

**-- 4R Gandkids Campaign --**  
**Save Our Water Ventura**

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California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: Public comment regarding THE **FLAWED AND INADEQUATE** 2017 CLIMATE CHANGE SCOPING PLAN UPDATE - THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET

Dear Sirs:

Everyone agrees that climate change and greenhouse gases are a serious problem. AB32 and SB32 were necessary to enable some hope for our future generations. However, the proposed strategy for achieving the 2030 target is flawed and inadequate. It should not be approved unless changes are made to the plan.

The flaws and inadequacies are as follows:

1. Although AB32 was passed many years ago, no one at the local level (city council level) is paying attention to GGE objectives. Numerical objectives for each county and city are not published regularly on city and county websites. In fact, a look at the state's ten year history of GGE emissions shows that total emission have flat lined for the LAST FIVE YEARS. CARB has failed to publish local and regional data, to keep it current, and to make that data readily available to the public. Failure to provide specific quantifiable state, county and city data has created a constant moving target -- which has led to business as usual. Quantifiable data is needed in order to increase public involvement and participation.
2. CARB has increased the probability of failure by allowing "business as usual" adjustments during CEQA reviews when calculating GGE compliance. This failure was discussed in the California Supreme Court's (S217763) 2015 review of Newhall Land and Farming's project for a new community of 58,000 residents. As you will recall the CEQA review by the California

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Department of Fish and Wildlife concluded that there would be no significant impact of GGE from the proposed new community of 58,000 residents. Our belief is that this kind of CEQA outcome demonstrates that CARB scoping has been a failure. Calculating GGE savings using "business as usual" adjustments defeats the intent of AB/SB32.

3. The Scoping Plan does not allow local communities to make their own decisions on how to reach objectives. For example, Appendix B ("Local Actions") simply provides a list of things to do with regard to development projects. There is no guarantee that compliance with this list will result in a 40% reduction in GGE.

4. The Scoping Plan's macro economic model is flawed because it does not adequately consider micro economic impacts across various sectors of the population. The model considers environmental justice for low income groups, but it does not adequately consider what will happen to California's middle class families, particularly those who work in the "non-unionized" private sector. The model simply is provided to show that the measures will be neutral from the standpoint of tax collection. There are going to be winners and losers. The public needs more clarification of what looks like a zero-sum game.

5. The omission of population growth control is a major failure. The scoping plan does not include the possibility GGE compliance by means of population control by limiting growth in over populated local communities. There is no mention of limiting foreign immigration, no mention of any need for birth control programs. There is no mention of the need to eliminate the RHNA requirements. Thus, GGE savings will be substantially negated by population growth.

6. An adequate Scoping Plan must recognize the following Three Rules of Neo-Sustainability: 1) Environmental Primacy; 2) Systems Thinking; 3) Limits to Growth.

7. The proposed Scoping Plan is an "open barn door" designed to accommodate lobbyists, a door which will allow "business as usual", and the objectives of AB32/SB32 will never be achieved unless the above deficits are corrected.

Respectfully,

Charles Spraggins, Chair  
4R Grandkids Campaign  
[SaveOurWaterVentura.org](http://SaveOurWaterVentura.org)