

**Comment 1 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: GURWINDER

Last Name: Mann

Email Address: Gmann481@gmail.com

Affiliation:

Subject: Trucks

Comment:

When we have quality 2010 motor with deffr
R with def. Than we don't need 13 y
yrs or 800,000 miles .that is base
less. We already going through a
let.how many times we change the
trucks.truck are so expensive.pleas done do this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-19 10:57:17

No Duplicates.

Comment 2 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Thomas
Last Name: Becker
Email Address: tbeckerpower@gmail.com
Affiliation: T. Becker Power Systems

Subject: Recirculated Draft EA
Comment:

9/20/22

- I submitted 2 comments on the original Draft 2022 Climate Change Scoping Plan. Those comments are still valid and staff must respond as required by CEQA.

-I also submitted a comment on the 2022 SIP revision. Staff responded to that comment by saying my alternative request was "infeasible", even though they admit they never prepared an analysis of my alternative. Staff also stated that I did not submit enough detail to evaluate my alternative. Staff had years of documents I submitted concerning my alternative plan, and staff had my email address which they could have used to contact me with questions about my alternative plan. Staff never contacted me.

In my two comments submitted for the Draft 2022 Climate Change Scoping Plan, I submitted alternatives to the ACC and ACC II components of the plan. If staff has any questions about my alternatives, or if staff requires more information to prepare an analysis of my alternatives, staff can contact me at tbeckerpower@gmail.com.

Thank you

Tom Becker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-20 10:38:59

No Duplicates.

**Comment 3 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltruckng.com

Affiliation:

Subject: Scoping plan update

Comment:

I question the ability of staff, appointed by a biased board, to fairly assess this plan, in a way that does not tilt the results in a pro environment (ie more regulation) direction. We as citizens have been over regulated to a point of loosing our freedoms. Our business are being broken down to a point of no longer being able to be profitable. This group of people, that does not represent the a cross section of the population, only has one thing in mind. That is to control the population in a way that they see fit. Whether it is reasonable or not. This so called "science" is so biased that common sense is not used.

I call for a complete dismantling of this Board it does not serve the public good.

Less government control is better for the citizens.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-22 03:33:42

No Duplicates.

Comment 4 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Gilbert

Last Name: Adjoyi

Email Address: gilbertkadjoyi@gmail.com

Affiliation: N/A

Subject: comment to sp22-recirc-ea-ws.

Comment:

It is important that the time frame for achieving net zero emissions be brought forward to 2030 as suggested by others.

The biggest contributor to reducing greenhouse gas emissions is the replacement of internal combustion engine vehicles with electric vehicles.

The concern about power sector infrastructure to accommodate the replacement is best done by providing fast charging stations at parking lots at work, in front of shops, in residential buildings including apartment buildings, at amusement parks and anywhere they can be done.

To provide adequate power for charging electric vehicles, photovoltaic solar energy and wind with storage batteries and hydrogen, and hydropower with pumped up storage etc. need to be rapidly developed.

Importantly emphasis must be on working with apartment building owners to build photovoltaic solar energy on their apartment roofs to be fed into the main building electrical power supplies, to supplement the entire buildings' electricity needs and consequently lower residents electricity bills. Majority of the population live in apartment buildings. They would be able to charge their electric cars from their apartment garages while the sun shines.

Solar thermal, geothermal solid fuel biomass and biogas should not be prioritized at the moment because they either emit heat, greenhouse gases including methane which weaken the effort at combating excessive global warming.

Similarly, mechanical carbon capture even if ambient, except at the source without any escaping as for example at landfills, atmospheric removal of carbon and carbon sequestration are elusive efforts that should not be prioritized at this crucial time of efforts to reduce emissions and combat global warming.

Some people falsely believe that if they purchase electric vehicles, they will spend more money than buying internal combustion vehicles. There is the need to arrange talks with people who already have electric vehicles to affirm the cost advantages of purchasing electric vehicles, especially with the Board's subsidies now in place. The users should emphasize the less maintenance and lower fuel costs to the public through talks at Townhall meetings, webinars etc.

It is also disheartening that the Board's recommendations are advisory without federal, statutory or gubernatorial enforcement powers. However, when the people are educated to see the health and environmental benefits of the drastic actions, they will cooperate to help have the changes happen.

Thank you for the opportunity to add my little thoughts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-22 22:37:44

No Duplicates.

**Comment 5 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Kimberly

Last Name: McCoy

Email Address: kimberly.mccoy@centralcalasthma.org

Affiliation: Central California Asthma Collaborative

Subject: 2022 Scoping Plan Update-Recirculated Draft

Comment:

Good morning,

My name is Kimberly McCoy, Climate and Environmental Policy Advocate for Central California Asthma Collaborative. I am submitting our comments on manufacturing in regard to the Recirculated Draft Environmental Analysis for the 2022 Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-sp22-recirc-ea-ws-VjICdlMzBDFQIIIN.pdf>

Original File Name: Draft of EJAC comments_ Manufacturing and Public Health (2).pdf

Date and Time Comment Was Submitted: 2022-09-28 09:20:14

No Duplicates.

**Comment 6 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Martin
Last Name: MacKerel
Email Address: martin.mackerel@gmail.com
Affiliation:

Subject: We need strict phase-out dates

Comment:

I strongly support a strict phase-out date in the CARB Scoping Plan for all fossil fuel activities: extraction, refining, transporting, and retailing. In particular, putting a fixed date for the end of fossil fuel refining in California will allow owners to plan for end-of-life (rather than wasting money on expansions) and allow communities to plan for economic transition.

The CARB scoping plan should also not include any forms of carbon capture in its projections and math – there's little evidence that these expectations can be met, and in the meantime, they soften the goals far too much.

Thank you, Martin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-03 10:35:16

No Duplicates.

Comment 7 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Julie

Last Name: Parker

Email Address: julieparkerbonjour@gmail.com

Affiliation: League of Women Voters, Pasadena, NRC

Subject: Where are the teeth in this wonderful plan??

Comment:

I like the plan's positive thrust, and its detailed inclusion of all the ways we are to reach carbon neutrality by 2045. I especially like the new inclusion of "modeling and quantification of GHG emissions and carbon sequestration in natural and working lands," because trees do the job of ridding us of CO2 practically free, with managed stewardship forests." However, I do not believe this CARB 'plan' will get us there. Why? Because it is full of feeble language, and I quote: "We must transition...," "we absolutely must identify and address...," "the plan delivers on the promise...," "the solution will have to include...," "we must also rapidly deploy...," "urgent and complete efforts are needed...," "this plan is fundamentally based on hope..." and "the Scoping Plan is only that: a plan...," and "After it is finalized comes the hard work--and hopeful work--of putting its recommendations into action. And there is no time to waste."

This Scoping Plan reveals over and over that it has no teeth. It is a plea. It sounds apologetic rather than authoritative. It sounds as if it is begging. If it, the plan, were my suitor, I would say "you don't really believe in yourself, so how can I?" I want you to sweep me off my feet with drama, with determination, with HOW we are going to do these things...call our bluff, refer to our past resistance, win us with fervor, with warnings of new regulations and sacrifices required, not weak words of 'we must, this is only a plan, next comes the hard and hopeful work." The tone is mealy-mouthed. Come on, CARB!!! Win my heart with confidence, not tipping your hand at every turn that you are worried I will say NO!!! Damn it, make me say YES!! Make me shiver in my boots that if I don't say YES, my life is at risk!!! You can't squeeze the carbon out of every sector of the economy until you squeeze the resistance out of me to changing my life so I will be ready to follow your lead for our dear Planet Earth. And when I say "I", I include our city governments, our planning commissions, our chambers of commerce, our businesses, our schools, our hospitals, our multinational corporations, our banks, our families, our entire human race.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 18:29:01

No Duplicates.

**Comment 8 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Carol

Last Name: Wuenschell

Email Address: cwuenschell@gmail.com

Affiliation:

Subject: Comment on 2022 Scoping Plan Update recirculated draft

Comment:

The 2022 Scoping Plan update draft looks very good. I do a lot of reading on the climate crisis and human responses to it, and I see that this draft plan update addresses pretty much every major issue in this area with cogency and clarity. Anthropogenic climate change is the paramount threat to our species at this time in history. We must meet this challenge with action that is aggressive, open-minded, fair, and flexible. That is the approach that I see reflected here, and I applaud this effort. Specific details may very well have to change as events unfold. Some proposed actions may not go as well as hoped, others may actually go better, and new discoveries and technologies may come to bear that will aid our collective efforts. Based on what I have read in this proposed plan, I have confidence that California will respond as well as can be hoped to whatever contingencies may arise. Let's do this!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 15:25:11

No Duplicates.

Comment 9 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Julie

Last Name: Parker

Email Address: julieparkerbonjour@gmail.com

Affiliation: LWV-Pasadena

Subject: Where are the teeth in this wonderful plan?

Comment:

I like the plan's positive thrust, and its detailed inclusion of all the ways we are to reach carbon neutrality by 2045. I especially like the new inclusion of "modeling and quantification of GHG emissions and carbon sequestration in natural and working lands," because trees do the job of ridding us of CO2 practically free, with managed stewardship forests." However, I do not believe this CARB 'plan' will get us there. Why? Because it is full of feeble language, and I quote: "We must transition..." "we absolutely must identify and address...," "the plan delivers on the promise..." "the solution will have to include..." "we must also rapidly deploy..." "urgent and complete efforts are needed..." "this plan is fundamentally based on hope..." and "the Scoping Plan is only that: a plan..." and "there is no time to waste."

This Scoping Plan reveals over and over that it has no teeth. It is a plea. It sounds apologetic rather than authoritative. It begs, in tone. If it, the plan, were my suitor, I would say "you don't really believe in yourself, so how can I?" I want you, CARB, to sweep me off my feet with conviction, with determination, with HOW we are going to do these things...call our bluff, refer to our past resistance, win us with fervor, not weak words of 'we must, this is only a plan, next comes the hard and hopeful work.' These phrases are mealy-mouthed. Come on, CARB!!! Win my heart with confidence, not tipping your hand at every turn that you are worried I will say NO!!! Damn it, make me say YES!! Make me shiver in my boots that if I don't say YES, my life is at risk!!! You can't squeeze the carbon out of every sector of the economy until you squeeze the resistance out of me to changing my life so I will be ready to follow your lead for our dear Planet Earth. And when I say "I", I include our city governments, our planning commissions, our chambers of commerce, our businesses, our multinational corporations, our banks, out think tanks, our families, our entire human race.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 20:35:21

No Duplicates.

**Comment 10 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Quinn

Last Name: Piening

Email Address: lobby@ellisonwilson.com

Affiliation: California Tow Truck Association (CTTA)

Subject: CTTA/ERSCA Comments on Proposed CARB Advanced Clean Fleets Regulation

Comment:

The California Tow Truck Association (CTTA), known nationally as the Emergency Road Service Coalition of America (ERSCA), submits the attached comments on CARB's proposed Advanced Clean Fleets (ACF) regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-sp22-recirc-ea-ws-UzBSIAdyU2ECW1Ix.pdf>

Original File Name: CTTA CARB ACF Comments.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:58:54

No Duplicates.

Comment 11 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Jessica

Last Name: Wentz

Email Address: jess.wentz@gmail.com

Affiliation:

Subject: Considering an ecological scenario for forest carbon assessment

Comment:

Dear CARB,

Thank you for this opportunity to comment on the CARB 2022 Scoping Plan. I have a specific comment on the scope of the analysis in Appendix I ("Natural and Working Lands Technical Support Document"). This document examines the potential effects of different forest management strategies on forest carbon stocks and GHG emissions. Although the document considers several scenarios for "improved" forest management, none of these scenarios reflect the full suite of management approaches that could be undertaken to improve forest health while also enhancing carbon sequestration capacity. As noted by LaLonde (2018), the goals of wildfire risk reduction and forest carbon storage are not necessarily at odds - they interviewed numerous experts who "commented about the high likelihood of making these goals complementary through fuel reduction treatments that create more stable forest structures, lessen fire risk, and increase sequestration in live carbon pools"

I would therefore like to recommend that CARB consider a forest management scenario aimed at maximizing forest health and carbon storage potential while minimizing wildfire risk. This would entail several components:

(1) Significant reductions in clear-cutting - a maladaptive practice which destroys forests and increases wildfire risk in the medium-to-long term. (Note that none of the scenarios envisioned in CARB's scoping plan entail any major reduction in clear-cutting.)

(2) Reductions in commercial harvesting or stipulations ensuring that harvesting will be conducted in a manner that does not destroy forests or increase wildfire risk. (All of the scenarios currently evaluated in the plan entail significant increases in commercial timber harvests; there are no provisions to ensure that these harvests actually promote the goals of forest health and wildfire risk reduction.)

(3) Banning the removal of old growth trees, and prioritizing efforts to promote the growth of larger trees (to help reinstate old growth forests).

In addition, CARB should consider whether reforestation efforts could help meet the state's climate goals. It may be that reforestation is not feasible in light of climate change (with drier and hotter conditions) but CARB should at least explain why it did not consider reforestation as a approach for enhancing carbon stocks.

Thank you very much.

Best,

Jessica Wentz

Citation: Seth J Lalonde et al., Forest Management in the Sierra Nevada Provides Limited Carbon Storage Potential: An Exert Elicitation, ECOSPHERE (2018).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-19 12:20:51

No Duplicates.

**Comment 12 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Ignacio

Last Name: Fernandez

Email Address: ignacio.m.fernandez@sce.com

Affiliation: Southern California Edison

Subject: SCE comments on Recirculated Environmental Analysis

Comment:

Dear Sir/Madam,

Please find attached Southern California Edison's comments on the Recirculated Environmental Analysis of the AB 32 2022 Scoping Plan Update released on September 9, 2022.

Best regards

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-sp22-recirc-ea-ws-AHNVMAFIACFXNABj.pdf>

Original File Name: SCERecirculatedEA.pdf

Date and Time Comment Was Submitted: 2022-10-21 12:51:25

No Duplicates.

**Comment 13 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Charles

Last Name: Davidson

Email Address: charlesdavidson@me.com

Affiliation:

Subject: The California Air Resources Board (CARB) Draft 2022 Scoping Plan Comment

Comment:

In particular, because of this comment's novel findings on refinery-level CO₂ greenhouse gas emissions for renewable diesel production:

NOTE: Section IV. Extremely high refinery-level carbon dioxide emissions for hydrogenated biofuels production [NOTE: Table I and II, references 1-7 and calculations. Pages 13-19].

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-sp22-recirc-ea-ws-UTICZVY7WGIBYQdo.docx>

Original File Name: California Air Resources Board - 2022 Scoping Plan Public Comments - v.7 .docx

Date and Time Comment Was Submitted: 2022-10-23 17:56:09

No Duplicates.

**Comment 14 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Jared
Last Name: Yoshiki
Email Address: jared.yoshiki@aopa.org
Affiliation: AOPA

Subject: AOPA - Comment Submission
Comment:

Good Morning,

The Aircraft Owners and Pilots Association (AOPA) is pleased to offer comments for the Draft Environmental Analysis via the attached pdf.

AOPA is prepared to assist the California Air Resources Board as it moves forward and would like to be used as a resource to offer its technical expertise regarding any aviation-related proposals.

Thank you,

Jared Yoshiki
Western Pacific Regional Manager, AOPA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-sp22-recirc-ea-ws-VjVdOlMgWWgAWVIh.pdf>

Original File Name: CARB Scoping Plan Letter.pdf

Date and Time Comment Was Submitted: 2022-10-24 09:52:24

No Duplicates.

**Comment 15 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Svec-Williams

Email Address: jennifers@car.org

Affiliation: California Association of Realtors

Subject: C.A.R. Comments on the 2022 Scoping Plan Update (sp22-recirc-ea-ws)

Comment:

Please see attched comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-sp22-recirc-ea-ws-UjFTNABzU2IAVVQn.pdf>

Original File Name: CARB Scoping Plan GHG Goals - REALTORS.pdf

Date and Time Comment Was Submitted: 2022-10-24 10:23:20

No Duplicates.

**Comment 16 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Jessica
Last Name: Marcus
Email Address: jessica.marcus@drax.com
Affiliation: Drax

Subject: Drax Comments to CARB Scoping Plan
Comment:

Attached you will find Drax's comments to the CARB Scoping Plan. Bioenergy with Carbon Capture and Storage (BECCS) has a key role to play in California's climate goals by capturing and storing carbon underground, while also simultaneously providing dispatchable renewable power. CDR technologies, such as BECCS, need government support to provide investor confidence and ensure that the widest range of negative emission solutions are brought to market.

A recent study from DOE National Renewable Energy Laboratory - <https://www.nrel.gov/docs/fy22osti/81644.pdf> - indicates that the US will need between 7-14GW of installed BECCS capacity by 2035 in order to achieve 100% clean electricity. This represents the removal of approximately 55-120 million tons CO2 per year by 2035 from BECCS.

We offer the attached comments which we believe will position California at the forefront of this technology. We welcome the opportunity to discuss these comments and BECCS opportunities further.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-sp22-recirc-ea-ws-AWUHc1ExV3wHXgYr.pdf>

Original File Name: Drax - CARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2022-10-24 11:28:51

No Duplicates.

**Comment 17 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Amanda

Last Name: Parsons DeRosier

Email Address: Amanda.DeRosier@gceholdings.com

Affiliation: Global Clean Energy

Subject: Comments on Recirculated Draft Environmental Analysis for CARB's AB 32 2022 Scoping Plan
Comment:

Please see the attached comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-sp22-recirc-ea-ws-UTVcPwZmBAgKf1Mw.docx>

Original File Name: DEA Scoping Plan 2022 Comment Letter.v3.DOCX

Date and Time Comment Was Submitted: 2022-10-24 12:20:25

No Duplicates.

**Comment 18 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Jason
Last Name: Pfeifle
Email Address: jpfeifle@biologicaldiversity.org
Affiliation: Center for Biological Diversity

Subject: 87 Groups Oppose CCS for Fossil Fuel Infrastructure
Comment:

To Whom It May Concern,

On behalf of 87 organizations, I'm submitting the attached letter outlining serious concerns about the use of carbon capture and storage (CCS) in the Scoping Plan. We urge you to adopt a plan that does not rely on investment in CCS for fossil fuel infrastructure.

Sincerely,
Jason Pfeifle
Center for Biological Diversity

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-sp22-recirc-ea-ws-AGdcKARqVHIBdwJd.pdf>

Original File Name: Group Letter - CCS in Scoping Plan.pdf

Date and Time Comment Was Submitted: 2022-10-24 14:11:41

No Duplicates.

**Comment 19 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Chelsea

Last Name: Tu

Email Address: chelsea@risingasone.org

Affiliation: CA Environmental Justice Alliance

Subject: CBD & CEJA Comments on 2022 Draft Scoping Plan RDEA

Comment:

Hello:

On behalf of the Center for Biological Diversity and the California Environmental Justice Alliance, I write to submit comments on the Recirculated Draft Environmental Analysis for the 2022 Draft Scoping Plan. Please find the comments attached.

Sincerely,
Chelsea Tu

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-sp22-recirc-ea-ws-UzBSNIUwUV1SCwFe.pdf>

Original File Name: CBD & CEJA Orgs 2022 Draft Scoping Plan RDEA Cmts_10_24_2022.pdf

Date and Time Comment Was Submitted: 2022-10-24 14:30:38

No Duplicates.

**Comment 20 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Lashof

Email Address: dan.lashof@wri.org

Affiliation: World Resources Institute

Subject: WRI Comments on Recirculated EA

Comment:

Please see attached comments on the recirculated Draft Environmental Analysis discussing the need to further reflect how the policy landscape has shifted since the May draft and the implications for the final Scoping Plan Update and Environmental Analysis

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-sp22-recirc-ea-ws-AmEFY1AjBzZRCAJn.pdf>

Original File Name: CARB EA Comment October 24 2022.pdf

Date and Time Comment Was Submitted: 2022-10-24 14:43:02

No Duplicates.

**Comment 21 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Chelsea

Last Name: Tu

Email Address: chelsea@risingasone.org

Affiliation: CA Environmental Justice Alliance

Subject: CBD & CEJA Comments on RDEA Citation Sources (1 of 2)

Comment:

Hello:

On behalf of the Center for Biological Diversity and California Environmental Justice Alliance, I write to submit source documents (part 1 of 2) cited in the organizations' comments.

Thank you.

Sincerely,
Chelsea Tu

Attachment:

Original File Name: CBD & CEJA Orgs RDEA Cmts Sources1of2_10_24_2022.zip

Date and Time Comment Was Submitted: 2022-10-24 14:48:14

No Duplicates.

**Comment 22 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Kenley
Last Name: Farmer
Email Address: kfarmer@airlines.org
Affiliation: Airlines for America

Subject: A4A Comments on Recirculated Draft EA
Comment:

To Whom It May Concern,

Please find attached written comments submitted on behalf of
Airlines for America.

Regards,
Kenley Farmer
Director, Environmental Affairs
Airlines for America

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-sp22-recirc-ea-ws-BWRSYAZmUFwGYwRr.pdf>

Original File Name: A4A Comments on Recirculated Draft EA for Draft 2022 Scoping Plan Update.2022-10-24 520PM (002).pdf

Date and Time Comment Was Submitted: 2022-10-24 15:00:43

No Duplicates.

**Comment 23 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Nora
Last Name: Brown
Email Address: shayla@caliberstrat.com
Affiliation: Charm Industrial

Subject: Charm Comments on the Recirculated Draft Environmental Analysis
Comment:

Please find Charm's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-sp22-recirc-ea-ws-UmNSZFZ5B2ZXZQYo.pdf>

Original File Name: 10.24.22 Draft EA Scoping Plan.docx.pdf

Date and Time Comment Was Submitted: 2022-10-24 15:03:36

No Duplicates.

**Comment 24 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation:

Subject: Joint Utility Group (JUG) Comments on Grid Reliability in the 2022 Scoping Plan

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-sp22-recirc-ea-ws-AGpRIIYwU19QJAls.pdf>

Original File Name: JUG_ReliabilityLetter_2022_10_03.pdf

Date and Time Comment Was Submitted: 2022-10-24 16:21:28

No Duplicates.

**Comment 25 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Laura
Last Name: Haider
Email Address: lauragreen.rosenberger@gmail.com
Affiliation: Fresnans Against Fracking

Subject: 2022 Scoping Plan Update-Recirculating
Comment:

Support Alternative 2 of the Advanced Clean Fleets Regulation.

This year too many oil wells had leaked in EJ Communities. We need direct measurement of GHG emissions by third parties. This could improve the timeliness of the emissions inventories, so we can see if the new legislation is really bringing improvements and what needs improvement the most.

The potential of new organic farming techniques to better sequester carbon was omitted from the current model.

Also, the emissions of logging are not accounted for in Biomass. Widespread logging does not reduce fires because it allows more short bushes to grow. The Intergovernmental Panel on Climate Change does not treat biomass energy as carbon neutral.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-24 16:10:51

No Duplicates.

**Comment 26 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Leah

Last Name: Bahramipour

Email Address: leah.bahramipour@sierraclub.org

Affiliation: Sierra Club

Subject: Regenerate California Comments on the Recirculated Draft Environmental Analysis

Comment:

Attached please find the Regenerate California Comments on the Electric Sector Portion of the Recirculated Draft Environmental Analysis for the 2022 Draft Scoping Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-sp22-recirc-ea-ws-UiBVNlI0VmAKYgdi.pdf>

Original File Name: Regenerate California - Scoping Plan Comments (Oct. 24, 2022).pdf

Date and Time Comment Was Submitted: 2022-10-24 16:25:11

No Duplicates.

**Comment 27 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Nick
Last Name: Cammarota
Email Address: ncammarota@cbia.org
Affiliation: California Building Industry Association

Subject: Comments on 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-sp22-recirc-ea-ws-UzBcNQNvAz0CYQFv.pdf>

Original File Name: Comments on the Draft 2022 Scoping Plan Update Recirculated Draft Environmental Analysis 102422.pdf

Date and Time Comment Was Submitted: 2022-10-24 17:06:05

No Duplicates.

**Comment 28 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

Email Address: tderivi@wspa.org

Affiliation: WSPA

Subject: WSPA Comments on 2022 Recirculated EA Scoping Plan

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-sp22-recirc-ea-ws-UzICZlcJAmIKPlAP.pdf>

Original File Name: AB 32 Scoping Plan Recirculated EA Comment Letter 10-24-2022.pdf

Date and Time Comment Was Submitted: 2022-10-24 17:13:38

No Duplicates.

**Comment 29 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Chris

Last Name: Gould

Email Address: Chris.Gould@CRC.com

Affiliation:

Subject: CRC Comments on Draft EA for 2022 Scoping Plan

Comment:

We are writing to provide comments on the Recirculated Draft Environmental Analysis (EA) for the Draft 2022 Scoping Plan released by the California Air Resources Board (CARB) on September 9, 2022. California Resources Corporation (CRC) applauds the efforts to map out a pathway to carbon neutrality for the state, an effort complicated by the sheer complexity of the economic interactions between sectors and the vast numbers of people living in widely different locals and climates.

The attached letter provides our specific comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-sp22-recirc-ea-ws-UTJXI1Q2BAgAZVU0.pdf>

Original File Name: CRC CARB SP EA Letter 10242022.pdf

Date and Time Comment Was Submitted: 2022-10-24 17:43:03

No Duplicates.

**Comment 30 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Julia

Last Name: May

Email Address: julia@cbecal.org

Affiliation: Communities for a Better Environment (CB)

Subject: CBE Comments Recirc. Envir. Assess. Scoping Plan 2022

Comment:

Focused most on Oil Refineries, please see attached comment letter including Attachments A & B.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-sp22-recirc-ea-ws-UzACZgBkV1tSNwhn.pdf>

Original File Name: CBE comments REA for CARB Scoping Plan 102422.pdf

Date and Time Comment Was Submitted: 2022-10-24 18:54:53

No Duplicates.

**Comment 31 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Sachs

Email Address: ssachs@ceres.org

Affiliation: Ceres

Subject: Major Businesses and Institutions Support an Ambitious 2022 Scoping Plan Update

Comment:

I'm pleased to submit comments on behalf of 15 major businesses and institutions in support of an ambitious final Scoping Plan update.

See attached for more.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-sp22-recirc-ea-ws-UTwBZIM4BTkKflIN.pdf>

Original File Name: Major Businesses and Institutions Support an Ambitious 2022 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2022-10-24 19:01:34

No Duplicates.

**Comment 32 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Sachs

Email Address: ssachs@ceres.org

Affiliation: Ceres

Subject: Ceres Support for an Ambitious 2022 Scoping Plan Update

Comment:

On behalf of Ceres, I appreciate the opportunity to provide public comments on the 2022 Climate Change Scoping Plan Update. We recognize and appreciate all the time and expertise that the CARB board and staff have invested in this process. Thank you for your leadership in developing and implementing critical climate and clean air policies for California.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-sp22-recirc-ea-ws-UzBdPgBzWW9VIFQL.pdf>

Original File Name: Ceres Support for an Ambitious 2022 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2022-10-24 19:12:03

No Duplicates.

**Comment 33 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Julia

Last Name: May

Email Address: julia@cbecal.org

Affiliation: Communities for a Better Environment (CB)

Subject: CBE Comments Recirc. Envir. Assess. Scoping Plan 2022

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-sp22-recirc-ea-ws-B2RRNVUxAw8BZFU6.pdf>

Original File Name: CBE comments REA for CARB Scoping Plan 102422.pdf

Date and Time Comment Was Submitted: 2022-10-24 19:15:21

No Duplicates.

**Comment 34 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Sasan
Last Name: Saadat
Email Address: ssaadat@earthjustice.org
Affiliation: Earthjustice

Subject: Sierra Club CA and Earthjustice Final Comments
Comment:

Attached are Sierra Club CA and Earthjustice's comments on the recirculated Draft Environmental Assessment.

Thank you for the opportunity to provide comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-sp22-recirc-ea-ws-BWNQP1E+UWMCaFUK.pdf>

Original File Name: Final Sierra Club CA & Earthjustice Recirculated DRaft EA Scoping Plan Comments (1).pdf

Date and Time Comment Was Submitted: 2022-10-24 19:49:36

No Duplicates.

**Comment 35 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Robert

Last Name: Spiegel

Email Address: rspiegel@cmta.net

Affiliation: CMTA

Subject: CMTA Comments - Scoping Plan Recirculated EA

Comment:

The California Manufacturers & Technology Association (CMTA) is pleased to offer the attached comments on the 2022 Scoping Plan Update - Recirculated Draft EA.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-sp22-recirc-ea-ws-VjVXPFInBTdWDwJh.pdf>

Original File Name: CMTA Comments - Scoping Plan Recirculated EA.pdf

Date and Time Comment Was Submitted: 2022-10-24 21:39:12

No Duplicates.

**Comment 36 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Katelyn

Last Name: Roedner Sutter

Email Address: kroedner@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on the draft EA of the 2022 Scoping Plan

Comment:

Attached please find comments on behalf of Environmental Defense Fund.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-sp22-recirc-ea-ws-Wj9QMII1BwsCd1Az.pdf>

Original File Name: EDF Scoping Plan EA comments 10.24.22_final.pdf

Date and Time Comment Was Submitted: 2022-10-24 21:48:33

No Duplicates.

**Comment 37 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: KATHLEEN

Last Name: VAN OSTEN

Email Address: kvanosten@mvmstrategy.com

Affiliation: MVM Strategy Group

Subject: Revised Environmental Assessment Comments

Comment:

Please find attached comments submitted on behalf of United Airlines, Boeing, World Energy and San Francisco International Airport.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-sp22-recirc-ea-ws-BWAHb1MkUSxVDARl.docx>

Original File Name: Env. Assessment Comment LTR CARB -Scoping Plan 10.24.22.docx

Date and Time Comment Was Submitted: 2022-10-24 22:36:27

No Duplicates.

**Comment 38 for 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

Email Address: evan@edgarinc.org

Affiliation:

Subject: Including Mining Impacts of ZEV batteries in EA

Comment:

Letter attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-sp22-recirc-ea-ws-VzRTNAR3WWgEXQlo.pdf>

Original File Name: CARB AB 32 Scoping Plan Final Draft EIR reivew Oct 24 2022.pdf

Date and Time Comment Was Submitted: 2022-10-24 23:03:43

No Duplicates.

**Comment 39 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Ellie
Last Name: Choen
Email Address: Helpline@arb.ca.gov
Affiliation: The Climate Center

Subject: subject of comment
Comment:

Re: Public Comment on the Recirculated Draft of the Environmental Analysis for the Draft 2022 Scoping Plan Update

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-sp22-recirc-ea-ws-VSQTJQQoUnVQPgBl.pdf>

Original File Name: SP-TheClimateCenters-comment .pdf

Date and Time Comment Was Submitted: 2022-10-27 13:56:29

No Duplicates.

Comment 40 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Staff

Last Name: Submittal

Email Address: Helpline@arb.ca.gov

Affiliation: Leadership Counsel for Justice and Accountability

Subject: subject of comment

Comment:

Leadership Counsel for Justice and Accountability

RE: Comments on the Recirculated Draft Environmental Analysis for the 2022 Draft Scoping Plan

Dear Board Members and Staff of the California Air Resources Board ("CARB"):

Leadership Counsel for Justice and Accountability submits these comments on the Recirculated Draft Environmental Analysis ("RDEA") for the 2022 Draft Scoping Plan Update ("Draft Scoping Plan"). CARB must exclude polluting fuels from the Low Carbon Fuel Standard ("LCFS") while increasing its stringency.

The RDEA proposes increasing the stringency of the LCFS.¹ This proposal echoes proposals by CARB staff in recent workshops on the upcoming LCFS rulemaking, and appears to be in response to Governor Newsom's call for increased stringency of the LCFS.² We are not opposed to increased stringency in concept. However, there are likely consequences of taking this action in isolation that are deeply concerning.

Currently, the LCFS includes not only decidedly carbon neutral transportation fuels, such as electric vehicles powered by solar and wind, but also polluting fuels such as dairy manure derived biomethane, otherwise known as factory farm gas. In fact, factory farm gas is considered the most carbon negative fuel.³ The methodology that generates this outcome is currently subject to significant scrutiny and skepticism due in part to an incomplete and inaccurate lifecycle analysis of factory farm gas.⁴ In particular, it treats liquified manure storage, a profit-maximizing practice that results in significant greenhouse gas emissions, as the baseline. The methodology also excludes enteric emissions and post-digestion emissions from manure along with other GHG emissions associated with the production of factory farm gas. A full accounting of these emissions undermines the assertion that production of factory farm gas results in greenhouse gas emissions reductions. For these reasons, along with myriad negative local air and water quality impacts, these polluting fuels should be excluded from the LCFS.

These methodological issues are of particular importance here because a likely outcome of increasing the stringency of the LCFS would be an increased demand for supposedly carbon negative fuels and the credits they currently generate for deficit holders to purchase. Without a true accounting of the net carbon emissions from industrial dairies and digesters, or excluding this fuel altogether, increasing the stringency of the LCFS would likely have the inverse effect that it intends: an increase in carbon emissions associated with the production of transportation fuels.

For these reasons, CARB must exclude factory farm gas from the LCFS. The RDEA should be revised to increase the stringency of LCFS, in line with Governor Newsom's letter, while excluding fuel pathways that would undermine that goal.

Respectfully Submitted,

Leadership Counsel for Justice and Accountability
Food & Water Watch
Animal Legal Defense Fund
The Center for Food Safety

1 RDEA at 22.

2 Governor Gavin Newsom's Letter to CARB. July 22, 2022. Available at
<https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf?emrc=1054d6>.

3 LCFS Pathway Certified Carbon Intensities, Cal. Air Res. Bd,
<https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities> (last visited Oct. 20, 2022). 4 See Petition for Reconsideration of the Denial of the Petition for Rulemaking to Exclude All Fuels Derived from Biomethane from Dairy and Swine Manure from the Low Carbon Fuel Standard Program. Dated March 2022. Available at <https://ww2.arb.ca.gov/sites/default/files/2022-04/2022-03-28%20-%20Petition%20for%20Reconsideration%20%20TOC%20Updated%29.pdf>.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 13:56:29

No Duplicates.

**Comment 41 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis
(sp22-recirc-ea-ws) - 1st Workshop.**

First Name: Marc
Last Name: Hardy
Email Address: glopez@tejonranch.com
Affiliation: Tejon Ranch

Subject: subject of comment
Comment:

Re: Public Comment on the Recirculated Draft of the Environmental Analysis for the Draft 2022 Scoping Plan Update

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-sp22-recirc-ea-ws-VSYCdAAsUHcAYwBq.pdf>

Original File Name: SP-Tejon_Ranch].pdf

Date and Time Comment Was Submitted: 2022-10-27 13:56:29

No Duplicates.

Comment 42 for 2022 Scoping Plan Update - Recirculated Draft Environmental Analysis (sp22-recirc-ea-ws) - 1st Workshop.

First Name: Katrina

Last Name: Olson

Email Address: bolsonkat@gmail.com

Affiliation: Self

Subject: subject of comment

Comment:

Re: Public Comment on the Recirculated Draft of the Environmental Analysis for the Draft 2022 Scoping Plan Update

Please reject Alternative 3 in the Scoping Plan.

California needs to be a climate leader- we need to be carbon neutral by 2035, not 2045. And we need to be net-negative after that. Governor Newsom has recommended that California reduce greenhouse gas emission by 80% by 2035, a goal supported by climate scientists and leaders.

It is inconvenient, feels costly and is being met with resistance- because change is hard, and not everyone will be on board with the changes. But the economic and social impact of delaying these climate goals is severe and irreversible. While there are costs upfront- the costs downstream would be much higher.

Our health, our economy, our childrens' future depend on making these changes now, without delay.

I agree with the goal of sequestering 40 million metric tons of CO2/year on natural and working lands by 2030. Let's not depend on failed CCS technology. There is good research to support the use of our natural lands for carbon sequestration and doing so will build resilience and support food security. Let's incorporate leadership, planning and collaboration with our agricultural community into this plan.

Let's focus on clean energy- it is cheaper today to build renewable energy than it is to operate existing fossil fuel plants.

California must begin investing in renewables at an accelerated pace. Solar power, wind, electric vehicle and appliances are more affordable- we need to adopt these energy sources and support further development and utilization of them.

Be brave, do what we all know needs to be done (yesterday, really) to get us to a better future. We have the science, the technology- we just need the will.

Thank you,

Katrina Olson

Attachment URL:

Original File Name:

Request to Speak:

Speaker Position:

Date and Time Comment Was Submitted: 2022-09-30 12:44:14

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 13:56:29

No Duplicates.

There are no comments posted to 2022 Scoping Plan Update - Recirculated Draft Environmental Anlysis (sp22-recirc-ea-ws) that were presented during the Workshop at this time.