: Jordan

Email Address: tom.jordan@valleyair.org

Affiliation: San Joaquin Valley APCD

Subject: Scoping Plan Update Comments

Comment:

San Joaquin Valley APCD comments on scoping plan update.

Attachment: [www.arb.ca.gov/lists/com-attach/63-sp22-concepts-ws-WikGY1c5BCcDbAJs.pdf](http://www.arb.ca.gov/lists/com-attach/63-sp22-concepts-ws-WikGY1c5BCcDbAJs.pdf)

Original File Name: Scoping Plan Update Comment Letter 9.3.21.pdf

Date and Time Comment Was Submitted: 2021-09-03 17:17:31

No Duplicates.

**Comment 61 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Transportation Coalition

Subject: Comment Letter re: 2022 Scoping Plan Update

Comment:

Please find attached a letter from stakeholders in support of clean  
renewable transportation fuels and technology.

Attachment: [www.arb.ca.gov/lists/com-attach/64-sp22-concepts-ws-AXJUMQBuBCdQPwNt.pdf](http://www.arb.ca.gov/lists/com-attach/64-sp22-concepts-ws-AXJUMQBuBCdQPwNt.pdf)

Original File Name: Scoping Plan Update 2022 Coalition Letter FINAL.pdf

Date and Time Comment Was Submitted: 2021-09-03 17:33:15

No Duplicates.

**Comment 62 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Fariya  
Last Name: Ali  
Email Address: fariya.ali@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on Aug Scoping Plan Workshop  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/65-sp22-concepts-ws-VydXNIYyUV0AdVAz.pdf](http://www.arb.ca.gov/lists/com-attach/65-sp22-concepts-ws-VydXNIYyUV0AdVAz.pdf)

Original File Name: PGE\_Scoping Plan Scenarios August 2021 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 17:42:28

No Duplicates.

**Comment 63 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Joanna  
Last Name: Gubman  
Email Address: joanna@urbanenvironmentalists.org  
Affiliation: Urban Environmentalists

Subject: Comments of Urban Environmentalists  
Comment:

Please see attached for the comments of Urban Environmentalists on the 2022 Scoping Plan Update - Scenario Concepts Technical Workshop.

Respectfully submitted,  
Joanna Gubman  
Executive Director, Urban Environmentalists  
www.urbanenvironmentalists.org

Attachment: [www.arb.ca.gov/lists/com-attach/66-sp22-concepts-ws-VmRUY1BhA2kFM1Rn.pdf](http://www.arb.ca.gov/lists/com-attach/66-sp22-concepts-ws-VmRUY1BhA2kFM1Rn.pdf)

Original File Name: 210903 CARB Scoping Plan Update Comments - UE.pdf

Date and Time Comment Was Submitted: 2021-09-03 18:14:15

No Duplicates.



**Comment 64 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Sara

Last Name: Fitzsimon Nelson

Email Address: [sfitzsimon-nelson@californiahydrogen.org](mailto:sfitzsimon-nelson@californiahydrogen.org)

Affiliation: California Hydrogen Business Council

Subject: California Hydrogen Business Council Comments

Comment:

CHBC's 2022 Scoping Plan Scenario Concepts Technical Workshop  
Comments

Attachment: [www.arb.ca.gov/lists/com-attach/67-sp22-concepts-ws-USJVMANtUnEHAAZo.pdf](http://www.arb.ca.gov/lists/com-attach/67-sp22-concepts-ws-USJVMANtUnEHAAZo.pdf)

Original File Name: Scoping Plan Scenario Concepts Technical Workshop\_CHBC Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 18:29:12

No Duplicates.

**Comment 65 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Sasan

Last Name: Saadat

Email Address: ssaadat@earthjustice.org

Affiliation:

Subject: Earthjustice SC CA Scoping Plan Comments

Comment:

Comments on Staff Presentation - Pathways to Carbon Neutrality

Attachment: [www.arb.ca.gov/lists/com-attach/68-sp22-concepts-ws-UTQHYPwVnEHaQZs.pdf](http://www.arb.ca.gov/lists/com-attach/68-sp22-concepts-ws-UTQHYPwVnEHaQZs.pdf)

Original File Name: Earthjustice Sierra Club Final Aug 17 Wkshp Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 19:06:14

No Duplicates.

**Comment 66 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Joanna

Last Name: Gubman

Email Address: joanna@urbanenvironmentalists.org

Affiliation: Urban Environmentalists

Subject: Urban Environmentalists Comments on 2022 SP Update - Scenario Concepts Technical Workshop  
Comment:

Please see attached PDF. This is a duplicate submission to one at about 6:30pm from another computer, as I didn't get a confirmation that the first one went through.

Attachment: [www.arb.ca.gov/lists/com-attach/69-sp22-concepts-ws-WmgCNVNiAmgHMQMw.pdf](http://www.arb.ca.gov/lists/com-attach/69-sp22-concepts-ws-WmgCNVNiAmgHMQMw.pdf)

Original File Name: 210903 CARB Scoping Plan Update Comments - UE.pdf

Date and Time Comment Was Submitted: 2021-09-03 19:03:37

No Duplicates.

**Comment 67 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation: California Natural Gas Vehicle Coalition

Subject: CNGVC Comment Letter on Scenarios Workshop

Comment:

The California Natural Gas Vehicle Coalition appreciates the opportunity to comment on the scenarios presented by staff at the August 17th technical workshop on the 2022 Scoping Plan Update. Please see the attached letter for more information about our position. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/70-sp22-concepts-ws-WjlWPgRiUXRWMwZZ.pdf](http://www.arb.ca.gov/lists/com-attach/70-sp22-concepts-ws-WjlWPgRiUXRWMwZZ.pdf)

Original File Name: CNGVC Scoping Plan Scenarios Comment Letter 090321.pdf

Date and Time Comment Was Submitted: 2021-09-03 20:10:40

No Duplicates.

**Comment 68 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

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

Affiliation: California Compost Coalition

Subject: Focus on SLCP on Scenario modeling to 2035

Comment:

CCC members recognize the importance of reducing short-lived climate pollutants and transitioning from diesel fuel, with a clear focus on near-term goals that need to be modeled for 2030 goals with the metrics of current programs, as well as being carbon neutral by 2035 and 2045. To focus more on SLCP reductions - as the last lever we have left to avoid catastrophic climate change - CARB should make SLCP Reductions the first and highest focus of the Scenarios generally and within each sector scenario, as well as all other sections of the 2022 climate Change Scoping Plan. When modeling, CARB should also use the cost metrics from the 2021 Climate Change Investments Annual Report where investing in renewable natural gas production facilities costs the state just \$55/ton and while mitigating methane emissions at landfills.

Attachment: [www.arb.ca.gov/lists/com-attach/71-sp22-concepts-ws-BnVQNQBkVGkLbABY.pdf](http://www.arb.ca.gov/lists/com-attach/71-sp22-concepts-ws-BnVQNQBkVGkLbABY.pdf)

Original File Name: Scenario Modeling Sept 3 2021.pdf

Date and Time Comment Was Submitted: 2021-09-03 20:17:12

No Duplicates.

**Comment 69 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Tim

Last Name: Carmichael

Email Address: tcarmichael@semprautilities.com

Affiliation:

Subject: SDGE 2022 scoping Plan Scenarios Workshop Comments

Comment:

Please find SDG&E's comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/72-sp22-concepts-ws-AXJXNVcxBTMGXwU3.pdf](http://www.arb.ca.gov/lists/com-attach/72-sp22-concepts-ws-AXJXNVcxBTMGXwU3.pdf)

Original File Name: SDGE 2022 Scoping Plan Scenarios Workshop Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 20:41:58

No Duplicates.

**Comment 70 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Tim

Last Name: Carmichael

Email Address: tcarmichael@semprautilities.com

Affiliation:

Subject: Joint Utilities 2022 Scoping Plan Scenarios Workshop Comments

Comment:

Please find Joint Utilities Comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/73-sp22-concepts-ws-WjBVPFA4VmsFd1IN.pdf](http://www.arb.ca.gov/lists/com-attach/73-sp22-concepts-ws-WjBVPFA4VmsFd1IN.pdf)

Original File Name: Joint Utilities 2022 Scoping Plan Scenarios Workshop Comments.pdf

Date and Time Comment Was Submitted: 2021-09-03 20:45:57

No Duplicates.

**Comment 71 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Jim R  
Last Name: Stewart, PhD  
Email Address: drjimstewart@gmail.com  
Affiliation:

Subject: Use biogas with carbon capture to make carbon negative electricity  
Comment:

Our peer-reviewed paper (Energies 2020, 13, 4972; doi:10.3390/en13184972) reports anaerobic digestion of biomass with the methane/carbon dioxide mixture fed into an Allam Cycle power plant produces electricity with zero emissions plus high pressure pure CO<sub>2</sub> ready for deep aquifer sequestration without additional pressurizing. The income from the electricity, plus income from the sequestered CO<sub>2</sub>, and potentially digestate sales, make this economically interesting. Hopefully, the digestate (if using pure food waste) can be sold as a high quality fertilizer that can be used on organic and other food crops and rangelands. If the organics are mixed with sewage sludge or other impure wastes, the digestate could be used to enrich shrublands and forests to increase natural sequestration. In addition the digestate could be added as a liquid to other organics in the composting process. Such profitable use of biomass is essential, especially with the requirement under SB 1383 to divert millions of tons of organic wastes now going to landfills every year. Hope CARB can model this opportunity for economical carbon negative electricity. You may contact me for more information, references and spreadsheets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-03 21:14:56

No Duplicates.



**Comment 72 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Pete

Last Name: Montgomery

Email Address: Pete@pmontgomeryconsulting.com

Affiliation:

Subject: CA Carbon Capture Coalition comments

Comment:

Attached

Attachment: [www.arb.ca.gov/lists/com-attach/75-sp22-concepts-ws-BzdcYwY3UzMHM1Jj.pdf](http://www.arb.ca.gov/lists/com-attach/75-sp22-concepts-ws-BzdcYwY3UzMHM1Jj.pdf)

Original File Name: 090321\_CARB\_SCOPINGPLAN\_CALCCC-1.pdf

Date and Time Comment Was Submitted: 2021-09-03 20:55:05

No Duplicates.

**Comment 73 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Wendy  
Last Name: Ring  
Email Address: wring123@gmail.com  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/76-sp22-concepts-ws-VzRcNVE9AD4BYgNt.docx](http://www.arb.ca.gov/lists/com-attach/76-sp22-concepts-ws-VzRcNVE9AD4BYgNt.docx)

Original File Name: Comment on SB 32 Scenarios (1).docx

Date and Time Comment Was Submitted: 2021-09-08 10:14:26

No Duplicates.

**Comment 74 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation:

Subject: Comments

Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/77-sp22-concepts-ws-BWZVPARoV2kLaAln.docx](http://www.arb.ca.gov/lists/com-attach/77-sp22-concepts-ws-BWZVPARoV2kLaAln.docx)

Original File Name: Comment to CARB from 350 Ventura County Climate Hub-CCS, goals & necessary programs.docx

Date and Time Comment Was Submitted: 2021-09-08 10:19:12

No Duplicates.

**Comment 75 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Shannon

Last Name: Harroun

Email Address: sharroun@placer.ca.gov

Affiliation: Placer County APCD

Subject: Comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/78-sp22-concepts-ws-VCRSOFc3BzcKaQV3.pdf](http://www.arb.ca.gov/lists/com-attach/78-sp22-concepts-ws-VCRSOFc3BzcKaQV3.pdf)

Original File Name: Placer APCD Scoping Plan Workshop Comments 9-3-21.pdf

Date and Time Comment Was Submitted: 2021-09-08 10:21:25

No Duplicates.

**Comment 76 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchndl@gmail.com  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/79-sp22-concepts-ws-UGJWYFJhUzIDWgV2.pdf](http://www.arb.ca.gov/lists/com-attach/79-sp22-concepts-ws-UGJWYFJhUzIDWgV2.pdf)

Original File Name: 2022 Scoping Plan Comments to CARB (1).pdf

Date and Time Comment Was Submitted: 2021-09-08 10:23:55

No Duplicates.

**Comment 77 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Tiffany  
Last Name: Roberts  
Email Address: troberts@wspa.org  
Affiliation: WSPA

Subject: WSPA comment letter  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/80-sp22-concepts-ws-AmNWJVA2VFgEM1Bn.pdf](http://www.arb.ca.gov/lists/com-attach/80-sp22-concepts-ws-AmNWJVA2VFgEM1Bn.pdf)

Original File Name: Aug 17th SP workshop\_WSPA FINAL(w Attachments).pdf

Date and Time Comment Was Submitted: 2021-09-08 10:31:09

No Duplicates.

**Comment 78 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Gino  
Last Name: DiCaro  
Email Address: gdicaro@cmta.net  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/81-sp22-concepts-ws-ATBWaVULAz9RJQhv.pdf](http://www.arb.ca.gov/lists/com-attach/81-sp22-concepts-ws-ATBWaVULAz9RJQhv.pdf)

Original File Name: 19 organizations comment on Scoping Plan Scenario Concepts.pdf

Date and Time Comment Was Submitted: 2021-09-08 10:33:44

No Duplicates.

**Comment 79 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Kyle  
Last Name: Heiskala  
Email Address: kyleh@environmentalhealth.org  
Affiliation:

Subject: Comment  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/82-sp22-concepts-ws-UTRRPVcJADwAdAlu.pdf](http://www.arb.ca.gov/lists/com-attach/82-sp22-concepts-ws-UTRRPVcJADwAdAlu.pdf)

Original File Name: EJ Orgs Scenario Input Question Responses 091721 final.pdf

Date and Time Comment Was Submitted: 2021-09-17 15:21:21

No Duplicates.



**Comment 80 for 2022 Scoping Plan Update - Scenario Concepts Technical Workshop  
(sp22-concepts-ws) - 1st Workshop.**

First Name: Laura  
Last Name: Cottrell  
Email Address: laura@houstonmagnani.com  
Affiliation:

Subject: CSCME Scoping Plan Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/83-sp22-concepts-ws-WzhQJVw+BDoDYAdY.pdf](http://www.arb.ca.gov/lists/com-attach/83-sp22-concepts-ws-WzhQJVw+BDoDYAdY.pdf)

Original File Name: CSCME Scoping Plan Technical Workshop Comments (signed).pdf

Date and Time Comment Was Submitted: 2021-09-20 08:31:11

No Duplicates.

**There are no comments posted to 2022 Scoping Plan Update - Scenario Concepts Technical Workshop (sp22-concepts-ws) that were presented during the Workshop at this time.**