

**Comment 1 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Teodoro  
Last Name: González  
Email Address: tegonfri@gmail.com  
Affiliation: Tegonfri

Subject: GENERADOR FUSIÓN NUCLEAR  
Comment:

Estimados Srs.:  
Quiero que me remita Información, Condiciones de Compra y/o  
Licencia de Transferencia de Tecnología y, Coste Económico de  
Generadores de Fusión Nuclear y, Sistemas de Geotérmica. Para  
España  
Reciban un cordial saludo.  
Teodoro González

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 11:59:33

No Duplicates.

**Comment 2 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Augie  
Last Name: Venezia  
Email Address: augie@fairfaxlumber.com  
Affiliation: Fairfax Lumber & Hardware

Subject: Comments from your 4/21/2022 request for comments  
Comment:

Have you watched the documentary "Kiss the Ground?" Are you factoring in what is presented in this documentary in your regulations?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 13:32:51

No Duplicates.

### **Comment 3 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Sandra  
Last Name: Manuel  
Email Address: sanman121@gmail.com  
Affiliation:

Subject: Senior complex  
Comment:

Harbor & Mesa Verde Dr East location. Continues traffic, 6ft away. Asked for HEPA filters as everything black when wiped down. Building owned by Segrestrom in Costa Mesa, managed by leagacy partners. Refuses to replace indoor apts with HEPA FILTERS. MGMT never ordered mask mandate, all activities held in closed 10 by 10 rooms. Never asked about vaccine status, never. Staff room uses HEPA FILTERS and masks. No concern for residents. Many have died. I've been hospitalized 3 times with COVID.. no concern of theirs for illness. How can I make them understand that they need to install better filters here. Now can't breath, scared to leave apt as outside air is also so dirty. Cars covered in black soot. Water is cold every tap, runs for 6min before turning warm. Everytime, every day. Mgmt bills us 60.00 each a Month for this. Only utility bill that doesn't come from Water company. All other utility bills come direct from their companies. Trying to get mgmt company to change some policices, they just get angry and suggest you move. I'm 78, on my own, no family left. Only way out of here is to die.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 13:46:06

No Duplicates.

**Comment 4 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Sherrill  
Last Name: Futrell  
Email Address: safutrel@ad3.ucdavis.edu  
Affiliation: University of California

Subject: Get Serious about our Air, Please  
Comment:

I live in the Central Valley and have developed asthma. The air's been bad for the 62 years I've lived in Davis. Do something.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 16:10:48

No Duplicates.

## **Comment 5 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Jana

Last Name: Moreno

Email Address: janamo47@yahoo.com

Affiliation:

Subject: THE AIR WE BREATHE SP22

Comment:

Phasing out fossil fuels requires more than electrifying vehicles. More importantly, all populations as well as all forms of life will benefit greatly from your making these necessary and difficult decisions and changes to California State policies, laws and regulations specific to omitting fossil fuel drilling, refining, transporting and burning.

Your commitment to the protection of our environment and our health are at great risk should 'business as usual ' be allowed to continue any longer.

I sincerely hope you can find the strength and wisdom to do the right things now.

There is no more time for hesitation or refusal for acting in for the best interest of everyone. Disadvantage or not, the favoritism California gives to big oil and gas companies must stop now!

Please vote for the environment and clean air and water for our beautiful state before its too late!

Thank you for your time and consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 16:14:34

No Duplicates.

**Comment 6 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Victor

Last Name: Paglia

Email Address: tabbies.ligand\_0i@icloud.com

Affiliation:

Subject: Air Quality

Comment:

I live in the 92663 ZIP Code and I checked the weather report every day and I receive more than 50% of the time I notice that the air quality is unhealthy for sensitive groups. What can be done about that?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 17:37:29

No Duplicates.

**Comment 7 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Heidi  
Last Name: Buech  
Email Address: buech.heidi@gmail.com  
Affiliation:

Subject: Comment on Scoping plans  
Comment:

Just voicing support for any measures that help get and keep our air cleaner, and for progressive actions to help mitigate human-caused climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 18:34:03

No Duplicates.

## **Comment 8 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Janette  
Last Name: Wolf  
Email Address: janette.wolf@sbcglobal.net  
Affiliation:

Subject: Comments on 2022 Scoping Plan  
Comment:

My first thought when I read we are trying to be carbon neutral before 2045 was, "That's way too late." Most plans strive toward 2030, and even that is too late if we want humankind to survive the changes that will come (are already here) from climate change.

I live in Benicia, and we recently learned that Valero has been releasing toxins into our air above legal levels FOR YEARS. We have a lot of back pedaling to do. I have lung issues that worsened when we moved here 10 years ago, and would not be surprised if Valero's emissions are to blame. The recent California fires have also adversely impacted both my lungs and our desired lowering of emissions.

If we are going to meet this goal, we have to take a look at all the ways we humans have made the planet sick. These include requiring sustainable farming, zero fossil fuels, no fracking, no mines, and a commitment to keep our water clean. Sustainable farming will improve air quality.

It means some farmers who historically have been able to use as much groundwater as they want will have to learn to use less.

It also means that companies like Nestle must be prohibited from using unlimited amounts of our water, and selling it. Capitalistic greed has gotten where we are today.

The canal carrying water from the Delta to Southern California is also a horrible idea for the environment, and therefore the air. Delta smelt are threatened, as is the water there, and channeling it down south will further harm the smelt and other endangered wildlife in the area.

Here's an idea: if we can ship oil in pipelines hundreds of miles, why can't we ship water? States like Washington and Oregon get tons of water every year. Would they be willing to let us ship it down here, assuming environmental factors don't get in the way?

What about desalination plants? Or recycling and cleaning waste water? It can certainly be done, even if the public has a distaste for it.

Or how about making energy from human waste?

There are so many options to ensuring we have clean water now and for years to come.

I don't envy the job you have before you. My thoughts are only a quick brainstorm; surely you can all come up with many more.

Best,  
~Janette Wolf



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-22 18:09:58

No Duplicates.

**Comment 9 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Joy  
Last Name: Walters  
Email Address: juwalters222@gmail.com  
Affiliation: CHA CHA facilitator

Subject: SORE 2020  
Comment:

Has there been a study done of job loss due to bans or reduction of the use of gas powered leaf blowers.

Has there been a study done on the health of gardeners who use gas powered leaf blowers on a routine bases? If yes, what health issue (hearing loss, high blood pressure, asthma, COPD, any other lung or heart ailments) became apparent as related to the use of gas powered leaf blowers?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-25 12:18:45

No Duplicates.

**Comment 10 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Mark

Last Name: Glasser

Email Address: mark7glasser@ca.rr.com

Affiliation:

Subject: Wildlife protection

Comment:

Always protect clean air, clean water, the environment. his needs  
to be your first criteria for approval. We ae past time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-25 16:54:31

No Duplicates.

## **Comment 11 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Anna

Last Name: Sergienko

Email Address: prezannaserg@gmail.com

Affiliation:

Subject: In the phrase, healthy wealthy and wise, healthy comes first

Comment:

Stop prioritizing the economy. It does not matter. People are getting sicker and sicker and you are not doing enough to protect people and the environment. I see all this talk of being afraid of job loss. What will losing these jobs do that will make things worse than the suffering that is already happening? Housing is unattainable, everyone is forced to rent with no hope to buy. Healthcare is too expensive, most people will choose to suffer before facing a medical bill. Jobs do not pay enough. Most of all, the air is killing us. 2045 is way too late to help anyone. 2030 is already too late, it is the least that you can do.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 10:01:56

No Duplicates.

**Comment 12 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Schroder  
Email Address: kschroder@sacrt.com  
Affiliation:

Subject: Bus useful life  
Comment:

For Alternative 3:

Please explain the "No before end - of - life retirement of vehicles or appliances" in the April 20th PowerPoint slides. Does that mean useful life buses can be held on the roadway after 2045?

What happens to the target goals for bus replacements in 2035? Does the replacement time extended into 2045.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-29 13:10:04

No Duplicates.

**Comment 13 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: David  
Last Name: Bezanson  
Email Address: bezanpsy3506@hotmail.com  
Affiliation:

Subject: 2022 Scoping Plan Update 20 April 2022  
Comment:

See attached pdf.

Attachment: [www.arb.ca.gov/lists/com-attach/18-sp22-econ-health-ws-VCdQNQFvV3QFagJs.pdf](http://www.arb.ca.gov/lists/com-attach/18-sp22-econ-health-ws-VCdQNQFvV3QFagJs.pdf)

Original File Name: SCOPING PLAN 2022.pdf

Date and Time Comment Was Submitted: 2022-04-30 15:47:04

No Duplicates.

## **Comment 14 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Mike

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation: Associate Member, County Democratic Part

Subject: Advanced Clean Car Regulation

Comment:

We can't allow new internal combustion cars after 2030, if we want LDVs to achieve the industrial world's 2030 climate stabilization requirement. I have done the math. I have done a Plan for LDVs. My work is peer-reviewed.

I am disappointed that your staff chose Alternative 3. We have a climate emergency.

5 words: Human survival requires climate stabilization.

We have to stop acting like those 5 words are not true.

Attachment: [www.arb.ca.gov/lists/com-attach/19-sp22-econ-health-ws-VjsBZVQgAzxWPFc4.docx](http://www.arb.ca.gov/lists/com-attach/19-sp22-econ-health-ws-VjsBZVQgAzxWPFc4.docx)

Original File Name: MBullock-Plat-FP-EA-796315-Deriving\_Climate\_Stabilizing30March20-R3.docx

Date and Time Comment Was Submitted: 2022-05-01 08:04:17

No Duplicates.

## **Comment 15 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Ann

Last Name: Feeney

Email Address: feeney@scripps.edu

Affiliation:

Subject: comments on Scoping Plan

Comment:

Please do NOT adopt Alternative 3. We must STOP burning fossil fuels as soon as possible. IPCC report and scientists everywhere tell us that. Please do NOT add any new gas capacity, and phase out oil and gas extraction. Also, please do not rely on CCS - it is a largely unproven technology. We have current existing technologies to expand renewable energy and storage. WE need to DECREASE our emissions, not deal with them afterwards by trying to capture them.

I strongly recommend that you adopt alternative 1

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-01 16:24:02

No Duplicates.



**Comment 16 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Colby  
Last Name: Allerton  
Email Address: gcolby1@rocketmail.com  
Affiliation:

Subject: Alternative 1 & Zero Emissions by 2035  
Comment:

Dear California Air Resources Board,

We have to take our climate and California's clean air goals seriously.  
Alternative 3 proposes to keep all current old gas plants and add 10 GW of new gas capacity. That is going still further in the wrong direction, farther into the future than science and our goals can allow.

Please be acutely aware that we want and need Alternative 1 zero emissions by 2035, not Alt 3.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-01 20:57:26

No Duplicates.

## **Comment 17 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Karl  
Last Name: Aldinger  
Email Address: karl.alddinger@sierraclub.org  
Affiliation: Sierra Club San Diego

Subject: 2022 Scoping Plan Update - Choose Option 1

Comment:

I was extremely alarmed that staff is proposing to subject our future to plan that they know will not do enough. Carbon Capture is not just unproven. It has been proven to be a failure. Yet option 3 relies on continued use of fossil fuels and suggests that there is any hope that Carbon Capture can be relied on to deal with our excessive emissions. That is not the case in California, and it is not the case in Texas, and it is not the case in Iceland.

Please do not be persuaded by fossil fuel companies that they understand how to sequester carbon through mechanical means. They have only proven that it DOES NOT WORK, despite having tried unsuccessfully for decades to do so. Our future is in peril, and you should choose the critical path of ending emissions through option 1 instead of weighing hypothetical job losses that aren't being accurately portrayed against the new work needed to transition to a decarbonized society.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 07:22:56

No Duplicates.

## **Comment 18 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Laura

Last Name: Rosenberger Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation:

Subject: I like option 1

Comment:

Don't waste money and time on big, expensive gas plants that need to be retired soon, and nuclear plants & carbon capture that could be destroyed in war, by terrorists, by earthquakes, or the usual corporate negligence. We don't want radioactive isotopes leeching from the CA toxic waste dumps with expired permits into crops. Cancer is expensive to treat. I would rather not have fuel nor energy nor heat nor packaged food from far away. I prefer not to commute far to work. Driving is tiring. Direct solar 200 watt hotplates are cheap and cook stew. No financial stress.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 13:12:03

No Duplicates.

**Comment 19 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Lobnitz

Email Address: [peggylobnitz@gmail.com](mailto:peggylobnitz@gmail.com)

Affiliation: Elders Climate Action

Subject: ECA Comments on Initial Air Quality & Health Impacts and Economic Analyses Results  
Comment:

Elders Climate Action is submitting its comments regarding the studies listed above in PDF form for your review.

Attachment: [www.arb.ca.gov/lists/com-attach/24-sp22-econ-health-ws-BmNXMIExWVVQNQBv.pdf](http://www.arb.ca.gov/lists/com-attach/24-sp22-econ-health-ws-BmNXMIExWVVQNQBv.pdf)

Original File Name: ECA COMMENTS ON 2022 SCOPING PLAN.pdf

Date and Time Comment Was Submitted: 2022-05-02 14:34:13

No Duplicates.

**Comment 20 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Pauline

Last Name: seales

Email Address: paulineseales120@gmail.com

Affiliation: Santa Cruz Climate Action Network

Subject: 2022 Scoping Plan Update

Comment:

We want Alternative 1 - zero emissions by 2035, not Alt 3.  
In order to preserve a livable planet it is essential to make  
changes to zero emissions AS FAST AS POSSIBLE.  
I'm writing for the 1700+ members of Santa cruz Climate Action  
Network

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 19:42:46

No Duplicates.

## **Comment 21 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: [bnowicki@biologicaldiversity.org](mailto:bnowicki@biologicaldiversity.org)

Affiliation: Center for Biological Diversity

Subject: Comments on the health and economic analysis

Comment:

The Center for Biological Diversity provides this input regarding the initial results from the air quality and health impacts and economic analyses, released at the April 20 workshop. The results released so far are general with little detail, providing only a summary of results. It is impossible to evaluate the health and economics modeling results at this point without being provided the underlying methods, model documentation, and detailed results. Our comments here are therefore necessarily general and focus on instances where the modeling assumptions appear to be faulty or unsubstantiated, and we recommend ways to make the modeling analyses as robust, science-based, and transparent as possible. We urge the California Air Resources Board to release the details of the modeling--the data inputs, detailed outputs, and the specific assumptions--in order to receive more detailed comments from the public and to modify the modeling and analysis as necessary, before selecting a preferred alternative.

Attachment: [www.arb.ca.gov/lists/com-attach/26-sp22-econ-health-ws-VGYANFcJVTZQYwJd.pdf](http://www.arb.ca.gov/lists/com-attach/26-sp22-econ-health-ws-VGYANFcJVTZQYwJd.pdf)

Original File Name: 22 05 03 Center for Biological Diversity Comments Scoping Plan Costs.pdf

Date and Time Comment Was Submitted: 2022-05-02 22:04:54

No Duplicates.

## **Comment 22 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: [bnowicki@biologicaldiversity.org](mailto:bnowicki@biologicaldiversity.org)

Affiliation: Center for Biological Diversity

Subject: Comments on the health and economic analysis

Comment:

The Center for Biological Diversity provides this input regarding the initial results from the air quality and health impacts and economic analyses, released at the April 20 workshop. The results released so far are general with little detail, providing only a summary of results. It is impossible to evaluate the health and economics modeling results at this point without being provided the underlying methods, model documentation, and detailed results. Our comments here are therefore necessarily general and focus on instances where the modeling assumptions appear to be faulty or unsubstantiated, and we recommend ways to make the modeling analyses as robust, science-based, and transparent as possible. We urge the California Air Resources Board to release the details of the modeling--the data inputs, detailed outputs, and the specific assumptions--in order to receive more detailed comments from the public and to modify the modeling and analysis as necessary, before selecting a preferred alternative.

Attachment: [www.arb.ca.gov/lists/com-attach/27-sp22-econ-health-ws-VWcBNVIMUDNXZARb.pdf](http://www.arb.ca.gov/lists/com-attach/27-sp22-econ-health-ws-VWcBNVIMUDNXZARb.pdf)

Original File Name: 22 05 03 Center for Biological Diversity Comments Scoping Plan Costs.pdf

Date and Time Comment Was Submitted: 2022-05-02 22:04:54

No Duplicates.

## **Comment 23 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation: 350 Ventura County Climate Hub

Subject: Climate stabilization calls for strengthening of Alternative 1, NOT 3!

Comment:

Alternative 3 is incredibly inadequate in an emergency to reach climate stabilization benchmarks by 2030. If you have an intention to help Californians do our part to stop runaway irreversible extinction, then you have to stop worrying about how much it will cost! Whatever is doable is affordable. Invest sooner to save more of what can be saved. You appear in the dark about what is at stake when you do this exercise with these scenarios.

If the current prognosis for humanity is credible, you would just parse out the elements in Alternative 1 with more clarity, accelerate all timelines, balance the options among all opportunities based on most likely to succeed, effectively market a transparent and truthful plan to the people, and completely stop compromising and allowing vested interests to scam your programs.

Alternative 1 is the only acceptable start for a viable plan. Scrap the rest. But it must needs work, including the following:

1. Count true costs and savings, especially social and health savings and environmental justice benefits from an accelerated timeline for phasing out fossil fuels.
2. Optimize every form of Distributed Energy Resources (and ensure affordability of electricity).
3. Fix the model assumptions about near term feasibility and effectiveness of all ECR, especially CCUS.
4. Explain clearly how in the world you are going to reduce VMT per capita by 25% by 2030!
5. Set ambitious goals for Natural and Working Lands and blue carbon measures for drawdown and do your best to make them happen and stop imagining unproven and conflicted CCUS schemes can fill the gap.
6. Achieve increase in organic acreage to 30% by 2030, NOT 2045.
7. Protect soil biology from artificial nitrogen and toxic pesticides to maximize carbon sequestration and water holding capacity focusing on whole systems and maximizing the enhanced carbon sequestration in diverse, multi-species cropping and afforestation.
8. Stop conflating wildfire emissions and forest management with agricultural strategies. There are independent forest scientists who profoundly disagree with your modeling assumptions. It neutralizes what could be extremely great potential of ambitious management of Natural and Working Lands. The assumptions regarding forest thinning in Alternative 4 are arguable, muddying the issues, and leading to an unhelpful diluting of what many experts are demonstrating is a much greater potential to sequester carbon by non forest management strategies than the models show.
9. Convene a group of experts whose funding has been clearly and totally free from biased industry and US Forest Service influence to conduct an analysis similar to what is done by the National Academy of Sciences.
10. Tell the truth about what is at stake clearly so that people can learn and understand the vast range of responsibilities we all have to drastically cut emissions and drastically expand soil,



ocean and freshwater biology.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 07:10:30

No Duplicates.

## **Comment 24 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: William  
Last Name: Murphy  
Email Address: wcmurphy19@yahoo.com  
Affiliation: Retired

Subject: Vital wins on methane/HFCs are MISSING from the Scoping Plan Update!

Comment:

The current version of the 2022 Scoping Plan is seriously deficient, if we hope to beat or even slow the emerging climate crisis.

SHORT LIVED CLIMATE POLLUTANTS LIKE METHANE AND HYDROFLOUROCARBONS ARE GETTING SHORT SHRIFT, AND ARE NEARLY OMITTED FROM THE PLAN! WHAT IS THERE IS WEAK...

Even though CARB uses a 20-year global warming potential (GWP\_ which clearly shows SLCPs causing over 50% of California's greenhouse forcing, the consultants are using the older 100-year GWP forcing. The latter data-choice has the unfortunate effect of trivializing what are actually our fastest-acting climate solutions in methane and refrigeration chemicals!

Though it is true we need to work hard on reducing CO2, available CO2 reductions from transportation, power and buildings sectors ARE NOT SUFFICIENT.

We also have to work equally hard on SLCPs, to buy us time for the slower-acting CO2 reductions to take effect.

Are the Board and staff or the E3 consultants prone to an institutional blind spot? The answer would appear to be 'yes.' This is our one chance to catch this critical omission and add vigor by getting the attached SLCPs-reduction playbook into the Plan in a big way.

The current Scoping Plan version is not capable of generating a successful outcome as defined in our state's high level goals.

Kindly take a very, very careful look at the uploaded 7/9/21 letter of concrete suggestions from Clean Air Task Force, Climate Reality California Coalition, Institute for Governance and Sustainable Development and Environmental Investigation Agency.

Attachment: [www.arb.ca.gov/lists/com-attach/29-sp22-econ-health-ws-AjAGMAY1BWcGwZl.pdf](http://www.arb.ca.gov/lists/com-attach/29-sp22-econ-health-ws-AjAGMAY1BWcGwZl.pdf)

Original File Name: 2021scopingplancomments.pdf

Date and Time Comment Was Submitted: 2022-05-03 09:19:46

No Duplicates.

**Comment 25 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Wendy  
Last Name: Legacki  
Email Address: Wlegacki@yahoo.com  
Affiliation:

Subject: Zero emissions  
Comment:

Please chose alternative 1 for zero emissions! Time is running out. We can't wait any longer to get to zero emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 09:48:15

No Duplicates.

## **Comment 26 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Franke

Email Address: bekka@sonic.net

Affiliation:

Subject: Comment on Scoping Plan Alternative 3

Comment:

I am in the midst of converting my home from gas to all electric. This is an expensive, multi-year effort. Having made this personal commitment to reduce the climate pollutants I generate, I am very disappointed that CARB's Scoping Plan recommends Alternative 3, which proposes adding new gas capacity, in addition to other regressive measures. We simply cannot be investing in new infrastructure that maintains and extends our reliance on fossil fuels. Any investments in fossil fuels at this point must be in managing their decline as sources of energy. Additionally, to assume that carbon capture will be a viable solution in the near future is a false notion. The investments made in this technology to this point haven't demonstrated financial or technical success. The real solution on which we must all be focused is reducing the production, distribution, and use of fossil fuels and increasing our investment in less expensive renewable energy. Please re-consider your support for Alternative 3; California needs a plan which recognizes that we are in the midst of a destabilizing climate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 10:53:45

No Duplicates.

## **Comment 27 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Birdlebough  
Email Address: scbaffirm@gmail.com  
Affiliation: Transportation Land Use Coalition

Subject: Scenarios and Annual Targets for GHG Reductions - VMT Reduction  
Comment:

A significant role in the necessary reductions of vehicle miles traveled (VMT) will be played by local agencies. However, many local policy makers and staff members have little time to apply their mathematical skills in solving the climate crisis. They benefit from a briefly stated goal, such as: "Vehicle Miles Traveled must be reduced at the rate of -- percent each year over the next ten years."

State grants often assist in the funding of local transportation projects and could incentivize VMT reductions.

First, the process of applying for a grant could require submission of a description of local plans, policies, and projects that reduce VMT. Supporting data can be required for the past success of each activity, as well as expectations for future reductions (total and per capita).

Second, the process could require a description of the effect that the grant would have on VMT, with supporting data.

Third, the scoring of applications for competitive grants could use the expected impacts on VMT as a factor in ranking each project for consideration of funding.

Please consider the impacts that the State funding process can have on VMT reduction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 11:49:59

No Duplicates.

**Comment 28 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on 2022 Scoping Plan Air Quality and Economic Analyses Results WS  
Comment:

Please see comments attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/33-sp22-econ-health-ws-ADJRZQc2UDYHVMVJh.pdf](http://www.arb.ca.gov/lists/com-attach/33-sp22-econ-health-ws-ADJRZQc2UDYHVMVJh.pdf)

Original File Name: 220503 Dairy Cares Comments on 2022 Scoping Plan Update WS on Initial Air Quality & Health Impacts and Economic Analyses Results (00575945-2xBA8E1).pdf

Date and Time Comment Was Submitted: 2022-05-03 13:41:53

No Duplicates.

**Comment 29 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Peter

Last Name: Reinhardt

Email Address: shayla@caliberstrat.com

Affiliation: Charm Industrial

Subject: Charm's Comments on the 2022 Scoping Plan Update Workshop

Comment:

Please find Charm's comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/34-sp22-econ-health-ws-AjJcb1xzVzRRZAcp.pdf](http://www.arb.ca.gov/lists/com-attach/34-sp22-econ-health-ws-AjJcb1xzVzRRZAcp.pdf)

Original File Name: 05.03.2022 Charm Comments on Public Workshop\_ 2022 Scoping Plan Update - Initial Air Quality & Health Impacts and Economic Analyses .pdf

Date and Time Comment Was Submitted: 2022-05-03 14:37:07

No Duplicates.

## **Comment 30 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Kathleen  
Last Name: Kilpatrick  
Email Address: dorioktk@gmail.com  
Affiliation: Safe Ag/Safe Schools

Subject: Economics and Health Webinar comments

Comment:

Comments on Economic & Health Analysis for CARB Scoping Plan

Thanks for the opportunity to expand on oral comments offered during the webinar. It's difficult to do this as a single context, since I have observed and commented during several previous (and one subsequent) meetings, and see that a recommendation has already been made, apparently based on the models used in this one. We are promised that the full scoping plan will include other parameters, yet economics seems to be a major driver in decision-making on how actions to address climate change are prioritized.

The choice of Option 3 in 2045 appears to have been recommended because it is the cheapest option relative to health benefits, as narrowly assessed. Many of my age will be gone by then, and our children, grandchildren, and generations beyond will bear the weight of our reluctance to sacrifice for and invest in their future, as well as that of many other species that inhabit this shared planet. Here are some specific critiques, categorized:

### The Industrial Model

Economic costs and health "benefits" present a narrow frame and odd combination. They address monetary costs and avoidance of costs, but not costs of damage from climate change, or of benefits of other climate strategies proposed. In the workshop these were dismissed as "qualitative concerns" that would be addressed elsewhere. The emphasis, described as being statute-driven, was on direct reduction of quantifiable emissions. Solutions presented were centralized, large-scale, capital intensive, and highly technical. This approach carries a likelihood of continued upward migration of wealth. The presenter stated explicitly that consumers would bear the costs, while failing to address other adverse consequences to those of us not positioned to buy our way out of the harms of a warming planet.

### Health Costs

Perhaps because the studies were under CARB's auspices (grant-funded?), these models were broad in scope, with limited granularity, yet very limited in focus: reduction in emissions, the first primarily from transportation and other fossil fuel use, the second addressing the health risks of catastrophic fires and various approaches to forest management. These were deemed "well-researched;" everything else was, apparently, considered qualitative. Surely there must be data available on morbidity and mortality from heat stress (e.g. Portland, BC), and other unusual weather extremes (e.g. Texas). Health and social costs are demonstrated to correlate, yet inequity in who will bear the costs was barely mentioned. Plus, of course, the omission of evaluation of impacts pesticides, the known detrimental environmental and health effects of which have been relegated as qualitative due to lack of investment in research.

### Social Costs

Presented with no parameters and no data as to what was or will be



considered, this was a quick "invest today, get payback in the future" recommendation for Option 3 out of 4, winnowed down from 8 options in the first presentation. There are already many social costs to Business as Usual (BAU), and planetary warming is likely to exacerbate them: housing, workforce training, food costs and access, limits to mobility, climate refugees, just to name a few. Many EJAC comments and questions revolved around social costs and all were poorly answered.

#### Natural and Working Lands (NWL)

Not a single recommendation from CARB's EJAC subcommittee on scoping was incorporated, or even mentioned. Yet in the economics presentation, agriculture was graphed, without explanation, as bearing a large proportion of the costs ascribed to mitigation measures. Early in this webinar, ag was referenced as an emissions source, also without explanation, aside from discussion of ozone and PM2.5s from forest fires.

Various scenarios for forest management were addressed as they related to health costs. The NWL presenter at least had the decency to apologize for the limitations of his presentation. He addressed, in passing, the costs and labor-intensive nature of managing forests, both urban and rural. (At this point in our history, it would be disingenuous to call our remaining rural forests "natural.") The catastrophic dangers of forest fires were reduced to smoke, and the addition of urban forests was framed as an alternative to aggressive forest management; both options were deemed costly implement and maintain.

To combat global warming, we need restoration of our forests to health by managing undergrowth that creates unnatural fire risks, by eliminating even-aged single species reforestation, and by preserving old growth, among other conservation methods. This can be done without wide use of herbicides.

In urban and suburban areas, augmenting tree cover, more parks and green spaces, and community gardens all have direct cooling effects, the potential to sequester carbon, and add value and health to neighborhoods, as long as methods used limit harmful chemicals and attend to soil health.

Pesticide reduction, conversion to organic farming, and regenerative practices in agriculture have been demonstrated to increase carbon capture and soil restoration, practices that have been effective far longer than removal and storage of carbon by the relatively untested mechanical, energy-intensive methods relied on in alternatives presented. To emphasize the latter, and to discount the former, tilts the process heavily toward increasing, not reducing, environmental injustice.

#### The Distributive Model

CARB's scoping plan is mandated to incorporate ways to promote environmental justice. This means looking beyond industrial methods based on direct extraction and reduction of carbon by industrial means. We need to know who will be most impacted, both by measures proposed, and by damages from failure to act quickly and equitably. In whose neighborhoods, and on whose land will renewable energy installations be installed? Where would plants to extract carbon be placed, and under whose feet would it be stored? If cap and trade is continued, who bears the brunt of trade-offs? These are sovereignty and quality of life concerns that cannot be reduced to dollars and cents.

In the economic realm, income inequality must be considered. For example, in order to increase capacity for labor-intensive solutions in forestry, farming, and restoration of natural and working lands, both urban and rural, workers must receive appropriate training and a living wage. Use of technology to develop alternative energy sources, increase the efficiency of transportation and distribution services, and track progress toward

climate goals should be income leveling, not an excuse for widening the gap.

Decentralization of production of food, and some goods and services, will reduce transportation costs and build in resiliency during such events as pandemics and climate emergencies. Energy systems must also be decentralized, increasing rooftop solar in urban areas, forming community-based power coops with collaborative grids, and developing accessible, fossil-fuel free, public transportation.

Restoration-based, Not Consumption-based

Finally, reduced consumption of some products (e.g., plastics, appliances, tech, and vehicles, all built for frequent replacement, limited recycling, and difficult disposal), restoration of biodiversity, and honoring the functions of the natural world are essential to reduce human climate impacts. 2045 is too late. The line between quantitative and qualitative impacts is not a solid boundary. For California to show real leadership, the final scoping plan must project this final vision more elegantly, holistically, and justly. Perhaps these issues will be addressed in the final scoping plan. If so, why are choices of options already being made? Our future is about qualitative choices. This is not just about money.

Kathleen Kilpatrick, RN, MN, NP, PHN, CSN  
Retired School Nurse, PVUSD

Attachment: [www.arb.ca.gov/lists/com-attach/36-sp22-econ-health-ws-B2RSNQZ1AjMGXwVm.docx](http://www.arb.ca.gov/lists/com-attach/36-sp22-econ-health-ws-B2RSNQZ1AjMGXwVm.docx)

Original File Name: CARB Comments on Ec & Health Analysis.docx

Date and Time Comment Was Submitted: 2022-05-03 15:12:57

No Duplicates.

**Comment 31 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Julie

Last Name: Van Wagner

Email Address: julie.vanwagner@ladwp.com

Affiliation: LADWP

Subject: Scoping Plan Comments - Initial AQ & Health Impacts/Economics

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/37-sp22-econ-health-ws-BWIWMQBIWX0HcVUK.pdf](http://www.arb.ca.gov/lists/com-attach/37-sp22-econ-health-ws-BWIWMQBIWX0HcVUK.pdf)

Original File Name: LADWP Scoping Plan comments May 3 2022 signed.pdf

Date and Time Comment Was Submitted: 2022-05-03 15:41:33

No Duplicates.

**Comment 32 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Rudolph  
Email Address: linda.rudolph@phi.org  
Affiliation: Center for Climate Change and Health

Subject: April 22 workshop  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/38-sp22-econ-health-ws-UiFdOFc5UHMAbwVr.docx](http://www.arb.ca.gov/lists/com-attach/38-sp22-econ-health-ws-UiFdOFc5UHMAbwVr.docx)

Original File Name: Scoping\_Plan\_Comments\_May\_3\_2022\_CCCH.docx

Date and Time Comment Was Submitted: 2022-05-03 15:44:08

No Duplicates.

**Comment 33 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Ashley

Last Name: McClure, MD

Email Address: caclimatehealthnow@gmail.com

Affiliation: Climate Health Now

Subject: concerns over lack of ambition in scoping plan scenarios

Comment:

Please find attached letter sharing concerns over the proposed scoping plan update, and our request for greater ambition in the interest of health and health equity.

Thank you,

Dr McClure, on behalf of Climate Health Now

Attachment: [www.arb.ca.gov/lists/com-attach/39-sp22-econ-health-ws-WjZWNQN2VHMHZA6.pdf](http://www.arb.ca.gov/lists/com-attach/39-sp22-econ-health-ws-WjZWNQN2VHMHZA6.pdf)

Original File Name: Letter to CARB\_Scoping Plan\_5.3.22.pdf

Date and Time Comment Was Submitted: 2022-05-03 16:14:38

No Duplicates.

**Comment 34 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Spangler

Email Address: thomas@cleanbayrenewables.com

Affiliation:

Subject: AgLand Renewables Comments on 2022 Scoping Plan  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/40-sp22-econ-health-ws-B2ZWNwZrVGyCalA0.pdf](http://www.arb.ca.gov/lists/com-attach/40-sp22-econ-health-ws-B2ZWNwZrVGyCalA0.pdf)

Original File Name: AgLand Scoping Plan Letter\_May 2022 Final.pdf

Date and Time Comment Was Submitted: 2022-05-03 16:21:52

No Duplicates.

**Comment 35 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Caroline

Last Name: Jones

Email Address: cajones@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF Comments on Health Impacts and Economic Analyses Results Workshop

Comment:

Please see attached file

Attachment: [www.arb.ca.gov/lists/com-attach/41-sp22-econ-health-ws-Wj9RMwNkUV1SN1U6.docx](http://www.arb.ca.gov/lists/com-attach/41-sp22-econ-health-ws-Wj9RMwNkUV1SN1U6.docx)

Original File Name: EDF comments on CARB Economic and Public Health Analyses Workshop (4.20.2022).docx

Date and Time Comment Was Submitted: 2022-05-03 16:56:31

No Duplicates.

**Comment 36 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchandler@gmail.com  
Affiliation: 350 Humboldt and 350 Silicon Valley

Subject: Comments on the April 20, 2022 Scoping Plan Update Workshop  
Comment:

Please accept the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/42-sp22-econ-health-ws-BXZRNFU7ByRRPgJs.pdf](http://www.arb.ca.gov/lists/com-attach/42-sp22-econ-health-ws-BXZRNFU7ByRRPgJs.pdf)

Original File Name: ScopingPlanComments\_350Humboldt\_350 SV.pdf

Date and Time Comment Was Submitted: 2022-05-03 16:57:32

No Duplicates.



**Comment 37 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Ana

Last Name: Boyd

Email Address: ana.boyd@sierraclub.org

Affiliation:

Subject: Coalition Comments on Scoping Plan - Alternative 3 is Not Acceptable  
Comment:

Please find attached the Coalition Comments on Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/43-sp22-econ-health-ws-ViVUMQNtUXJSPQVr.pdf](http://www.arb.ca.gov/lists/com-attach/43-sp22-econ-health-ws-ViVUMQNtUXJSPQVr.pdf)

Original File Name: Scoping Plan Coalition Letter - Not Alt 3 (May 2, 2022).pdf

Date and Time Comment Was Submitted: 2022-05-03 16:52:32

No Duplicates.

**Comment 38 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Evelyn

Last Name: Loya

Email Address: eloya@socalgas.com

Affiliation: SoCalGas Company

Subject: SoCalGas Comments on 2022 Scoping Plan Update - Analyses Results Workshop

Comment:

Attached please find SoCalGas' comments on the April 20 2022  
Scoping Plan Update Analyses Results Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/44-sp22-econ-health-ws-BXYHblAyAzFRO1Qz.pdf](http://www.arb.ca.gov/lists/com-attach/44-sp22-econ-health-ws-BXYHblAyAzFRO1Qz.pdf)

Original File Name: SoCalGas Comments on CARB Scoping Plan Update - April 20 Workshop.pdf

Date and Time Comment Was Submitted: 2022-05-03 17:13:01

No Duplicates.

**Comment 39 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Muriel  
Last Name: Strand  
Email Address: ecoengr@comcast.net  
Affiliation:

Subject: comments on april 20 scoping plan workshop  
Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/45-sp22-econ-health-ws-UyAFYAdpUXJV0II8.pdf](http://www.arb.ca.gov/lists/com-attach/45-sp22-econ-health-ws-UyAFYAdpUXJV0II8.pdf)

Original File Name: scoping workshop april 20.pdf

Date and Time Comment Was Submitted: 2022-05-03 17:49:07

No Duplicates.

**Comment 40 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Teresa

Last Name: Cheng

Email Address: [teresa.cheng@sierraclub.org](mailto:teresa.cheng@sierraclub.org)

Affiliation: Sierra Club

Subject: 1,348 Comments in Support of a Clean Energy Grid

Comment:

Attached

please find 1,348 comments from Sierra Club members asking CARB to set goals that do not include new gas infrastructure buildout and only zero emission targets for the electric sector.

Attachment: [www.arb.ca.gov/lists/com-attach/46-sp22-econ-health-ws-WjlUM1d7UmJWMVcl.pdf](http://www.arb.ca.gov/lists/com-attach/46-sp22-econ-health-ws-WjlUM1d7UmJWMVcl.pdf)

Original File Name: CA-CARB-comments.pdf

Date and Time Comment Was Submitted: 2022-05-03 17:47:42

No Duplicates.

**Comment 41 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

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

**Comment 42 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: James  
Last Name: Fischer  
Email Address: jwmfischer@gmail.com  
Affiliation: California Climate Reality Coalition

Subject: Comments on the 2022 Scoping Plan Update  
Comment:

Please find attached our comments for the 2022 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/48-sp22-econ-health-ws-VmRcalxvUjMFXFAj.pdf](http://www.arb.ca.gov/lists/com-attach/48-sp22-econ-health-ws-VmRcalxvUjMFXFAj.pdf)

Original File Name: 2022 Scoping Plan Comments 20220503.pdf

Date and Time Comment Was Submitted: 2022-05-03 18:51:00

No Duplicates.

**Comment 43 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Harris  
Email Address: fharris@cmua.org  
Affiliation: California Municipal Utilities Associati

Subject: CMUA Comments on the April 20, 2022, Scoping Plan Workshop  
Comment:

Clerk of the Board,

Please find CMUA's comments on the 2022 Scoping Plan Update - Initial Air Quality & Health Impacts and Economic Analyses Results Workshop.

Best Regards,

Frank Harris  
Manager of Energy Regulatory Policy  
California Municipal Utilities Association  
915 L Street, Suite 1210  
Sacramento, CA 95814  
www.cmua.org

Attachment: [www.arb.ca.gov/lists/com-attach/49-sp22-econ-health-ws-WjlROlAkBzVXDgl6.pdf](http://www.arb.ca.gov/lists/com-attach/49-sp22-econ-health-ws-WjlROlAkBzVXDgl6.pdf)

Original File Name: CMUA Scoping Plan Comments 5.3.2022.pdf

Date and Time Comment Was Submitted: 2022-05-03 19:11:08

No Duplicates.

**Comment 44 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Richard

Last Name: Grow

Email Address: grow.r@att.net

Affiliation: US EPA Retired

Subject: Comments on 2022 Scoping Plan - Scenario Inputs Technical Workshop

Comment:

Attached:Comments on 2022 Scoping Plan - Initial Air Quality &  
Health Impacts and Economic Analysis

Attachment: [www.arb.ca.gov/lists/com-attach/50-sp22-econ-health-ws-VzRXPlwwU21WNQdp.docx](http://www.arb.ca.gov/lists/com-attach/50-sp22-econ-health-ws-VzRXPlwwU21WNQdp.docx)

Original File Name: Comments on CARB Scoping Plan Modeling RGrow 5-3-2022.docx

Date and Time Comment Was Submitted: 2022-05-03 19:49:54

No Duplicates.



**Comment 45 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

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

**Comment 46 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Robert

Last Name: Spiegel

Email Address: rspiegel@cmta.net

Affiliation: CA Manufacturers and Technology Assoc.

Subject: CA Business - Industry Coalition Comments: Economic Analyses Workshop

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/53-sp22-econ-health-ws-AWJVMIwCUMMHdAV2.pdf](http://www.arb.ca.gov/lists/com-attach/53-sp22-econ-health-ws-AWJVMIwCUMMHdAV2.pdf)

Original File Name: CA Business-Industry Coalition Comments - Air Quality, Health Impacts and Economic Analyses Workshop (5.03.22).pdf

Date and Time Comment Was Submitted: 2022-05-03 21:25:15

No Duplicates.

**Comment 47 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Floyd  
Last Name: Vergara  
Email Address: FVergara@cleanfuels.org  
Affiliation: Clean Fuels Alliance America

Subject: Clean Fuels and CABA Comments on Scoping Plan Update  
Comment:

Joint comments from the Clean Fuels Alliance America and California  
Advanced Biofuels Alliance (CABA) for CARB's consideration

Attachment: [www.arb.ca.gov/lists/com-attach/54-sp22-econ-health-ws-UTJXPVE1ADICagNc.pdf](http://www.arb.ca.gov/lists/com-attach/54-sp22-econ-health-ws-UTJXPVE1ADICagNc.pdf)

Original File Name: Clean Fuels\_CABA Comments CARB 2022 Scoping Plan Update\_Initial AQ and Health Impacts (FINAL May 3 2022).pdf

Date and Time Comment Was Submitted: 2022-05-03 21:41:55

No Duplicates.

## **Comment 48 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Birdlebough  
Email Address: scbaffirm@gmail.com  
Affiliation: Transportation Land Use Coalition

Subject: Scenarios and Annual Targets for GHG Reductions - VMT Reduction  
Comment:

Embedded carbon emissions in battery-powered vehicles must be evaluated in setting goals for the shift from ICE autos to electric vehicles.

By some estimates, battery production for electric vehicles will require graphite, lithium, and cobalt supplies that will need to grow by over 450 percent by 2050 to meet global climate targets. This new demand, even with maximum reuse and recycling, implicates a range of environmental issues and the lives of people in mineral-producing countries.

These products offset some of the environmental benefits of battery-powered automobiles. I have seen estimates in the 30% to 40% range. Hydrogen-powered autos have similar issues that must be accounted for.

See:  
<https://www.law.berkeley.edu/wp-content/uploads/2020/07/Sustainable-Drive-Sustainable-Supply-July-2020.pdf>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 21:46:52

No Duplicates.

## **Comment 49 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Hari  
Last Name: Lamba  
Email Address: hlamba101@gmail.com  
Affiliation: Brighter Climate Futures

Subject: Comments on Alternative 3  
Comment:

Liane Rudolph, Chair      May 3, 2022  
California Air Resource Board

RE: Comments by Brighter Climate Futures - Alternative 3 will not get us there

Proposing instead an "Alternative 5" Instead that will get us zero emissions, plenty of clean energy and expanded carbon sink ecosystems. Our group stands ready to present the energy, emissions, economics, business development and timeline aspects if you will give us the opportunity to do so.

Dear Chair and Members of the Board,

During the recent workshop on your Scoping Plan, your staff indicated that they favored Alternative 3, as presented. Alternative 3 will not get California to Carbon Neutral by 2045. Already wildfires are devastating California and recently the Governor massively increased the wildfire management budget to over \$500 billion but with very little for the energy transition. By pursuing Alternative 3 the wildfire management budget to grow tenfold by 2045, and the climate mitigation and transition (transition to renewable energy and emissions reductions) budgets to shrink.

If you wish to get to a 100% reduction in greenhouse gas (GHG) emissions by 2045 (23 years from today), only strategies that reduce GHG emissions of about 4% per year will get you there. We talk of grid reliability, but one talks of climate change "reliability", the only action that will get you there for sure is reductions in fossil fuel emissions and replacement of all of them with renewable energy in direct and stored forms.

Alternative 3 will not get us there for the following reasons:

1. Adding 10GW of natural gas power plants will only increase GHG emissions from the energy sector.
2. We already have a super example of carbon capture and storage (CCS) - it's called fossil fuels. Our dear planet has done us a big favor by capturing carbon out of the atmosphere over hundreds of millions of years and storing it in fossil fuels, thereby cooling the atmosphere of our Earth and making it favorable for our species and life as we know it. Digging them up, burning them and emitting the carbon back into the atmosphere and then turning around and trying to capture the carbon by technological means and then store it makes no sense. Why not keep the carbon captured in fossil fuels buried in the ground? The planet has already done it for us for free. CCS and DAC (Direct Air Capture) are expensive unproven technologies that we should not waste our money on - if you have to include them, put them on notice that you will only agree to them if they prove themselves and do it with no GHG emissions.
3. Most of California's GHG emissions came from transportation. Alternative 3 does very little to put forward a program for

reducing emissions from gasoline and diesel vehicles.

4. California has 15 refineries. Alternative 3 does little to begin to reduce the extraction, import, refining and use of oil that will help the refineries transition out of oil to forms of renewable energy.

5. California is currently suffering much from poor air quality (there are many non-attainment areas), mainly due to the burning of fossil fuels in energy, transportation and off-road engines, although admittedly legacy activities like wood burning fireplaces also add to it in winter. The adverse health aspects of especially particulates even of less than PM2.5 size have much more economic impacts than Alternative 3 calculates. With Alternative 3, we will be also more prone to steadily worsening air quality from wildfires.

6. The carbon capture and storage in natural working lands is a beneficial aspect, but this has more benefits in terms of protecting biodiversity and helping our ecosystems survive under the increasing stress of climate change related drought that we are suffering increasingly from. Besides, the actual carbon absorption by any kind of land is tough to quantify and much depends on actual management. Hence, it is our suggestion that we do not rely on quantitative calculations of carbon absorption, unless we engage in a massive effort to expand ecosystems, and quantify the actual carbon absorbed in practice by measurements and evaluations.

In tabular form, here is what we propose instead by the way of "Alternative 5"

#### S.No. Sector or Area Actions

1 Electric Power Replace existing natural gas power plants in a systematic programmed manner with solar plus battery power plants but with strict requirements for minimum environmental impact of large Solar PV power plants - but also to minimize added electric transmission line requirements and costs, such power plants should be located near the original fossil fuel power plants, so as to use the existing electric transmission lines as much as possible.

2 Road Transportation Replace all road fossil fuel vehicles with zero emissions vehicles (battery electric or fuel cell vehicles using green hydrogen) on a programmed annual basis to target the absence of fossil fuel vehicles by 2045. All EV charging should be matched with a corresponding increase in solar energy close by and an increase in green hydrogen and fuel cell vehicles produced using solar (and wind and geothermal) energy.

3 Off Road Units Replace all off road vehicles and units (lawn mowers, leaf blowers, etc.) with electric vehicles and units. These units have high pollution and have very little pollution controls. Agricultural machines including tractors can be included in this legislation.

4 Transit Transportation & High-Speed Rail All existing or new transit modes or added transit systems must be zero emissions, with the use of solar and battery systems, and innovative so as to provide lower cost and greater area coverage. Target the reduction of vehicle miles traveled and aviation and tourism emissions, with maximum links to pedways and bikeways

5 Electrification All sectors should be electrified with replacement of use of fossil fuels with electric uses, and the added electrical energy all provided by renewable energy power plants. All existing uses should be retrofitted in a programmed manner: Sectors to include industry, homes & buildings, ships, and ports.

- For transportation, EV charger installation, permitting, interconnection by utility and quality/reliability issues need to be addressed through combination of legislation, enablement of cities and funding

6 Added Electrical Power All the added energy due to electrification to be mostly met by distributed solar - behind the meter rooftop, front of the community microgrids, small solar near consuming communities, for EVs and solar for transit and high-speed rail. Mandate increased customer benefits for rooftop solar and reduced transmission access charges for electric users. Electrical

transmission lines, sub-stations and points of interconnection only to be added for replacing large fossil fuel facilities for large Solar PV plus battery installations (with green hydrogen electric power generation to be added later, similar to Intermountain Power Project of the Los Angeles Department of Water and Power)

7 Green Hydrogen What cannot be electrified must rely on chemically stored forms of renewable energy, such as green hydrogen from electrolysis and green ammonia produced ONLY by use of renewable energy, with the development of programs for the production, storage, transport, and end uses of green hydrogen in all sectors. This should aim at overcoming the variability of renewable energy and supplying an energy dense portable non-carbon transportation fuel.

8 Methane Emissions Reductions Methane emissions must be reduced by elimination of fossil fuel uses, reduction in animal agriculture (especially CAFOs - concentrated animal feed operations), and avoidance of biowaste going to regular landfills, and instead being composted in industrial scale composting facilities. Carbon sink agriculture will then benefit from such increases in composted fertilizer.

9 Carbon sink Coastal Ecosystems Expansion of coastal ecosystems, especially in all bays along the coast for example with sea grasses, salt marshes and oyster reefs. The 30 by 30 program should be expanded to include the expansion of coastal wetlands to absorb more carbon and increase ocean biodiversity and revive fisheries.

10 Carbon sink Land Ecosystems All ecosystems identified in the 30 by 30 program must be restored and then expanded with massive reforestation and expansion of land-based wetlands but combined with strategies for wildfire management and wildlife biodiversity enhancement. Lumbering strategies need to transition to sustainable forestry, a banning of clear cutting, and include creating breaks for wildfires. One sure way of storing carbon in land is a massive afforestation program of say 20 million hectares to add standing forests, and from urban and agroforestry

11 Carbon sink agricultural systems Green revolution type chemical agriculture should be replaced by organic and natural farming but with massive increases in compost added (e.g., composted biowastes), and crops that need less water, pesticides, and herbicides with electrification of all agricultural equipment or transition to fuel cells using green hydrogen

12 Air Quality Pass legislation and empower and challenge all Air Quality Management Districts to begin controlling the major sources of pollution and accompanying greenhouse gas emissions in their areas - vehicles, off road engines, refinery emissions, wood burning, ports, ships, boats, locomotives, etc.

13 Jobs, Economy & Just Transition California already leads the world and has the most renowned Silicon Valley. California now needs to take the lead in business and technology solutions to climate change, new, green and clean energy technologies, through encouraging and funding R&D (Research and Development), and in incubating and accelerating low and zero carbon businesses, and in developing their needed infrastructure and end uses. In this way, California can provide a role model for the replacement of fossil fuels and provide a just transition for fossil fuel workers and companies. Such new businesses and jobs will help the state transition from its current fossil fuel economy, and replace the jobs lost in the fossil fuel sector

Our group is available to present to your Board and in a future workshop, the quantitative aspects of energy transitions, costs, benefits, technologies and fossil fuel emissions reductions and natural absorptions.

Thanks for allowing us to comment on your workshop!

Regards,

Dr. Hari Lamba  
Brighter Climate Futures

Richmond, CA 94805  
www.brighterclimatefutures.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 22:48:37

No Duplicates.



## **Comment 50 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Ron

Last Name: Whitehurst

Email Address: ron@rinconvitova.com

Affiliation: Rincon-Vitova Insectaries, Inc.

Subject: Achieve climate-stabilizing goal by 2030 and attend to EJAC recommendations

Comment:

Our company urges more ambition than any of the alternatives presented in order to achieve a necessary climate-stabilizing goal by 2030. We further agree with the Sierra Club California main points:

1. Exclude New Investments in Fossil Fuel Infrastructure and Pursue Renewable Energy
2. Pursue Direct Emissions Reductions Rather Than Gambling on Carbon Capture and Other Unproven Technologies
3. Reduce Emissions from the Transportation Sector by Enforceable Measures to Comply with the Governor's Executive Order
4. Phase Out Oil Refining, Gas Extraction, and Correct Assumptions in Alternatives 2- 4
5. Evaluate Public Health Benefits on the Same Level as Economic Costs
6. Exclude Green Hydrogen Injections into the Methane Pipeline System
7. Set a Date for Electrification Retrofits in Addition to Replacing Gas Appliances at End-Of-Life

We would additionally want the goal for 30% organic acreage to be achieved no later than 2030 to cut the use of artificial nitrogen and toxic inputs to soil that damage the capacity for biological carbon sequestration and climate resilience. We also urge you to incorporate into land management goals, practices to slow, spread and sink water: rehydrating and re-vegetating and thereby cooling landscapes based on the latent heat of evaporation.

We would like to see you be more responsive to the recommendations of the EJAC. You don't appear to respect the time they are putting into the process and it seems rude and inappropriate. The short timeline seems to be a recurring reason for not explaining the assumptions and the models that EJAC has asked for. Please take the time to respond to the EJAC because we can count on the EJAC's recommendations to be sound.

We need to achieve the climate-stabilizing, emission-reduction requirement by 2030; however, you are not showing us the details to assure us that we will get there. We anticipate that to get there requires enforceable measures with annual accountability reports and ongoing adjustment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 23:22:39

No Duplicates.

**Comment 51 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Doug  
Last Name: Bender  
Email Address: [alfabender@verizon.net](mailto:alfabender@verizon.net)  
Affiliation: Indivisible South Bay LA

Subject: Scoping Plan  
Comment:

I urge you to select Option 1, Zero Emissions. It's premature to commit to carbon capture and storage, we need to put our emphasis on driving as close to zero emissions as we can get. We should be pursuing nature based solutions and ban the use of artificial nitrogen and toxic pesticides that can harm the soil's ability to maximally sequester carbon.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 23:36:17

No Duplicates.

**Comment 52 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Aird

Email Address: sarah@pestcidereform.org

Affiliation:

Subject: CPR comments

Comment:

CPR comments

Attachment: [www.arb.ca.gov/lists/com-attach/59-sp22-econ-health-ws-Wz1SPVwzVmRWPAVa.pdf](http://www.arb.ca.gov/lists/com-attach/59-sp22-econ-health-ws-Wz1SPVwzVmRWPAVa.pdf)

Original File Name: FINAL FINAL Scoping Plan Comments 050322.pdf

Date and Time Comment Was Submitted: 2022-05-03 23:58:59

No Duplicates.

**Comment 53 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Ignacio

Last Name: Fernandez

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

Affiliation: Southern California Edison

Subject: SCE comments on AB 32 2022 SPU AQ & PH Technical Workshop

Comment:

See. attached. Comments received 5/3/22.

Attachment: [www.arb.ca.gov/lists/com-attach/60-sp22-econ-health-ws-AXIHYgdjUl4AZQFu.pdf](http://www.arb.ca.gov/lists/com-attach/60-sp22-econ-health-ws-AXIHYgdjUl4AZQFu.pdf)

Original File Name: SCE\_comments\_SPU\_AQPH\_20220420.pdf

Date and Time Comment Was Submitted: 2022-05-04 08:04:39

No Duplicates.

**Comment 54 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Matt  
Last Name: Haynie  
Email Address: shayla@caliberstrat.com  
Affiliation: POET, LLC

Subject: Comments  
Comment:

See attached; comments received 5/3/22.

Attachment: [www.arb.ca.gov/lists/com-attach/61-sp22-econ-health-ws-BWNTpABvWGoDaQRb.pdf](http://www.arb.ca.gov/lists/com-attach/61-sp22-econ-health-ws-BWNTpABvWGoDaQRb.pdf)

Original File Name: Final 05.03.22 POET Scoping Plan Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-05-04 08:04:39

No Duplicates.

**Comment 55 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Michael

Last Name: Wara

Email Address: mwara@stanford.edu

Affiliation: Stanford University

Subject: Thank you for your work and the opportunity to provide comment!

Comment:

See attached. Comments received 5-3-22

Attachment: [www.arb.ca.gov/lists/com-attach/62-sp22-econ-health-ws-VDVSJgNgVloBdAVm.pdf](http://www.arb.ca.gov/lists/com-attach/62-sp22-econ-health-ws-VDVSJgNgVloBdAVm.pdf)

Original File Name: ARB Scoping Plan Economics and Air Modeling Workshop Stanford Comment.pdf

Date and Time Comment Was Submitted: 2022-05-04 11:01:34

No Duplicates.

**Comment 56 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Vincent

Last Name: Wiraatmadja

Email Address: vincent@theclimatecenter.org

Affiliation: The Climate Center

Subject: Comments on the Scoping Plan

Comment:

Please find attached The Climate Center's comments urging the Board to reject Alternative 3 and adopt a more ambitious GHG emission goal.

Attachment: [www.arb.ca.gov/lists/com-attach/63-sp22-econ-health-ws-UDMGYVckBzYBWFQn.pdf](http://www.arb.ca.gov/lists/com-attach/63-sp22-econ-health-ws-UDMGYVckBzYBWFQn.pdf)

Original File Name: CARB Scoping Plan Comment Letter 05.03.22.pdf

Date and Time Comment Was Submitted: 2022-05-04 13:36:27

No Duplicates.



**Comment 57 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Emily  
Last Name: Turkel  
Email Address: emily.turkel@calpine.com  
Affiliation: Calpine Corporation

Subject: Comments of Calpine Corporation on the Initial Air Quality & Health Impacts Workshop  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/64-sp22-econ-health-ws-VTZVMgZrV3QLZFA+.pdf](http://www.arb.ca.gov/lists/com-attach/64-sp22-econ-health-ws-VTZVMgZrV3QLZFA+.pdf)

Original File Name: Calpine Comments on Initial Air Quality and Health Impacts Workshop.pdf

Date and Time Comment Was Submitted: 2022-05-09 13:18:04

No Duplicates.

**Comment 58 for 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) - 1st Workshop.**

First Name: Neena  
Last Name: Mohan  
Email Address: neena@caleja.org  
Affiliation:

Subject: Update on CEJA comment letter re Scoping Plan modeling  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/65-sp22-econ-health-ws-BmVWNQBrVWcFXFc0.pdf](http://www.arb.ca.gov/lists/com-attach/65-sp22-econ-health-ws-BmVWNQBrVWcFXFc0.pdf)

Original File Name: CEJA Comment Letter on Scoping Plan Modeling - May 2022.pdf

Date and Time Comment Was Submitted: 2022-05-27 08:09:41

No Duplicates.

**There are no comments posted to 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop (sp22-econ-health-ws) that were presented during the Workshop at this time.**