

## **Comment 1 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Peter

Last Name: Okurowski

Email Address: peter@ceaconsulting.com

Affiliation:

Subject: Please Release a Redline/Strikeout Version

Comment:

Please also post a redline/strikeout version of the Proposed First Update to the Climate Change Scoping Plan that is compared to the Discussion Draft posted in October. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-02-11 10:18:44

No Duplicates.



## **Comment 2 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Theodore

Last Name: Hadzi-Antich

Email Address: tha@pacificlegal.org

Affiliation: Pacific Legal Foundation

Subject: Comments on Proposed First Update to the Climate Change Scoping Plan

Comment:

To the extent that the Proposed First Update to the Climate Change Scoping Plan (the "Update") purports to administratively initiate policies, procedures, rules, or criteria for reducing greenhouse gas emissions in California beyond the levels required to be achieved by the year 2020 under AB 32, the Update is ultra vires because it is not authorized by AB 32 or any other statute. Reliance on an executive order issued prior to or after the enactment of AB 32 to initiate action to reduce greenhouse gas emissions between 2020 and 2050 is misplaced because AB 32 does not include or authorize any substantive emissions reduction requirements other than achievement and maintenance of the 2020 greenhouse gas emissions goals. Because the Update goes beyond the 2020 goals of AB 32, it is improper to refer to it as "Pursuant to AB 32," as set forth on the title page of the Update. At most, any policies, procedures, rules, or criteria set forth in the Update may be considered as proposals for legislation. No government funds are authorized to be spent in an effort to further any such proposals unless and until authorized by legislation duly signed by the Governor. And any effort by CARB or other state agencies to implement greenhouse gas reduction goals beyond the 2020 goals set forth in AB 32 without additional legislative authorization is subject to court challenge because such efforts are and will continue to be ultra vires administrative acts and, therefore, void.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-02-11 13:34:22

No Duplicates.



### **Comment 3 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Karl

Last Name: Gawell

Email Address: karl@geo-energy.org

Affiliation: Geothermal Energy Association

Subject: Comments and Input for the Planning Process

Comment:

The Geothermal Energy Association and the geothermal community applaud the California Air Resources Board for their international leadership at testing creative and bold programs to address the threat of climate change. To support the efforts of CARB, we offer the attached Status Report on geothermal power in California for your deliberations.

Geothermal power produces some of the lowest life-cycle emissions when compared to almost every other energy technology and even some renewables yet only about half of California's identified geothermal resources have operating power plants today. GEA estimated in its May 2013 report that geothermal power provides approximately \$278 million in externality benefits per year to the entire U. S. or \$117 million per year to the states of Nevada and California by avoiding fossil fuel emissions." (Promoting Geothermal Energy: Air Emissions Comparison and Externality Analysis, May 2013, available at: <http://geo-energy.org/reports.aspx>.)

Geothermal Energy Association asks that CARB consider the values and benefits geothermal power can offer to the State of California towards accomplishing the goals laid out by CARB in its February 2014 "Climate Change Scoping Plan."

Attachment: [www.arb.ca.gov/lists/com-attach/4-proposed-sp-ws-UjFcO1E8V20HZwVq.pdf](http://www.arb.ca.gov/lists/com-attach/4-proposed-sp-ws-UjFcO1E8V20HZwVq.pdf)

Original File Name: California Status Report February 2014 Final.pdf

Date and Time Comment Was Submitted: 2014-02-19 10:36:19

No Duplicates.



**Comment 4 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Gary

Last Name: Gero

Email Address: gary@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Initial Comments on Draft Proposed Update to the Scoping Plan

Comment:

Comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/5-proposed-sp-ws-BmBTPAFuVWdQOglW.pdf](http://www.arb.ca.gov/lists/com-attach/5-proposed-sp-ws-BmBTPAFuVWdQOglW.pdf)

Original File Name: Final Comment Letter on Scoping Plan Update 022014.pdf

Date and Time Comment Was Submitted: 2014-02-20 13:53:24

No Duplicates.



## **Comment 5 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: James  
Last Name: Brady  
Email Address: james.brady59@gmail.com  
Affiliation:

Subject: AB32  
Comment:

I previously directed my concerns to others and was encouraged to submit online.

Hello, I had to a chance to review the scoping plan and not one mention of Urban Agriculture! How could CARB throw out Urban Ag a significant solution for distressed communities. This is a travesty and oversight that AB32 did not cover, instead it favors big Ag-over new found public interest to grow food (Greeehouses) locally while reducing the carbon footprint in distressed communities along with flourishing job creation.

The 25% investment plan for distressed communities falls short of making these changes where they are needed most right now. I would hope that this scoping plan gets updated in 2014 with the addition of Urban Farming as a serious catalyst for climate change that includes Urban Farmers on your planning teams. Perhaps CDFA can enhance this section for relief because your teams has failed to address!

Respectfully

James Brady

[www.con10u2farm.com](http://www.con10u2farm.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-02-24 19:03:20

No Duplicates.



**Comment 6 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Jerilyn

Last Name: Mendoza

Email Address: ombcomm@arb.ca.gov

Affiliation: So Cal Gas Company

Subject: SoCalGas Response to AB 32 Scoping Plan

Comment:

see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7-proposed-sp-ws-B3QAaVB8AzNVMIU5.pdf](http://www.arb.ca.gov/lists/com-attach/7-proposed-sp-ws-B3QAaVB8AzNVMIU5.pdf)

Original File Name: so-cal-gas-company.pdf

Date and Time Comment Was Submitted: 2014-02-27 14:25:41

No Duplicates.



**Comment 7 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Sam

Last Name: Emmerson

Email Address: ombcomm@arb.ca.gov

Affiliation: GWAC

Subject: Planning for Greenhouse Gas Emissions Reductions After 2020

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8-proposed-sp-ws-UjVSIwBgVGQLI1Ul.pdf](http://www.arb.ca.gov/lists/com-attach/8-proposed-sp-ws-UjVSIwBgVGQLI1Ul.pdf)

Original File Name: gwac.pdf

Date and Time Comment Was Submitted: 2014-02-27 14:29:08

No Duplicates.



**Comment 8 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Mac

Last Name: Farrell

Email Address: ombcomm@arb.ca.gov

Affiliation: Environment California

Subject: Strong Updated Scoping Plan for Implementing AB 32

Comment:

Attached Form Letter from 2,065 Undersigned Citizens/Environment California.

Attachment: [www.arb.ca.gov/lists/com-attach/9-proposed-sp-ws-AmcAaFYhUWsCdghn.pdf](http://www.arb.ca.gov/lists/com-attach/9-proposed-sp-ws-AmcAaFYhUWsCdghn.pdf)

Original File Name: environmental-california.pdf

Date and Time Comment Was Submitted: 2014-02-27 14:30:46

No Duplicates.



**Comment 9 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Paul

Last Name: Baer

Email Address: ombcomm@arb.ca.gov

Affiliation: UCS

Subject: An Open Letter on Climate Change

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/10-proposed-sp-ws-AHUFYFIgVCkEclQw.pdf](http://www.arb.ca.gov/lists/com-attach/10-proposed-sp-ws-AHUFYFIgVCkEclQw.pdf)

Original File Name: ucs.pdf

Date and Time Comment Was Submitted: 2014-02-27 14:36:12

No Duplicates.



**Comment 10 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Roger  
Last Name: Bales  
Email Address: robal@alumni.caltech.edu  
Affiliation: UC Merced

Subject: Comments on Draft Update to Scoping Plan  
Comment:

Pls see attached pdf file

Attachment: [www.arb.ca.gov/lists/com-attach/11-proposed-sp-ws-ViRQNABeAzMGbwRp.pdf](http://www.arb.ca.gov/lists/com-attach/11-proposed-sp-ws-ViRQNABeAzMGbwRp.pdf)

Original File Name: RB\_comments2.pdf

Date and Time Comment Was Submitted: 2014-03-07 11:49:25

No Duplicates.



**Comment 11 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Samantha

Last Name: Infeld

Email Address: sindrei@stanfordalumni.org

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

I strongly support California leading the way by using a  
revenue-neutral carbon tax to reach to the goals of AB 32.

Attachment: [www.arb.ca.gov/lists/com-attach/13-proposed-sp-ws-UTRXP1QjUGoLfwNs.pdf](http://www.arb.ca.gov/lists/com-attach/13-proposed-sp-ws-UTRXP1QjUGoLfwNs.pdf)

Original File Name: Environmental-Tax-Reform-in-California-Economic-and-Climate-Impact-of...-1.pdf

Date and Time Comment Was Submitted: 2014-03-09 13:30:41

No Duplicates.



**Comment 12 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Garrick  
Last Name: Wahlstrand  
Email Address: garrickw100@gmail.com  
Affiliation:

Subject: carbon tax  
Comment:

I strongly support California leading the way by using a  
revenue-neutral carbon tax to reach to the goals of AB 32.

Attachment: [www.arb.ca.gov/lists/com-attach/14-proposed-sp-ws-BWAAaFwrAzkFcQZp.pdf](http://www.arb.ca.gov/lists/com-attach/14-proposed-sp-ws-BWAAaFwrAzkFcQZp.pdf)

Original File Name: Environmental-Tax-Reform-in-California-Economic-and-Climate-Impact-of...-1.pdf

Date and Time Comment Was Submitted: 2014-03-09 13:30:41

No Duplicates.



**Comment 13 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Hunt

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Keep the Global Warming Solutions Act strong!

Comment:

see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/17-proposed-sp-ws-BmRTNF0uVGUBZgl7.pdf](http://www.arb.ca.gov/lists/com-attach/17-proposed-sp-ws-BmRTNF0uVGUBZgl7.pdf)

Original File Name: BarbaraHunt.pdf

Date and Time Comment Was Submitted: 2014-03-11 12:53:32

No Duplicates.



**Comment 14 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Lester

Last Name: Snow

Email Address: [mrzo@resourceslegacyfund.org](mailto:mrzo@resourceslegacyfund.org)

Affiliation: California Water Foundation

Subject: Comment Letter on AB32 Scoping Plan Update

Comment:

Letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/18-proposed-sp-ws-WjlUPQNvUW9RMgFv.pdf](http://www.arb.ca.gov/lists/com-attach/18-proposed-sp-ws-WjlUPQNvUW9RMgFv.pdf)

Original File Name: Comment Letter on AB32 Scoping Plan Update (00244324xA1C15).pdf

Date and Time Comment Was Submitted: 2014-03-12 10:02:37

No Duplicates.



**Comment 15 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Climate Change Scoping Plan, First Update

Comment:

Attached are the comments of the Alliance of Automobile  
Manufacturers on the subject scoping plan.

Sincerely,  
Steve Douglas

Attachment: [www.arb.ca.gov/lists/com-attach/19-proposed-sp-ws-UmAANlJiUjUGLQY2.pdf](http://www.arb.ca.gov/lists/com-attach/19-proposed-sp-ws-UmAANlJiUjUGLQY2.pdf)

Original File Name: 2014-03-14 Alliance Scoping Plan Letter.pdf

Date and Time Comment Was Submitted: 2014-03-14 15:11:44

No Duplicates.



## **Comment 16 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Peter

Last Name: Fiekowsky

Email Address: pfieko@gmail.com

Affiliation: Citizens' Climate Lobby

Subject: Gradually increasing carbon tax will be effective & simple

Comment:

CCL did a study of a California carbon tax, starting at \$10/ton and increasing \$10/ton per year at least for 20 years. It provides an \$18 billion GDP increase, 300,000 new jobs, \$2500 annual income increase for the two lowest income quintiles, and a 31% reduction in emissions after 20 years.

This is a better result than any proposed cap and trade, both in terms of emissions and in economics. It is easier to implement, since we already have gas and utility taxes. Businesses like it a lot because it gives them predictability so they can plan their capital spending.

Please view the study at:

<https://drive.google.com/file/d/0B6bBWZVVtmXHSXFCc3VTTWo1bjA/edit?usp=sharing>

It was completed in March 2014.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-18 15:28:31

No Duplicates.



**Comment 17 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Lossy  
Email Address: ftlossy322@comcast.net  
Affiliation: physician

Subject: Climate Change Scoping Plan  
Comment:

Dear California Air Resources Board,

Thank you for accepting these comments on the Proposed First Update to the Climate Change Scoping Plan.

I believe that the Cap & Trade program can be improved by increasing the amount of allowances auctioned, reducing the free allowances to industrial emitters, and returning more revenues collected back to households as a dividend. The goal of a carbon pricing program should be to provide an economic incentive to Californians to change their economic behavior, not to build big infrastructure projects, which can be funded in other ways.

Sincerely yours,

Frank T.Lossy, M.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-19 22:14:49

No Duplicates.



## **Comment 18 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Kjell  
Last Name: Kühne  
Email Address: kjell.kuehne@gmail.com  
Affiliation:

Subject: Don't use forests from other countries as offsets!

Comment:

Please take out the "international forest-based offsets" aka REDD+.

The people in Mexico and elsewhere don't want to sell their forests to California's polluters to allow them to continue polluting. Pollution must stop. That's what everyone wants.

Even if government officials and companies and NGOs that hope to take part in the business tell you otherwise.

"Buying airtime" for polluters is no solution to the climate crisis.

REDD+ was stopped at the UN level for good reasons. Don't try to bring back this zombie.

No to REDD+.

P.S.: Allow me to share a piece of artwork to illustrate the point.

Attachment: [www.arb.ca.gov/lists/com-attach/23-proposed-sp-ws-AHJXNARhV2AKUwFu.jpg](http://www.arb.ca.gov/lists/com-attach/23-proposed-sp-ws-AHJXNARhV2AKUwFu.jpg)

Original File Name: REDD Offsets - a life saver for the Fossil Industry.jpg

Date and Time Comment Was Submitted: 2014-03-27 16:17:11

No Duplicates.



**Comment 19 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



## **Comment 20 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Jim  
Last Name: Downing  
Email Address: jbdown@gmail.com  
Affiliation: Private citizen

Subject: Fact on page 69: GHG emissions 70x greater from urban land than ag  
Comment:

Dear CARB,

Thank you for your excellent work on the updated scoping plan.

I request that the following sentence on page 69 of the Scoping Plan be removed or amended:

"Recent research has shown that GHG emissions from urban areas are approximately 70 times greater than those from agricultural lands on a per-acre basis."

While this sentence correctly cites peer-reviewed information (the 70x fact is from page 562 of Haden et al. 2013. Journal of Environmental Planning and Management 56(4):553-571), I contend that it is misleading, in that it greatly overstates the emissions cost associated with the conversion of agricultural land to urban land uses.

In calculating this 70:1 ratio, the authors count nearly all emissions related to human activities (all electricity and transportation emissions, for instance) as "belonging" to developed acreage, while emissions from agricultural land are calculated as only those emissions stemming from farming. Thus, on a per-acre basis, emissions from urban land are determined to be much greater than emissions from farmland.

The problem is that the urban emissions have very little to do with the fact that the urban land is covered with houses and businesses. Nearly all of the emissions arise from human activities (driving, using electricity, industrial activities, etc). If an acre of developed land was converted back to agriculture, those emissions would remain; the people who previously lived there would be continuing to conduct these activities, just in a different place. While higher-density development could reduce both electricity and transportation emissions somewhat, the net result would be nothing approaching a 70:1 reduction.

To close, I am commenting because I have now seen this misleading 70:1 figure cited in multiple places -- CARB could contribute to the understanding of the emissions implications of land use change by not repeating it, and by citing (or developing) a more realistic figure to replace it.

Disclosure: I am a consultant to environmental groups that generally favor the conservation of agricultural land. These comments are entirely my own.

Thank you,

Jim Downing  
Oakland, Calif.



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 13:40:50

No Duplicates.



**Comment 21 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: David  
Last Name: Schonbrunn  
Email Address: David@Schonbrunn.org  
Affiliation: TRANSDEF

Subject: Complete Comments  
Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/26-proposed-sp-ws-VzZVIQRnV1tVIFU2.pdf](http://www.arb.ca.gov/lists/com-attach/26-proposed-sp-ws-VzZVIQRnV1tVIFU2.pdf)

Original File Name: ARB Scoping Plan Update Comments w Attachments.pdf

Date and Time Comment Was Submitted: 2014-04-07 11:04:42

No Duplicates.



**Comment 22 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Connie  
Last Name: Gallippi  
Email Address: cmgallippi@caufc.org  
Affiliation: California Urban Forests Council

Subject: California Urban Forests Council Comments on Draft Proposed First Update to Scoping Plan  
Comment:

Attached please find our letter in support of the Draft Proposed  
First Update to the Scoping Plan.

Thank you.

Connie Gallippi  
California Urban Forests Council

Attachment: [www.arb.ca.gov/lists/com-attach/28-proposed-sp-ws-WilVMAFvUnEHaAVr.pdf](http://www.arb.ca.gov/lists/com-attach/28-proposed-sp-ws-WilVMAFvUnEHaAVr.pdf)

Original File Name: Scoping Plan\_First Update \_4.11.14.pdf

Date and Time Comment Was Submitted: 2014-04-11 16:44:17

No Duplicates.



**Comment 23 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: AGUSTIN

Last Name: AVILA ROMERO

Email Address: gustinavila@yahoo.com

Affiliation:

Subject: No a los proyecto REDD en Chiapas

Comment:

Pedimos que se respeten realmente a las comunidades y que se hagan consultas públicas de acuerdo al convenio 169 de la OIT...

(English translation attached)

Attachment: [www.arb.ca.gov/lists/com-attach/29-proposed-sp-ws-AGMBaAdrWGZVNgdp.pdf](http://www.arb.ca.gov/lists/com-attach/29-proposed-sp-ws-AGMBaAdrWGZVNgdp.pdf)

Original File Name: Comment - Avila Romero.pdf

Date and Time Comment Was Submitted: 2014-04-16 14:46:34

No Duplicates.



**Comment 24 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Jody

Last Name: London

Email Address: jody\_london\_consulting@earthlink.net

Affiliation: Local Gov't Sustainable Energy Coalition

Subject: LGSEC Comments RE Revised AB 32 Scoping Plan Update

Comment:

Please see attached comments of the Local Government Sustainable Energy Coalition on the Revised AB 32 Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/30-proposed-sp-ws-UmABN11tBGNWD1Ji.pdf](http://www.arb.ca.gov/lists/com-attach/30-proposed-sp-ws-UmABN11tBGNWD1Ji.pdf)

Original File Name: 2014\_04\_17 LGSEC Comments re AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2014-04-17 17:05:52

No Duplicates.



**Comment 25 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Staci  
Last Name: Heaton  
Email Address: sheaton@rcrcnet.org  
Affiliation: RCRC

Subject: RCRC Comments on the Draft Proposed First Update to the Scoping Plan  
Comment:

Please accept the attached comments of the Rural County  
Representatives of California on the Draft Proposed First update to  
the Scoping Plan, and contact me with any questions you may have.

Attachment: [www.arb.ca.gov/lists/com-attach/31-proposed-sp-ws-AmMGYlwCA2NQZAJd.pdf](http://www.arb.ca.gov/lists/com-attach/31-proposed-sp-ws-AmMGYlwCA2NQZAJd.pdf)

Original File Name: AB\_32\_Scoping\_Plan\_2014\_First\_Update\_Comments\_Ltr\_04172014.pdf

Date and Time Comment Was Submitted: 2014-04-18 13:38:40

No Duplicates.



**Comment 26 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Porteshawver  
Email Address: [aporteshawver@ci.benicia.ca.us](mailto:aporteshawver@ci.benicia.ca.us)  
Affiliation:

Subject: City of Benicia Comments to the Draft Proposed First Update to Scoping Plan  
Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/32-proposed-sp-ws-UjFSPQRxUHoGbwJk.pdf](http://www.arb.ca.gov/lists/com-attach/32-proposed-sp-ws-UjFSPQRxUHoGbwJk.pdf)

Original File Name: CityofBeniciaCommentsonScopingPlanUpdate.pdf

Date and Time Comment Was Submitted: 2014-04-21 16:03:08

No Duplicates.



**Comment 27 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Anthony  
Last Name: Andreoni  
Email Address: tandreoni@cmua.org  
Affiliation: CMUA

Subject: CMUA Comment Letter - Updated Scoping Plan  
Comment:

Please see our attached comment letter on the Updated Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/33-proposed-sp-ws-BWZcN1ElUGIEXVU2.pdf](http://www.arb.ca.gov/lists/com-attach/33-proposed-sp-ws-BWZcN1ElUGIEXVU2.pdf)

Original File Name: CMUA\_Comment\_Letter\_to\_ARB\_Updated\_Scoping\_Plan\_04\_21\_2014.pdf

Date and Time Comment Was Submitted: 2014-04-22 16:58:20

No Duplicates.



**Comment 28 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Mike  
Last Name: Sandler  
Email Address: [mike@carbonshare.org](mailto:mike@carbonshare.org)  
Affiliation: Carbon Share

Subject: Auction more permits, return more revenues to people  
Comment:

Thank you for accepting these comments on the Proposed First Update to the Climate Change Scoping Plan. ARB has the opportunity to improve the California program by increasing the amount of allowances auctioned, reducing the free allowances to industrial emitters, and returning more revenues collected back to households as a dividend.

Using funds on large infrastructure projects to reduce emissions may simply reduce the price of allowances, or change the relative price of emissions between sectors, but result in no net emission reduction because the reductions achieved only create space for new emissions from other sectors under the cap. In other words, the space below the cap created by the infrastructure investment is simply filled up by emissions in other sectors. A better use of funds is to return them to everyone equally, building a statewide constituency for a carbon price, altering perceptions of people's relationship to climate change and to each other, and addressing the regressive impacts of a carbon price. We are in this together, and we need an economic system that supports us as we make the transition.

Please see the attached comments for more information.  
Thank you for your consideration.  
Sincerely,

Mike Sandler  
[www.carbonshare.org](http://www.carbonshare.org)

Attachment: [www.arb.ca.gov/lists/com-attach/34-proposed-sp-ws-UjFVPFI+VGpXNFQ6.pdf](http://www.arb.ca.gov/lists/com-attach/34-proposed-sp-ws-UjFVPFI+VGpXNFQ6.pdf)

Original File Name: CommenttoARB4-23-14ScopPlan-Sandler.pdf

Date and Time Comment Was Submitted: 2014-04-23 19:10:53

No Duplicates.



## **Comment 29 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Harvey  
Last Name: Eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Ex Dir Public Solar Power Coalition

Subject: Total CA Solar Conversion by 2023/ or in 9 Years HE PSPC SC 119641 Eder v SCAQMD  
Comment:

This is part of Harvey Eder's submittal and for PSPC on the 5 year CARB Scoping Plan Review. Here in not Eder/PSPC incorporates by reference the entire record including the Clerks Transcript to Harvey Mark Eder vs SCAQMD ( South Coast Air Quality Management District & Barry Walerstein, and CARB (California Air Resources Board & Richard Cory et. al. SC 119641. This is official service for CARB etc Amended Complaint Filed

September 2013,  
This law suit directs by 2023 that the whole state of California be converted ITSC (Immediate Total Solar Conversion )This will clean the air of Global Warming and Criteria pollutants help the economy and the health of Ca citizens.

The clerks transcript is apx 600 pages in 3 volumes also transcripts court 3 reporter transcripts are herein incorporated into the record including all of Eder/PSPC and environmental groups submittals in the 2012 SCD Plan etc and since then.

The entire record of information example the 4/13/14 IPCC study written in the NY Times is incorporated herein in the record of the this law suit and comments to the scoping plan review as well as all submittals to date and in september 2014.

More comments will follow by Eder & PSPC before the 5pm 4/28/14 comment deadline etc.

& PSDPC Public Solar Power  
Coalition

etc. Harvey Eder 4/25/14 86 Ozone Nox and PM  
1223 Wilshire Blvd. # 667  
Santa Monica, CA. 90403 (310)3932589

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-25 13:41:01

No Duplicates.



**Comment 30 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation: CalChamber

Subject: Comments on Draft Proposed First Update to Scoping Plan

Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/37-proposed-sp-ws-AmFcO1QnV2YFXFUm.pdf](http://www.arb.ca.gov/lists/com-attach/37-proposed-sp-ws-AmFcO1QnV2YFXFUm.pdf)

Original File Name: CARB Scoping Plan Update 2013 CalChamber Comments 42514.pdf

Date and Time Comment Was Submitted: 2014-04-25 15:32:51

No Duplicates.



**Comment 31 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Ralph  
Last Name: Moran  
Email Address: moranrj1@bp.com  
Affiliation:

Subject: BP Comments on Scoping Plan Update  
Comment:

BP America Comments

Attachment: [www.arb.ca.gov/lists/com-attach/38-proposed-sp-ws-VjRcKlAOWGgKYwRp.pdf](http://www.arb.ca.gov/lists/com-attach/38-proposed-sp-ws-VjRcKlAOWGgKYwRp.pdf)

Original File Name: BP comment ltr on CARB Scoping Plan Update 4 14 final.pdf

Date and Time Comment Was Submitted: 2014-04-25 16:06:11

No Duplicates.



**Comment 32 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

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

Affiliation: California Compost Coalition

Subject: Support direct regulation of organic waste and Net-Zero

Comment:

CCC strongly supports the following programs as part of First Update to Scoping Plan:

- Direct regulation by CARB to prohibit/phase out landfilling of organic wastes with the goal of requiring initial compliance action in 2016.
- Produce carbon negative fuel for the hundreds heavy duty collection trucks that collect organic waste in California
- Develop Net-Zero recycling and composting facilities
- Mandate commercial organic waste collection starting in 2016
- Streamline the permitting of composting and anaerobic digestion facilities
- Support distributed renewable energy from biomass and biomethane development developed from organic wastes
- Utilize "cap-and-trade" revenue to assist in funding the above programs

Attachment: [www.arb.ca.gov/lists/com-attach/39-proposed-sp-ws-VTNUO1QnAiIFd1MM.pdf](http://www.arb.ca.gov/lists/com-attach/39-proposed-sp-ws-VTNUO1QnAiIFd1MM.pdf)

Original File Name: First Scoping Plan Update comments.pdf

Date and Time Comment Was Submitted: 2014-04-27 10:05:13

No Duplicates.



**Comment 33 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Brad  
Last Name: Heavner  
Email Address: brad@calseia.org  
Affiliation: CALSEIA

Subject: Comments on Scoping Plan Update  
Comment:

Attached please find comments of the California Solar Energy  
Industries Association on the Climate Change Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/40-proposed-sp-ws-VzQFYlc6UXEHZFQ9.pdf](http://www.arb.ca.gov/lists/com-attach/40-proposed-sp-ws-VzQFYlc6UXEHZFQ9.pdf)

Original File Name: CALSEIA comments on scoping plan update.pdf

Date and Time Comment Was Submitted: 2014-04-27 22:54:23

No Duplicates.



**Comment 34 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Mack  
Last Name: McFarland  
Email Address: mack.mcfarland@dupont.com  
Affiliation: The DuPont Company

Subject: Comments on the Draft Proposed First Update to Scoping Plan  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/41-proposed-sp-ws-VjJUIcmWWUGbgVx.pdf](http://www.arb.ca.gov/lists/com-attach/41-proposed-sp-ws-VjJUIcmWWUGbgVx.pdf)

Original File Name: DuPont Comments on CA scoping plan first update.pdf

Date and Time Comment Was Submitted: 2014-04-28 09:05:58

No Duplicates.



**Comment 35 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 36 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Wallauch  
Email Address: stw@platinumadvisors.com  
Affiliation: CTE

Subject: AB 32 Scoping Plan Update  
Comment:

Please find attached a coalition letter headed by the Center for Transportation and the Environment (CTE) in support of the Scoping Plan Update. I am submitting this letter on behalf of CTE.

Attachment: [www.arb.ca.gov/lists/com-attach/9-drafteaspu14-BWZQIgNnUV1WM1U6.pdf](http://www.arb.ca.gov/lists/com-attach/9-drafteaspu14-BWZQIgNnUV1WM1U6.pdf)

Original File Name: CTE Coalition\_ CARB Scoping Plan.pdf

Date and Time Comment Was Submitted: 2014-04-28 09:31:59

No Duplicates.



## **Comment 37 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Alexandra

Last Name: Maratou

Email Address: alexandra.maratou@shecco.com

Affiliation: Deputy Public Affairs Manager, shecco

Subject: Comments on Proposed First Update to Climate Change Scoping Plan -Addressing HFCs  
Comment:

shecco welcomes California's Proposed First Update to the Climate Change Scoping Plan and the consideration of measures to limit emissions of short lived climate pollutants (SLCPs), and in particular hydrofluorocarbons (HFCs), the fastest growing sector of greenhouse gas (GHG) emissions in California.

We also commend California Air Resources Board for envisioning the drawing up in 2015 of a detailed strategy to address short-lived climate pollutants including HFCs.

Additional measures on HFCs have the potential to position California among the world leading regions for innovation in and implementation of climate friendly technology with HFC-free natural refrigerants. A package of measures would be necessary for effectively reducing HFC emissions in California, including:

- Minimising refrigerant leakage from HFC systems (as in California's existing Refrigerant Management Program)
- Low-GWP use requirements that would ensure that high-GWP HFC-based equipment is no longer placed on the market in sectors where they are no longer necessary (where alternatives are commercially available)
- A phase-down (or phase-out) of HFCs with GWP > 150
- A fee on high-GWP HFCs (GWP > 150) that would among other things reduce the chances of overallocation of HFC quotas and windfall profits under an HFC phase down
- Measures Incentivising the reclamation and recycling of HFCs (and ODSs)

In the attached briefing we provide comments in relation to the specific type of measures for addressing HFCs and promoting the use of HFC-free technology, drawing examples and best practices from other world regions with similar measures already in place. In addition we highlight the links and synergies between action on HFCs and other cross-cutting issues in the draft update (green buildings, public procurement, support for households and businesses).

Attachment: [www.arb.ca.gov/lists/com-attach/44-proposed-sp-ws-AnEAblA0VGQHYIU6.pdf](http://www.arb.ca.gov/lists/com-attach/44-proposed-sp-ws-AnEAblA0VGQHYIU6.pdf)

Original File Name: shecco comments to California's Proposed First Update to the Climate Change Scoping Plan\_April 2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 09:54:06

No Duplicates.



## **Comment 38 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Ed  
Last Name: Pike  
Email Address: epike@energy-solution.com  
Affiliation: Energy Solutions

Subject: Support for Fuel Efficient Passenger Vehicle Replacement Tire Program  
Comment:

Richard Corey  
Executive Officer  
California Air Resources Board  
Sacramento, California

Subject: Proposed First Update to the AB32 Scoping Plan and in-use vehicle efficiency

Dear Mr. Corey:

Thank you for the opportunity to provide comments on the Proposed First Update to the Climate Change Scoping Plan (Proposed Update). We suggest short revisions regarding two topics.

The first topic is low rolling resistance (LRR) passenger vehicle replacement tires. We appreciate CARB's acknowledgement in the Proposed Update of the near term greenhouse gas (GHG) benefits. We estimate that the statewide benefits include a reduction of least three million metric tons CO<sub>2</sub>e annually and an Energy Solutions study commissioned by the South Coast AQMD shows avoided fuel cost benefits many times greater than costs.

We recommend several short revisions to the Proposed Update regarding this topic, starting with adding a potential implementation strategy based on text in the Transportation Working Paper (p.24) (shown underlined in the attached PDF comment letter):

p. 54: "Furthermore, commercially available technologies, such as low-rolling resistant tires for light-duty vehicles, can be utilized by both new and in-use vehicles in the near-term to achieve GHG emission reductions. In the short-term, improvements can be made to the efficiency of in-use vehicles including deployment of fuel efficient passenger vehicle replacement tires. Deployment could include limited incentives, followed by ratings and then standard setting to permanently shift the market."

Next, we recommend adding an action item to the "Key Recommended Actions for a Transportation System" Table (shown underlined in the attached PDF comment letter):

p.64: "CARB will assess potential in-use vehicle efficiency opportunities including passenger vehicle replacement tires." We also recommend, as noted in the attachment to our letter, clarifying that the original scoping plan included fuel efficient tires as part of Measure T-4.

Second, we recommend clarifying the plug-in electric vehicle off-peak charging recommendation in the table on page 64 to explicitly address renewables (shown underlined in the attached PDF comment letter): "...plug-in vehicle charging rates that strongly encourage off-peak charging and managed charging to facilitate



renewable energy uptake...".

We appreciate your consideration of our comments. Please contact me or have your staff contact me at epike@energy-solution.com or (510) 482-4420 x239 if you have any questions.

Sincerely,

Ed Pike, P.E.  
Senior Project Manager

Note: please see PDF for this comment submittal for full letter including test shown with underline and attachment to the letter

Attachment: [www.arb.ca.gov/lists/com-attach/45-proposed-sp-ws-VjMAaAZiWXhRMAhx.pdf](http://www.arb.ca.gov/lists/com-attach/45-proposed-sp-ws-VjMAaAZiWXhRMAhx.pdf)

Original File Name: Energy Solutions comment AB32\_scoping plan proposed updateApril 25 2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 10:44:08

No Duplicates.



**Comment 39 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Marsom

Email Address: Matthew.Marsom@phi.org

Affiliation: Public Health Institute

Subject: Comments on Draft Proposed First Update to Climate Change Scoping Plan

Comment:

Please accept my comments on behalf of the Public Health Institute  
on the Draft Proposed First Update to the Climate Change Scoping  
Plan.

Sincerely,

Matthew Marsom

Attachment: [www.arb.ca.gov/lists/com-attach/10-drafteaspu14-AmMBZVYIWtkGMgRb.pdf](http://www.arb.ca.gov/lists/com-attach/10-drafteaspu14-AmMBZVYIWtkGMgRb.pdf)

Original File Name: AB 32 Scoping Update PHI Comments 2014-04-28.pdf

Date and Time Comment Was Submitted: 2014-04-28 10:24:38

No Duplicates.



**Comment 40 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Rachael

Last Name: Koss

Email Address: rkoss@adambroadwell.com

Affiliation: Adams Broadwell Joseph & Cardozo

Subject: Proposed Update Comments of CURE

Comment:

Attached please find the Proposed Update Comments of CURE.

Attachment: [www.arb.ca.gov/lists/com-attach/47-proposed-sp-ws-UWBVZVVgVjEKIQIy.pdf](http://www.arb.ca.gov/lists/com-attach/47-proposed-sp-ws-UWBVZVVgVjEKIQIy.pdf)

Original File Name: 1644-038cv - Proposed Update Comments of CURE.pdf

Date and Time Comment Was Submitted: 2014-04-28 11:06:33

No Duplicates.



## **Comment 41 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Lila

Last Name: Rubenstein

Email Address: lila.rubenstein@berkeley.edu

Affiliation: University of California, Berkeley

Subject: Agriculture Section of Scoping Plan Should Focus on Immediately Actionable Solutions

Comment:

Dear Members of the California Air Resources Board,

I am writing to submit my comments on the Scoping Plan Amendments for AB 32, the California Global Warming Solutions Act. Specifically, I would like to remark on your recommended actions and next steps for the agriculture sector, which comprises a significant portion of California's economy.

The agriculture sector is a \$45 billion dollar industry that generates about \$100 billion in related economic activity (1). Given its substantial scale and the impending threats to agriculture from climate change (as evidenced by the crippling drought the state is currently experiencing), as well as California's unique position as a leader in innovative technologies that may be adopted nation-wide, there is much to be gained by farmers, ranchers, and the state as a whole from reducing overall greenhouse gas emissions (GHG) within this sector.

The current proposed updates to the Scoping Plan include voluntary measures to reduce GHG emissions, such as the adoption of manure digesters, soil management practices, improvements to water and fuel use practices, land use planning, and others. However, as a whole, the Scoping Plan is lacking in specificity, and is missing detailed information on actionable solutions that can be incorporated into farming and ranching practices.

In the short term, farmers and ranchers can adopt immediate, low-tech, and cost-effective measures that will reduce GHG emissions. In particular, measures could focus on reducing methane gas from livestock production and nitrous oxide from the usage of nitrogen-based chemical fertilizers. Together, methane and nitrous oxide comprise approximately 80 percent of GHG emissions from agriculture in the US (2). Below, I outline possible strategies for reducing both methane and nitrous oxides through simple adaptations of farming and ranching practices.

Methane Gas (CH<sub>4</sub>)

Methane is the second most prevalent GHG emitted from human activities in the US. Although methane has a relatively short lifetime in the atmosphere, its comparative impact pound for pound is over 20 times greater than carbon dioxide over a 100-year period (3). After natural gas and petroleum systems, methane from domestic livestock constitutes the second largest source of emissions from all other sectors including landfills, mining, wastewater treatment, and others (3). Domestic livestock naturally produce large amounts of methane as part of their normal digestive process. Methane is also produced when animal manure is kept or stored in lagoons or holding tanks.

The Scoping Plan Update highlights the use of manure digesters—a voluntary measure—as its main strategy for reducing methane emissions. Manure digesters capture methane from storage ponds or



lagoons and subsequently use this captured methane to produce energy or renewable fuel. In the long term, the use of manure digesters represents an innovative and valuable solution. However, as acknowledged in the Scoping Plan Update, there are many obstacles to implementing their use on a wide scale (4). For one, as a voluntary strategy, purchasing and installing the technology is extremely cost prohibitive – manure digesters often cost as much as three million dollars – and actually obtaining one entails a lengthy and often confusing permitting process (5). One livestock producer stated that "getting a digester in [California] takes an act of God" (5). The California Air Resources Board (CARB) has committed to incentivizing and removing obstacles to digester installation. However, in the interim, greater focus should be placed on low-tech fixes and improved feed and land use management practices that reduce methane gas emissions from livestock.

One simple fix that CARB can and should highlight for farmers and ranchers is the improvement of livestock diets. Supplementing cattle feed with grains, high quality fats, and more digestible fodder such as silage (a fermented feed) and legume hay can help to reduce methane production in the animals' digestive processes (5). Livestock producers can also complement cattle feed with high quality fats (such as edible vegetable oils) in order to reduce methane emissions. According to one study, supplemental high quality fats may reduce emissions by almost 4 percent by inhibiting the rumen bacteria in the animals' gut (6).

Another approach is to ensure that cattle have access to high-quality pasture as opposed to mature grass – one study found a 50 percent reduction in methane emissions from livestock that grazed high-quality pasture grasses (7). One technique that ensures livestock have access to high-quality pasture grasses that have not been overgrazed is a practice known as Managed Intensive Rotational Grazing (MIRG). Adopted by many farmers globally, MIRG is a grazing management system in which pasturelands are divided into numerous paddocks or cells, and selectively grazed. This practice allows ranchers to selectively manage the timing and intensity of defoliation (8). Lastly, incorporating legume grasses into pastures can also have significant effects on methane emissions—cattle raised on legume-grass pastures emitted 25 percent less methane than animals raised on grass-only pastures (9). Through a variety of low-cost, low-tech feed supplementation and pasture management strategies, long-term methane reductions may be achieved starting immediately.

Although further research is required to identify optimal livestock diets and supplements, these relatively simple first steps aimed at livestock producers should be included in the Scoping Plan in order to reduce methane emissions. To be effective, these strategies must be widely communicated and financially incentivized. If these suggestions rely solely on voluntary action, it is likely that farmers and ranchers will not change their feed practices.

#### Nitrous oxide (N<sub>2</sub>O)

Agricultural soil management is the largest source of nitrous oxide emissions in the United States and accounted for almost 70 percent of total US nitrous oxide emissions in 2011 (10). The impact of 1 pound of nitrous in terms of atmospheric warming is over 300 times that of 1 pound of carbon dioxide (10). Nitrous oxide is emitted when farmers add nitrogen to the soil through the use of synthetic fertilizers. Farmers can use a variety of fertilizer and soil management practices to reduce these emissions. Most farmers routinely over-fertilize their crops hoping to increase yields, fearing that under-use will lessen overall crop production (5). However, when farmers over-fertilize, the unused nitrogen in the soil can form nitrous oxide. In order to reduce the formation of nitrous oxide from over-fertilized fields, farmers can time fertilizer applications for key growth phases of the crop, reduce reliance on synthetic fertilizers through the use of nitrogen fixing crops such as legumes, and explore the adoption of new



tilling practices, including no-till methods. Reducing tillage has been shown to decrease nitrous oxide emissions (11). Another low-tech improvement that may be employed is the use of drip irrigation practices in which liquid fertilizers are mixed with water. This method decreases nitrous oxide emissions through a more efficient delivery system of fertilizer to the plant roots through the irrigation system (5).

## Conclusion

While the current Scoping Plan Update outlines promising future research in the agricultural sector, there is a need to include more immediately actionable next steps that farmers and ranchers can adopt. The main strategies outlined for GHG emission reductions are mainly voluntary practices, such as the adoption of a manure digester, which is cost-prohibitive and logistically challenging. Other approaches in areas such as nitrogen management, soil management practices, water and fuel use, and land use planning, to name a few, are lacking in detail. Farmers and ranchers should be educated and financially incentivized to make use of low-cost, low-tech, immediately actionable strategies to reduce emissions of methane and nitrous oxide.

By focusing on so-called 'low-hanging fruit,' CARB has an opportunity to strengthen recommendations and next steps for reducing GHG emissions in California's agricultural sector, as well as demonstrating innovative leadership that may be followed nation-wide and globally.

Respectfully yours,

Lila Rubenstein, MPH Candidate  
School of Public Health/ University of California, Berkeley  
Environmental Health Sciences Division

## Sources

1. CDFA. California Department of Food and Agriculture History. California Department of Food and Agriculture (2014). at
2. Paustian, K., Antle, J. M., Sheehan, J. & Paul, E. A. Agriculture's role in greenhouse gas mitigation. (2006).
3. US EPA. Methane Emissions. Overview of Greenhouse Gases (2013). at
4. California Air Resources Board. Proposed First Update to the Climate Change Scoping Plan: Building on the Framework. (2014). at
5. Elkind, E. N. Room to Grow: How California Agriculture Can Help Reduce Greenhouse Gas Emissions. (University of California, Berkeley Law School, 2010). at
6. Moate, P. J. et al. Influence of cold-pressed canola, brewers grains and hominy meal as dietary supplements suitable for reducing enteric methane emissions from lactating dairy cows. Animal Feed Science and Technology 166-167, 254-264 (2011).
7. National Sustainable Agriculture Coalition. Agriculture & Climate Change: Impacts and Opportunities at the Farm Level. (2009). at
8. Badgery, W. B., Cranney, P., Millar, G. D., Mitchell, D. & Behrendt, K. Intensive rotational grazing can improve profitability and environmental outcomes. in Proceedings of the 27th annual conference of the Grassland Society of NSW Inc.'. Wagga Wagga.(Eds C Harris, G Lodge, C Waters) pp 85-91 (2012).
9. Ominski, K. H., Boadi, D. A., Wittenberg, K. M., Fulawka, D. L. & Basarab, J. A. Estimates of enteric methane emissions from cattle in Canada using the IPCC Tier-2 methodology. Canadian Journal of Animal Science 87, 459-467 (2007).
10. US EPA, C. C. D. Nitrous Oxide Emissions. Overview of Greenhouse Gases (2014). at



11. Omonode, R. A., Smith, D. R., Gál, A. & Vyn, T. J. Soil Nitrous Oxide Emissions in Corn following Three Decades of Tillage and Rotation Treatments. Soil Science Society of America Journal 75, 152 (2011).

Attachment: [www.arb.ca.gov/lists/com-attach/11-drafteaspu14-BnRQIwZlUWcEbANw.pdf](http://www.arb.ca.gov/lists/com-attach/11-drafteaspu14-BnRQIwZlUWcEbANw.pdf)

Original File Name: Rubenstein\_ScopingPlan.pdf

Date and Time Comment Was Submitted: 2014-04-28 10:38:13

No Duplicates.



**Comment 42 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Jodean  
Last Name: Giese  
Email Address: jodean.giese@ladwp.com  
Affiliation: LADWP

Subject: LADWP Comments - Draft Scoping Plan Update  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/49-proposed-sp-ws-BWlcO1cyUXUEclcl.pdf](http://www.arb.ca.gov/lists/com-attach/49-proposed-sp-ws-BWlcO1cyUXUEclcl.pdf)

Original File Name: LADWP Comments on Draft Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2014-04-28 12:18:40

No Duplicates.



**Comment 43 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Tara

Last Name: Thronson

Email Address: tara.thronson@valleyvision.org

Affiliation:

Subject: Broadband Infrastructure as a Greenhouse Gas Emission Reduction Strategy

Comment:

Please find attached Valley Vision's comments regarding the Draft  
Proposed First Update to the Climate Change Scoping Plan.

Best regards,  
Tara Thronson

Attachment: [www.arb.ca.gov/lists/com-attach/50-proposed-sp-ws-UCNSN10zWXoDbFU7.pdf](http://www.arb.ca.gov/lists/com-attach/50-proposed-sp-ws-UCNSN10zWXoDbFU7.pdf)

Original File Name: ScopingPlan\_VV\_Comments\_042814\_FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-28 12:49:18

No Duplicates.



**Comment 44 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Nussbaumer

Email Address: enussbaumer@fwwatch.org

Affiliation: Food & Water Watch

Subject: Do Not Allow REDD+ Offsets

Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/51-proposed-sp-ws-B3VSMQRhBzBQCQVa.pdf](http://www.arb.ca.gov/lists/com-attach/51-proposed-sp-ws-B3VSMQRhBzBQCQVa.pdf)

Original File Name: REDD+ Offsets Comment .pdf

Date and Time Comment Was Submitted: 2014-04-28 13:06:47

No Duplicates.



**Comment 45 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding ARB's Scoping Plan Update  
Comment:

Good Afternoon,

Attached please find comments submitted on behalf of the AB 32 Implementation Group on the ARB's Scoping Plan Update.

Should you have any questions or need anything further, please feel free to contact me.

Attachment: [www.arb.ca.gov/lists/com-attach/52-proposed-sp-ws-UDlcPQBeBSUCdAdy.pdf](http://www.arb.ca.gov/lists/com-attach/52-proposed-sp-ws-UDlcPQBeBSUCdAdy.pdf)

Original File Name: IG\_SPU Final Comments\_4\_28\_14.pdf

Date and Time Comment Was Submitted: 2014-04-28 13:34:19

No Duplicates.



**Comment 46 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Brandon

Last Name: Bullock

Email Address: [bbullock@octa.net](mailto:bbullock@octa.net)

Affiliation: Orange County Transportation Authority

Subject: OCTA Comments: Proposed Update to Scoping Plan  
Comment:

Please see attached letter from Orange County Transportation  
Authority CEO Darrell Johnson

Attachment: [www.arb.ca.gov/lists/com-attach/53-proposed-sp-ws-UWUCKQMwUjklIAQ1.pdf](http://www.arb.ca.gov/lists/com-attach/53-proposed-sp-ws-UWUCKQMwUjklIAQ1.pdf)

Original File Name: 4-28-14 ARB Scoping Plan-Comment.pdf

Date and Time Comment Was Submitted: 2014-04-28 13:33:57

No Duplicates.



**Comment 47 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Van Brunt  
Email Address: mvanbrunt@covanta.com  
Affiliation: Covanta

Subject: Comments on the draft proposed first update to the scoping plan  
Comment:

Please see attached PDF file for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/54-proposed-sp-ws-WmgGMAQ0A2QELwIy.pdf](http://www.arb.ca.gov/lists/com-attach/54-proposed-sp-ws-WmgGMAQ0A2QELwIy.pdf)

Original File Name: 2014-04 CVA Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:34:48

No Duplicates.



**Comment 48 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Lucas  
Email Address: bob.lucas@calobby.com  
Affiliation: CCEEB

Subject: CCEEB Comments to the Draft Proposed First Update to Scoping Plan  
Comment:

Attached are CCEEB comments. If you have a questions, please  
contact Bob Lucas at 916-444-7337.

Attachment: [www.arb.ca.gov/lists/com-attach/55-proposed-sp-ws-UDNSN105UWdWMglW.pdf](http://www.arb.ca.gov/lists/com-attach/55-proposed-sp-ws-UDNSN105UWdWMglW.pdf)

Original File Name: CCEEB comments re Draft Proposed First Update to Scoping Plan.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:28:18

No Duplicates.



**Comment 49 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Amy

Last Name: Kyle

Email Address: [adkyle@berkeley.edu](mailto:adkyle@berkeley.edu)

Affiliation:

Subject: Avoid Environmental and Occupational Health Impacts of New Technologies

Comment:

Please find comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/56-proposed-sp-ws-BWZUPQBsUmwEZ1Q6.pdf](http://www.arb.ca.gov/lists/com-attach/56-proposed-sp-ws-BWZUPQBsUmwEZ1Q6.pdf)

Original File Name: Comments.AB32Scoping.Revision.04.28.14.adk.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:45:34

No Duplicates.



**Comment 50 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Gustavo

Last Name: Castro

Email Address: guscastro@otrosmundoschiapas.org

Affiliation:

Subject: Declaración del Movimiento Redeldía de los Montes Azules

Comment:

Declaración del Movimiento Redeldía de los Montes Azules

Attachment: [www.arb.ca.gov/lists/com-attach/57-proposed-sp-ws-BmVROAdrU3UKYgVs.pdf](http://www.arb.ca.gov/lists/com-attach/57-proposed-sp-ws-BmVROAdrU3UKYgVs.pdf)

Original File Name: Comunicado Redeldía y fotos, Encuentro Montes Azules.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:48:32

No Duplicates.



**Comment 51 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Sam

Last Name: Emmersen

Email Address: sam@betterworldgroup.com

Affiliation: Global Warming Action Coalition

Subject: Support for Planning for GHG Emissions Reductions After 2020

Comment:

Attached please find a letter of support on behalf of the Global Warming Action Coalition (GWAC) for CARB to begin planning for GHG emission reductions beyond 2020 through the Scoping Plan update, including the recommendation that the state adopt a "midterm" limit for statewide GHG emissions in 2030.

Attachment: [www.arb.ca.gov/lists/com-attach/58-proposed-sp-ws-UDcBcAFhUGBRCFQ4.pdf](http://www.arb.ca.gov/lists/com-attach/58-proposed-sp-ws-UDcBcAFhUGBRCFQ4.pdf)

Original File Name: GWAC letter on post-2020 April 2014 FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:51:32

No Duplicates.



**Comment 52 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on Draft Proposed Update AB 32 Scoping Plans  
Comment:

Please see attached Comments on Draft Proposed Update AB 32 Scoping  
Plans.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/59-proposed-sp-ws-UiVSJ1IjUmALUgVm.pdf](http://www.arb.ca.gov/lists/com-attach/59-proposed-sp-ws-UiVSJ1IjUmALUgVm.pdf)

Original File Name: WSPA Comments on Draft Proposed Update AB32 Scoping Plans.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:09:31

No Duplicates.



**Comment 53 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Wendy

Last Name: Strack

Email Address: wstrack@sanbag.ca.gov

Affiliation: San Bernardino Associated Governments

Subject: Comments on the Proposed Scoping Plan Update

Comment:

AB 32 Scoping Plan Update Comment letter by the San Bernardino  
Associated Governments.

Attachment: [www.arb.ca.gov/lists/com-attach/60-proposed-sp-ws-WzpWMgRaAGBVYQRb.pdf](http://www.arb.ca.gov/lists/com-attach/60-proposed-sp-ws-WzpWMgRaAGBVYQRb.pdf)

Original File Name: AB 32 Scoping Plan Update Comments.pdf

Date and Time Comment Was Submitted: 2014-04-28 14:18:53

No Duplicates.



## **Comment 54 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Harvey  
Last Name: Eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Ex Dir PSPC Public Solar Power Coalition

Subject: Immediate Total Solar Conversion by 2020 or 23 (Nox EPA REQ.SIP) 5 Or 9 yea HE PSPC  
Comment:

Harvey Eder  
Executive Director PSPC Public Solar Power Coalition  
1223 Wilshire Blvd. #667  
Santa Monica, CA 90403  
(310) 3932589

Thank you for your input.

Your comment as shown below has been forwarded to the Clerk of the Board. Posted comments will appear in the Comments Log.

A copy of this submittal is being sent to the email address you provided. If you don't receive this email, then you may have incorrectly entered your email address. For more information, please see our disclaimer.

We recommend that you print this page for your records.

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Comment for drafteaspul4 (Non-Reg).

CONTACT INFORMATION:  
First Name: Harvey  
Last Name: Eder  
Email: harveyederpspc@yahoo.com  
Phone: (310) 3932589  
Affiliation: Pt 2 Ex Dir Public Solar Power Coalition  
File (i.e., Attachment):

Subject: Total CA Solar Conversion by 2023 or in 9 Years HE PSPC SC  
119641 Eder v SCAQMD et. al.  
Comment:

This is Part 2 of Comments. Part 1 was written on April 25, 2014 and submitted both for Comment 29 For Draft Proposed First Update To The Climate Change Scoping Plan and to The Draft Environmental Analysis Prepared For Proposed First Update To The Climate Change Scoping Plan ...Today is Monday April 28,2014

T^he Environmental Analysis is Illegal and not a sick bird rather a bird...

Solar Energy makes the wind blow the water flow and the plants grow  
. It is the engine of our ecosystem. It's the way things work.



Solar systems have become life cycle cost effective as the costs of systems and interest rates have declined in recent years.

CARB approved on Dec 25, 2012 the SCAQMD South Coast Air Quality Management Districts December 2012 Air Quality Management Plan. This is illegal and fattening. Both SCD and CARB as well as San Joaquin District and the Bay Area District as well as the rest of the State must be converted to IMMEDIATE TOTAL SOLAR ENERGY BY 2020

AS SOON AS POSSIBLE. WE (THE REGAL WE) HAVE BEEN IN TOUCH WITH epa

AND WILL OPPOSE THE 2012 SIP AND DISTRICTS PLANS THAT ARE NOT IMMEDIATE TOTAL SOLAR CONVERSION PLANS & IMPLEMENTATIONS.

In the State of CA Supreme Court Case of SCAQMD v Coatings Association of 2012 the SCD won and established that BACT Best Available Retrofit Control Technology is a technology forcing law and while solar is life cycle cost effective now it will be more so by 2020 and must be required to be retrofitted now for building and for processes as well as electric vehicles in the state.

While the current peak electricity load is approx. 60 GW Gigawatts a total of 180 GW Gigawatts peak will be needed to convert to solar electric vehicles and hydrogen electric either fuel cells electrolysis of water to hydrogen or hydrogen directly which work at from 50-80% efficiency and can store solar energy daily weekly months seasonally or for years.

CPUC ordering plus 1 GW of Storage is a modest start but we will need approx 180 GW Hours plus to convert CA.

AB32 and other parts of CA law require CARB etc to convert to Solar

Renewables ASAP by 2020. The law says thou shalt implement the best technology that is possible that is cost effective which solar is. Incorporated herein by reference is State Health and safety code 3800 as well as 40404.5 and 40405 and 40406 ie as SCD Solar conversion (immediate) and implementation plan as well as other District and the CA

State Implementation Plan. Districts use low NOx burners as BACT etc to can use Solar as BACT BACT etc now. Do it already.

US DOE Department of Energy Sunshot will have solar electricity at 5 cents per KWH by 2020 no question do it now...

ITSC using CHP Combined Solar Heat and Cooling (absorption chillers district heating and cooling and PV and thermal systems or hybrids

are cost effective now (also remember CA Supreme Tech Forcing Solar 5 cents by 2020.

PG&E went bankrupt and Commissioner Florio told me that Senator Pro Tem John Burton put together a deal what the state would buy out their T &

D transmission and distribution system for \$1 but even thought this was a go with a republican governor and was good for a

few weeks it fell through. But they are going BK in when the shareholders have to pay for a minimum of 250,000 year of storage

of nuclear waste as well as bankruptcy for SCE and SDG&E and Sempra Dirty Gas is 80-100 plus times the GWP global warming potential impact compared to CO2 must be 896 dirty gas care and as all

heat etc, etc, more to come ...



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 15:14:29

No Duplicates.



**Comment 55 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Conant

Email Address: jconant@foe.org

Affiliation: Friends of the Earth

Subject: Comments to scoping plan: do not risk including REDD credits in AB32

Comment:

Please see our comments, attached:

While we strongly support the overall goals and the implementation plan of AB32, we remain concerned that the use of offsets detracts from the overall objective of reducing emissions, and results in a diverse array of perverse impacts. Our comments focus on the possible inclusion of REDD-offsets within California's cap and trade program, as referred to in the draft scoping plan (pg. 95 and pg. 140). We strongly urge ARB not to consider an international REDD program, for the reasons enumerated in the body of our comments.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/62-proposed-sp-ws-UjRUIFU9BTMHbwFl.pdf](http://www.arb.ca.gov/lists/com-attach/62-proposed-sp-ws-UjRUIFU9BTMHbwFl.pdf)

Original File Name: Friends of the Earth CARB scoping plan comments April2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:13:45

No Duplicates.



**Comment 56 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Yasuhisa

Last Name: Kumada

Email Address: yasuhisa.kumada@daikinus.com

Affiliation:

Subject: Comments to ARB Scoping Plan Update

Comment:

Please see the attached comment letter from Daikin U.S. Corporation  
to the ARB's Scoping Plan Update. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/63-proposed-sp-ws-AmYAZ1Q8UmpSPQNt.pdf](http://www.arb.ca.gov/lists/com-attach/63-proposed-sp-ws-AmYAZ1Q8UmpSPQNt.pdf)

Original File Name: daikin\_scoping plan\_comments\_final.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:20:27

No Duplicates.



**Comment 57 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on Draft Proposed First Update to the Scoping Plan  
Comment:

PG&E Comments on Draft Proposed First Update to the Scoping Plan

Attachment: [www.arb.ca.gov/lists/com-attach/64-proposed-sp-ws-VydSMwRaVmAAWQBj.pdf](http://www.arb.ca.gov/lists/com-attach/64-proposed-sp-ws-VydSMwRaVmAAWQBj.pdf)

Original File Name: PG&E Comments on Proposed First Update to Scoping Plan.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:29:49

No Duplicates.



**Comment 58 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Will

Last Name: Barrett

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

Affiliation: American Lung Association in California

Subject: Public Health and Environmental Coalition Comments on Draft Scoping Plan Update  
Comment:

Please see the attached comments on the draft Scoping Plan Update  
sectors on behalf of health and environmental member organizations  
of the Global Warming Action Coalition.

Attachment: [www.arb.ca.gov/lists/com-attach/65-proposed-sp-ws-VyRdOAFvVXZRPgNt.pdf](http://www.arb.ca.gov/lists/com-attach/65-proposed-sp-ws-VyRdOAFvVXZRPgNt.pdf)

Original File Name: Scoping Plan Update Comments 4.28.14.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:10:37

No Duplicates.



**Comment 59 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Adam R.

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation:

Subject: SCE Comments on the Scoping Plan Update

Comment:

SCE Comments on the Scoping Plan Update (Attached).

Attachment: [www.arb.ca.gov/lists/com-attach/66-proposed-sp-ws-VyRcOVYyWFRWIght.pdf](http://www.arb.ca.gov/lists/com-attach/66-proposed-sp-ws-VyRcOVYyWFRWIght.pdf)

Original File Name: SCE Response to Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2014-04-28 15:39:29

No Duplicates.



**Comment 60 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Laurie

Last Name: Wayburn

Email Address: lwayburn@pacificforest.org

Affiliation:

Subject: Comments of the Pacific Forest Trust on the draft Scoping Plan

Comment:

Please find the comments of the Pacific Forest Trust on the draft  
Scoping Plan in the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/68-proposed-sp-ws-UWNUYINjUjUCNAcz.docx](http://www.arb.ca.gov/lists/com-attach/68-proposed-sp-ws-UWNUYINjUjUCNAcz.docx)

Original File Name: 20140428 SP PFT Comment Letter FINAL.docx

Date and Time Comment Was Submitted: 2014-04-28 15:46:27

No Duplicates.



**Comment 61 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Allis

Last Name: Druffel

Email Address: [allis@interfaithpower.org](mailto:allis@interfaithpower.org)

Affiliation: California Interfaith Power & Light

Subject: Faith Comments on AB 32 Scoping Plan Update Draft  
Comment:

Hello,

Please see attached letter signed by eight organizations in regards to comments for the AB 32 Scoping Plan Update Draft. If there are any questions, please do not hesitate to contact me.

Thank you.

Allis Druffel

Southern California Outreach Director

California Interfaith Power & Light

Attachment: [www.arb.ca.gov/lists/com-attach/12-drafteaspu14-VTRRNVYIAGBQZABf.pdf](http://www.arb.ca.gov/lists/com-attach/12-drafteaspu14-VTRRNVYIAGBQZABf.pdf)

Original File Name: AB 32 SP Update Faith Comments 04.28.14.pdf

Date and Time Comment Was Submitted: 2014-04-28 12:19:25

No Duplicates.



**Comment 62 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Danielle

Last Name: Blacet

Email Address: danielleb@acwa.com

Affiliation: Association of California Water Agencies

Subject: Proposed First Update to the Climate Change Scoping Plan

Comment:

Please accept the attached comments from the Association of California Water Agencies (ACWA) on the Proposed First Update to the Climate Change Scoping Plan.

Thank you.

Danielle Blacet

Attachment: [www.arb.ca.gov/lists/com-attach/13-drafteaspu14-WjtXMwNdA2NWYgFe.pdf](http://www.arb.ca.gov/lists/com-attach/13-drafteaspu14-WjtXMwNdA2NWYgFe.pdf)

Original File Name: AB 32 Comments 042814.pdf

Date and Time Comment Was Submitted: 2014-04-28 12:23:58

No Duplicates.



**Comment 63 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



## **Comment 64 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Vanessa  
Last Name: Raditz  
Email Address: vraditz@berkeley.edu  
Affiliation: UC Berkeley School of Public Health

Subject: Include Urban Agriculture in the AB32 Scoping Plan Update  
Comment:

Vanessa Raditz  
Master of Public Health Candidate  
Environmental Health Sciences  
University of California, Berkeley  
vraditz@berkeley.edu

April 28, 2014

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

Subject: Include Urban Agriculture in the AB32 Scoping Plan Update

Re: Public Comment on AB32 Scoping Plan Update

Summary: The Scoping Plan Update for AB32 has taken important steps in recognizing the importance of agriculture and working lands for carbon mitigation and other co-benefits. The plan could be further improved by including urban agriculture. The following comment is broken into three sections, as follows:

- 1) Including urban agriculture could for reductions in greenhouse gas emissions from localizing food production, as a carbon sink, and as a bioremediator for other short-lived climate pollutants, along with other co-benefits for public health and city planning.
- 2) Including urban agriculture in the scoping plan could incorporate policy initiatives the state has already passed.
- 3) CARB should consider actions for legalizing and incentivizing urban agriculture, funding urban agriculture in environmental justice communities, and consider penalties for the conversion of urban agricultural land into development projects as a part of climate mitigation and co-benefit strategies.

- 1) Including urban agriculture in the scoping plan would contribute to reductions from GHG and short-lived climate pollutants, and incorporate more public health and city planning co-benefits such as land conservation and environmental justice, all of which are described in other sections of the scoping plan:

Greenhouse gas reductions

The scoping plan outlines the GHG reduction impacts of agricultural land, such as the research showing that "agriculture can also be a carbon sink, where carbon is stored (sequestered) in both crops and soil" (pg 65). However, the scoping plan could be improved by looking at the potential for GHG reductions from urban agriculture projects. The scoping plan should evaluate the direct GHG carbon sequestration from urban agriculture projects since trees, vegetation, and un-paved soil all have carbon sink properties. The scoping plan should also evaluate the indirect impacts from



incorporating urban agriculture with green zone and smart growth city planning strategies to reduce energy consumption. Finally, the scoping plan should evaluate the GHG gas emissions reductions from localized food systems, including sustainable production, cooling and refrigeration, food waste minimization and reduced transportation from agricultural delivery systems.

- o Policy suggestions: Legalize and incentivize urban agriculture
- o Allow urban agriculture projects to claim credits for moving us towards our climate goal.

#### Short-lived climate pollutant reductions

One of the most important new components to the scoping plan is the attention to mitigation of short-lived climate pollutants. The ARB recognizes that reducing these chemicals can have a faster impact on climate change, and will also have many co-benefits in terms of public health. The scoping plan acknowledges how urban forestry can have an impact on both GHG reduction and remediation of air quality. Vegetation from urban agriculture acts as a passive filter effect on short-lived climate pollutants and reduces the production of these compounds from reduction of diesel delivery systems.

- o Policy suggestion: Fund and support research into the carbon sequestration and short-lived climate pollutant remediation effects of urban agriculture, and methods that enhance these functions.

#### Co-Benefits for public health and city planning

The AB32 Scoping Plan Update includes more extensive consideration of the co-benefits of GHG reduction strategies. For instance, it explains that "efforts to reduce GHG emissions and enhance carbon sequestration on natural and working lands also have significant economic, social, and environmental co-benefits" (pg 78). There are many public health benefits to urban agriculture, particularly for nutrition and food security, but also for environmental remediation. Additionally, there are many city planning co-benefits, including organic waste management, biodiversity, microclimate control (combats heat island effect), urban greening, economic revitalization, strengthens communities and social capital, cultural heritage, and education.

- o Policy suggestion: Fund and support place-based public health and city planning initiatives into the co-benefits of urban agriculture for transportation, energy use, water use, air quality, nutrition, and health.

#### Conservation of Agricultural Land

The current scoping plan focuses on the necessity for the conservation of agricultural lands and forests. It states that "local and regional land use planning actions and policies need to more fully integrate and emphasize land conservation and avoided conversion of croplands, forests, rangelands, and wetlands—as well as expansion and promotion of urban forestry and green infrastructure" (pg 78), and that "this could be accomplished by using incentives for conservation easements, supporting urban growth boundaries, and maintaining agricultural zoning" (pg 65). Urban agriculture faces the same problem of economic pressures to convert the land to development, and similar strategies such as easements could be effective in the conservation of these urban open spaces.

- o Policy Suggestion: Penalize and otherwise creating disincentives for cities converting urban agricultural land into development.
- o Streamline processes and public investments in easements for urban agricultural land to promote conservation.

#### Environmental Justice

The scoping plan update also considers Environmental Justice impacts. For instance, the plan examines how "urban forests can significantly reduce the disproportionate environmental impacts on



California's environmental justice communities through increased green infrastructure investments that reduce GHG emissions," and that further social benefits such as "experience, training, and opportunity for at-risk youth" could also be achieved by partnering with local groups in implementing urban forestry projects. The same logic can be applied to policies prioritizing urban agriculture, which provides many co-benefits to food desert and food insecure communities, including integral environmental justice goals such as community empowerment.

- o Policy suggestion: Invest in environmental justice communities, including particular attention to supporting community-based urban agriculture projects.
- o Incentivize and reward cities that create urban agriculture initiatives for identifying useable land and passing policy that assists young and beginning urban farmers.

2) Considering urban agriculture policies in the AB32 Scoping Plan Update would dovetail with other path-breaking California policies for urban agriculture and environmental justice:

The Urban Agriculture Incentive Zone Act (AB 551)  
AB 551 is a state assembly bill introduced by Assemblymember Phil Ting (CA-D-19) and signed by Governor Brown in 2013. AB 551 gives cities and counties the opportunity to pass local ordinances to create "incentive zones" for urban agriculture. Within these zones, private landowners who commit their land for urban agriculture for 10 years will be able to sign contracts with the city or county to give them a lower property tax rate. Urban farmers will have more rate stability because the land value is assessed only for agricultural use and does not compete with the land's value for residential or commercial use.

- o Policy Suggestion: The scoping plan should build upon this important policy, and encourage cities to create these incentive zones. The scoping plan should also focus on implementing different policy solutions that not only incentivize this kind of land use, but which also regulates or creates disincentives for the conversion of urban agricultural land to development, since this is a powerful force in cities with limited open space.

The Greenhouse Gas Reduction Fund (SB 535)  
SB 535 is a state senate bill introduced by Senator Kevin De León and signed by Governor Brown in 2012. SB535 follows up on The Global Warming Solutions Act of 2006 (AB32) by making provisions for disbursing funds from the cap and trade program. Under SB535, CalEPA must identify disadvantaged communities and then the ARB must follow-up with an investment plan to ensure that at least 25% of auction revenues are set aside for investments in "projects that provide benefits to [these disadvantaged] communities," with at least 10% in projects "located within" these communities.

- o The scoping plan update could expand upon this act with further policy that focuses on high priority needs to ensure that projects receiving investment achieve both GHG-reductions as well as significant direct and immediate benefits to these disadvantaged communities. Benefits such as economic opportunities, social capital, education, pollution control, and food security, are all integral aspects of urban agricultural programs that also have GHG reduction impacts.

3) Following up on the precedent set by these progressive policies, the AB32 Scoping Plan Update should prioritize policies that consider urban agriculture in GHG reduction, such as those that:

- o Legalize and incentivize urban agriculture
- o Allow urban agriculture projects to claim credits for moving us



towards our climate goal.

- o Fund and support research into the carbon sequestration and short-lived climate pollutant remediation effects of urban agriculture, and methods that enhance these functions.
- o Fund and support place-based public health and city planning initiatives into the co-benefits of urban agriculture for transportation, energy use, water use, air quality, nutrition, and health.
- o Penalize and otherwise creating disincentives for cities converting urban agricultural land into development.
- o Streamline processes and public investments in easements for urban agricultural land to promote conservation.
- o Invest in environmental justice communities, including particular attention to supporting community-based urban agriculture projects.

- o Incentivize and reward cities that create urban agriculture initiatives for identifying useable land and passing policy that assists young and beginning urban farmers.

Overall, considering these progressive policy approaches to urban agriculture would support the goals in the AB32 Scoping Plan Update for reductions in GHG and short-lived climate pollutants, and other public health and city planning co-benefits including land conservation and environmental justice.

Considering urban agriculture would be a strong addition to the scoping plan, and would keep California at the helm of this thriving international movement.

## References

Kulak, M., et al. (2013). "Reducing greenhouse gas emissions with urban agriculture: a life cycle assessment perspective." *Landscape and urban planning* 111: 68-78.

Zhang, B., et al. (2014). "The cooling effect of urban green spaces as a contribution to energy-saving and emission-reduction: A case study in Beijing, China." *Building and Environment* 76: 37-43.

MacRae, R., et al. (2013). "The Food System and Climate Change: An Exploration of Emerging Strategies to Reduce GHG Emissions in Canada." *Agroecology and Sustainable Food Systems* 37(8): 933-963.

Schindler, S. B. (2012). "Of Backyard Chickens and Front Yard Gardens: The Conflict Between Local Governments and Locavores." *Tul. L. Rev.* 87: 231.

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Rose, N. and K. Larsen (2013) "Economic Benefits of 'Creative Food Economies': Evidence, Case Studies and Actions for Southern Melbourne." *Victorian Eco Innovation Lab*. Accessed online 4/12/2014.

<  
<http://www.ecoinnovationlab.com/wp-content/attachments/Creative-Food-Economies-1-Economic-Benefits-and-Case-Studies.pdf>>

Lovell, S. T. (2010). "Multifunctional urban agriculture for sustainable land use planning in the United States." *Sustainability* 2(8): 2499-2522.

Campbell, M. C. and D. A. Salus (2003). "Community and conservation land trusts as unlikely partners? The case of Troy Gardens, Madison, Wisconsin." *Land Use Policy* 20(2): 169-180.

McClintock, N. (2008). "From industrial garden to food desert: Unearthing the root structure of urban agriculture in Oakland, California."

Urban Agriculture Incentive Zone Act. AB551 (2013-2014). Accessed online 04/12/2014.



California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund. SB535 (2012). Accessed online 04/12/2014.

Schindler, S. B. (2012). "Of Backyard Chickens and Front Yard Gardens: The Conflict Between Local Governments and Locavores." Tul. L. Rev. 87: 231.

Attachment: [www.arb.ca.gov/lists/com-attach/15-drafteaspu14-VyICdl0+VmQFbQRb.docx](http://www.arb.ca.gov/lists/com-attach/15-drafteaspu14-VyICdl0+VmQFbQRb.docx)

Original File Name: Urban Agriculture Comment Scoping Plan Update AB32.docx

Date and Time Comment Was Submitted: 2014-04-28 14:01:12

No Duplicates.



# **Comment 65 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Harvey  
Last Name: Eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Ex. Dir. Public Solar Power Coalition

Subject: Ttotal CA Solar Conversion by 2023/or in 9 Years HE PSPC SC 119641 Eder v SCAQMD et. al.  
Comment:

First Name: Harvey  
Last Name: Eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Ex Dir Public Solar Power Coalition

Subject: Total CA Solar Conversion by 2023/ or in 9 Years HE PSPC  
SC 119641 Eder v SCAQMD  
Comment:

This is part of Harvey Eder's submittal and for PSPC on the 5 year CARB Scoping Plan Review. Here in not Eder/PSPC incorporates by reference the entire record including the Clerks Transcript to Harvey Mark Eder vs SCAQMD ( South Coast Air Quality Management District & Barry Walerstein, and CARB (California Air Resources Board & Richard Cory et. al.

SC 119641. This is official service for CARB etc Amended  
Complaint  
Filed

September 2013,  
This law suit directs by 2023 that the whole state of California be converted ITSC (Immediate Total Solar Conversion )This will clean the air of Global Warming and Criteria pollutants help the economy and the health of Ca citizens.

The clerks transcript is apx 600 pages in 3 volumes also transcripts court 3 reporter transcripts are herein incorporated into the record in cluding all of Eder/PSPC and environmental groups submittals in the 2012 SCD Plan etc and since then.

The entire record of information example the 4/13/14 IPCC study written in the NY Times is incorporated herein gin the record

of the this law suit and comments to the scoping plan review as well as all submittals to date and in september 2014.

More comments will follow by Eder & PSPC befoire the 5pm 4/28/14 comment deadline etc.

& PSDPC Public Solar Power  
Coalition

etc. Harvey Eder 4/25/14 86 Ozone Nox and PM  
1223 Wilshire Blvd. # 667  
Santa Monica, CA. 90403 (310)3932589

Attachment:  
Original File Name:

Date and Time Comment Was Submitted: 2014-04-25 13:41:01

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If you have any questions or comments please contact Office of the  
Ombudsman at (916) 327-1266.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 14:04:51

No Duplicates.



**Comment 66 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Bundy  
Email Address: kbundy@biologicaldiversity.org  
Affiliation: Center for Biological Diversity

Subject: Center for Biological Diversity comments on EA for Proposed First Update  
Comment:

Attached please find comments from the Center for Biological Diversity (and attached exhibits) regarding the environmental assessment for the Proposed First Update to the Climate Change Scoping Plan. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/18-drafteaspu14-UjFcLIQnVFhXM1Q9.zip](http://www.arb.ca.gov/lists/com-attach/18-drafteaspu14-UjFcLIQnVFhXM1Q9.zip)

Original File Name: Ctr Bio Div Proposed First Update EA comments 20140428.zip

Date and Time Comment Was Submitted: 2014-04-28 15:33:46

No Duplicates.



**Comment 67 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 68 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 69 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF comments on Proposed First Scoping Plan Update

Comment:

Please accept these comments from EDF on the Proposed First Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/77-proposed-sp-ws-VTAHZQNkBDQDalQ5.pdf](http://www.arb.ca.gov/lists/com-attach/77-proposed-sp-ws-VTAHZQNkBDQDalQ5.pdf)

Original File Name: EDFCommentstScopingPlanProposedUpdateApril2014Combined.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:04:50

No Duplicates.



**Comment 70 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: John

Last Name: Edgar

Email Address: jredgar@glosten.com

Affiliation: Glosten / PelaStar

Subject: Offshore Wind in CA's Renewable Energy Portfolio

Comment:

As outlined in the accompanying document, California's deepwater offshore wind resource has great potential to diversify California's renewable energy resources. We urge the Air Resources Board and Climate Action Team to consider adding offshore wind energy to California's renewable energy portfolio.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/78-proposed-sp-ws-UjVRO1Q6VXVVJwBl.pdf](http://www.arb.ca.gov/lists/com-attach/78-proposed-sp-ws-UjVRO1Q6VXVVJwBl.pdf)

Original File Name: Glosten Comments to Draft Climate Change Scoping Plan.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:13:14

No Duplicates.



**Comment 71 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Joyce  
Last Name: Dillard  
Email Address: dillardjoyce@yahoo.com  
Affiliation:

Subject: Comments Draft Proposed First Update to Scoping Plan due 4.28.2014  
Comment:

Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/79-proposed-sp-ws-VDdTOLc7AD5XNFM9.pdf](http://www.arb.ca.gov/lists/com-attach/79-proposed-sp-ws-VDdTOLc7AD5XNFM9.pdf)

Original File Name: Comments Draft Proposed First Update to Scoping Plan due 4.28.2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:16:12

No Duplicates.



**Comment 72 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: SDeslauriers@carollo.com  
Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on the Draft Proposed Scoping Plan  
Comment:

Hello,

CWCCG appreciates the opportunity to provide comments on the draft Proposed First Update to the Scoping Plan. Please see the attached comment letter. We want to emphasize that wastewater treatment plants have opportunities to be significant renewable energy providers, suppliers of a marketable renewable organic fertilizer/soil amendment product, suppliers of a sustainable (drought-proof) water supply, and environmental stewards of our natural and working lands.

Please contact me if you have any questions. We welcome the opportunity to further discuss the wastewater community's position.

Regards,  
Sarah Deslauriers  
CWCCG Program Manager

Attachment: [www.arb.ca.gov/lists/com-attach/80-proposed-sp-ws-WjlcLVY0ADBWNwNc.pdf](http://www.arb.ca.gov/lists/com-attach/80-proposed-sp-ws-WjlcLVY0ADBWNwNc.pdf)

Original File Name: CWCCG Comments\_AB 32 2014 Draft Proposed Scoping Plan\_FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:23:05

No Duplicates.



**Comment 73 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: ExDir PSPC Public Solar Power Coalition

Subject: Immediate Total Solar Conversion Plan CA CARB scoping review 2014

Comment:

Harvey Eder Ex.Dir.

PSPC Public Solar Power Coalitiobn

Health

Thank you for your input.

Your comment as shown below has been forwarded to the Clerk of the Board. Posted comments will appear in the Comments Log.

A copy of this submittal is being sent to the email address you provided. If you don't receive this email, then you may have incorrectly entered your email address. For more information, please see our disclaimer.

We recommend that you print this page for your records.



-----  
Comment for drafteaspul4 (Non-Reg).

CONTACT INFORMATION:

First Name: Harvey

Last Name: Eder

Email: harveyederpspc@yahoo.com

Phone: (310) 3932589

Affiliation: ExDir PSPC Public Solar Power Coalitio

File (i.e., Attachment):

Subject: Convert To Solar Now Or Cause the 6th Earth

Extinction/Humans etal 86

Comment:

Solar facts about 3 to 6 therms (100,000 BTU) PER SQ FOOT FALL ON  
A SOLAR COLLECTOR/MODULE ABOUT 1KWH PER SQ METER OF ~ 10 SQ. FT.

10

THERMS = 1MM,BTU OR ONE MILLION BTU. Dirty gas in us sells for  
\$\$\$4 or 5 per MMBTU in US now double of tripple that retail about  
\$10 a million plus in europe and \$15-20 in Asia.

The whole sunshot DOE 2012 document is incorporated into the  
record

here by reference.t even withput that solar wins energy  
environmenta economy, and is practiable as well. It's the  
reasonable person/man womans choice.

In 1910 in Pasadena 30% of the new houses (checking buildong  
permits ref The Golden Thread ciorca 1978 book cited by CEC etc/  
HAD SOLAR HOT WATER SSSYSTEMS. OVER 100 YEARS AGO.

tHE scd 1992 air quality plan used solar for heaters (hot water  
and steam) for 1122 homes as wellas commercial industrial  
businesses andaaaaaapartments etc, rule 1146 and 1146,1 which CARB  
is reviewingf now for the SCD. This needs to be thke plan now.

AB 32 requires the best technology ie solar that is life cycle  
cost

effective this includes SE as well as PE socipo economic and  
political economic.

These was a 80% solar renewable plan Draft presented in  
SSSSSSSSLO( to the Sierra club by 2030 in 15years is will be in  
the  
final (not draft -it will go to the desert committee mid may this  
used ezisting cost effective solar renewable off the shelf proven  
tech nology. We can do it now ! and must . The report of IPCCsays  
that 4/2014 global warrming wierding is worst that estimated just  
a few years ago and oponion po;;s reflect this. Look around in SM  
people are walking, ridinhg bikes and skate boards. The cats out  
of  
the bag.

Sorry that my spelling ios bad etc. but IO I had surgery done  
omn

on both of my hands 17 years ago due to %%%^&\*()+

I get pissed at my diagits and they get at me and don';t work . I  
;earned to type in highschool but they said they may have to cut  
off my singers or hands ... they didn;t but their messed up  
I drop coffee and thinnnnngs .my lefty thumb is wiped out and my  
middle finger on my right hand (the bird finger ) is wiped out...  
used to play the guitar and was a locksmith... pasttttt etdc

HE/PSPC was on the record in the 08 scoping plan and was going to  
sue over omission of dirty warmin g gas in lcfs not ulsing gwp  
numbers and brushed off by staff etc, 88% of CA gas is from out  
pof state and its fracked. Went to SM env task force and rec.  
that



the city council movee against gas and they did now theres a network around the state that wa s started byk HE PSPC retc. We use fracked gas.

Need 100& solar electric now.

no ND no FED SCP Solar Converision Plan Alternative # 1 one now.  
No tomarrow

LHad copies made by court to sderve you but didn';t get them , new address will follow up and serve, etc.,

Mush morep  
nrda cbe etc augst 2014 fed ref tald with staff epa etc,

amoutside need solarcal cec carb casip and govs office pof  
planningh etc and cpuic will contact M Comm F,/.Fed

Harvey

Eder ex Dit PSPC  
1223 wilshire bl #667  
Santa Monica Ca 90403 4/28/14 4:25 pm

some Pt 4 to come by 5pm he pspc

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[Back to Top](#) | [All ARB Contacts](#) | [A-Z Index](#)

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The Board is one of six boards, departments, and offices under the umbrella of the California Environmental Protection Agency.  
[Cal/EPA](#) | [ARB](#) | [CalRecycle](#) | [DPR](#) | [DTSC](#) | [OEHHA](#) | [SWRCB](#)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 16:27:00

No Duplicates.



**Comment 74 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Tutt

Email Address: ttutt@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: Comments On Draft First Update 2013 Scoping Plan

Comment:

Attached are the 2013 Scoping Plan comments of the Sacramento  
Municipal Utility District.

Attachment: [www.arb.ca.gov/lists/com-attach/82-proposed-sp-ws-VSYFblUhVmEBNQU1.pdf](http://www.arb.ca.gov/lists/com-attach/82-proposed-sp-ws-VSYFblUhVmEBNQU1.pdf)

Original File Name: SMUD2013scopingplancomments.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:33:04

No Duplicates.



## **Comment 75 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Jim

Last Name: Stewart

Email Address: jim@EarthDayLA.org

Affiliation: Earth Day Los Angeles

Subject: Set higher GHG reduction targets for 2020, 2030 and beyond

Comment:

Earth Day Los Angeles appreciates the opportunity to provide these comments to the California Air Resources Board on the Climate Change Scoping Plan First Update Draft dated February 2014. We endorse the Sierra Club comments submitted November 1, 2013, on ARB's Discussion Draft AB 32 Scoping Plan Update, which has many details on our main points below.

1. New GHG targets. We urge ARB to initiate a state process to set more aggressive California greenhouse-gas reduction targets for 2020, 2030 and beyond. ARB should recognize that Governor's Executive Order S-3-05 is no longer adequate, and a new state trajectory should be mandated, through a new process that is informed by the latest climate science, including IPCC's new urgency and new methane GHG values. Stabilization of greenhouse gas emissions at 450 ppm and targets of less than 2°C increase are insufficient to minimize the risk of catastrophic outcomes.

"Climate impacts accompanying global warming of 2°C or more would be highly deleterious. Already there are numerous indications of substantial effects in response to warming of the past few decades. That warming has brought global temperature close to if not slightly above the prior range of the Holocene. We conclude that an appropriate target would be to keep global temperature at a level within or close to the Holocene range. Global warming of 2°C would be well outside the Holocene range and far into the dangerous range." Hansen, J., et al., PLOS ONE, 8, e81468 (2013).

We believe it is technically possible and economically feasible by 2030 to cut GHG emissions from the electric sector by 80% over 1990 levels and from the transportation sector by 50%.

2. Higher RPS. We urge ARB to call upon CPUC to increase the state's Renewable Portfolio Standard (RPS) to 40% by 2020 and set a 2030 standard at 70%. We believe a pathway is possible to achieve these targets using only available and feasible current technologies. An open public process should develop sector-by-sector near-term and medium-term targets. New RPS targets should have substantial carve-outs for distributed renewable energy systems, far beyond the governor's goal of 12 GW.

3. Total Decarbonization by 2050. We recommend that ARB formulate the state's ultimate 2050 target as total elimination of GHG from the electrical and transportation sectors. We believe that even this may not be sufficient to moderate climate disruption to safer levels and avoid catastrophic outcomes, and we recognize the need also for serious work to remove substantial amounts of anthropogenic carbon already in the atmosphere.

4. New Utility Model. We recommend that ARB and other state agencies begin to examine and develop a New Utility Business Model as well as a New Regulatory Model. The traditional utility



business model was developed many decades ago for industrial-scale, central-station, one-way flow, primarily fossil-fuel energy and is no longer suited to advanced, emerging renewable technologies, new flexible information flows, carbon reduction exigencies, and new economic and consumption conditions.

5. No More Big Gas-Fueled Plants. We urge ARB to urge all agencies to stand firm against any more new, major gas-fired generation capacity in California. Climate targets will not accommodate more dirty fossil-fueled electricity. There is now a sufficient array of clean alternatives to integrate rapidly growing quantities of renewables without more gas power plants, either baseload or peakers, particularly if market penetration of the full span of possibilities of decentralized power is facilitated by the agencies. (Some new, highly efficient combined heat-and-power could be the exception to getting off gas.)

6. Clean Transportation. The Draft Scoping Plan Update does a good job of laying out the challenge and need to achieve and extend movement toward zero and near-zero vehicles. We are glad the plan recognizes that the Clean Air Act requires NOx reductions on the order of 90% below 2010 levels to meet 2032 ozone requirements in South Coast and San Joaquin Valley, which will necessitate much greater use of ZEVs.

We also appreciate the proposal to advance the use of zero and near-zero vehicles in the freight sector. However, planning must assure a sufficiently comprehensive charging infrastructure to support not just the initial ZEVs but also eventually a mostly-ZEV fleet.

However, the draft Scoping Plan's transportation discussion falls short in a number of areas. Although the Transportation Working Paper, page 36, states, "ARB will assess the role of natural gas in the low-carbon transportation fuel future," the plan appears to advocate for increasing dependence on natural gas as a fuel source, when it states on p. 55, "A heavy-duty vehicle Phase 2 standard, ... Under these standards, natural gas (NG) trucks will likely be deployed in large numbers." This makes no sense given that natural gas extraction throughout the country, especially through fracking technologies, is linked to high levels of methane leakage, making the climate impacts of natural gas much worse than diesel. Additionally, developing a larger natural gas infrastructure to fuel vehicles will drain investment from truly clean vehicle fuels and infrastructure.

Additionally, the state has in the past played a stronger, greater role in helping ensure effective mass transit within cities, especially through funding incentives and other methods. The Scoping Plan should discuss ways in which the state can help accelerate mass transit development and improve existing mass transit operations.

Important market mechanisms can be advanced by new regulations, laws and incentives, such as road use fees, appropriately adjusted for differing emissions levels of vehicles. We appreciate the mention of parking cash out (in the Transportation Working Paper, page 23), but unbundling the pricing of parking is also an important option. The scoping plan should note this and offer recommendations that encourage the use of reasonable pricing mechanisms.

The Scoping Plan should also note that in certain cases, modal shifts may be the best route to accelerating emissions reductions in the freight sector.

Finally, the ARB must set much higher targets for MPO VMT reductions required under SB 375, so that they at least meet the requirements of Executive Order S-3-05. An example of the current ARB targets being too low is shown in the case of the San Diego



Association of Governments (SANDAG). ARB required only 13% reduction, which was exactly what SANDAG requested (and which would allow all of their planned freeway expansions). However, the California Attorney General sued SANDAG, and the judge found that the EIR for the SANDAG transportation plan was "impermissibly dismissive of S-3-05." We request the next set of targets be transparently calculated to show how each of the regional transportation plans will meet at least the requirements of S-3-05, and hopefully the higher standard required by the latest climate science.

Attachment: [www.arb.ca.gov/lists/com-attach/83-proposed-sp-ws-Wj8GZAdqU2FRNARr.docx](http://www.arb.ca.gov/lists/com-attach/83-proposed-sp-ws-Wj8GZAdqU2FRNARr.docx)

Original File Name: EDLAComments on CARB 2014 Scoping PlanUpdateJim3.docx

Date and Time Comment Was Submitted: 2014-04-28 16:31:50

No Duplicates.



**Comment 76 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Bullock  
Email Address: mike\_bullock@earthlink.net  
Affiliation:

Subject: Comments on theDraft AB 32 Scoping Plan Update  
Comment:

Please find the uploaded file containing my comment letter.

April 28, 2014

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

Submitted via CARB comments webpage:  
<http://www.arb.ca.gov/cc/scopingplan/2013comments.htm>

RE: Comments on the California Air Resources Board (CARB) 2014  
Draft First Update to AB 32 Scoping Plan ("Draft") and It's  
Supporting  
Appendix B, Appendix C (Working Paper on Transportation), and  
Appendix F (Draft Environmental Analysis)

Attachment: [www.arb.ca.gov/lists/com-attach/85-proposed-sp-ws-AGIAc10wUG9QOVc0.docx](http://www.arb.ca.gov/lists/com-attach/85-proposed-sp-ws-AGIAc10wUG9QOVc0.docx)

Original File Name: BullockReCARB\_ReAB32ScopingUpdate&3Appendices.docx

Date and Time Comment Was Submitted: 2014-04-28 16:36:07

No Duplicates.



**Comment 77 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Jonathan  
Last Name: Nadler  
Email Address: nadler@scag.ca.gov  
Affiliation:

Subject: SCAG Comments on AB 32 Scoping Plan Update  
Comment:

SCAG Comments on the Draft AB 32 Scoping Plan Update

Attachment: [www.arb.ca.gov/lists/com-attach/86-proposed-sp-ws-B2ZRVNQKAmIHMwJd.pdf](http://www.arb.ca.gov/lists/com-attach/86-proposed-sp-ws-B2ZRVNQKAmIHMwJd.pdf)

Original File Name: AB 32 scoping plan update comment April 2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:24:52

No Duplicates.



**Comment 78 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: Support momentum of livestock anaerobic digestion market

Comment:

Thank you for the opportunity to submit comments regarding the AB32 Scoping Plan update. Please find comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/87-proposed-sp-ws-BmdSMwdZVmgAYwl9.pdf](http://www.arb.ca.gov/lists/com-attach/87-proposed-sp-ws-BmdSMwdZVmgAYwl9.pdf)

Original File Name: Ag Meth\_AB32ScopingPlanUpdateComments\_4.28.14.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:52:54

No Duplicates.



**Comment 79 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Michael

Last Name: Rubio

Email Address: MichaelRubio@chevron.com

Affiliation: Chevron Corporation

Subject: Comments on Proposed First Update to the Scoping Plan

Comment:

Chevron submits the attached comments on the Proposed First Update  
to the Climate Change Scoping Plan

Attachment: [www.arb.ca.gov/lists/com-attach/88-proposed-sp-ws-UjECbFI2ACVSJgdo.pdf](http://www.arb.ca.gov/lists/com-attach/88-proposed-sp-ws-UjECbFI2ACVSJgdo.pdf)

Original File Name: Chevron Comments on First Scoping Plan Update 4\_28\_2014.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:40:02

No Duplicates.



**Comment 80 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cbbf.com

Affiliation: California Farm Bureau Federation

Subject: Scoping Plan comments

Comment:

pls find attached the CBBF comments

Attachment: [www.arb.ca.gov/lists/com-attach/89-proposed-sp-ws-BXYGY1M9ACMBbgRq.pdf](http://www.arb.ca.gov/lists/com-attach/89-proposed-sp-ws-BXYGY1M9ACMBbgRq.pdf)

Original File Name: Scoping Plan Comments final.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:43:43

No Duplicates.



**Comment 81 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Hal  
Last Name: Romanowitz  
Email Address: hal@altonenergy.com  
Affiliation: Alton Energy

Subject: Alton Energy Comments to Scoping Plan Update  
Comment:

Our comments are attached

Attachment: [www.arb.ca.gov/lists/com-attach/91-proposed-sp-ws-UDFUPgdyUm4CagdY.pdf](http://www.arb.ca.gov/lists/com-attach/91-proposed-sp-ws-UDFUPgdyUm4CagdY.pdf)

Original File Name: Alton - ARB Comments on Scoping Plan Update - 20140428.pdf

Date and Time Comment Was Submitted: 2014-04-28 16:53:12

No Duplicates.



**Comment 82 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



## **Comment 83 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Jim

Last Name: Stewart

Email Address: JimStewart@PODEnergy.org

Affiliation: PODEnergy, Inc.

Subject: Include Seaweed Forests to reverse climate change

Comment:

ARB must include carbon removal technologies in its scoping plan. It is clear from the current climate science that the current GHG levels in the atmosphere are already inflicting serious damage to the health and safety of all Californians.

The only way to protect the health and safety of all Californians is to include carbon removal technologies in the scoping plan, starting immediately.

There are many technologies that can remove carbon dioxide from the atmosphere and oceans. We recommend seaweed forests in the ocean as the most environmentally-friendly and most economical climate solution.

The attached peer-reviewed paper, published in the journal, Process Safety and Environment Protection, presents the following analysis:

1. Climate disruption and ocean acidity can only be restored to the conditions of the last 10,000 years of human civilization by removing nearly a trillion tons of CO<sub>2</sub> from the atmosphere and ocean. (This means that most technologies such as wind and solar power only slow down the climate and ecological disaster.)
2. No other proposed negative carbon technologies can address the scope of this challenge at a reasonable cost. See McLaren, D., 2012. A comparative global assessment of potential negative emissions technologies. Process Safety and Environment Protection, Vol. 90, p. 489-500.
3. Anaerobic digestion of seaweed is designed to be sustainable in every sense of the word: Environmental, Climate, Political, Social, Energy, and Economic (i.e. profitable).
4. The process relies on all natural processes. The main difference from nature is capturing nutrients left after digestion and returning them to keep the macroalgae forest sustainable.
5. Seaweed forests have multiple advantages:
  - produces abundant, carbon-neutral renewable energy in the form of clean burning natural gas (which can be converted to liquid fuels)
  - increases natural biodiversity
  - increases food supplies plus other products from algae, plus fertilizers for food security
  - can clean up ocean dead zones and coastal pollution
  - supports energy independence and local jobs - especially for developing countries without low-cost natural gas.
6. Seaweed forests have been vetted by key ocean researchers and published in a peer-reviewed scientific journal issue on "Negative Carbon Technologies." See "Negative carbon via Ocean Afforestation." Process Safety and Environment Protection, Vol. 90 (2012), p. 467-474.

More details and copies of our published papers and supplemental



materials are available at: [www.OceanForests.org](http://www.OceanForests.org)

Jim Stewart, PhD, Vice President  
PODenergy Inc.  
213-487-9340 Fax: 310-362-8400 Cell: 213-820-4345  
1216 S. Westlake Ave.  
Los Angeles, CA 90006-4118

Attachments:

1. "Negative carbon via Ocean Afforestation." Process Safety and Environment Protection, Vol. 90 (2012), p. 467-474.

Attachment: [www.arb.ca.gov/lists/com-attach/95-proposed-sp-ws-VzIRMI07VWcEdglg.docx](http://www.arb.ca.gov/lists/com-attach/95-proposed-sp-ws-VzIRMI07VWcEdglg.docx)

Original File Name: NegativeCarbonViaOceanAfforestation2012Authors.docx

Date and Time Comment Was Submitted: 2014-04-28 16:55:46

No Duplicates.



## Comment 84 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: ExDir PSPC Public Solar Power Coalitio

Subject: Convert To Solar Now Or Cause the 6th Earth Extinction/Humans etal 86

Comment:

Solar facts about 3 to 6 therms (100,000 BTU) PER SQ FOOT FALL ON A SOLAR COLLECTOR/MODULE ABOUT 1KWH PER SQ METER OF ~ 10 SQ. FT. 10 THERMS = 1MM,BTU OR ONE MILLION BTU. Dirty gas in us sells for \$\$\$4 or 5 per MMBTU in US now double of tripple that retail about \$10 a million plus in europe and \$15-20 in Asia.

The whole sunshot DOE 2012 document is incorporated into the record here by reference. t even withput that solar wins energy environmenta economy, and is practiabile as well. It's the reasonable person/man womans choice.

In 1910 in Pasadena 30% of the new houses (checking buildong permits ref The Golden Thread ciorca 1978 book cited by CEC etc/ HAD SOLAR HOT WATER SSSYSTEMS. OVER 100 YEARS AGO.

tHE scd 1992 air quality plan used solar for heaters (hot water and steam) for 1122 homes as wellas commercial industrial businesses andaaaaaapartments etc, rule 1146 and 1146,1 which CARB is reviewingf now for the SCD. This needs to be thke plan now.

AB 32 requires the best technology ie solar that is life cycle cost effective this includes SE as well as PE socipo economic and political economic.

These was a 80% solar renewable plan Draft presented in SSSSSSSLO( to the Sierra club by 2030 in 15years is will be in the final (not draft -it will go to the desert committee mid may this used ezisting cost effective solar renewable off the shelf proven tech nology. We can do it now ! and must . The report of IPCCsays that 4/2014 global warrming wierding is worst that estimated just a few years ago and oponion po;;s reflect this. Look around in SM people are walking, ridingh bikes and skate boards. The cats out of the bag.

Sorry that my spelling ios bad etc. but IO I had surgery done omn on both of my hands 17 years ago due to %%%^&\*()+ I get pissed at my diagits and they get at me and don';t work . I ;earned to type in highschoool but they said they may have to cut off my singers or hands ... they didn;t but their messed up I drop coffee and thinnnnngs .my lefty thumb is wiped out and my middle finger on my right hand (the bird finger ) is wiped out... used to play the guitar and was a locksmith... pasttttt etdc

HE/PSPC was on the record in the 08 scoping plan and was going to sue over omission of dirty warmin g gas in lcfs not ulsing gwp numbers and brushed off by staff etc, 88% of CA gas is from out pof state and its fracked. Went to SM env task force and rec. that the city council movee against gas and they did now theres a network around the state that wa s started byk HE PSPC retc. We use fracked gas.

Need 100& solar electric now.



no ND no FED SCP Solar Converision Plan Alternative # 1 one now.  
No tomorrow

LHad copies made by court to sderve you but didn't get them , new  
address will follow up and serve, etc.,

Mush morep  
nrda cbe etc augst 2014 fed ref tald with staff epa etc,

amoutside need solarcal cec carb casip and govs office pof  
planningh etc and cpuic will contact M Comm F,/.Fed

Harvey

Eder ex Dit PSPC  
1223 wilshire bl #667  
Santa Monica Ca 90403 4/28/14 4:25 pm

some Pt 4 to come by 5pm he pspc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 15:29:01

No Duplicates.



**Comment 85 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 86 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 87 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Part 4 of 4 Eder/PSPC ITSC ExDir Publi

Subject: Part 4 of 4 Immediate Total Solar Conversion PSPC of CA by 2020/23 Public Solar Power Coa  
Comment:

Part 4 of 4 4/28/14

Harvey Eder PSPC Ex Dir ITSC

Scoping Plan Review 2014

Scoping plan must be made @ yr with IPER and semi IPER @CEC and CPUE LTPP Com Florida plus 86 Diablo and Songs wastes 1Million yeagars watch and protect fo bankrupt have share holders pay for it all thier co thier problem etc

If we frack and use tar sands ddddepo water bpo exxon valdez shale use water earthquake etc insaaaaaaaaaane ..... must cconvert spo ITSC now.

Solar CPH and cooling district Heating and cooling and burry pipe or about groundsdd . Do as the same time as new /epaorir sewers and water pipes systems. ;

International Energy Agency task force on seasonal storage. storage compressed air , s trains up dpown weiltht to store mechanical and electricity batteries capacitors fly wheels pg&e compressed air ibn any ubdrgroubnd air. above ground CPUC Ca Storage Group nat andinternational

FED EPA nox by 2023 in 05 plan

Hybrid PV concentrators theory tp 63% eff. Solar thermal dishes 90%plus wff BS BOTTOMINGF ACYCKE h&c PROCESS ETC. IN NEIGHBORHOODS WHERE LOAD IS... OUT OF TIME BAYBEE

he PSPC 1223 WILSHIRE BL #667 sm ca 90403 (310)393258994:53PM

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 16:35:07

No Duplicates.



**Comment 88 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Nancy  
Last Name: Rader  
Email Address: nrader@calwea.org  
Affiliation: CA Wind Energy Assn

Subject: Proposed First Update to the Climate Change Scoping Plan  
Comment:

Attached please find CalWEA's comments on the Proposed First Update  
to the Climate Change Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/30-drafteaspu14-BmVTNAdqACQDYAR1.pdf](http://www.arb.ca.gov/lists/com-attach/30-drafteaspu14-BmVTNAdqACQDYAR1.pdf)

Original File Name: CalWEA\_Comments\_ARB\_Draft\_Proposed\_Scoping\_Plan\_First\_Update\_(4-28-14).pdf

Date and Time Comment Was Submitted: 2014-04-28 16:05:14

No Duplicates.



## **Comment 89 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Harvey  
Last Name: Eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Ex Dir PSPC Public Solar Power Coalitio

Subject: Ca 100% Immediate Total Solar Conversion Plan by 2020/23 86 Nox PM Toxics Criteria etc  
Comment:

you for your input.

Your comment as shown below has been forwarded to the Clerk of the Board. Posted comments will appear in the Comments Log.

A copy of this submittal is being sent to the email address you provided. If you don't receive this email, then you may have incorrectly entered your email address. For more information, please see our disclaimer.

We recommend that you print this page for your records.

-----  
Comment for drafteaspl4 (Non-Reg).

### CONTACT INFORMATION:

First Name: Harvey  
Last Name: Eder  
Email: harveyederpspc@yahoo.com  
Phone: (310) 3932589  
Affiliation: Part 4 of 4 Eder/PSPC ITSC ExDir Publi  
File (i.e., Attachment):

Subject: Part 4 of 4 Immediate Total Solar Conversion PSPC of CA  
by 2020/23 Public Solar Power Coa

Comment:

Part 4 of 4 4/28/14  
Harvety Eder PSPC Ex Dir ITSC  
Scoping Plan Review 2014

Scoping plan must be made @ yr with IPER and semi IPER @CEC  
and CPUE LTPP Com Florida plus 86 Diablo and Songs wastes  
1Million  
years watch and protect for bankrupt have shareholders pay for  
it all their cost their problem etc

If we frack and use tar sands ddddepo water bpo exxon valdez  
shale use water earthquake etc insaaaaaaaaaane ..... must convert  
to ITSC now.

Solar CPH and cooling district Heating and cooling and bury pipe  
or about grounds. Do as the same time as new sewer  
sewers and water pipes systems. ;

International Energy Agency task force on seasonal storage.  
storage



compressed air , s trains up ddown weiioht to store mechan ical  
and electricity batteries capasiotpors fly wheels pg&e compressed  
aur ibn any ubdrgroubnd air. abpove ground CPUC Ca Storage  
Group  
nat andinternational

FED EPA nox by 2023 in 05 plan  
part 4of4.....PART 4 OF 4

Hybrid PV concen trators thkeory tp 63% eff. Solar thermal  
dishes 90%plua wff BS BOTTOMINGF ACYCKE h&c PROCESS ETC. IN  
NEIGHBORHOODS WHERE LOAD IS... OUT OF TIME BAYBEE

he PSPC 1223 WILSHIRE BL #667 sm ca 90403 (310)393258994:53PM

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Decisions Pending and Opportunities for Public Participation  
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The Board is one of six boards, departments, and offices under  
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[Cal/EPA](#) | [ARB](#) | [CalRecycle](#) | [DPR](#) | [DTSC](#) | [OEHHA](#) | [SWRCB](#)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 16:53:53

No Duplicates.



**Comment 90 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

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



**Comment 91 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: william

Last Name: mccarthy

Email Address: williammccarthy55@comcast.net

Affiliation: none

Subject: Draft USELESSNESS! SCAM

Comment:

This Draft and the Original compiling of the Climate Change Scoping Plan is a violation of every Legal statute on the Justifiable use of Public Funds. The Idea that Man has any significant control or causation of any climate Change of the entire earth is reckless and without any foundation in fact. In fact MOTHER NATURE controls it all at random. Earth's Billion years of climate history as we know it, shows similar and continual random changes in all areas of the Globe long before and since Mankind's arrival! Furthering the certainty of this, while the Bureaucratic Skullduggery by the AIR Board defrauds us all!. I submit it needs to be Dropped! AS USELESS!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-28 16:57:01

No Duplicates.



**Comment 92 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Azibuike

Last Name: Akaba

Email Address: azibuike@rampasthma.org

Affiliation: RAMP

Subject: AB 32 Scoping Plan Comments

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/110-proposed-sp-ws-AWBVKVwCUGJRNQg7.docx](http://www.arb.ca.gov/lists/com-attach/110-proposed-sp-ws-AWBVKVwCUGJRNQg7.docx)

Original File Name: AZ AB32 Comments 2014 v2 0 .docx

Date and Time Comment Was Submitted: 2014-04-29 14:26:47

No Duplicates.



**Comment 93 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Ken

Last Name: Nold

Email Address: krnold@TID.ORG

Affiliation: Turlock Irrigation District

Subject: Comments on the Proposed Update

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/111-proposed-sp-ws-VGVRY1RIWD8HM1Nr.pdf](http://www.arb.ca.gov/lists/com-attach/111-proposed-sp-ws-VGVRY1RIWD8HM1Nr.pdf)

Original File Name: 140428\_TID AB 32 Scoping Plan Update Comments.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:32:08

No Duplicates.



**Comment 94 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Richard J.

Last Name: Lambros

Email Address: lwebb@southerncaliforniagroup.com

Affiliation: Southern CA Leadership Council

Subject: RE: Comments on Proposed Update to the AB 32 Scoping Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/112-proposed-sp-ws-UiEGY1E8BzcLUgZl.pdf](http://www.arb.ca.gov/lists/com-attach/112-proposed-sp-ws-UiEGY1E8BzcLUgZl.pdf)

Original File Name: SCLC Comment Ltr on CARBs Proposed AB 32 Scoping Plan Update.pdf

Date and Time Comment Was Submitted: 2014-04-29 14:40:02

No Duplicates.



**Comment 95 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Christopher

Last Name: Cannon

Email Address: ombcomm@arb.ca.gov

Affiliation: Port of Los Angeles

Subject: Comments on the proposed Scoping Plan Updates

Comment:

see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/113-proposed-sp-ws-WikCdFI+BWBWYlJh.pdf](http://www.arb.ca.gov/lists/com-attach/113-proposed-sp-ws-WikCdFI+BWBWYlJh.pdf)

Original File Name: SPM623AF@arb ca gov\_20140429\_153715.pdf

Date and Time Comment Was Submitted: 2014-04-30 07:50:55

No Duplicates.



**Comment 96 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Van Dam  
Email Address: mvandam@uci.edu  
Affiliation:

Subject: Scoping Plan Update  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/114-proposed-sp-ws-VyQGY1I8ACMKZVM9.docx](http://www.arb.ca.gov/lists/com-attach/114-proposed-sp-ws-VyQGY1I8ACMKZVM9.docx)

Original File Name: Scoping Plan Update Comment 2014.docx

Date and Time Comment Was Submitted: 2014-04-30 07:58:39

No Duplicates.



**Comment 97 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Tim  
Last Name: Grabiell  
Email Address: TimGrabiell@eia-international.org  
Affiliation: EIA International

Subject: Comments on Scoping Plan Update  
Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/115-proposed-sp-ws-VCcHYIU7UHMkZVc5.zip](http://www.arb.ca.gov/lists/com-attach/115-proposed-sp-ws-VCcHYIU7UHMkZVc5.zip)

Original File Name: scopingplan.zip

Date and Time Comment Was Submitted: 2014-04-30 08:06:01

No Duplicates.



**Comment 98 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Raspberry

Email Address: dxjones@semprautilities.com

Affiliation: Southern California Gas Co.

Subject: Proposed First Update to the Climate Change Scoping Plan: Building on the Framework  
Comment:

Attached are comments with 2 separate attachments from the Sempra Energy utility, Southern California Gas Company.

Attachment: [www.arb.ca.gov/lists/com-attach/116-proposed-sp-ws-UCNTNgRqACMGaVU7.zip](http://www.arb.ca.gov/lists/com-attach/116-proposed-sp-ws-UCNTNgRqACMGaVU7.zip)

Original File Name: scopingplanupdate.zip

Date and Time Comment Was Submitted: 2014-05-01 08:10:57

No Duplicates.



**Comment 99 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Ken

Last Name: Weinberg

Email Address: ombcomm@arb.ca.gov

Affiliation: San Diego County Water Authority

Subject: Comments on the Scoping Plan Update

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/117-proposed-sp-ws-VDdUMwNwBDVRCAdh.pdf](http://www.arb.ca.gov/lists/com-attach/117-proposed-sp-ws-VDdUMwNwBDVRCAdh.pdf)

Original File Name: CARB Feb 2014 Proposed First Update to Scoping Plan\_comments FINAL 5-2-14.pdf

Date and Time Comment Was Submitted: 2014-05-07 13:28:31

No Duplicates.



**Comment 100 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Fernando

Last Name: Losada

Email Address: ombcomm@arb.ca.gov

Affiliation: Director of Environmental Health and C

Subject: Comments on the Draft Scoping Plan

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/118-proposed-sp-ws-AGVdMVY2VWUHXghk.pdf](http://www.arb.ca.gov/lists/com-attach/118-proposed-sp-ws-AGVdMVY2VWUHXghk.pdf)

Original File Name: EJAC Letter ARB 5-19-14.pdf

Date and Time Comment Was Submitted: 2014-05-22 08:08:33

No Duplicates.



## **Comment 101 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 2nd Workshop.**

First Name: Mari Rose

Last Name: Taruc

Email Address: marirose@apen4ej.org

Affiliation: AB32 Campaign

Subject: EJAC in AB32 Scoping Plan

Comment:

Please accept this letter from leading California environmental organizations actively working on AB32 implementation who support the Environmental Justice Advisory Committee for its work on the AB32 Scoping Plan Update.

Attachment: [www.arb.ca.gov/lists/com-attach/119-proposed-sp-ws-AGECdwRsV2UFbQdY.pdf](http://www.arb.ca.gov/lists/com-attach/119-proposed-sp-ws-AGECdwRsV2UFbQdY.pdf)

Original File Name: Asian Pacific Environmental Network.pdf

Date and Time Comment Was Submitted: 2014-05-22 08:19:15

No Duplicates.



**Comment 102 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Public Health letter on scoping plan

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/122-proposed-sp-ws-AGhTMFU1Um0HdQBo.pdf](http://www.arb.ca.gov/lists/com-attach/122-proposed-sp-ws-AGhTMFU1Um0HdQBo.pdf)

Original File Name: Health Group Letter on Scoping Plan May 2014.pdf

Date and Time Comment Was Submitted: 2014-05-22 12:53:46

No Duplicates.



**Comment 103 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Jeffrey

Last Name: Kightlinger

Email Address: ombcomm@arb.ca.gov

Affiliation: The Metropolitan Water District of So CA

Subject: Comments on the Draft Scoping Plan

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/123-proposed-sp-ws-UTkGYQFyUWYEawBu.pdf](http://www.arb.ca.gov/lists/com-attach/123-proposed-sp-ws-UTkGYQFyUWYEawBu.pdf)

Original File Name: hardingletter.pdf

Date and Time Comment Was Submitted: 2014-05-29 08:09:57

No Duplicates.



**Comment 104 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Cara

Last Name: Martinson

Email Address: ombcomm@arb.ca.gov

Affiliation: Solid Waste Industry Group

Subject: Comments on the Draft Scoping Plan

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/124-proposed-sp-ws-VyQHdII6VGBRCFQ4.docx](http://www.arb.ca.gov/lists/com-attach/124-proposed-sp-ws-VyQHdII6VGBRCFQ4.docx)

Original File Name: SWIG ltr to ARB re SPU 14-5-21.docx

Date and Time Comment Was Submitted: 2014-05-29 08:14:54

No Duplicates.



**Comment 105 for Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) - 2nd Workshop.**

First Name: Jack Lucero

Last Name: Fleck

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Support for the AB32 Environmental Justice Advisory Committee Recommendations

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/125-proposed-sp-ws-B2oGYVYIUGpWDwFz.pdf](http://www.arb.ca.gov/lists/com-attach/125-proposed-sp-ws-B2oGYVYIUGpWDwFz.pdf)

Original File Name: Mari Rose letter.pdf

Date and Time Comment Was Submitted: 2014-05-29 08:19:26

No Duplicates.



**Comment 106 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Jerilyn Lopez

Last Name: Mendoza

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Comments on the draft scoping plan

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/126-proposed-sp-ws-WygHbVQ8AzQFZlck.pdf](http://www.arb.ca.gov/lists/com-attach/126-proposed-sp-ws-WygHbVQ8AzQFZlck.pdf)

Original File Name: slides.pdf

Date and Time Comment Was Submitted: 2014-05-29 08:35:56

No Duplicates.



**Comment 107 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Martha Ann

Last Name: Blackman

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Comments on Draft Scoping Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/127-proposed-sp-ws-VWRXZQEtdNVfIng.pdf](http://www.arb.ca.gov/lists/com-attach/127-proposed-sp-ws-VWRXZQEtdNVfIng.pdf)

Original File Name: 14-4-3 Written Submission 4 - Martha Ann Blackman.pdf

Date and Time Comment Was Submitted: 2014-05-30 09:52:27

No Duplicates.



**Comment 108 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Daryl

Last Name: Halls

Email Address: ombcomm@arb.ca.gov

Affiliation: Bay Area CMA Association

Subject: Comments on Draft Scoping Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/128-proposed-sp-ws-UzFcO1AoU2EGcgZj.pdf](http://www.arb.ca.gov/lists/com-attach/128-proposed-sp-ws-UzFcO1AoU2EGcgZj.pdf)

Original File Name: bayareacma.pdf

Date and Time Comment Was Submitted: 2014-05-30 09:55:30

No Duplicates.



**Comment 109 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Arthur

Last Name: Dao

Email Address: ombcomm@arb.ca.gov

Affiliation: Alameda CTC

Subject: Draft Scoping Plan comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/129-proposed-sp-ws-WzoGbFAwV2lQMwlt.pdf](http://www.arb.ca.gov/lists/com-attach/129-proposed-sp-ws-WzoGbFAwV2lQMwlt.pdf)

Original File Name: alamedactc.pdf

Date and Time Comment Was Submitted: 2014-05-30 09:58:26

No Duplicates.



**Comment 110 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Martha Dina

Last Name: Arguello

Email Address: ombcomm@arb.ca.gov

Affiliation: Environmental Justice Advisory Committee

Subject: Scoping Plan Update comments

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/130-proposed-sp-ws-VDFSPgZmBzcKUwh4.docx](http://www.arb.ca.gov/lists/com-attach/130-proposed-sp-ws-VDFSPgZmBzcKUwh4.docx)

Original File Name: EJAC priority recommendations for Update.docx

Date and Time Comment Was Submitted: 2014-05-30 10:02:05

No Duplicates.



**Comment 111 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 1st Workshop.**

First Name: Gustavo

Last Name: Castro

Email Address: guscastro@otrosmundoschiapas.org

Affiliation:

Subject: Declaración del Movimiento Redeldía de los Montes Azules

Comment:

Declaración del Movimiento Redeldía de los Montes Azules

(translated)

Attachment: [www.arb.ca.gov/lists/com-attach/131-proposed-sp-ws-AXVQJF09Um8Kf1U5.zip](http://www.arb.ca.gov/lists/com-attach/131-proposed-sp-ws-AXVQJF09Um8Kf1U5.zip)

Original File Name: translation.zip

Date and Time Comment Was Submitted: 2014-06-12 09:36:54

No Duplicates.



**Comment 112 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Bob

Last Name: Harding

Email Address: bharding@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Comments on the Draft First Update to California's Climate Change Scoping Plan

Comment:

Please see attachment for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/132-proposed-sp-ws-WjJUMwFyBTIAbwFv.pdf](http://www.arb.ca.gov/lists/com-attach/132-proposed-sp-ws-WjJUMwFyBTIAbwFv.pdf)

Original File Name: hardingletter.pdf

Date and Time Comment Was Submitted: 2014-06-20 09:10:50

No Duplicates.



**Comment 113 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Mari Rose

Last Name: Taruc

Email Address:

Affiliation:

Subject: Support for the AB32 Environmental Justice Advisory Committee Recommendations

Comment:

Please see attachment for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/134-proposed-sp-ws-BmsGYVMgBz1XDIIg.pdf](http://www.arb.ca.gov/lists/com-attach/134-proposed-sp-ws-BmsGYVMgBz1XDIIg.pdf)

Original File Name: Mari Rose letter.pdf

Date and Time Comment Was Submitted: 2014-06-20 09:10:50

No Duplicates.



**Comment 114 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Jerilyn

Last Name: Lopez Mendoza

Email Address:

Affiliation: Southern California Gas Company

Subject: Slides presented at Hearing

Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/135-proposed-sp-ws-VyQGbABoVWIKaVIh.pdf](http://www.arb.ca.gov/lists/com-attach/135-proposed-sp-ws-VyQGbABoVWIKaVIh.pdf)

Original File Name: slides.pdf

Date and Time Comment Was Submitted: 2014-06-20 09:10:50

No Duplicates.



**Comment 115 for Draft Proposed First Update to the Climate Change Scoping Plan  
(proposed-sp-ws) - 2nd Workshop.**

First Name: Cara

Last Name: Martinson

Email Address: cmartinson@counties.org

Affiliation: Solid Waste Industry Group

Subject: First Proposed Update to the Climate Change Scoping Plan

Comment:

Please see attachment for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/136-proposed-sp-ws-B3RTIIM7BTELUIU5.docx](http://www.arb.ca.gov/lists/com-attach/136-proposed-sp-ws-B3RTIIM7BTELUIU5.docx)

Original File Name: SWIG ltr to ARB re SPU 14-5-21.docx

Date and Time Comment Was Submitted: 2014-06-20 09:32:56

No Duplicates.



**There are no comments posted to Draft Proposed First Update to the Climate Change Scoping Plan (proposed-sp-ws) that were presented during the Workshop at this time.**