

**Comment 1 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jon

Last Name: Lemerand

Email Address: jonlemerand@roadrunner.com

Affiliation:

Subject: climate regulation

Comment:

Please stop with the foolish rules (cow farts) in your quest for nonexistent danger from CO2 emissions....you are adding unnecessary expenses to everyday commerce.....please go away ! !

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-11-30 10:48:37

No Duplicates.

**Comment 2 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Steven

Last Name: Deiker

Email Address: [steve@kairosaerospace.com](mailto:steve@kairosaerospace.com)

Affiliation: Kairos Aerospace

Subject: Kairos Aerospace comment on proposed SLCP strategy

Comment:

Thank you for the opportunity to comment on the proposed strategy.  
Please find comments from Kairos Aerospace in the attached PDF.

Steven Deiker  
CEO, Kairos Aerospace

Attachment: 'www.arb.ca.gov/lists/com-attach/2-2016slcp-VD9UM1Q8BSRVPAZ1.pdf'

Original File Name: Kairos SLCP Comment.pdf

Date and Time Comment Was Submitted: 2017-01-09 17:26:36

No Duplicates.

### **Comment 3 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Gerald  
Last Name: Hasselbrink  
Email Address: glwj@charter.net  
Affiliation:

Subject: wood smoke pollution  
Comment:

Dear ARB:

Many of us visit California and also live in areas where we share the wood smoke problem. We are also seeking answers that can have national and international application and protect the environment in your State as well as ours.

The Board needs to view this very serious problem in the context of how nearby residents' health and use of their own property is affected by these rules, and the desirability of the environment for us visitors. You are dealing with pollution. Any amount of it that you allow is still pollution. Zero pollution is the only result that really benefits the community as a whole.

With regard to the proposal, here are some recommendations.

First, the revised strategy should be upgraded to include estimates of the global warming from methane and carbon monoxide emissions. This will more accurately contextualize the problem.

Second, with regard to subsidy programs, non-wood burning devices should be prioritized and promoted where possible. This is a compromise. Wood burning should be eliminated entirely unless and until technology catches up to offer pollution-free exhaust. If there is no "push" then the technology will not come; it is as simple as that. Neighbors and the general public should not be subjugated and required to suffer the pollution of others, without compensation, whenever an alternative is available. The burden should be entirely upon the polluter to prove that there is absolutely no alternative available, such as bottle or piped gas or solar, for example. EPA certified wood stoves are not at all clean; there is little difference between certified and non-certified as actually used by the public.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-11 12:04:24

No Duplicates.

## **Comment 4 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: julie

Last Name: mellum

Email Address: mellum.julie@gmail.com

Affiliation: Doctors & Scientists against wood smoke

Subject: wood smoke accelerates climate change

Comment:

The Revised Proposed Short-Lived Climate Pollutant Strategy seems to make light of the hazards of wood smoke. Even so-called "cleaner" wood burning units still emit a lot of black carbon soot, and there is no safe level of it, no matter how "efficiently" it burns. All carbon soot is implicated in hastening climate change and interfering with the seeding of rain and moisture in clouds (NASA studies).

With cleaner forms of energy readily available, there should be no justification for burning wood for food, fun or fuel. For the facts, see [www.woodsmokepollution.org](http://www.woodsmokepollution.org).

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-11 15:14:06

No Duplicates.

**Comment 5 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Abby

Last Name: Halperin

Email Address: ahalperin@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Pacific Forest Trust comments on the revised SLCP Strategy

Comment:

Please find the Pacific Forest Trust's comments on the revised SLCP Strategy attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-2016slcp-WipSNVMxUGpXNwlg.pdf'

Original File Name: Pacific Forest Trust Comments on Revised SLCP Strategy.pdf

Date and Time Comment Was Submitted: 2017-01-12 14:16:56

No Duplicates.

**Comment 6 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Eric

Last Name: Oddo

Email Address: eoddo@placer.ca.gov

Affiliation: Western Placer Waste Mgmt Authority

Subject: WPWMA Comments on Revised SLCP

Comment:

Please find attached the WPWMA's comments on the revised proposed SLCP.

Attachment: 'www.arb.ca.gov/lists/com-attach/6-2016slcp-VGZXYVFhWDwDKAMz.pdf'

Original File Name: 2017-01-12 WPWMA SLCP Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-01-12 16:13:45

No Duplicates.

## **Comment 7 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Dr Dorothy L

Last Name: Robinson

Email Address: drd.robinson@gmail.com

Affiliation: AAQG

Subject: Changes required to the Revised Proposed SLCP Strategy

Comment:

As explained in detail in the attached file:

1) The revised strategy should include estimates of the global warming from methane and carbon monoxide emissions, which are comparable in magnitude to the global warming of BC emissions from wood stoves.

2) As well as noting that: "To protect public health and use incentive dollars efficiently, non-wood burning devices should be prioritized where possible" the revised strategy should recommend that subsidies be available to replace old stoves with non-polluting heating but not new wood stoves because there is little or no benefit in the latter.

Attachment: 'www.arb.ca.gov/lists/com-attach/7-2016slcp-VDUFYlcnUmYHXgZ1.doc'

Original File Name: AAQG\_sub\_CARB\_SCLP\_Revised\_Proposed\_Strategy.doc

Date and Time Comment Was Submitted: 2017-01-12 21:35:26

No Duplicates.



**Comment 8 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Anne  
Last Name: Germain  
Email Address: agermain@wasterecycling.org  
Affiliation: NWRA

Subject: 2016SLCP  
Comment:

Please see attached comments.

Best,  
Anne Germain

Attachment: 'www.arb.ca.gov/lists/com-attach/8-2016slcp-UD5TIgBzBTcAWQhX.pdf'

Original File Name: NWRA SWANA comments - CARB SLCP - 1-2017.pdf

Date and Time Comment Was Submitted: 2017-01-13 10:04:55

No Duplicates.

**Comment 9 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: Comments on the SLCP Strategy

Comment:

Attached please find RCRC's comments on the Revised Proposed Short-Lived Climate Pollutant Strategy. Please contact me if you have any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-2016slcp-AnFSPFc5VHUFdwZZ.pdf'

Original File Name: Short Lived Climate Pollutant Strategy letter January 2017.pdf

Date and Time Comment Was Submitted: 2017-01-13 15:25:51

No Duplicates.

**Comment 10 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Bill

Last Name: Lewin

Email Address: rcaf435@gmail.com

Affiliation:

Subject: NO financial incentives for new wood burning devices

Comment:

Please don't subsidize EPA certified wood stoves. Only cleaner forms of heat should be subsidized

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-13 18:53:03

No Duplicates.

## **Comment 11 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Barbara

Last Name: Peters

Email Address: barbaraannpeters@gmail.com

Affiliation:

Subject: Financial Incentives for Wood Burning Devices

Comment:

Please do not offer any financial incentives for EPA Certified wood stoves or for any wood burning devices.

Real world change-out programs have failed to produce desired results. The EPA's program in Libby, Montana is one example where the EPA and the state paid to change out every wood stove to an EPA-certified stove. No need to quote the subsequent studies because I'm sure you already know they didn't get what they paid for.

Any public policy that incentivizes a new wood burning device as a replacement for an old wood burning device has the added damage of implying that wood can be burned without harm to public health.

Please don't offer any subsidies for EPA or alternate wood burning devices.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-13 18:47:36

No Duplicates.

## **Comment 12 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Lana

Last Name: Shirs

Email Address: Pcherry00@outlook.com

Affiliation:

Subject: wood stoves

Comment:

Wood stove and other wood burning devices are the biggest cause of pollution. Swap outs for other wood burners are not the answer. Swap outs for non wood burning devices are the only way to reduce pollutions. Check out the website for doctors and physicans against woodsmoke pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-13 20:00:36

No Duplicates.

**Comment 13 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Daniel

Last Name: McCarter

Email Address: dparnellm@gmail.com

Affiliation:

Subject: Please do not subsidize wood stoves

Comment:

Rather than subsidizing wood stoves, EPA certified or otherwise, California should be highly taxing them. Wood stoves that are not EPA certified should have a higher tax on them than those that are.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-13 20:09:35

No Duplicates.

## **Comment 14 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Alan

Last Name: Smith

Email Address: alforcleanair@yahoo.ca

Affiliation: Canadian Cleanair Alliance

Subject: Changing-out old wood stoves to new EPA approved models

Comment:

The new models are tested under totslly unrealistic conditions and in the real world result in only token reductions in emissions. I note the reduction in Libby, Montana of 28%--basically from the equivalent of 300 cars to 200--still alarming. I have a study from Perth, Australia where the reduction was zero. I receive e-mails from members affected by wood smoke from a neighbour and it does not matter if the stove is old or the latest; the smoke makes them sick.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-14 07:19:03

No Duplicates.

**Comment 15 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Kevin

Last Name: Messner

Email Address: kmessner@aham.org

Affiliation: AHAM

Subject: AHAM Comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

The Association of Home Appliance Manufacturers (AHAM) would like to comment on the California Air Resources Board's (CARB) November 2016 Revised Proposed Short-Lived Climate Pollutant Reduction Strategy (Revised Proposed Strategy).

Attachment: 'www.arb.ca.gov/lists/com-attach/17-2016slcp-WzhUMwFsVW9QMAFu.docx'

Original File Name: California CARB SLCP Revised Proposed Strategy AHAM Comments 01172017 (00057185).DOCX

Date and Time Comment Was Submitted: 2017-01-14 13:23:55

No Duplicates.



**Comment 16 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jeff

Last Name: Cohen

Email Address: jcohen@eosclimate.com

Affiliation: EOS Climate

Subject: Additional HFC Reduction Opportunities

Comment:

Comments attached

Attachment: 'www.arb.ca.gov/lists/com-attach/18-2016slcp-UDUBaAd1WFQAZwBy.pdf'

Original File Name: EOS ARB SLCP Jan 2017.pdf

Date and Time Comment Was Submitted: 2017-01-14 14:42:51

No Duplicates.

**Comment 17 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jianhao

Last Name: Meng

Email Address: nowood@meng.biz

Affiliation:

Subject: Please don't subsidize EPA certified wood stoves.

Comment:

Please don't subsidize EPA certified wood stoves.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-15 19:03:44

No Duplicates.

**Comment 18 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Stacey

Last Name: Sullivan

Email Address: ssullivan@suscon.org

Affiliation: Sustainable Conservation

Subject: Comments on 11/28/16 SLCP Draft Strategy

Comment:

Thank you for the opportunity to comment.

Attachment: 'www.arb.ca.gov/lists/com-attach/20-2016slcp-VCdXJAZ0WX5WMQlg.docx'

Original File Name: Sustainable Conservation 1-17-17 SLCP comments.docx

Date and Time Comment Was Submitted: 2017-01-16 13:35:42

No Duplicates.

## **Comment 19 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Karim

Last Name: Amrane

Email Address: kamrane@ahrinet.org

Affiliation: AHRI

Subject: AHRI Comments - Revised SLCP Strategy

Comment:

Attached are AHRI's comments on the revised proposed short-lived pollutant strategy. Please do not hesitate to contact me if you have questions about this submission.

Karim Amrane

Attachment: 'www.arb.ca.gov/lists/com-attach/21-2016slcp-BWQCbFQnAjhWD1U2.pdf'

Original File Name: AHRI Comments -Revised SLCP Strategy 17Jan17.pdf

Date and Time Comment Was Submitted: 2017-01-17 04:51:42

No Duplicates.

**Comment 20 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Allen

Last Name: Karpman

Email Address: allen.karpman@arkema.com

Affiliation:

Subject: Arkema Comments on the Revised Proposed SLCP Reduction Strategy

Comment:

Please find attached Arkema's comments to the Revised Proposed SCLP Reduction Strategy.

Attachment: 'www.arb.ca.gov/lists/com-attach/22-2016slcp-B2tWJAFyBQIWM1Ax.pdf'

Original File Name: Ltr CARB 16 Jan 2017 final.pdf

Date and Time Comment Was Submitted: 2017-01-17 06:20:49

No Duplicates.

**Comment 21 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Mark

Last Name: Menzer

Email Address: markmenzer@danfoss.com

Affiliation: Danfoss

Subject: Danfoss Comments on 2016 SLCP

Comment:

Comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/23-2016slcp-VzMHYFE+V2JROAFy.pdf'

Original File Name: Danfoss Comments on CARB SLCP report .pdf

Date and Time Comment Was Submitted: 2017-01-17 06:36:21

No Duplicates.

## **Comment 22 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Ellen

Last Name: Golla

Email Address: ellen@paperchipmunk.com

Affiliation:

Subject: California's Short-Lived Climate Pollutant Reduction Strategy

Comment:

Wood to wood stove conversions should not be included in California's Short-Lived Climate Pollutant Reduction Strategy.

The reductions in black carbon emissions that are assumed to come from newer wood stoves are based on faulty assumptions that are not borne out by research. As stated in the Revised Proposed Short-Lived Climate Pollutant Reduction Strategy, "While certified wood-burning devices reduce fine particulate emissions, certification values may not correlate well with in-home performance of wood heaters, and emission reductions are not as large as for non-wood technologies" (p.54). In fact, research has shown that real-world emissions of newer wood stoves can be approximately 15 to 16 times higher than their certification values suggest. In addition, certification tests, which bear little resemblance to actual in-home usage, also ignore the emissions released during the start-up period, which are substantial. [1,2,3].

If wood to wood stove changeouts worked, Libby, Montana would have decent air quality. But it doesn't. Even after replacing almost every wood stove in the community with a new EPA-certified one, Libby is still not in attainment of either the EPA's PM2.5 or PM10 standards[4] and approximately 81% of the area's particulate pollution still comes from residential wood burning. Post-changeout levels of elemental carbon emissions from residential wood burning have remained the same.[5]

Higher combustion temperatures, which new wood stoves have, may actually raise the ratio of light-absorbing carbon, affecting climate balance. For example, one study found the relative fractions of black carbon in PM emissions rose by as much as 12-fold higher with an "eco-labeled" stove.[6] The premise that newer stoves reduce black carbon emissions is simply incorrect.

It has also been shown that the brown carbon in wood smoke is highly absorbing in the near-UV spectrum, with further implications for our climate. For example, a California study found that the light-absorbing properties of organic carbon "in atmospheres burdened with residential wood smoke" are significant.[7]

The Revised Proposed Short-Lived Climate Pollutant Reduction Strategy states, "Reducing annual wood consumption from 1.5 to 1 cord per year would save the average resident \$145 per year. Approximately 379,000 wood to wood conversions would result in savings of approximately 44 million dollars per year to consumers

receiving incentives to replace their inefficient wood stove." This assumes that the efficiency claims for newer stoves are actually valid, which is questionable, and does not take into account that, as with emissions, efficiency can vary considerably in real-world usage, depending upon the kind of wood used and the technique used by the consumer.[8,9]

As for the assumed financial savings, this does not take into account the well-documented increases in medical costs, both to individuals and society, that result from residential wood burning, which add millions of dollars in expenses due to excess illnesses and premature deaths. For example, a 2001-2003 study by the San Joaquin Valley Air Pollution Control District estimated that residential wood burning, even after implementation of some limited restrictions on wood burning, resulted in an added \$11 million in increased health costs in the Fresno/Clovis area alone, and expenses related to excess deaths cost \$367.5 million.[10]

Even with newer stoves, the added expenses from excess illnesses, loss of productivity and premature death will still far exceed any potential savings in buying wood, and are borne by the entire community and state. (For more health costs examples, see source below.)[11]

In the U.S., residential wood burning also accounts for over 45% of methane emissions from stationary combustion. There is no reason to assume that newer stoves will emit less methane.[12,13]

On page 50 of the Revised Proposed Short-Lived Climate Pollutant Reduction Strategy it is stated that "A number of local air districts have residential wood combustion rules, and are working to make further progress in this category to meet air quality standards and protect public health." Unfortunately, this is not true of some of the air districts that are most seriously affected by wood smoke pollution, including the district I reside in, the North Coast Unified Air Quality Management District. When the district's PM monitor in Willow Creek recently was recording high levels of wood smoke from neighboring wood stoves, the NCUAQMD simply dealt with this issue by deciding to move the monitor to a neighborhood with fewer wood stoves.[14] They steadfastly refuse to implement any curtailment programs such as Spare the Air, even during inversion conditions when levels of wood smoke can become suffocating in some district neighborhoods. They actively encourage wood burning. A considerable portion of the District's annual budget also comes from selling open burning permits, so they have little incentive to limit open burning.[15] Last year, 300 out of 366 days were permissive open burn days, including the summer months when burning was banned due to fire danger.[16] If the state is to tackle SLCPs, it must also tackle open burning, which is an environmental and health catastrophe for those who live nearby, and a climate concern for all of us.

For the sake of our climate and public health, it is clear that wood to wood stove exchanges are not an appropriate solution. Only a move to cleaner, non-wood combustion technologies should be promoted and encouraged. And all air districts in California, including rural ones, must begin to take the problem of residential wood burning seriously.

1. Fisher, L., Houck, J., Tiegs, P., McGaughey, J. (2000). Long - Term Performance of EPA-Certified Phase 2 Woodstoves, Klamath Falls



and Portland, Oregon. U.S. Environmental Protection Agency.

2. Scott, A.J. , (2005). Real-Life Emissions from Residential Wood Burning Appliances in New Zealand. Ministry for the Environment Sustainable Management Fund.

3. Houck, J.E., Pitzman, L.Y., Tiegs, P. (2008). Emission Factors for New Certified Residential Wood Heaters. Presented at the 17th International Emission Inventory Conference, U.S. Environmental Protection Agency.

4. Montana Department of Environmental Quality. Montana Air Quality Nonattainment Status.

5. Ward, T. , Palmer, C. , Bergauff, M. , Jayanty, R. , & Noonan, C. (2011). Organic/Elemental Carbon and Woodsmoke Tracer Concentrations Following a Community Wide Woodstove Changeout Program. *Atmospheric Environment*, 45(31), 5554-5560.

6. Alves, C., Gonçalves, C., Fernandes, A.P., Tarelho, L., Pio, C. (2011). Fireplace and Woodstove Fine Particle Emissions from Combustion of Western Mediterranean Wood Types. *Atmospheric Research*, 101&#65279;(3), &#65279;692-700.

7. Kirchstetter, T.W. and Thatcher, T.L. (2012). Contribution of Organic Carbon to Wood Smoke Particulate Matter Absorption of Solar Radiation. *Atmospheric Chemistry and Physics*, 12, 6067-6072.

8. Houck, J.E., Pitzman, L.Y., Tiegs, P. (2008). Emission Factors for New Certified Residential Wood Heaters. Presented at the 17th International Emission Inventory Conference, U.S. Environmental Protection Agency.

9. Houck, J.E. (2009). Pick a Number, Any Number: No one really knows how efficient many cordwood and pellet heater are. *Hearth & Home*, 148.

10. Lighthall, D., Nunes, D., Tyner, T. (2009). Environmental Health Evaluation of Rule 4901: Domestic Wood Burning, A Case Study of the Fresno/Clovis and Bakersfield Metropolitan Areas. The San Joaquin Valley Air Pollution Control District.

11. Real Costs of Wood Burning. Retrieved from <http://woodsmokepollution.org/real-costs-of-wood-burning.html>.

12. Ahlers, C.D. (2016). Wood Burning, Biomass, Air Pollution, and Climate Change. *Environmental Law*, Vol 46; Vermont Law School Research Paper No. 4-16.

13. Wood Burning and Our Climate. Retrieved from <http://woodsmokepollution.org/climate.html>.

14. North Coast Unified Air Quality Management District. Regular Meeting of the Governing Board of Directors October 13, 2016 Agenda packet, p. 97. Retrieved from <http://www.ncuaqmd.org/files/Governing%20Board/2016/October%202016%20NCUAQMD%20Board%20Packet.pdf>.

15. North Coast Unified Air Quality Management District Adopted FY 2016-2017 Budget. Retrieved from <http://www.ncuaqmd.org/files/Public%20Notice/Budget/16-17%20Adopted%20Budget.pdf>

16. North Coast Unified Air Quality Management District. Regular Meeting of the Governing Board of Directors January 12, 2017 Agenda packet, p. 15. Retrieved from <http://ncuaqmd.org/files/Governing%20Board/2017/January%202017%20Board%20Packet%20.pdf>.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2017-01-17 08:38:53

No Duplicates.

**Comment 23 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Craig

Last Name: Thomas

Email Address: craig@sierraforestlegacy.org

Affiliation: Sierra Forest Legacy

Subject: Revised Short Lived Climate Pollutant Plan and Revised EA

Comment:

Attached are Sierra Forest Legacy comments on the Revised Short-Lived Climate Pollutant Strategy and Revised EA

Attachment: 'www.arb.ca.gov/lists/com-attach/25-2016slcp-VTYBaFE9AjwCYQFv.docx'

Original File Name: Comments on Revised SLCP Strategy and Revised Draft EA 1-17-17.docx

Date and Time Comment Was Submitted: 2017-01-17 10:38:29

No Duplicates.

**Comment 24 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Craig

Last Name: Thomas

Email Address: craig@sierraforestlegacy.org

Affiliation: Sierra Forest Legacy

Subject: Attached file for Sierra Forest Legacy comments

Comment:

Please find Long et al. 2017 Aligning Smoke Management with Ecological and Public Health Goals in support of our comments.

Craig Thomas  
Conservation Director  
Sierra Forest Legacy

Attachment: 'www.arb.ca.gov/lists/com-attach/26-2016slcp-B2YAagRsAjYCalc+.xps'

Original File Name: Aligning Smoke Management with Ecological and Public Health Goals-- Long et al. 2017.xps

Date and Time Comment Was Submitted: 2017-01-17 10:45:12

No Duplicates.

**Comment 25 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: John

Last Name: Gibbons

Email Address: john.gibbons@carrier.utc.com

Affiliation: nufacturer

Subject: Comments on SLCP from UTC-Carrier Jan17

Comment:

Please accept our comments from the November 28th, 2016 SLCP Strategy Document. Thanks & regards.

Attachment: 'www.arb.ca.gov/lists/com-attach/27-2016slcp-B2RXMABzWXhVOII3.pdf'

Original File Name: Carrier Comments on ARB SLCP 01172017.pdf

Date and Time Comment Was Submitted: 2017-01-17 11:07:26

No Duplicates.

**Comment 26 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Charlie

Last Name: Souhrada

Email Address: csouhrada@nafem.org

Affiliation: NAFEM

Subject: Public Comments on the Revised Proposed SLCP Reduction Strategy

Comment:

Thank you for the opportunity to submit comments regarding the revised draft Short-Lived Climate Pollutant (SLCP) Reduction Strategy, issued November 28, 2016.

Please see the attachment for comments from the North American Association of Food Equipment Manufacturers (NAFEM).

Attachment: 'www.arb.ca.gov/lists/com-attach/28-2016slcp-AGEHcwBjUV0LfgFt.pdf'

Original File Name: ARB SLCP Comments - 1.17.17.pdf

Date and Time Comment Was Submitted: 2017-01-17 11:11:14

No Duplicates.

**Comment 27 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Ronald

Last Name: Shebik

Email Address: ron.shebik@hussmann.com

Affiliation: Hussmann Corporation

Subject: CARB Revised SLCP Draft Strategy

Comment:

Please refer to the attachment for Hussmann Corporation Comments

Attachment: 'www.arb.ca.gov/lists/com-attach/29-2016slcp-VT1RIIwuBSUFbglo.doc'

Original File Name: Hussmann Corporation Comments - CARB Draft Strategy January 17, 2017.doc

Date and Time Comment Was Submitted: 2017-01-17 12:23:41

No Duplicates.

**Comment 28 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Stephen

Last Name: Mandracchia

Email Address: smandracchia@hudsontech.com

Affiliation: Hudson Technologies Company - VP Legal

Subject: REvised Strategy for Short-Lived Climate Pollutants

Comment:

The attached comment letter is submitted on behalf of Hudson Technologies company

Attachment: 'www.arb.ca.gov/lists/com-attach/30-2016slcp-VT0Ac1I3VHQC1U7.pdf'

Original File Name: Hudson Comments to Revised SLCP Strategy.pdf

Date and Time Comment Was Submitted: 2017-01-17 12:41:05

No Duplicates.



**Comment 29 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: David

Last Name: Cranston

Email Address: DCranston@GreenbergGlusker.com

Affiliation:

Subject: Comment Letter re Revised EA for Proposed SLCP Strategy

Comment:

We submit these comments to the Revised Environmental Analysis for the Proposed Short-Lived Climate Pollutant Reduction Strategy dated November 28, 2016 on behalf of Dairy Cares.

Attachment: 'www.arb.ca.gov/lists/com-attach/31-2016slcp-UDcFZFcyBDhWMwBz.pdf'

Original File Name: GGDOCS1-#2740888-v1-

Comment\_Letter\_to\_ARB\_re\_\_Revised\_EA\_for\_Proposed\_SL....pdf

Date and Time Comment Was Submitted: 2017-01-17 12:58:31

No Duplicates.

**Comment 30 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: David

Last Name: Winningham

Email Address: dave.winningham@alliedair.com

Affiliation: Lennox International

Subject: Lennox Comments on Revised Short Lived Climate Pollutant Strategy

Comment:

Lennox comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/32-2016slcp-UT1TMANsAD0DalUt.docx'

Original File Name: Lennox Comments CARB SLCP Reduction Strategy 01172017.docx

Date and Time Comment Was Submitted: 2017-01-17 13:03:17

No Duplicates.

**Comment 31 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Maureen

Last Name: Beatty

Email Address: mbeatty@refrigerants.com

Affiliation: National Refrigerants, Inc.

Subject: 2016SLCP

Comment:

Please find our comments attached. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/33-2016slcp-VTRVIVAzUV0Cd1I+.pdf'

Original File Name: ARB SLCP Strategy Jan 2017-NRI.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:08:03

No Duplicates.

**Comment 32 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Public health group comments on SLCP Strategy

Comment:

Please see the attached comment letter on the SLCP Strategy on behalf of the American Lung Association, Public Health Institute and the Center for Climate Change and Health.

Attachment: '[www.arb.ca.gov/lists/com-attach/34-2016slcp-UyAHbVU3AyBVDAhk.pdf](http://www.arb.ca.gov/lists/com-attach/34-2016slcp-UyAHbVU3AyBVDAhk.pdf)'

Original File Name: SLCP letter\_final\_1-17-17.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:29:48

No Duplicates.

## **Comment 33 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Evan

Last Name: Edgar

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

Affiliation: California Compost Coalition

Subject: SLCP Comments

Comment:

CCC has the following comments:

- Support regulations adopted in 2018 to be poised for 2022 implementation in tandem with CalRecycle's Waste Characterization Study and the Fourth Assessment of California Compost and Mulch-Producing Infrastructure for 2017.
- Need to recognize Compost and Anaerobic Digestion as a Cost-Effectiveness Measure
- Overcome Barriers with a more robust AB 1045 process
- Increase tip fee on Cheap Landfills to fund Infrastructure
- Include green waste ADC in the disposal tons
- 'Chip and grind' is not a biomass market - Need bioenergy and market development

Attachment: 'www.arb.ca.gov/lists/com-attach/35-2016slcp-AWJQNVw+VVkHcghk.pdf'

Original File Name: CCC SLCP Comments 011717.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:45:08

No Duplicates.

**Comment 34 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environmen

Subject: Comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Submitting Comments on Revised Proposed Short-Lived Climate  
Pollutant Reduction Strategy

Attachment: 'www.arb.ca.gov/lists/com-attach/36-2016slcp-ADJUY11tWT0DKwAw.pdf'

Original File Name: 2017.01.17 revised SLCP strategy comments FINAL with Exhibits.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:08:34

No Duplicates.

**Comment 35 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jeffrey

Last Name: Fort

Email Address: jeffrey.fort@dentons.com

Affiliation: Dentons US LLP

Subject: 2016 SLCP

Comment:

Comments on 2016 SLCP

Attachment: 'www.arb.ca.gov/lists/com-attach/37-2016slcp-AGRdPIM8AyQGblA+.pdf'

Original File Name: Dentons.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:52:33

No Duplicates.

**Comment 36 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC's Comments on SLCP Reduction Strategy

Comment:

Attached please find the Bioenergy Association of California's Comments on the November 2016 Draft Strategy to Reduce Short-Lived Climate Pollutants.

Attachment: 'www.arb.ca.gov/lists/com-attach/38-2016slcp-VjQBZgdlAw8Kb1I9.pdf'

Original File Name: BAC Comments on Nov2016 SLCP Strategy.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:53:04

No Duplicates.



**Comment 37 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Dave

Last Name: Stirpe

Email Address: david.stirpe@honeywell.com

Affiliation: Honeywell

Subject: Comments on Revised Proposed SLCP Strategy

Comment:

See attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/39-2016slcp-VGUGLVJiWDwDKAQ1.pdf'

Original File Name: 1-17-17Honeywell Comments to CARB on Revised Proposed SLCP Strategy.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:56:29

No Duplicates.

**Comment 38 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Mary

Last Name: Dane

Email Address: mdane@traulsen.com

Affiliation: ITW-Food Equipment Group, LLC.-Traulsen/

Subject: (2016SLCP) Public Comments on the Revised Proposed Short-Lived Climate Pollutant Reduction

Comment:

Please review the comments regarding (2016SLCP) SLP Plan.

Thank you in advance.

Mary Dane

Attachment: 'www.arb.ca.gov/lists/com-attach/40-2016slcp-VGZXYQY2WT0AK1Bg.doc'

Original File Name: 2017-0117 Traulsen\_CA SLP\_Comments.doc

Date and Time Comment Was Submitted: 2017-01-17 14:19:09

No Duplicates.

**Comment 39 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Stephen

Last Name: Van Maren

Email Address: vanmaren@alliancepolicy.org

Affiliation:

Subject: Comments from the Alliance for Responsible Atmospheric Policy

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/42-2016slcp-VjcCaFU4BT8GYQZo.pdf'

Original File Name: Alliance Comments on Revised Proposed SLCP Red Strat.pdf

Date and Time Comment Was Submitted: 2017-01-17 14:22:53

No Duplicates.

**Comment 40 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Douglas

Last Name: Reinke

Email Address: dreinke@bluonenergy.com

Affiliation: Bluon Energy

Subject: Bluon Energy Comments on November 2016 proposed Short-Lived Climate Pollutant (SLCP) Reduc

Comment:

Please see attached file: ARB\_BluonResponse\_01.17.17Final.pdf

Attachment: 'www.arb.ca.gov/lists/com-attach/43-2016slcp-UTAFcVY1VFgDZwFt.pdf'

Original File Name: ARB\_BluonResponse\_01.17.17Final.pdf

Date and Time Comment Was Submitted: 2017-01-17 14:21:36

No Duplicates.

**Comment 41 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jason  
Last Name: Schmelzer  
Email Address: jason@shawyoderantwih.com  
Affiliation:

Subject: SWANA LTF Comments re: ARB's November 2016 Proposed Short-Lived Climate Pollutant Strategy  
Comment:

Good Afternoon,

Please find attached the Legislative Task Force of the Solid Waste Association of North America, California Chapters' comments regarding the ARB's proposed SLCP Reduction Strategy. Thank you.

Best,

Jason Schmelzer  
Partner  
Shaw / Yoder / Antwih, Inc.

Attachment: 'www.arb.ca.gov/lists/com-attach/44-2016slcp-B3RTIgNjVmsCZVcI.pdf'

Original File Name: SWANA LTF Letter to ARB re SLCP Draft Strategy 1.17.17 Final.pdf

Date and Time Comment Was Submitted: 2017-01-17 14:20:34

No Duplicates.

**Comment 42 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Susan

Last Name: Goldsborough

Email Address: sgoldsborough@familiesforclearair.org

Affiliation: Families for Clean Air

Subject: FCA comments on Revised SLCP Strategy

Comment:

Attached please find Families for Clean Air's comments on the Revised Short-Lived Climate Pollutant Reduction Strategy. Thank you for the opportunity to comment.

Attachment: 'www.arb.ca.gov/lists/com-attach/45-2016slcp-VzECZwRkBzcCZQJw.pdf'

Original File Name: FCACARBcomments2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 13:58:16

No Duplicates.

**Comment 43 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Christina

Last Name: Starr

Email Address: cstarr@eia-global.org

Affiliation: Environmental Investigation Agency

Subject: EIA Comments on HFC Measures in SLCP Strategy

Comment:

Please see attached comments of the Environmental Investigation Agency.

Attachment: 'www.arb.ca.gov/lists/com-attach/46-2016slcp-UDUHafAwWFRXMII9.pdf'

Original File Name: EIA Comments on CARB Strategy\_Jan 2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 14:50:31

No Duplicates.

**Comment 44 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Helen

Last Name: Walter-Terrinoni

Email Address: helen.a.walter-terrini@chemours.com

Affiliation: The Chemours Company

Subject: Chemours Comments on California Air Resources Board Short-Lived Climate Pollutant Strategy

Comment:

Please see attached comments.

Thank-you

Attachment: 'www.arb.ca.gov/lists/com-attach/48-2016slcp-VzQGaFE1AjwFbFIn.pdf'

Original File Name: Chemours comments on the CARB Short Lived Climate Pollutant Proposed Strategy 1 17 17.pdf

Date and Time Comment Was Submitted: 2017-01-17 14:58:45

No Duplicates.



**Comment 45 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Alia

Last Name: Schoen

Email Address: alia.schoen@bloomenergy.com

Affiliation:

Subject: Bloom Energy's SLCP Reduction Strategy comments

Comment:

Please find attached Bloom Energy's comments on the November 2016 Revised Proposed Short-Lived Climate Pollutant Reduction Strategy.

Thank you,  
Alia Schoen  
Public Policy Manager

Attachment: 'www.arb.ca.gov/lists/com-attach/49-2016slcp-ViVSOAFjUnEAWQFy.pdf'

Original File Name: SLCP Strategy comments\_vF.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:07:26

No Duplicates.

**Comment 46 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jennifer

Last Name: Morris

Email Address: jhmmorris@semprautilities.com

Affiliation: SoCalGas

Subject: SoCalGas and SDG&E Comments on the Revised Proposed SLCP  
Comment:

Please find attached comments from SoCalGas and SDG&E on the Revised Proposed SLCP Reduction Strategy. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/50-2016slcp-VCdXMgdhWFQEcQJm.pdf'

Original File Name: SCG\_SDGE Comments on SLCP 1-17-2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:21:09

No Duplicates.

## **Comment 47 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Todd

Last Name: Shuman

Email Address: tshublu@yahoo.com

Affiliation: WUMU - Wasteful Unreasonable Methane Upr

Subject: SLCP RS DEA Comments - WUMU/SFK/VCCH

Comment:

In its April 2016 proposed SLCP Reduction Strategy, the CA ARB effectively ignored the single largest methane emission source in California: enteric emissions from California livestock. No "reasonably foreseeable compliance responses associated with the methane reduction measures" were projected concerning potential enteric emission reductions from California livestock in Appendix C, pages 4-16/17, Draft EA for Proposed SLCP Reduction Strategy (April 11, 2016). In the aftermath of the legislative and executive enactment of SB 1383, this judgment remains unchanged but now also extends to the California legislature and the Governor of California.

Unfortunately, the very real atmospheric/thermodynamic impacts of past, present, and future enteric methane emissions on the Earth's already disrupted climate system are also likely to remain unchanged.

Still, we believe that there are reasonable measures that could be (and should be) enacted to dramatically reduce methane emissions from this source (as well as other GHG emissions associated with livestock supply chains in California). We again present these measures in the pdf file uploaded to CA ARB.

Todd Shuman, Ara Marderosian, and Jan Dietrick

Attachment: 'www.arb.ca.gov/lists/com-attach/51-2016slcp-UyAFbwFjBCcCWwV3.pdf'

Original File Name: SLCP RS Rev DEA Comments January 17 2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:24:37

No Duplicates.

**Comment 48 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Betsy

Last Name: Hammer

Email Address: bhammer@counties.org

Affiliation: CSAC

Subject: CSAC Comments on Revised Proposed Short-Lived Climate Pollutant Strategy  
Comment:

Attached please find CSAC's comments on the Revised Proposed Short-Lived Climate Pollutant Strategy.

Attachment: 'www.arb.ca.gov/lists/com-attach/52-2016slcp-VSZVO1I8WHkEdgUo.pdf'

Original File Name: Short-Lived Climate Pollutant Reduction Strategy\_CSAC comments.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:05:47

No Duplicates.

**Comment 49 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Agricultural Council of California

Subject: Comments on the Revised Proposed SLCP Reduction Strategy

Comment:

We appreciate your consideration and the opportunity to comment. Should you have any questions or need anything further from us, please contact either Rachael O'Brien at (916) 443-4887 / Rachael@agcouncil.org or Cynthia Cory at (916) 446-4647 / ccory@cbbf.com.

Attachment: 'www.arb.ca.gov/lists/com-attach/53-2016slcp-BWRSMwZkVmoKeVc5.pdf'

Original File Name: AgCouncil\_CBBF\_SLCPComments\_January2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:46:01

No Duplicates.

**Comment 50 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: John

Last Name: Shears

Email Address: Shears@ceert.org

Affiliation: CEERT

Subject: C4-NGOs Joint Comments on Revised Proposed SLCP Reduction Strategy

Comment:

Californians Against Waste, the Center for Energy Efficiency and Renewable Technologies, the Clean Power Campaign and the Coalition for Clean Air thank the ARB for the opportunity to submit these joint comments on the November 28th, 2016 Revised Proposed SLCP Reduction Strategy.

Attachment: 'www.arb.ca.gov/lists/com-attach/54-2016slcp-VzRQYgcrWWRRMABv.pdf'

Original File Name: C4-NGOs Joint Comments on RP SLCP Reduction Strategy\_Final 01 17 17.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:44:13

No Duplicates.

**Comment 51 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: J.P.

Last Name: Cativiela

Email Address: jcativiela@cogentcc.com

Affiliation: Dairy Cares [www.dairycares.com](http://www.dairycares.com)

Subject: Dairy Cares Comments on SLCP

Comment:

Please see the attached comment letter from Dairy Cares on the November update (Revised Proposed SLCP Strategy). A separate letter was submitted earlier today related to the Environmental Analysis.

Attachment: '[www.arb.ca.gov/lists/com-attach/55-2016slcp-UDNUPQFtBDoKaVQ6.pdf](http://www.arb.ca.gov/lists/com-attach/55-2016slcp-UDNUPQFtBDoKaVQ6.pdf)'

Original File Name: Comments on SLCP.1.17.2017.Dairy Cares.F.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:02:29

No Duplicates.

**Comment 52 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: John

Last Name: Crouch

Email Address: crouch@hpba.org

Affiliation: HPBA - Hearth, Patio & Barbecue Associat

Subject: HPBA comments on Proposed SLCP Strategy

Comment:

Attached are the comments of the Hearth, Patio & Barbecue Association regarding the woodstove portion of the Proposed SLCP Strategy

Attachment: 'www.arb.ca.gov/lists/com-attach/56-2016slcp-UTlcKIU2AjBVDABj.doc'

Original File Name: HPBA Comments on ARB SLCP .doc

Date and Time Comment Was Submitted: 2017-01-17 16:08:00

No Duplicates.



**Comment 53 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.org

Affiliation: Center on Race, Poverty & the Environmen

Subject: Amended Comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

AMENDED Comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy

Attachment: 'www.arb.ca.gov/lists/com-attach/57-2016slcp-VGYCNFRkUjYKIIBg.pdf'

Original File Name: 2017.01.17 revised SLCP strategy comments AMENDED FINAL with Exhibits.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:58:09

No Duplicates.

**Comment 54 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: SBC comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy  
Comment:

Please accept the attached letter with comments from Sierra Business Council on the Revised Proposed Short-Lived Climate Pollutant Reduction Strategy.

Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/58-2016slcp-BnUAZFayVVIWMQh6.pdf'

Original File Name: SBC\_ARB\_SLCPStrategy\_2017\_01\_17.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:12:37

No Duplicates.

**Comment 55 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jacqueline

Last Name: Zipkin

Email Address: jackie.zipkin@ebmud.com

Affiliation: East Bay Municipal Utility District

Subject: EBMUD Comments on Revised Proposed SLCP Strategy

Comment:

Attached please find comments of the East Bay Municipal Utility District (EBMUD) on the Revised Proposed Short-Lived Climate Pollutant Strategy.

Attachment: 'www.arb.ca.gov/lists/com-attach/59-2016slcp-UTRTN1U5VHJWNAIW.pdf'

Original File Name: EBMUD SLCP comment letter - 17Jan2017 Final.pdf

Date and Time Comment Was Submitted: 2017-01-17 15:56:43

No Duplicates.

**Comment 56 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Irene

Last Name: Gutierrez

Email Address: [igutierrez@nrdc.org](mailto:igutierrez@nrdc.org)

Affiliation: Clean Energy Attorney, NRDC

Subject: NRDC Comments to Proposed SLCP Strategy

Comment:

Please see the attached comments to ARB's Revised Proposed Short-Lived Climate Pollutant Strategy.

Attachment: '[www.arb.ca.gov/lists/com-attach/60-2016slcp-UT9cKAdiV2cFXAdk.pdf](http://www.arb.ca.gov/lists/com-attach/60-2016slcp-UT9cKAdiV2cFXAdk.pdf)'

Original File Name: NRDC Comments on CA SLCP (01-17-2017).pdf

Date and Time Comment Was Submitted: 2017-01-17 16:14:10

No Duplicates.

**Comment 57 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: LA County Waste Mgmt Task Force

Subject: Comments on the Revised Proposed SLCP Reduction Strategy - Dated November 2016  
Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/61-2016slcp-UCJWNVIIVmwDdgl.pdf'

Original File Name: Revised Proposed SLCP Reduction Strategy 01-17-17 Final.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:16:35

No Duplicates.

**Comment 58 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jerry  
Last Name: Secundy  
Email Address: jerrys@cceeb.org  
Affiliation: CCEEB

Subject: CCEEB Comment Letter RE: Proposed SLCP Strategy  
Comment:

Attached you will find a comment letter from the California Council for Environmental and Economic Balance regarding Proposed Short-Lived Climate Pollutant Strategy.

Attachment: 'www.arb.ca.gov/lists/com-attach/62-2016slcp-UjEAZVI2U2VXMwFe.pdf'

Original File Name: CCEEB SLCP Comment Letter\_ 1-17-17.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:11:57

No Duplicates.

## **Comment 59 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CA Association of Sanitation Agencies

Subject: Comments Regarding the Revised Proposed SLCP Reduction Strategy

Comment:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the Revised Proposed Short Lived Climate Pollutant (SLCP) Reduction Strategy. We largely support the conclusions and recommendations in the Revised Proposed Strategy and appreciate the recognition articulated that the wastewater sector is part of the solution for methane reduction.

We want to emphasize that POTWs have opportunities to provide cross-sector benefits and to be:

- Suppliers of a marketable renewable fertilizer/soil amendment product in the form of biosolids.
- Suppliers of a low carbon fuel.
- Significant renewable energy providers.
- Environmental stewards of our natural and working lands.

Each of these can significantly contribute toward reductions in SLCPs. In most cases, all that is lacking is the funding to advance these practices. We strongly recommend allocation of Cap-and-Trade revenue to wastewater projects through allocating additional revenue to CalRecycle to fund the diversion of organic waste from landfills to wastewater treatment plants. We also agree that the State needs to build market certainty and value for the use of biosolids and other bioproducts from wastewater facilities.

Please contact me if you have any questions regarding our attached comments at (925) 705-6404 or via email at sdeslauriers@carollo.com. We look forward to working together as proactive partners on our multitude of shared objectives.

Sincerely,

Sarah A. Deslauriers

CASA Climate Change Program Manager

Attachment: 'www.arb.ca.gov/lists/com-attach/63-2016slcp-UjEHYFYkBDZVDARn.pdf'

Original File Name: CASA Comments on  
RevisedProposedSLCPReductionStrategy\_011717\_FINAL.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:40:20

No Duplicates.



**Comment 60 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@crrcnorth.org

Affiliation: California Refuse Recycling Council

Subject: CRRC Comments on the Revised Proposed Short-Lived Climate Pollutant Strategy  
Comment:

The California Refuse Recycling Council thanks you for the opportunity to submit comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/64-2016slcp-VTZRJQd0WWkKUwR3.pdf'

Original File Name: CRRC SLCP Comments 01.17.17.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:35:13

No Duplicates.

**Comment 61 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Erik

Last Name: White

Email Address: ecwhite@placer.ca.gov

Affiliation: Placer County APCD

Subject: Comments to Target Scoping Plan Update 2030 Discussion Draft

Comment:

Attached--Comments to Target Scoping Plan Update 2030 Discussion  
Draft

Attachment: 'www.arb.ca.gov/lists/com-attach/65-2016slcp-VzRSO1Q4U21QM1I8.pdf'

Original File Name: Comments Letter Target Scoping Plan Update Discussion Draft Jan  
2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:33:32

No Duplicates.

**Comment 62 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Fariya

Last Name: Ali

Email Address: fxao@pge.com

Affiliation: PG&E

Subject: PG&E Comments on the Revised SLCP Strategy

Comment:

See attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/66-2016slcp-BnQGZQF2WGICdwRh.pdf'

Original File Name: Revised SLCP\_PGE Comments\_01172017.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:46:58

No Duplicates.

**Comment 63 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Sarah

Last Name: Aird

Email Address: sarah@pestidereform.org

Affiliation:

Subject: CPR Comments on Revised Proposed SLCP Reduction Strategy

Comment:

Please see attached comments from Californians for Pesticide Reform.

Attachment: 'www.arb.ca.gov/lists/com-attach/67-2016slcp-VjVFZIEmWGICgM0D.pdf'

Original File Name: FINAL CPR SLCP Comments 011717.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:19:54

No Duplicates.

**Comment 64 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the Revised Proposed Short-Lived Climate Pollutant Strategy

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/68-2016slcp-VjVTNFY7VWUBb1c2.pdf'

Original File Name: CalChamber CARB SLCP January 2017.pdf

Date and Time Comment Was Submitted: 2017-01-17 16:51:23

No Duplicates.

**Comment 65 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Andrea

Last Name: Weber

Email Address: Non-web submitted comment

Affiliation: Center for Biological Diversity

Subject: Comments to Revised Proposed Short-lived Climate Pollutant Strategy

Comment:

See Attached.

\*A CD of references was submitted along with this comment and is available upon request from the Clerk of the Board.

Attachment: 'www.arb.ca.gov/lists/com-attach/69-2016slcp-UDMFZl0yU3QHZABy.pdf'

Original File Name: Center for Biological Diversity Comment.pdf

Date and Time Comment Was Submitted: 2017-01-18 13:40:14

No Duplicates.

**Comment 66 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Jeanne

Last Name: Merrill

Email Address: Non-web submitted comment

Affiliation: CalCAN

Subject: Comments on the Revised Proposed Short-Lived Climate Reduction Strategy

Comment:

Late Comment. See Attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/70-2016slcp-AnBQM1EmWWNWIwht.pdf](http://www.arb.ca.gov/lists/com-attach/70-2016slcp-AnBQM1EmWWNWIwht.pdf)'

Original File Name: Revised Proposed SLCP Strategy Comments - 1-18-16.pdf

Date and Time Comment Was Submitted: 2017-01-23 16:54:56

No Duplicates.

**Comment 67 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: George

Last Name: Parsons

Email Address: george.parsons@iceomatic.com

Affiliation:

Subject: Revised Proposed Short-lived Climate Pollutant Strategy - CARB

Comment:

Letter is attached

Attachment: 'www.arb.ca.gov/lists/com-attach/4-scopingplan2030-BWYFYgR3BzYBWAR2.pdf'

Original File Name: CARB Response January 2017.pdf

Date and Time Comment Was Submitted: 2017-01-25 12:10:45

No Duplicates.



**Comment 68 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Todd

Last Name: Shuman

Email Address: Non-web submitted comment

Affiliation:

Subject: slcp comments attachment to 47

Comment:

see attached

Attachment: 'www.arb.ca.gov/lists/com-attach/72-2016slcp-VTRVJwdyBTcGY1A4.zip'

Original File Name: attachments to #47.zip

Date and Time Comment Was Submitted: 2017-03-08 15:58:27

No Duplicates.

**Comment 69 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp) - Non-Reg.**

First Name: Susan

Last Name: Goldsborough

Email Address: Non-web submitted comment

Affiliation:

Subject: Final Short-Lived Climate Pollutant Reduction Strategy

Comment:

Late Comment. See Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/73-2016slcp-VDdVMlAjAzIFYQdo.pdf'

Original File Name: CARBboard20March2017.pdf

Date and Time Comment Was Submitted: 2017-03-21 10:46:42

No Duplicates.

**Comment 1 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp). (At Hearing)**

First Name: John

Last Name: Shears

Email Address: Non-web submitted comment

Affiliation: CA Hydrogen Business Council

Subject: Final Proposed SLCP Reduction Strategy

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/75-2016slcp-VGUFNFB8AmJXfFdi.pdf](http://www.arb.ca.gov/lists/com-attach/75-2016slcp-VGUFNFB8AmJXfFdi.pdf)

Original File Name: 17-3-5 John Shears.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:36:40

No Duplicates.

**Comment 2 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp). (At Hearing)**

First Name: Margaret

Last Name: Clark

Email Address: Non-web submitted comment

Affiliation: SWMC

Subject: Final Proposed Short-Lived Climate Pollutant Reduction Strategy

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/76-2016slcp-ATBTY1B8UjJQe1Rh.pdf](http://www.arb.ca.gov/lists/com-attach/76-2016slcp-ATBTY1B8UjJQe1Rh.pdf)

Original File Name: 17-3-5 Margaret Clark.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:36:40

No Duplicates.

**Comment 3 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp). (At Hearing)**

First Name: Paul

Last Name: Delaney

Email Address: Non-web submitted comment

Affiliation: Southern California Edison

Subject: Low Charge Ammonia Systems

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/78-2016slcp-AjMAMVR4UjJSeQM2.pdf](http://www.arb.ca.gov/lists/com-attach/78-2016slcp-AjMAMVR4UjJSeQM2.pdf)

Original File Name: 17-3-5 Paul Delaney.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:36:40

No Duplicates.

**Comment 4 for Short-Lived Climate Pollutant Strategy and Revised Draft Environmental Analysis (2016slcp). (At Hearing)**

First Name: Susan

Last Name: Wood

Email Address: Non-web submitted comment

Affiliation: American Carbon Registry

Subject: SLCP Strategy

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/79-2016slcp-UWBSY1Z6UjIELwI3.pdf](http://www.arb.ca.gov/lists/com-attach/79-2016slcp-UWBSY1Z6UjIELwI3.pdf)

Original File Name: 17-3-5 Susan Wood.pdf

Date and Time Comment Was Submitted: 2017-04-07 12:36:40

No Duplicates.