

**Environmental Justice Advisory Committee's (EJAC)  
Draft Initial Recommendations for Discussion Draft Version of  
2030 Target Scoping Plan Update**

**Drafted by EJAC at April 4, 2016 and May 24-25 Meetings**

<b>Overarching questions for each sector to respond to in write-up</b>	
a.	Break down how current recommendations are different from 2014 scoping plan and why
b.	Clearly identify data gaps in analysis (i.e. RPS considerations)
c.	Identify clear metrics for each recommendation; data should start to be collected now, with first check-in in 2020 and every two years thereafter
d.	What are the consequences/conflicts of requirements on the ground (e.g., cheap gas can lead to excess emissions)?

**EJAC Initial Recommendation**

<b>Overarching Issues, Economic Analysis, Short-Lived Climate Pollutant Reduction Strategy</b>	
a.	We need public engagement and a culture shift in California. Not for sprawl with equity at center; equity overlay.
b.	More aggressive emissions reduction plan and target Oil and Gas sector to reduce emissions.
c.	Interconnectivity between the California/Baja California border regions.
d.	Consider real-time monitoring, citizen science, and SEPs.
e.	Carbon Capture and Sequestration – totally eliminated for reducing GHGs (SJV concerns).
f.	Geographic equity should be a part of the process, need air quality monitors where people are breathing, need meeting in Huron (west side), rural areas need special attention.
g.	Equity must always be a primary consideration when examining issues in any sector.
h.	Environmental Justice activities should refocus on neighborhood-level solutions and draw on community input, rather than just taking a top-down approach.
i.	Coordinate meetings between the interagency working groups (IWG) and EJAC, to encourage information sharing and mutual cooperation between the groups.
j.	A communications plan should be developed to educate and engage communities on how pollution affect them.
k.	ARB should ensure that a sufficient number and distribution of air quality monitors are placed in disadvantaged regions, to account for air quality differences in the region.
l.	Identify what tools are being used to gather emissions data on both sides of the rural California/Mexico border, and how California's approaches interact with the Mexican framework of rules and regulations.

**Economic Analysis**

a.	Add Manuel Pastor, Jim Sadd, or Jonathan London to Scoping Plan Economic Reviewers.
b.	The Scoping Plan Economic Analysis should consider carbon tax, straight up regulation, and Cap-and-Dividend or Fee and Dividend.
c.	Expand definition of economy to include costs to public (e.g., U.S. EPA social cost calculator).
d.	Maximize job & economic benefits, want to see section in Scoping Plan around jobs and economic benefits, target environmental justice communities.

**Short-Lived Climate Pollutant Reduction Strategy**

a.	The EJAC hereby makes a recommendation to CARB to mandate a 40% methane reduction from dairies and CAFOs by the year 2030 and require community consultation and approval of the implementation plan for the 40% methane mandate; all additional ancillary emissions generated through achieving this goal must be mitigated.
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b.	The Strategy should explicitly state no disposal of food waste to landfills or incinerators; and explore synergies with methane reductions from dairies and the management of organic waste, such as wood waste.
<b>Transportation</b>	
a.	SCSs be based on land use & transportation changes, further increased enforcement how implementation matches the plan, strengthen transit planning components of SCSs, prioritize investments in disadvantaged communities. Include transit costs and planning in the SCS process.
b.	Expand transit services to provide neighborhood level access, use different vehicle sizes and types to ensure economies scale & ensure sustainability; ensure accessibility to disadvantaged communities.
c.	Community needs mobility assessments that inform equitable investments, regulations, & implementation strategies. Increase access to clean mobility technologies. Just transition for communities, individuals, and small businesses reliant on fossil fuel based transportation. Research: infuse environmental justice considerations into pre-policy research.
d.	Define infrastructure; not just highways & freeways (new fueling stations, roads); support new vehicle types, reach neighborhoods and small communities. New technologies: CNG, electric. Improve existing transit resources such as bus stops (e.g., covered bus stops). Need inventory assessment – COGs have this inventory; interagency communication.
e.	Battery refueling stations within corridor of freight operations, community participation, ground truth.
f.	Financially support transit operations and restoration of transit service and routes and expansion of services where lacking in disadvantaged communities.
g.	There should be a holistic approach for transit options to rectify disadvantaged communities' history of inequities, also shared mobility.
h.	Look at mobility regionally as there are different challenges in distinct areas of California.
i.	An increase from the current 10% to 30% by 2030 for LCFS should be put in place.
j.	Methane isn't a necessary byproduct of dairies and the Life Cycle Analysis shouldn't have assumed that it is was. It's that mistaken assumption that allows the methane emissions credit to be awarded. Instead, the (unnecessary) methane emissions should be accounted for as an emissions debit against the fuel.
k.	Include metrics around displacement and gentrification.
l.	Target truck fleets and vehicle fleets to achieve the quickest, most significant reductions in emissions.
m.	Reduce vehicle miles traveled (VMT) while increasing alternative transportation options and accessibility.
n.	Design and implement new incentives beyond tax credits to encourage infield development over sprawl. Consider code and permitting changes to streamline planning. Help pay for infrastructure improvements, and mandate that activities target the most pressing needs.
o.	Promote and support clean and renewable energy sources to power vehicles, and coordinate those activities with energy and transportation agencies to help ensure their success.
p.	Study the emissions reduction benefits from increasing gasoline prices.
q.	Conduct equity analyses when evaluating and implementing transportation options, to prevent adverse secondary effects in disadvantaged communities (e.g., the Los Angeles FasTrak program, which resulted in more vehicles on artery streets, creating even worse air quality problem for those communities).
r.	Conduct equity analyses in transportation projects to ensure that investments go to the highest area of need. Track where projects are implemented.

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s.	Metropolitan Planning Organizations (MPOs) should only approve transportation projects that are compliant with the Sustainable Communities Strategy (SCS).
t.	Measure emissions reductions by per capita VMT.
u.	Identify the state policy direction for transit costs and routes. (Increased fares in Sacramento to more than \$6 day, and eliminated bus routes.)
v.	Conduct and provide funding for a program that enables a large percentage of people in disadvantaged communities to drive electric vehicles and install charging infrastructure.
w.	Pilot the placement of EVs in seven or eight low-income communities across California. Ensure a proper diversity of density and urban versus rural areas, and choose areas with aging infrastructure. Proving success in these pilots will demonstrate how it could work elsewhere.
<b>Energy, Green Buildings, Water</b>	
a.	Include considerations for electrical upgrades that need to happen to support electric vehicles or other energy improvements. Conduct community-level assessment of needs for additional infrastructure improvements.
b.	Electric vehicle charging capacity – CAISO conduct assessment at local level, not just Statewide.
c.	Develop aggressive Renewable energy targets, bring back 2014 EJAC Energy Recommendations.
d.	Create micro-grids, self-sufficient for electricity. Pilot 10-100 in environmental justice communities.
e.	Don't dilute California's progress in electricity emissions reductions.
f.	Do a pilot project with substandard low-income housing, how retrofit, if HUD has funding ..., if weatherization funding, how that gets done.
g.	Include community driven power that promotes jobs.
h.	Make pumping of water in California 100% renewable by 2030.
i.	Remove special considerations for investor-owned utilities, require them to develop power that is the most efficient.
j.	Desert native tree forestation, tree canopy. Caution use of water as energy source, such as geothermal, are there benefits going back into community?
k.	Solar not on rooftops in desert communities, why?
l.	Need low-cost stacking, weatherization technologies, solar.
m.	Avenal doesn't qualify for electric vehicles, Huron does. Low-income community bracket, need to approach holistically (multiple factors).
n.	Incorporate EJAC recommendations from 2014.
o.	Do not give full credit for out-of-state renewables if that state then needs to use fossil fuel to generate the same amount of electricity for itself.
p.	Encourage a transition from natural gas-based appliances and technologies to all electric.
q.	Support tree planting and green infrastructure to reduce the energy needed for cooling.
r.	Approach energy reductions (building retrofits, weatherization, etc.) in a way that addresses the entire disadvantaged community, rather than addressing individual buildings. GHG reduction funds should address the whole disadvantaged community, and the disadvantaged community itself should qualify for funding, rather than having each residence having to qualify individually. SB 535 investments in these communities could address energy efficiency, solar, and microgrids.
s.	Develop an innovative pilot program to consolidate programs to create a one-stop shop for energy efficiency. Support efforts among state agencies and others to coordinate renovation and weatherization programs so efforts can focus on the whole house, rather than on one aspect at a time, and so multiple program offerings can be more easily accessed.
t.	Identify and implement metrics to track savings from energy efficiency efforts, to quantify

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energy reductions. Standardize the metrics and conduct post-project assessments to ensure accountability.
u. Survey local activities to identify which strategies are working and which are not. Use Environmental Justice communities as a resource.
v. Increase the current California renewables target to 100% renewables, to reach emissions reduction targets sooner.
w. Set a target of zero net energy (ZNE) for all new construction by 2020.
x. Set a goal of no natural gas or biogas in new buildings.
y. Support the development of standards for “living buildings” (regenerative buildings that more closely follow natural ecosystems, with features such as solar, water capture, efficient and affordable transportation options, etc.) to encourage development of such buildings.
z. Broaden the definition of a “green building” to include retrofits of existing buildings in disadvantaged communities.
aa. Identify the current state of green building technologies, and set goals for green buildings in California.
ab. Identify the percentage of GHG emissions that are coming from existing buildings in the state, and estimate the portion of emissions expected for the future, to identify the level of improvement expected.
ac. Provide direction to industry on best practices for rapidly moving toward widespread design and construction of green buildings, and incentivize developers to adopt the standards and implement them. Ensure that building or retrofit costs are not passed along to low- and moderate-income tenants by providing tax incentives, or adopt policies that prevent having those costs passed on to them.
ad. Consider providing state tax credits for solar for farms if federal credits for this are discontinued.
ae. California needs to build solar panels to pump water for the State Water Project (SWP), using the extensive right-of-way that exists along those canals.
af. The SWP pumps at Tracy are the single largest energy user in the state. Identify the energy use that would be associated with the proposed California Water Fix and Eco Restore project (formerly, the Bay Delta Conservation Plan).
<b>Industry</b>
a. California shouldn't commit to continuing Cap-and-Trade through the Clean Power Plan.
b. Do not include REDD in Scoping Plan.
c. Complete adaptive management analysis for Kern County, keep offsets in California, don't pursue REDD offsets.
d. Trades cannot be verified, Clean Power Plan should ensure power purchases are from sustainable, renewable power plants.
e. One more EJAC member on Adaptive Management Work Group, benefits in California first (no REDD program).
f. Make sure we are measuring and creating caps to emissions based on sectors and facilities. Design fixes to Cap-and-Trade, increase floor price to real price of carbon, highest price offered not lowest, make sure offsets are limited or eliminated. Energy loading order (renewables first, etc.) could be same for Cap-and-Trade (disadvantaged communities, California, etc.). Consultation with tribes and affected communities. 50% reduction in Oil and Gas sector.
g. Offsets need to happen where emissions occur.
h. ARB and other state agencies (including PUC, CEC, OEHHA, DTSC, and CalRecycle) should undertake a process to examine the growing evidence that biomass and biogenic carbon have real and significant climate impacts, examine long distance transport contribution to overall GHG impacts of burning biomass material, and examine assumptions health and environmental impacts from burning various materials considered to be biomass, including impacts of biomass ash. This is of growing

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importance as new EPA regulations allow for the increased burning of waste and biomass at industrial facilities (i.e. industrial boilers, cement kilns), and as material deemed to be biomass are exempt from compliance obligations under Cap-and-Trade.
i. Need more real time monitoring.
j. Include an emissions profile analysis for both command-and-control and Cap-and-Trade options for the scoping plan, for comparison.
k. Address methane emissions from extraction and production of natural gas. (This is already covered in SB 1371).
l. Through standardized metrics, ensure that emission reductions from AB 32 activities are happening, especially in Environmental Justice communities.
m. Conduct comprehensive analysis of costs to not just the industries participating in Cap-and-Trade, but also to the rest of California's citizens, who pay in other ways for the effects of pollution. Conduct activities that minimize cost and maximize reductions.
n. Instead of just using a sector-wide standard for emissions reductions, examine methods that could be used to reduce pollution from individual high-polluting entities.
o. Expand the definition of "health impact" to include health consequences other than cancer when looking at health effects of industrial emissions.
<b>Natural and Working Lands, Agriculture, Waste</b>
a. Integrate urban forestry, work with local communities, 20-30% reduction.
b. Increase tree canopy.
c. Define what food rescue means, in terms of waste mgmt., geothermal waste needs to be managed.
d. Establish more refined metrics to determine benefits in trees.
e. Protect greenspace.
f. Need better coordination between ARB, CalRecycle, and DTSC.
g. Increase urban canopy goals.
h. Compost manure with biomass (wood chips). Co-benefits are methane and N2O reductions, reduced synthetic fertilizer imports, reduced water use.
i. Increase urban garden goals and composting.
j. Funding and permitting of increased compost operations, particularly in Southern California.
k. Market development for application of compost for environmental health protection of carbon sequestration.
l. Biogas converted to biomethane. Mandate vehicles servicing digesters and converters utilize that gas as a primary fuel source.
m. Build biomass, not burn biomass (i.e., use compost to increase plant matter growth in grasslands, etc., instead of burning biomass and putting more carbon dioxide into air immediately.
n. Repeat 2014 EJAC Waste Recommendation 2.(f): ARB and other State agencies...
o. Investigate growing evidence of carbon sequestration benefits from applying compost to grasslands (Marin Carbon Project, UC Berkeley Dept. of Environmental Science Researchers).
p. Add urban tree and greenspace maintenance, not just planting/creation.
q. Add forest management for wild fire protection, require tribal consultation.
r. Include urban agriculture.
s. Disincentivize/discourage locating biomass/digesters in disadvantaged communities (close proximity to housing).
t. Protect greenspace by better enforcement of SB375/SCSs.
u. Ban agriculture burning.
v. Develop and implement metrics to quantify the GHG benefits of managing natural and working lands. Achieve consensus on how to measure GHG emissions reductions from activities in natural

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systems.
w. Revise the goal of increasing tree canopy by 5% by 2030 to 10%, and conduct research to identify methods of achieving that increase given drought conditions.
x. Quantify potential jobs created from regenerating forests and jobs for maintenance of green spaces, and increase funding to support those activities.
y. Create green spaces within DACs, rather than outside those communities.
z. Do not turn agricultural lands into solar and wind projects. They often produce mostly only a few, short-term jobs, the electricity goes to large population centers, and farmworkers are displaced, resulting a net job loss.
aa. Expand the definition of “urban forestry” to include “rural desert urban forestry,” so those areas can qualify for funds to support tree planting.
ab. Support training, education, and incentives for planners to design and develop infill building projects rather than sprawling developments. Provide incentives such as guarantees for a more rapid planning and approval process for infill projects.
ac. Support life cycle analyses of sprawling developments to determine long-term economic and societal costs versus infill projects, to identify actual costs.
ad. Identify, develop, and implement policy tools to prevent the current trend of gentrification in California pushing lower-income residents and people of color inland.
ae. Do not provide GHG reduction funds for improvement projects that will displace current residents.
af. Do not use gasification and biofuels as qualifying renewable options, since those technologies have other pollution issues associated with them.
ag. Do not invest in gasification.
ah. Communities should take full ownership of their waste so that it is not exported to disadvantaged communities. View it as a resource, including recycling and clean-up of landfills, look at both new and existing generation.
ai. Set composting as the primary goal for incentivizing waste diversion. Promote composting by providing education and assistance to implement composting in all communities. Support the expansion of infrastructure for composting, and map out the mechanisms for composting in each community. Incentivize neighborhoods to compost food waste, from schools and at the community level. Establish communications plans that show Californians how to compost and that motivate people. Ban agriculture burning.
aj. Determine if the supporting infrastructure is in place before making decisions on how to manage woody or organic waste.
ak. Do not incinerate biomass; instead, identify and support methods for returning it to the soil.
al. Do not count incineration of any material as a renewable energy source.
am. No credits should be given for GHG avoidance from landfill or for biodigesters.
an. Provide a baseline credit for applying carbon back to soils.
ao. Divert dairy waste before it can convert to methane.
ap. Identify waste management technologies which have been found to be problematic.
aq. Identify the metrics being used to quantify GHG reductions for this sector. Discuss and agree upon these metrics with the interagency working group.
ar. Research and identify alternatives for dumping biosolids (sewage sludge) in disadvantaged communities. Pilot a program to explore and demonstrate better options.
as. Identify effective methods for implementing food rescue programs; especially strategies for getting food to those who need it. Incentivize these programs. Promote communication plans for projects, so all communities have access to successful plans.

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**California Climate Investments**

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|----|---|
| a. | GGRF projects should be transformative for disadvantaged communities.   |
| b. | Need regional investment equity, look at plans/developments in disadvantaged communities to get type of models funded and developed (separate from the grid).   |
| c. | Emphasize technology forcing regulations, understand pipeline of technology to identify near-term wins to create markets for technologies further out.  |
| d. | Outreach, accountability, and helping agencies prioritize, informing guidelines and investment plan.  |
| e. | Continuous involvement, additional GHG reductions, prioritize disadvantaged communities when GHG emissions increase despite implementation of AB32 programs.  |
| f. | EJAC play key role in oversight and accountability.   |
| g. | Play stronger advisory role, review investments plan, assist in outreach, engage local networks (ground-truth), develop guidance, defining what transformative means, assist with setting priorities. |
| h. | Bring projects to communities that are able and should receive funding, define community benefits.  |
| i. | Geographic equity – formula for funding; geographic – density – equity.   |
| j. | Increase accountability of local government with regard to reductions claimed for their GGRF funded activities.   |
| k. | The Greenhouse Gas Reduction Fund (GGRF) program should provide information at EJAC meetings.   |
| l. | Spend Greenhouse Gas Reduction Funds (GGRFs) to incentivize local economic development so people do not have to travel far for employment.  |