2017 PLAN

SPARE THE AIR - COOL THE CLIMATE

Public Comments

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

APRIL 2017

375 BEALE ST. SUITE 600
SAN FRANCISCO, CA 94105

WWW.BAAQMD.GOV

Table of Contents

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: A Bonvouloir [mailto:ra3ajw@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:30 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

A Bonvouloir
ra3ajw@sbcglobal.net
POB 70185
Sunnyvale, California 94086

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: 1305 Solano Apt G Fix [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 1:18 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I absolutely support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

I thank you for your time and consideration.

1305 Solano Apt G Fix
afixafix@gmail.com
1305 solano ave apt g
Albany, California 94706

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: abigail zoger [mailto:Azoger00@gmai.com]
Sent: Saturday, March 4, 2017 8:13 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Great start on the Clean AirPlan. But the Plan needs more enforceable measures for reducing greenhouse gases (GHGs).

Things to think about:
green building incentives especially for retrofitting Hold the line on large industry carbon generation.
Make biofuel easier
Thanks
Abigail Zoger

abigail zoger
Azoger00@gmai.com
953 Del Mar Drive
Santa Rosa, California 95405

<http://click.actionnetwork.org/mpss/o/3gA/kLwXAA/t.25d/3Jr2FuytQs-b-eWsArXWyQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Alexis Goldstein [mailto:alexis@ourfinancialsecurity.org]
Sent: Wednesday, March 1, 2017 10:02 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Alexis Goldstein
alexis@ourfinancialsecurity.org
123 main
brooklyn, New York 11217

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.259/JmdcFraxRTOHN10AkGLTgQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Alice Merrill [mailto:alicem3@mindspring.com]
Sent: Wednesday, March 1, 2017 8:29 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Alice Merrill
alicem3@mindspring.com
PO Bos 357
Sausalito, California 94966

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.259/iqEemxUzT_GnahMx7DZVHg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:46 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Allen Lilleberg [mailto:lilleah@napanet.net]
Sent: Wednesday, March 1, 2017 10:19 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” faraway climate goals.

Allowing the port of oakland to export coal will only add to our problems. Over a quarter of our particulates come off the ocean from China! We cannot allow our old military ports to be facilitating our air pollution problem .

Allen Lilleberg
lilleah@napanet.net
2470 West. Pueblo Ave.
Napa, California 94558

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.25a/05q3N0tPSiqfXk_A-uFPDQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Alma Prins [mailto:woodprins@att.net]
Sent: Wednesday, March 1, 2017 2:46 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

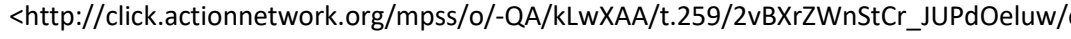
Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

During this time when climate change seems to be accelerating, and on a national level we appear to be going dangerously backwards, we need strong action in California!

Alma Prins
woodprins@att.net
1812 Curtis Street
Berkeley , California 94702



Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Amanda Groziak [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Amanda Groziak
Amanda.groziak@gmail.com
3491 Skyline Drive
Hayward, California 94542

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/fW-xqQfhTfuyl0gleOg3cQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Amy Stimmel [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 4:30 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

Amy Stimmel
astimmel@yahoo.com
1059 Bella Vista Ave #3
Oakland, California 94610

<http://click.actionnetwork.org/mpss/o/4gA/kLwXAA/t.25e/ZgNVxgYxTBumX5h_MFGODA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Amy Valens [mailto:amylvalens@comcast.net]
Sent: Wednesday, March 1, 2017 9:41 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

My husband Tom and I appreciate the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. We very much agree that: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” But the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). We hope you will add regulations for immediate meaningful reductions of GHGs, so this plan can have a real impact.

One piece that strikes us as very important is SS12. Saying that there are carbon limits, and then providing a way to avoid the limit is counterproductive. With the industry's push for processing tar sands here, it is vital that we have stronger measures in place than the current plan proposes.

Thank you again for the work you have done, and take our comments as they are given, in the spirit of working together for the future of our children and our world.

Amy Valens
amylvalens@comcast.net
209 Montezuma Ave box 524
Forest Knolls, California 94933

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/Lt5jDkGOQ02ORq4r2oRxWg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: andrea kean [mailto:davanmad@lmi.net]
Sent: Wednesday, March 1, 2017 8:34 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

andrea kean
davanmad@lmi.net
1423 campus dr
berkeley, California 94708

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.259/sAPEaB_yS6SytZ87rKIOcQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Anita Watkins [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 1:57 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Anita Watkins
watanita@gmail.com
6109 Westover Drive
Oakland, California 94611

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/TLnlHFpdTRGM8nhKZp2CKQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Ann Wizer [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:04 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Ann Wizer
annwizer1118@gmail.com
484 Lake Park Ave #530
Oakland, California 94610

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:31 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Anne Szostek [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:31 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

In particular, the Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

Thank you for your good work,
Anne

Anne Szostek
atszostek@gmail.com
5700 Skyview PLace
Richmond, California 94803

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:46 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: anne veraldi [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:59 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

anne veraldi
anneveraldi@hotmail.com
21 lapidge
sf, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Arthur Gregorian [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:05 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Arthur Gregorian
raffi_g@yahoo.com
3906 Linwood Ave
Oakland, California 94602

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Aryeh Frankfurter [mailto:aryeh@lionharp.com]
Sent: Wednesday, March 1, 2017 8:08 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Aryeh Frankfurter
aryeh@lionharp.com
205 ELLSWORTH
san francisco, California 94110

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.259/pvHHcx1cSBqyEzWxGEPmsQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Barbara Hollenbach [mailto:barbhol@comcast.net]
Sent: Wednesday, March 1, 2017 8:09 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Barbara Hollenbach
barbhol@comcast.net
3225 Lucas Circle
Lafayette, California 94549

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/K7AF24T2QHqxkynMk-5tfA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: beth weinberger [mailto:bethw0104@mindspring.com]
Sent: Wednesday, March 1, 2017 8:37 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Ms. Riviere and Mr. Burch,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Relying on education and incentive funding will not do the job that requires truly "aggressive action." Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

beth weinberger
bethw0104@mindspring.com
4011 suter st.
oakland, California 94619

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.259/WScf8dN4QY6x_cRJNwwNoA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Bianca Molgora [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:37 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Bianca Molgora
biancamsf@yahoo.com
3976 Folsom St.
San Francisco, California 94110-6138

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Bill Hilton [mailto:billhilton@mac.com]
Sent: Wednesday, March 1, 2017 2:10 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action. It should also include specific actions--regulations if necessary--to show how the Bay Area and the state may catch up our goals.

The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of the fossil fuel appliances.

I trust that you will take my comments as they are intended: constructive ideas to move CA and the Bay Area in the directions we MUST go.

Sincerely,

Bill Hilton
Sunnyvale

Bill Hilton
billhilton@mac.com
881 Cumberland Dr
Sunnyvale, California 94087

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/TR2Gc9IfTrCWOCqAvAXqng/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Bob Harlow [mailto:bob@harlow.com]
Sent: Wednesday, March 1, 2017 1:53 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Bob Harlow
bob@harlow.com
65 Greenbrae Boardwalk
Greenbrae, California 94904

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.259/-n9iLNFnS1eY4hwLanLAeA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:31 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Brenda Carter [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:32 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” However, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but more than these welcome actions are required to achieve real reductions. Experience has shown the strength of resistance to making changes to limit carbon emissions. Education and incentives are good, but enforceable rules are needed to get the job done.

Brenda Carter
firefly24.bc@gmail.com
410 Kearney
El Cerrito, California 94530

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Bruce Jensen [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:18 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

•The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

•The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

•The purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.

•The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

It needs to incorporate Residential and Commercial Energy Conservation Ordinances (RECO / CECO) or their regulatory equivalents to require energy efficiency measures at time of sale in order to help make older building stocks, notorious wasters of energy, much more energy efficient and carbon-neutral. We here at the local government level (I am a Planner for Alameda County) would love to have some backup on these and other unnecessarily controversial common-sense Climate Action Plan (CAP) measures.

We need to recognize the effect water treatment and processing has on energy use, and work with local agencies to implement water conservation measures that have also been difficult to include in CAPs due to public opposition. We

live in a Mediterranean climate - this should be second nature to us, and yet we waste water and burn carbon energy in the process.

•The Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area.

Thank you for driving us in the right direction, and thanks for considering strong and effective regulations to reduce our carbon intensity.

Bruce Jensen
bpnjensen@yahoo.com
2122 Via Barrett
San Lorenzo, California 94580

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Caitlin Cronkhite [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 6:34 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Caitlin Cronkhite
caitlincronkhite@gmail.com
407 Orange Street, 308
Oakland, California 94610

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.25a/_EzmB-jOTvi9jC-pj6Zycw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Caitlin Piccolo [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 1:40 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Ms. Christy Riviere and Mr. David Burch,

Thank you very much for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. We are at a crucial time we must as citizens make our voices heard under threats to our first amendment by the president, and our local and state authorities must put forward strong regulations on Climate Change to forge a path for the rest of the country and the world and demonstrate to the federal government that we understand the crisis at hand and the need for action.

That is why I would like to express my support for this stated purpose in the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our challenging but attainable climate goals.

I urge you to be strong in the face of powerful industry lobbyists, contrary to what certain state regulatory bodies have failed to do in the past. Education and incentive funding are important options for reducing GHGs, which I understand well because I have the privilege of working in the field of environmental education as a peace corps volunteer in Mexico. But I also understand, working in this field, that real change requires strict regulations and enforcement of them. That is why I ask that you consider stricter options for enforcement of GHG limits. In particular, stationary sources of GHGs should not be given the option of compensating for exceeding carbon intensity limits under measure SS12 by increasing biofuel production. We need to move to more electrified transportation. If possible industry responsible for exceeding carbon intensity limits should be faced with harsh fees that go towards sustainable public transportation options or restoration or reforestation projects that capture GHGs.

Thank you very much for your time and consideration.
Sincerely,
Caitlin Chew

Caitlin Piccolo
caitlin.chew@gmail.com
11452 Lochard St
Oakland, California 94605

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:48 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carol Bardoff [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:16 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I would like to comment on the Air District's Draft 2017 Clean Air Plan, particularly the following statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

I do support this statement. However, the Plan seems to lack enforceable measures for reducing greenhouse gases (GHGs). Please do all you can to add more regulations that would promote reduction of GHGs within a time frame that would support our goals in the battle against climate change.

Carol Bardoff
kairu22@gmail.com
978 Begier Avenue
San Leandro, California 94577

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carol Cook [mailto:cabomail@comcast.net]
Sent: Wednesday, March 1, 2017 10:20 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

In summary, the Draft Plan relies mostly on education and incentive funding to reduce greenhouse gases. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

Thank you for considering my concerns.

Carol Cook
cabomail@comcast.net
282 La Casa Ave
San Mateo, California 94403

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:46 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carol Rothman [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:45 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Carol Rothman
carolrothman@gmail.com
1539 Parker St
Berkeley , California 94703

<http://click.actionnetwork.org/mpss/o/_QA/kLwXAA/t.25a/-bzPqrF1R1qHU8ozzHSPaw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carolyn Chaney [mailto:cchaney@sfsu.edu]
Sent: Wednesday, March 1, 2017 8:32 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,
Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I agree with this key statement, “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” I am concerned that the plan lacks enforceable measures for reducing greenhouse gases (GHGs).
Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals. For example, I am glad that SS12 sets carbon limits on petroleum refineries, but I do not agree that they should be allowed to exceed those limits, even if increasing biofuel production, thereby doing an end-run around the set limits. The waiver from limits will only encourage processing of dirty fuels, such as tar sand And I am quite concerned that the plan is not reducing our Bay Area GHG emissions to the 1990 level by 2020. Every day that we fall behind is a day less for our habitation of our planet.
Thank you for all that you do to spare the air.

Carolyn Chaney
cchaney@sfsu.edu
313 Lakeview Way
Emerald Hills, California 94062

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carolyn Knoll [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:31 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Carolyn Knoll
clk5356@gmail.com
2 Irwin Way, Apt. 208
Orinda, California 94563

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/xq4QfMIERSOFIFtrOhxtSw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:27 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Carolyn Stern [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 11:08 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Carolyn Stern
cdsternv@yahoo.com
1145 woodside rd
Berkeley, California 94708

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Cassandra Burdyshaw [mailto:cburdyshaw@seaturtles.org]
Sent: Wednesday, March 1, 2017 2:26 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Cassandra Burdyshaw
cburdyshaw@seaturtles.org
225 Locust St., S-28
Sausalito, California 94965

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Cate Leger [mailto:cate@greendwellings.com]
Sent: Sunday, March 5, 2017 4:16 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

The Plan shows (in Figure 3-9) that California's climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren't reducing the Bay Area's GHG emissions to highlight the importance and necessity for regional action.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to "offset" the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

The purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.

Cate Leger
cate@greendwellings.com
McGee Ave
Berkeley, California 94703

<http://click.actionnetwork.org/mpss/o/4QA/kLwXAA/t.25e/7aJtDI5kRCu-xKLTNXLfAg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Catherine Crockett [mailto:cm_crockett@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:10 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Catherine Crockett
cm_crockett@sbcglobal.net
1739 Havana St.
Seaside, California 93955

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Cecilia Brown [mailto:cecilia.brown@att.net]
Sent: Wednesday, March 1, 2017 11:30 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Cecilia Brown
cecilia.brown@att.net
Chelton Dr
Oakland, California 94611-2427

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.25a/WuObUvhGRSCUxS0-H-nc6g/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Charesa Harper [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:31 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Charesa Harper
charleighh78@yahoo.com
4399 Warm Springs Rd.
Glen Ellen , California 95442

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.259/CYf8H77UR4yy1gNu34e8aw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Charis Stiles [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:06 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Thank you for your concern and please consider additional regulations. Now more than ever California is the model for environmental policy and for leadership in climate change. Please understand the weight of your decision for ourselves and future generations.

Thank you,
Charis Stiles MSW

Charis Stiles
charis.stiles@gmail.com
Charis Stiles
Oakland, California 94610

<http://click.actionnetwork.org/mpss/o/_QA/kLwXAA/t.259/Wvk3IxFHT_-HntDfAzvq5w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: cheryl higgins [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

cheryl higgins
cherylhiggins8@gmail.com
po Box 1348
Point Reyes Station, California 94956

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.259/83AOnidKQBy58OIGNIZ3Nw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Cheryl Kozanitas [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:28 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Cheryl Kozanitas
cherylkoz44@gmail.com
646 Pico Ave
San Mateo, California 94403

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Chris Baldwin [mailto:newsletters@shoulderhigh.com]
Sent: Wednesday, March 1, 2017 8:37 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Chris Baldwin
newsletters@shoulderhigh.com
50 Elsie St
San Francisco, California 94110

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/d-4bZ1lbSbeSCPXc9QUujg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Christine Dhein [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 7:35 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Christine Dhein
christinedhein@yahoo.com
405 Via Casitas #8, El Portal
Greenbrae, California 94904

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: christine hoex [mailto:choex@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:53 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” That"s a good statement and vision, however, the Plan seems to have few enforceable measures. The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions! Education and incentives are good, but regulations are needed to get the job done. The Plan needs MORE ENFORCEABLE RULES requiring GHG reductions.
. Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

christine hoex
choex@sbcglobal.net
330 horn
santa rosa, California 95407

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.259/yiw_meDORZi-DSdzJnomXg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Christine Orth [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 3:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Christine Orth
cmorth.90@gmail.com
Kipling Drive, 160
Mill Valley, California 94941

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:30 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Chrysa Caulfield [mailto:chrysa@chrysacaulfield.com]
Sent: Thursday, March 2, 2017 10:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Chrysa Caulfield
chrysa@chrysacaulfield.com
1626 Channing Wy Apt A
Berkeley, California 94703

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.25a/9F7talLfQYW9rzO34A7IyQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Claudia Wornum [mailto:claudiawornum@comcast.net]
Sent: Wednesday, March 1, 2017 8:40 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Claudia Wornum
claudiawornum@comcast.net
11780 Cranford Way
Oakland, California 94605-5812

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.259/a2SNtV7LQmiVVcxWxyGnjw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Corinne Smith [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:41 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Corinne Smith
corinnesmith115@gmail.com
6017 Romany Rd
Monterey, California 94708

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: District Draft plan 2017 comments

-----Original Message-----
From: Crqaig Merrilees [mailto:craig@ilwu.org]
Sent: Wednesday, March 1, 2017 10:04 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: District Draft plan 2017 comments

Christy Riviere,

Dear Planners Riviere and Burch,

I'm writing to thank you for your work on the Draft Clean Air plan 2017, and coffer some comments.

FIrst, thank you for noting that "aggressive action" is required to meet the goal of transitioning to a "post-carbon economy."
This seems like the only way to protect the public health and our climate. Eliminating oand/or drastically reducing the burning of fossil fuels is essential, as you note in the plan.

I was troubled by the lack of specific mechanisms and regulations to reduce greenhouse gas emissions. Without specific regs and enforcement power, this will be just another good plan with lofty ideals that goes on the shelf.

Hopefully, you will consider adding the missing specifics in the current draft, to make this a policy document with consequences and impact.

Thank you very much,
Craig Merrilees

Crqaig Merrilees
craig@ilwu.org
20 South Forty Dock
Sausalito, California 94965

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Dalya Massachi [mailto:dm.writer@live.com]
Sent: Friday, March 3, 2017 10:35 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

However, the Plan seems to have few enforceable regulations (protections) for reducing greenhouse gases (GHGs). Please consider additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Dalya Massachi
dm.writer@live.com
6605 Telegraph Av
Oakland, California 94609

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.25b/GMJCFU2OTVCKe4G-qq6yDQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Dasha Lebedeva [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 4:04 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Dasha Lebedeva
lebedeva.dasha@gmail.com
25 Home Pl W Apt A
Oakland, California 94610

To: Bay Area Air Quality Management District

Re.: Spare the Air Plan

From: David Bezanson, Ph.D., bezanpsy3506@hotmail.com, San Mateo County

Date: 3 Mar. 2017

Thank you for drafting this visionary plan. It will improve our air quality and quality of life. Most of our comments recommend inclusion of topics and sources that you may have in mind, but are not mentioned in the plan. Many of these are best addressed by multi-agency, multidisciplinary collaboration.

Dollar value of reducing one ton per year of each pollutant using MPEM. The values in table c-2 are somewhat different from those in the 2010 CAP on the equivalent table 1-2. Can a discussion be inserted why several of the values have changed?

Health effect of PM2.5. Since PM2.5 is identified as a major health risk, coiuld the document expand on how the public can avoid emitting or being exposed to this pollutant. In particular, pellet fireplaces are often sold as very low polluting devices. Is this a valid statement?

Also, the document refers to health hazards from being “near” freeways. Could the District expand on this concept to give city planners a quantitative guideline on how big a buffer should be placed along freeways?

The most effective way of removing CO2 from our air is preserving and adding vegetation, especially trees on private and public lands. Protect our forests by prohibiting clearcutting. Promote tree planting in urban areas. Prohibit burning of fallen branches, leaves, and trees in forests.

Provide education on divestiture of public and private funds from fossil fuel companies and others producing harmful products. Catalyze the local renewable energy industry, e.g., via new issues of green municipal bonds.

On web page 28, replace the final sentence in the Low GHG Diet section with something stronger.

All research published in the past 15 years has found that GHGs (and many other global environmental problems) would be significantly decreased by humans consuming vegetarian, and preferably vegan, diets. Beef has a higher carbon footprint than any other food.

Reclassify N2O as a super GHG. This is consistent with data on web pages 79, 84, 146, and elsewhere throughout the document.

Livestock factories (CAFOs) emit massive amounts of N2O, methane, and toxics. These pollute our air, land, and water. Monitoring and enforcement by the EPA and FDA is pitiful. There are ways to mitigate these emissions, but only slightly. Globally, livestock is the largest source of

methane emissions.The most eco-friendly way to produce beef is to use organic management of pasture-fed beef. The best solution for the environment, however, is for humans to cease consumption of dairy and meat. Reallocate land use to crops.

Nuclear radiation is found in air, land, and water in most areas of the planet. Some point sources are distal (e.g., Fukushima reactor melt down – where current radiation levels are at least as high as they were in 2011 when failure commenced); while some are local (Lawrence Livermore National Lab, which has designed all kinds of U.S. nuclear weaponry. Radioactivity is emitted from LLNL into surrounding urban areas, soil, and water.)

This toxin has a half-life measured in millennia. No effective way of neutralizing fissile material has been discovered. By many measures, nuclear energy is the most toxic and costly form of electric energy. Neither renewable nor green, small amounts of radiation are found in plants. Much higher levels are stored in animals (including humans and livestock) for the life span of the organism. No effective way of removing radiation from animals has been discovered. The kelp forest in Monterey Bay has been monitored for radiation since the Fukushima failure. Please include nuclear radiation as a toxin in the plan and collaborate with government agencies to prevent exposure.

Ordinances banning smoking have been passed in Bay Area cities, e.g. San Bruno. Their chief objective to improve local air quality by decreasing sidestream smoke emissions within and proximal to public buildings and parks, businesses, and multifamily housing. Please include tobacco smoke in the plan and take measures to protect public health.

Part of the plan is adding more EV recharging stations. This infrastructure should include 240 volt DC charging stations next to major highways in the Bay Area. The governors of 3 nearby states, including NV, jointly drafted a plan to build such.

Gasoline-powered leafblowers do not have catalytic converters. Their emissions per hour of operation far exceed that of gas-guzzler automobiles. Lacking mufflers, they also generate noise pollution. Check out options for replacing these with electric leafblowers.

The cost of constructing and operating buses is less than that of trains in most areas. Compare costs before adding more public transit routes.

There is an enormous amount of repetition throughout the draft. Without deleting a single factoid of content (statistic, concept, fact, or citation), editing out the reiteration would decrease the number of webpages from 274 to less than 100. This would decrease the environmental impact of the plan and respects readers' time.

Research has shown that communities who set lofty targets for environmental health achieve more change than those who set low targets. Aim high, but be prepared to negotiate and accept less. E.g., taxation of gasoline is far too low to motivate us to pursue 2050 targets: Work toward a 40% increase by 2020 but be prepared to negotiate lower.

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: David Shearn [mailto:dlshearn@comcast.net]
Sent: Wednesday, March 1, 2017 10:21 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I wholeheartedly support the intent of this plan: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”
However as a lifelong educator who trained physicians for three decades, I know that education and incentives, though important, do not by themselves lead to significant behavior change. They must be paired with regulations and consequences for failure to comply. The Plan needs more enforceable rules requiring GHG reductions.
Furthermore, the Plan shows (in Figure 3-9) that California’s climate program is not going to reduce Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.
Thank you again for the opportunity to provide feedback.

David Shearn
dlshearn@comcast.net
37 Hancock Street
San Francisco, California 94114

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/fmY3gQIdTiCRFicEBGLjCg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: David Sprowls [mailto:dvsprowls@msn.com]
Sent: Wednesday, March 1, 2017 5:23 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

David Sprowls
dvsprowls@msn.com
20313 Northcove Square
Cupertino, California 95014

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.25a/jz65H4dTTPWSHwirFcjaVA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Deborah St Julien [mailto:dstjulien@sbcglobal.net]
Sent: Thursday, March 2, 2017 7:55 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Deborah St Julien
dstjulien@sbcglobal.net
4570 Kingspark Dr
San Jose, California 95136

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.25b/ZyFBJXCqSuq4v4wFs0lKsQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Dee Simmons [mailto:deesimmons@sbcglobal.net]
Sent: Wednesday, March 1, 2017 2:30 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

However, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please do consideration additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

The Plan regarding Green Buildings needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

Regarding energy, given the need to stop combustion and electrify to reduce both air pollution and greenhouse gases, the Plan should support the development of bioenergy only where sources are already present from current land use and should expedite permitting for biofuel projects only where necessary (EN1).

Sincerely,

Dee Simmons

Dee Simmons
deesimmons@sbcglobal.net
1015 stimel drive
concord,ca , California 94518

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Deirdre Fennessy [mailto:dfennessy@mac.com]
Sent: Wednesday, March 1, 2017 9:02 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Deirdre Fennessy
dfennessy@mac.com
2929 Baker St
Hayward, California 94941

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Diana Bohn [mailto:nicca@igc.org]
Sent: Wednesday, March 1, 2017 10:51 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Diana Bohn
nicca@igc.org
618 San Luis Road
Berkeley, California 94707

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/xvUXqPRIRROyJhI2hCnKvg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Donovan Rankin [mailto:info@actionnetwork.org]
Sent: Saturday, March 4, 2017 9:59 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Donovan Rankin
dlrankin1@yahoo.com
4006 granada road
el sobrante, California 94803

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:06 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Knable Dorothy [mailto:dancer24@me.com]
Sent: Wednesday, March 1, 2017 8:03 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
Many of us are now studying hard to really learn about climate change. Stop fossil fuels and their corporate money in Congress and our elections.

Knable Dorothy
dancer24@me.com
2161 Fruitridge Rd
Sacramento, California 95822

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Edward Mainland [mailto:emainland@comcast.net]
Sent: Wednesday, March 1, 2017 5:38 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Ms. Rivière and Mr. Burch:,

Permit me to register comments on the Air District's Draft 2017 Clean Air Plan. I hope the Plan's basic mission gets strong support: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” But we need deeds to go with this fine words. It seems to me that the Plan lacks enough means of enforcement. To realistically cut CO2 emissions, the Plan needs to outline real mandatory steps to do so. I urge you to develop and enforce added regulations. Otherwise, we will not reduce GHGs soon enough. And climate goals set by the state and cities will not be reached. We need to decarbonize the entire energy economy rapidly. The District's Plan must be enforceable, effective and comprehensive.

Edward Mainland
emainland@comcast.net
1017 Bel Marin Keys Blvd.
Novato, California 94949

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25a/EMNY_6VlQguRmQEpGW5rnw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Elaine Salinger [mailto:esalinger@mac.com]
Sent: Wednesday, March 1, 2017 9:16 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
In particular, I would suggest adding charging stations for cars close to our freeways. For example, I have a car with an 80 mile range, and have to take a gas car to drive from the Peninsula to Sacramento. And by the way, Sacramento has almost NO public charge stations! Amazing for a state capital with a green perspective.

Elaine Salinger
esalinger@mac.com
1407 Tarrytown St
San Mateo, California 94402

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Valarie Stengle [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:07 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

I suffer from environmental asthma and can tell a difference in my breathing on days when the air quality is bad. The Clean Air Act is vital to our health!

Thank you,
Elise Stengle

Valarie Stengle
val.at.area51@gmail.com
653 Cayuga Ave
San Francisco, California 94112

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.259/V8fOSvZBTUGE0mijM4xa0A/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Elizabeth Boyne [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:50 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Elizabeth Boyne
eboyne@gmail.com
7118 c street
el cerrito, California 94530

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.259/x7owxSA_SmW7Dr4tOVVRuw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Elizabeth Lobos [mailto:betty_lobos@sbcglobal.net]
Sent: Wednesday, March 1, 2017 10:31 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the chance to comment on the Air District's Clean Air Plan. I vigorously support this statement: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

Now we need to have clear, enforceable measures put in place to reduce greenhouse gases (GHGs). Please carefully consider additional regulations to assure that we reduce GHGs immediately. That is the only way we will meet our goals for an improved climate.

Elizabeth Lobos
betty_lobos@sbcglobal.net
1201 Monument Blvd Spc 60
Concord, California 94520

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Elizabeth Schumacher [mailto:peterliz.schumacher@comcast.net]
Sent: Wednesday, March 1, 2017 8:15 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Elizabeth Schumacher
peterliz.schumacher@comcast.net
49 Loring ave
Mill Valley, California 94941

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/A-fNqTWpR5W0yHCk-22D5w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Ellen Franzen [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:21 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions. Frankly, I disagree with the current president about regulations hurting business. We have regulations because businesses often act only in their own interests, not in the interests of the community at large. I strongly favor regulations that will reduce greenhouse gases. Although I think we are probably beyond fixing without experiencing serious environmental damage, I think we may be able to limit some damage if we regulate to reduce greenhouse gases.

As a new owner of a Chevy Bolt, I also strongly urge you not to let carbon intensity limits be exceeded.

Ellen Franzen
ellen_franzen@yahoo.com
970 Jones Street
Berkeley, California 94710

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:47 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Ellen Koivisto [mailto:offstage@earthlink.net]
Sent: Wednesday, March 1, 2017 9:03 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. Of course I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” However, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). We need additional regulations to assure we reduce GHGs in a meaningful time frame or else we will never meet our climate goals.

Specifically, a plan that relies on education and incentive funding won't do much. I'm a teacher. I work hard to help my students know their actions have consequences, and what those consequences will mean to them. But it's only when there are immediate consequences that they actually change their behavior.

Reducing to 1990 levels (and it looks like we won't even manage that in the Bay Area) by 2020 is insufficient. We'll be wading in an acid sea by then all along the coasts. To make any real change, we need no allowance to exceed limits on CO2 output and no offsets; we need to fix the climate, not keep it where it is now.

All buildings need to be green, whether new or remodeled. We need to be adding to these requirements (such as making all roofing either living, water reclaiming, solar, or high albedo). We need to be diving into alternative energy (non-nuclear) generation at a breakneck pace, and rapidly phasing out all appliances, HVAC, and other building systems that require fossil fuels.

Ellen Koivisto
offstage@earthlink.net
1556 Great Hwy #101
San Francisco, California 94122

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.25a/3Uz0C_r_Q-OiEm6S7NBgYw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: elliot helman [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:19 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

elliot helman
muzungu_X@yahoo.com
park st
SF, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Eloise Hamann [mailto:hamanne@comcast.net]
Sent: Wednesday, March 1, 2017 8:50 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy Rivers and David Burch,

I support the Air District's Draft 2017 Clean Air Plan's recommendation to take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy. However, I did not see many enforceable measures for reducing greenhouse gases. Please consider further regulation to reduce GHGs. The time for action is yesterday.

Thank you for the opportunity to comment.

Eloise Hamann,
Dublin, California

Eloise Hamann
hamanne@comcast.net
7065 Inclined Place
Dublin, California 94568

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/6-2Ik7atROyMkSxjahpmmw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Elsa Stevens [mailto:CubanElsa@SBCglobal.net]
Sent: Wednesday, March 1, 2017 10:46 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Protect public health and stabilize the climate, Transition to a post-carbon economy." Reduce greenhouse gases (GHGs). Add regulations that assure we reduce GHGs in a meaningful time frame and meet our climate goals.

Elsa Stevens
cubanelsa@sbcglobal.net
3801 Lakeside Drive, Apt. B203
Richmond, California 94806

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Emlyn Guiney [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 4:19 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Emlyn Guiney
emlynguiney@gmail.com
456 41st st
Oakland, California CA

<http://click.actionnetwork.org/mpss/o/2gA/kLwXAA/t.25e/kvITNJrVS_Sh4DOQCEd5Mg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Emily Jacobi [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:38 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for your hard work to protect the future of clean air for the Bay Area, and for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”
Despite that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). I'm writing to ask that you please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

Thank you very much for your hard work and incorporating suggestions from the public.

Warmly,
Emily Jacobi,
Oakland

Emily Jacobi
emily.jacobi@gmail.com
4953 Desmond St, Apt 3
Oakland, California 94618

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Emily Laskin [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:08 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions. Furthermore, the Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

Finally, I'm concerned about this region's role in the global fuel economy. The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

Sincerely,
Emily Laskin

Emily Laskin
emily.laskin@gmail.com
726 60th Street
Oakland, California 94609

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Eric Meece [mailto:eric@philosopherswheel.com]
Sent: Wednesday, March 1, 2017 10:25 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I agree with this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Despite that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs).

Progress has been slower than has been planned. The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances. Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Eric Meece
eric@philosopherswheel.com
3914 Leigh Ave.
San Jose, California 95124

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Erica Stanojevic [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Erica Stanojevic
ericast@gmail.com
611 Centennial St.
Santa Cruz, California 95060

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.259/lJBdf0sHRQmZV-wpFjZurQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Fiona Smythe [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:57 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

First, I appreciate the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I am happy to see the Bay Area move forward in this effort, especially given the current climate in Washington. I hope the work we do at a local level will serve as a blueprint for other communities. In addition to the proposed measures, I'd respectfully request that the Plan also include enforceable measures for reducing greenhouse gases (GHGs) in the near future.

In particular, I'd like to see the following points addressed in the plan:
1) Actionable ways California can go beyond current efforts to bring Bay Area GHG emissions back to 1990 levels by 2020. I realize this is aggressive, but we must act now and act decisively to address climate change.
2) Significant penalities for stationary sources (like the petroleum refineries in and around Richmond) that exceed carbon intensity limits. The emissions and environmental pollutants at those refineries pose a health threat to the communities around them, in addition to contributing the GHGs our region emits into the atmosphere.
3) Funding to promote the installation or replacement of fossil fuel space and water heater with electric ones in large and commerical developments by 2025.
4) Support bioenergy only where sources already exist - we need clean, renewable energy like solar, wind, thermal, etc.

Thank you for your consideration. I look forward to seeing the proposal, and appreciate your hard work in implementing this much needed plan.

Fiona

Fiona Smythe
fionaesmythe@gmail.com
90 25th Avenue
San Francisco, California 94121

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Frances Aubrey [mailto:francesaubrey@earthlink.net]
Sent: Wednesday, March 1, 2017 4:33 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I have been working to reduce emissions of CO2 and other greenhouse gases for the past eleven years, on both the east coast and in California. I'm on the steering committees of the Alameda Interfaith Climate Action Network and the Contra Costa Interfaith Climate Action Network . We view addressing climate change as a moral issue. It is immoral to leave our children and grandchildren a planet that is less able to provide clean air, water and soil than the planet you and I inherited. It is morally wrong to harm the planet God created and its ability to sustain life when other clean alternatives to fossil fuels are readily available. We need to do everything we can to slow and stop the emissions of all greenhouse gases, as quickly as possible.

I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

The Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area.

Frances Aubrey
francesaubrey@earthlink.net
6846 Wilton Dr.
Oakland, California 94611

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25a/2VslLNXoQauGJNj0V27AxA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: G & B martin [mailto:martin2198@sbcglobal.net]
Sent: Wednesday, March 1, 2017 10:53 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

G & B martin
martin2198@sbcglobal.net
po 946
redwood city, California 94064

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/a2UaRX1eRdazrh6inF5ujA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Gabriel Steinfeld [mailto:gstein@sonic.net]
Sent: Wednesday, March 1, 2017 11:24 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Gabriel Steinfeld
gstein@sonic.net
693 Spruce
Oakland, California 94610

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.259/zL_Ic9lkSVCYOByjKnrZxw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Gayle Eads [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:18 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

However, I'd like to see some specific goals with enforcement provisions so that this document has some real teeth to use when it is implemented. Let's omit the wiggle room and be very serious about adopting a document that will provide measurable steps forward for cleaner air in our air basin.
Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Gayle Eads
gayle.s.eads@gmail.com
4338 Edgewood Ave
Oakland, California 94602

From: Gladwyn D'Souza <godsouza@mac.com>
Sent: Monday, February 27, 2017 2:51 PM
To: Josh Pollak
Subject: Air District's draft 2017 Clean Air Plan comments

Please include electric bicycles in your incentive program for electric cars. There are currently 200m electric bicycles being used in China.

The ARB should integrate past failures of the clean air plans for criteria pollutants and greenhouse gases with annual reports on how targets are being met and adjusted to make the target.

Please include an equity component for addressing criteria pollutants in communities of concern.

Regards,
Gladwyn d'Souza
1473 Sixth Ave, Belmont, CA 94002

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:47 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Helen Bruner [mailto:helenbruner@sbcglobal.net]
Sent: Wednesday, March 1, 2017 9:17 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air plan. Thank you! An insist rather than a protest. I commend you, Helen

Helen Bruner
helenbruner@sbcglobal.net
40 Camino Alto
Mill Valley, California 94941

<http://click.actionnetwork.org/mpss/o/_QA/kLwXAA/t.25a/j_dzvt5pQlC0J7ro9ArOxw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:06 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: HUNTER WALLOF [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:00 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

HUNTER WALLOF
huntergatherer8@yahoo.com
12340 Sir Francs Drke Blvd # A
Pt Reyes Sta, California 94956

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: llyana landes [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:38 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

llyana landes
landeslly@gmail.com
546 62nd St
Oakalnd, California 94609

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Iris Greenberg-smith [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:47 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

Iris Greenberg-smith
ipgeepers@yahoo.com
835 Santa Barbara rd
Berkeley , California 94707

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: J E Lawrence [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I am taking the time to write to you today to comment on the Air District's Draft 2017 Clean Air Plan. I completely agree with the statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

However, aggressive action means rules - reasonable, achievable and enforceable measures - that reduce greenhouse gas emissions. Education is great as a first step, but unfortunately, we are beyond that stage now. For example, by now we all know that we should be recycling and/or composting our waste. Yet, according to a report from the California Dept. of Resources, Recycling and Recovery, California now has less than a 50 percent recycling rate.

Clearly, education and incentives are not enough. Stronger measures are absolutely essential if we are ever to meet our climate goals before it is too late.

Thank you,

J E Lawrence

J E Lawrence
jillelawrence@gmail.com
5400 Boyd Ave
Oakland, California 94618

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/tVkg1ueeRS-MyR6l_PRotA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:06 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: j furstoss [mailto:jfurstoss@riseup.net]
Sent: Wednesday, March 1, 2017 8:01 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals. Thank you.

j furstoss
jfurstoss@riseup.net
520 31st st
oakland, California ca

<http://click.actionnetwork.org/mpss/o/_QA/kLwXAA/t.259/gHyHJSzmRKieSbeKSonSAg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Air District Draft 2017 Plan: Comment

-----Original Message-----
From: Jake Da is [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 4:20 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Air District Draft 2017 Plan: Comment

Christy Riviere,

David and Christy,

Please, please, please improve on the Clean Air Plan to include meaningful regulations governing GHG emissions with enforceable repercussions if companies fail to adhere to them. Educating folks is what we in the environmental movement have been trying to do for decades to very little avail. It's going to take strictly enforced government regulations to get people and companies to do what needs to be done. The science around man's role in climate change is beyond dispute. And the clock is ticking incredibly fast. We each have to do whatever we can RIGHT NOW. Please, do all that YOU can. Make this plan better before you approve it.

Thank you so much for all you do for a better world.

With deep bows,
Jake Davis

Jake Da is
jakesdavis@yahoo.com
120 Three Oaks Ct.
Chico, California 95973

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: James Masi [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:30 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

James Masi
masi.james@gmail.com
300 Berry St
SAN FRANCISCO, California 94158

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/-pDnvKkPTiqvroc7lMgxBg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jan Warren [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:05 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.

Jan Warren
jxwarren1947@yahoo.com
3202 Primrose Lane
Walnut Creek, California 94598

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/KBAGolY1T_2glSOAm5F2pA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:27 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jane Calame [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 2:01 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Jane Calame
janecalame@gmail.com
77, 7th Ave
San Francisco, California 94118

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Janelle London [mailto:jlondon@stanfordalumni.org]
Sent: Wednesday, March 1, 2017 9:57 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I am grateful for your leadership in helping ensure California continues to lead the way on environmental protection and prove to the world that aggressive emissions reduction is as possible as it is necessary for a habitable planet.

I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

Please consider additional regulations to ensure that we reduce GHGs in a meaningful time frame and meet our climate goals. Here are a few ways this could be done:

We need widespread fuel-switching from gas to electric in buildings. The Plan needs to incentivize and fund electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of gas appliances.

We also need firm limits on emissions from oil refineries. The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits and “offset” by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible. Rather, the limit should be firm.

Finally, our energy should come from renewable sources. The Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area. It should only support bioenergy where sources are already present from current land use and should expedite permitting for biofuel projects only where necessary (EN1).

Thank you again for all the good work you are doing. The Bay Area, the state and the world are counting on your leadership for the well-being of ourselves and future generations.

Sincerely,
Janelle London
Menlo Park

Janelle London
jlondon@stanfordalumni.org
10 Sharon Court
Menlo Park, California 94025

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Janice Cumming [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 8:07 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Janice Cumming
cummingphd3@aol.com
55 Samrose Dr
Novato, California 94945

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.25a/2PtpUSuzQDKLlPq_2vSJ_A/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:48 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Janice Gloe [mailto:rainglo@msn.com]
Sent: Wednesday, March 1, 2017 8:37 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Janice Gloe
rainglo@msn.com
3100 Guido Street, ,
Oakland, California 94602

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.25a/TM6tkBkZQxmjCgPm_XWzIw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Janie Lucas [mailto:janielucas@att.net]
Sent: Sunday, March 5, 2017 8:59 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Janie Lucas
janielucas@att.net
827 Capp St
San Francisco, California 94110

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.25d/3Dzgw-H7QvqZPhUf-_St3w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Janika McFeely [mailto:ecologicaldesign@yahoo.ca]
Sent: Wednesday, March 1, 2017 2:52 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Janika McFeely
ecologicaldesign@yahoo.ca
561 Valle Vista Ave
Oakland, CA, California 94610

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Jean Lindgren [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 3:22 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

The Air District should use its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area.

I hope you are really serious about this issue and take the much needed steps to ensure that the move to totally renewable energy is successful. I, for one, am counting on you to do so.

Thanks for your consideration and appropriate action.

Sincerely,

Jean Lindgren
lindgren.b8@gmail.com
389 Guerrero Street
San Francisco, California 94103

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.25a/H0sQr8fIT3ib1-szb7sDCA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:22 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jean Severinghaus [mailto:info@actionnetwork.org]
Sent: Monday, March 6, 2017 11:57 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

The plan must provide strong regulations as guidance to develop clean energy sources and keep all fossil fuels in the ground. No more tar sands oil, nor tar sands oil transport by any means, pipeline, railcar, truck or ship: all support more extraction. Regulations must prevent that.

Thank you.
Jean

Jean Severinghaus
jsever117@gmail.com
117 Greenbrae Boardwalk
Greenbrae, California 94904

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jeremy Spencer [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:05 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Jeremy Spencer
jpspencer@gmail.com
551 Arguello Boulevard
Pacifica, California 94044-3318

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joan Hebert [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 2:15 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Joan Hebert
joanheb@gmail.com
450 Eighth Ave
Menlo Park, California 94025

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/mzx-fYHvTZ-9OJ-29tBxHw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joan Kiley [mailto:jlkiley@pacbell.net]
Sent: Wednesday, March 1, 2017 9:41 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Oil refineries must not exceed carbon intensity limits. Public health is more important than their profits. We should be leading the way to cleaner air, not lagging behind. Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Joan Kiley
jlkiley@pacbell.net
3792 Harrison ST #32
Oakland, California 94611

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/LOk-1sqVQJWrIkmq8bOTow/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joan Smith [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 2:22 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Joan Smith
joanesq93@gmail.com
765F Portola Street
San Francisco, Colorado 94129-2219

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joe Buhowsky [mailto:jbuhowsky@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:58 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Joe Buhowsky
jbuhowsky@sbcglobal.net
83 Tahoe Ct
San Ramon, California 94582-4865

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joel Sokolsky [mailto:esthersfolks@sbcglobal.net]
Sent: Wednesday, March 1, 2017 10:27 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Joel Sokolsky
esthersfolks@sbcglobal.net
1611 Castle Hill Rd
Walnut Creek, California 94595

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/Dx65BoZjTJ6ge5n8Gr7kWw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Commenting on Air District Draft 2017 Plan

-----Original Message-----
From: joey smith [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 7:40 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Commenting on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I appreciate the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. To be blunt, I think it needs more teeth. While I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”, the rest of the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). We need to do this in a meaningful time frame, and I hope you'll consider more TEETH to this Plan.

joey smith
joey.w.smith@gmail.com
4375 Wallace Road
Santa Rosa, California 95404

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.25a/UdjqCF6USg6v4KxCt09rig/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: joffre baker [mailto:info@actionnetwork.org]
Sent: Saturday, March 4, 2017 7:51 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

joffre baker
joffrebaker@gmail.com
p.o.b. 371212
montara, CA, California 94037

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: John Ota [mailto:johnota@sbcglobal.net]
Sent: Wednesday, March 1, 2017 10:57 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

John Ota
johnota@sbcglobal.net
1720 Broadway
Alameda, California 94501

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:47 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jon Bazinet [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:51 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Jon Bazinet
jon_bazinet@hotmail.com
15972 Via Paro
San Lorenzo, California 94580

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:30 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jonathan Eden [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:54 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Jonathan Eden
edenjonathan@hotmail.com
494 Vincente Ave.
Berkeley, California 94707

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25a/p88PPhD-ScCqFnqFJP9Y6Q/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Jonathan Knight [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:25 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Ms. Riviere and Mr. Burch,

I appreciate the chance to comment on the Draft 2017 Clean Air Plan, and support the plan's call for aggressive action. That said, my understanding is that the plan could indeed be more aggressive. In particular, I would support amendments that make it more difficult for stationary sources to exceed emissions limits. While financial incentives are important, the plan have enough teeth to ensure we can make rapid progress on reducing regional carbon intensity.

Thank you,
Jonathan Knight

Jonathan Knight
jonnynat@yahoo.com
921 Santa Fe Ave.
Albany, California 94706

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.25a/Kqv28NnSQ32LQq81Q8wGQQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: joseph illick [mailto:illick@sfsu.edu]
Sent: Wednesday, March 1, 2017 4:32 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

joseph illick
illick@sfsu.edu
1015 guerrero st
san francisco, California 94110

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.25a/oeCtXIgAS9qKUHYAwGjiyA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Joy Hahn [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:30 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

And the Plan should include a discussion of why California efforts aren't reducing the Bay Area's GHG emissions to highlight the importance and necessity for regional action.

Joy Hahn
joyhahn@aol.com
265 North Point Street, #4559
San Francisco, California 94133

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/1Ga1BYToTYqmfDgNL1NomA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Judith Schumacher-Jennings [mailto:sjmadrone@sonic.net]
Sent: Thursday, March 2, 2017 1:18 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Judith Schumacher-Jennings
sjmadrone@sonic.net
870 Terra California Drive Apt 6
Walnut Creek, California 94595

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.25a/lqV3UoQKSJ2WdpMcfPjbJw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Judith Stoddard [mailto:judithstoddard@sonic.net]
Sent: Wednesday, March 1, 2017 1:03 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. However, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals. I'm convinced that "keep it in the ground"
is the only way to go to save us from
extreme climate change that threatens
our continued existence.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.

Judith Stoddard
judithstoddard@sonic.net
2671 Sacramento St
San Francisco, California 94115-2217

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: julia dashe [mailto:jdashe@mac.com]
Sent: Wednesday, March 1, 2017 6:41 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

julia dashe
jdashe@mac.com
439 49th st. apt. 26
OAKLAND, California 94609

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.25a/Y_q6x09LRKCuIfDZraDGzg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Karen Irias [mailto:info@actionnetwork.org]
Sent: Saturday, March 4, 2017 11:25 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Karen Irias
karenirias@gmail.com
329 Meghan Lane
Walnut Creek, California 94597

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.25d/vEXcAXJXTOSIavnH8R3_Lg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Karen Pedersen [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 3:43 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Karen Pedersen
flexmaiden1@hotmail.com
767 3rd Street East
Sonoma, California 95476

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:30 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Karen Walls [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 11:59 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the chance to comment on your proposed Clean Air plan.I am grateful that you are addressing this important challenge for reducing greenhouse gases. I ask that this plan be given actual teeth by adding in enforceable rules.

Thank you,
Karen Walls

Karen Walls
kjenwalls@gmail.com
275 Grandview Ave
Novato, California 94945

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kathleen Ruppel [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:09 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Kathleen Ruppel
kathleen.ruppel@gmail.com
680 San Juan Street
Stanford, California 94305

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kathryn Santana [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 3:02 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Kathryn Santana
kathryn.qahira@gmail.com
1951 Joseph Dr
Moraga, California 94556

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Keith Bein [mailto:kjbein@ucdavis.edu]
Sent: Thursday, March 2, 2017 2:53 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Keith Bein
kjbein@ucdavis.edu
3046 Frye Street
Oakland, California 94602

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kelly Jones [mailto:kelly@vmisoft.com]
Sent: Wednesday, March 1, 2017 8:46 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I'm very concerned that Clean Air Plan really doesn't appear to have meaningful, enforceable measures for reducing greenhouse gases (GHGs). Please plan for and advocate additional, powerful regulations that would >assure< we reduce GHGs in a much more rapid timeframe than currently envisioned. As you may know, climate change is now occurring at a rate near the "worst case" scenario curve of projections made years ago, and we need to respond forcefully and rapidly to this tremendous threat.

Thanks for your efforts,
Kelly Jones
Larkspur, CA.

Kelly Jones
kelly@vmisoft.com
170 Wilson Way
LARKSPUR, California 94939

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Ken Jones [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 6:27 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I am glad your are giving us the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I certainly support the statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” I think the "aggressive action" part is key here and seems lacking in this document. The Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals. California has to lead the way and where else but in the Bay Area will people in California look for an example?
We have failed to do much to reduce the Bay Area's GHG emissions and this is totally unacceptable. The need to put a cap GHG emissions on stationary sources, especially as you have been hearing with regard to refineries is so clear it almost goes without saying.
We need a carbon intensity rule for SS12 that decreases (not allows for increases from tar sands) emissions. Something real, not pretend.
With regard to biofuel, EN1, that should be a very last resort and only in areas where sources exist from the way land is being used. We need to promote the electrification of transportation in a big way so that solar and wind can be maximized.
I look forward to helping these rules develop with you. Thank you for this start on a plan.

Ken Jones
meta4ken350@hotmail.com
1005 S. Eliseo Dr.
Greenbrae, California 94904

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kerry Stanwyck [mailto:kerry@seiinc.org]
Sent: Wednesday, March 1, 2017 10:13 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Kerry Stanwyck
kerry@seiinc.org
7858 Burton
Rohnert Park, California 94928

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.259/0tZlQTkJRWK-TRIRPO7c7w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: kevin slauson [mailto:kslauson1@juno.com]
Sent: Wednesday, March 1, 2017 11:40 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

kevin slauson
kslauson1@juno.com
2808 Central Ave
ALAMEDA, California 94501

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Kim Anderson [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 7:49 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Kim Anderson
kimnoreen@gmail.com
Post Office Box 909
Red Bluff, California 96080

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:22 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kit Long [mailto:info@actionnetwork.org]
Sent: Tuesday, March 7, 2017 6:54 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

As a resident of Napa County I am pleased about the progress of BAAQMD in beginning to address standards for addressing short lived climate pollutants. Your efforts are helping our County to create a more realistic Climate Action Plan.

However, you are also using protocols of measurement that are outdated, particularly with methane. How will we be able to accurately assess the impact of a gas that we know is much more powerful in trapping heat than CO2 unless the GWP20 are updated to reflect current scientific knowledge?

Thank you for your consideration, and all your hard work to move us toward a stable climate.

Kit Long

Kit Long
kittylong00@gmail.com
2134 Clay Street
Napa, California 94559

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Kristina Pappas [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:40 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy Rivere and David Burch,

Regarding the Air District's Draft 2017 Clean Air Plan:
- The plan needs more enforceable rules requiring GHG reduction;
- The plan should address whether CA is on track to meet its goals as laid out in the AB 32 (2006), why or why not, and what we can do about it;
- Not allow stationary sources to exceed carbon intensity limits (otherwise, why bother placing limits?).

Thank you for your attention.
Sincerely,
Kristina

Kristina Pappas
kristina.pappas@gmail.com
3359 21st Street
San Francisco, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lacey Hicks [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:02 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Lacey Hicks
laceyhicks@hotmail.com
34655 Skylark
Union City , California 94587

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Laetitia Benador [mailto:LBENADOR@GMAIL.COM]
Sent: Thursday, March 2, 2017 7:16 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Thank you
Laetitia Benador

Laetitia Benador
LBENADOR@GMAIL.COM
4046 Gros Ventre Ave
San Diego, California 92117-4640

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.25a/R8OysR9NQjqPmWcPRpYj7w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Laura Cottril [mailto:timlaura@astound.net]
Sent: Friday, March 3, 2017 5:07 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Laura Cottril
timlaura@astound.net
1687 Suncrest Ct
Walnut Creek, California 94597

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25c/keAV0QQ8QAGFNU_IpgsXNg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lawrence Dillard, Jr. [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:01 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Lawrence Dillard, Jr.
lawrence_dillard@yahoo.com
1 Saint Francis Place, Apartment 1608
San Francisco, California 94107

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lee Bishop [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:10 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I am concerned about the lack of enforceable rules requiring greenhouse gas reductions. I am also concerned that the plan does not reduce bay area emissions to 1990 levels by 2020. I think moving forward we need a discussion about that.

I am also very concerned about emissions due to land use changes. I think we should only support bioenergy where those land use changes have already taken place and only where necessary. I think we should move toward electrical wherever possible.

Thank you,
Lee Bishop

Lee Bishop
bishoplm@gmail.com
1735 Carleton St Apt E
Berkeley, California 94703

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/nZNbVg-7SvarswzFyUzkZA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lena Wolff [mailto:lena@lenawolff.com]
Sent: Sunday, March 5, 2017 4:41 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Lena Wolff
lena@lenawolff.com
2308 Jefferson Ave
Berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Linda Brosh [mailto:lmbrosh@comcast.net]
Sent: Wednesday, March 1, 2017 9:16 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Linda Brosh
lmbrosh@comcast.net
21 Libra Dr
Novato, California 94947

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Linda Riebel [mailto:linda.riebel@earthlink.net]
Sent: Wednesday, March 1, 2017 8:24 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

When I moved to the Bay Area in 1979, you could see a layer of ugly smog stretching from Marin across San Francisco and down the peninsula from my window in the Berkeley hills. I've often felt grateful to the regulators and their staffs who made it possible to replace the greasy smudge with cleaner air.

“To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

Good goal! I support regulations to make it happen. Thanks, Linda Riebel

Linda Riebel
linda.riebel@earthlink.net
3350 hermosa way
lafayette, California 94549

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/fNqdCCqET7GLU-eVVnA6dw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lisa Baffi [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:02 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The area which I most particularly concerned about is animal agriculture and the enormous impact it has on our environment. Not only is methane a more potent greenhouse gas but the growing of grains, sprayed mercilessly with pesticides, for the animals to eat is degrading our soil, polluting our waters and killing our bees. CA is the pinnacle of healthy lifestyle. It is paramount that we begin to help people lean about and adopt a more plant-based diet so that animal agriculture can be greatly minimized thereby decreasing a significant polluting pillars. Please focus your effort on this very important area. Thank you.

Lisa Baffi
lbaffi@gmail.com
69 C orte Madera Ave, Apt B
Corte Madera, California CA

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/x3ShiSxERpKHRvPEoTGRNw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Lisa Tracy [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:48 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I'd like to comment on the Air District's Draft 2017 Clean Air Plan. Unfortunately, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please consider additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our long-term climate goals.

Lisa Tracy
lisa_tracy@hotmail.com
383 61st St.
Oakland, California 94618

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Loring Dales [mailto:annlordales@earthlink.net]
Sent: Wednesday, March 1, 2017 9:15 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Loring Dales
annlordales@earthlink.net
544 Vincente Ave.
Berkeley, California 94707

<http://click.actionnetwork.org/mpss/o/-QA/kLwXAA/t.259/1ra-DRLxRqaqL4PYoyPiRw/o.gif>

To: Luz Gomez
From Bruce Naegel
Date 1/31/17
Re Seeing you yesterday.

It was good to see you yesterday at the BAAQMD Event. You suggested that some of the items we discussed would be welcome as input into your process so here they are.

The BAAQMD plan presented in this event is very comprehensive which is needed. However. we do not have a lot of time until 2030 or 2050 when our state mandated goals arrive to prevent climate changes worst effects. While an "All of the Above" approach is required to address air quality and climate change, prioritization of what to do first is also required. One example is the "Super GHG" poster session (Methane, Black Carbon, Fluorinated Hydrocarbons). From what I have read, it is important to remove these first before trying to get all the C02 out of the air. The reason is that these substances are shorter lived and more potent. Spending a dollar to remove these will drop the temperature faster than the same dollar spent to remove the standard GHGs (e.g. C02). While we need to remove all GHGs, focusing first on the "Super GHGs" will drop the temperature faster.

There are other notable examples. A paper recently released by the North Bay Clean Energy Forum (1) proposed an interesting path to getting the residential segment to zero carbon. The path was to get all electricity from 100% renewable (or at least carbon free) sources, convert to all electric vehicles and have all home appliances be electric. This includes replacing gas powered water and space heaters with electric heat pumps.

The article did not mention weatherizing the homes. An intact building envelope will reduce energy demand, lower individual energy bills and. improve comfort. However, it will not drop energy use (and carbon) to zero. A building with all energy supplied by electricity that is carbon free makes for a carbon free building.

The second key component is to put out measurable goals, follow through to see if they are met, and supply corrective action if they are not. One of the goals in SB 350 currently presents a challenge that hopefully will be rectified shortly. The goal is to "double the energy efficiency of existing buildings". The actual standards for energy efficiency are planned to be released on April 1, 2017 (2). I have looked for references that exist today that provide a preview to the standards coming in 2 months. The closest I found to this is referenced here (3). Unfortunately, it does not contain Natural Gas and only goes to 2025. This makes the release of the standard in two months key to implementing SB 350.

Thank you for your comments in regards to being welcome to display at the event. We will be attending the display at the Martin Luther King Library in San Jose next week.

I would also be interested in your comments on the 4th quarter report we sent you.

(1) http://cleanpowerexchange.org/local-group-lays-out-strategies-for-100-clean-energy-communities/
(2) http://www.energy.ca.gov/sb350/timeline.pdf
(3) http://www.energy.ca.gov/2014publications/CEC-200-2014-009/CEC-200-2014-009-SD.pdf

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:46 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mahin Charles [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:19 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mahin Charles
ferdousi68.mh@gmail.com
577 Dolores Street
San Francisco, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:23 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marc Dahlberg [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 4:07 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. The only way we will succeed long-term is by making worthwhile, short term decisions now in a meaningful time frame.

I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marc Dahlberg
mcdahlberg@gmail.com
6139 Prospect Road
San Jose, California 95129

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marg Hall [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:20 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thanks for your work but please make this a stronger document. I have a compromised respiratory system. Clean air is essential to my own health and that of millions of my neighbors. It is our precious commons-- education alone won't protect us. We need better protection from polluters. I also support any efforts to promote transitions from fossil fuel based heating systems to cleaner alternatives. This aspect of green building is under-developed. We live in an area where properly designed and scaled solar thermal or PV can meet our heating needs. Please find ways to incentivize the development and utilization of this technology.
Thank you

Marg Hall
sismhall1@aol.com
1927 Fairview St
Berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Margaret Crimmins [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:08 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Margaret Crimmins
ccrimminsrsm7@gmail.com
11154 San Pablo Ave.
El Cerrito, California 94530

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Margaret Hasselman [mailto:mhasselm@vt.edu]
Sent: Wednesday, March 1, 2017 11:59 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Thank you for your work on this!

Margaret Hasselman
mhasselm@vt.edu
555 Pierce St, #1023
Albany, California 94706

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.259/2p_XWqf3QpWBJzSZ4C3ztQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Margaret Pearce [mailto:pearcesf@comcast.net]
Sent: Friday, March 3, 2017 5:53 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Margaret Pearce
pearcesf@comcast.net
30 Quickstep Lane, Apt. 3
San Francisco, California 94115

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marguerite Sgrillo [mailto:sgrillom@comcast.net]
Sent: Wednesday, March 1, 2017 2:23 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marguerite Sgrillo
sgrillom@comcast.net
5024 Match Ct
Richmond, California 94806

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marilyn Price [mailto:mprice@the-acorn.com]
Sent: Wednesday, March 1, 2017 11:37 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marilyn Price
mprice@the-acorn.com
138 Sunnyside
Mill Valley, California 94941

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marinell Daniel [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 9:01 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marinell Daniel
marinelldaniel@gmail.com
4070 La Colina Rd.
El Sobrante, California 94803

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marisa de Belloy [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:03 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marisa de Belloy
mdebelloy@gmail.com
187 St Thomas Way
BELVEDERE TIBURON, California 94920

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: marjorie xavier [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:16 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

marjorie xavier
marjorie618@aol.com
3252 guillermo place
hayward, California 94542

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:47 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mark Beckwith [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:17 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mark Beckwith
mark.beckwith@yahoo.com
2931 ellis st.
berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mark Swoiskin [mailto:mark.swoiskin@ucsf.edu]
Sent: Saturday, March 4, 2017 5:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mark Swoiskin
mark.swoiskin@ucsf.edu
655 Redwood Hwy Ste 255
Mill Valley, California 94941

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Marta Lutz [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 4:24 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Marta Lutz
obtata205@gmail.com
1556 Great Highway #205
San Franciscoo, California 94122

Areana Flores

From: Christianne Riviere
Sent: Wednesday, March 15, 2017 11:10 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: MMartha Evans [mailto:marthops2@sonic.net]
Sent: Friday, March 10, 2017 11:49 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. In the light of the current EPA Director's comments denying climate change and the role of CO2 in declining air-quality, local measure become even more vitally important.

I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

MMartha Evans
marthops2@sonic.net
1022 57th St.
Oakland, California 94608

<http://click.actionnetwork.org/mpss/o/3AA/kLwXAA/t.25i/bqw2H20ERmynOUwar8113g/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Martha Utley [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 2:45 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Martha Utley
librarygirl91@yahoo.com
37155 Birch St
Newark , California 94560

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Martin Horwitz [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:11 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Martin Horwitz
martin7ahorwitz@yahoo.com
1326 23rd Avenue
San Francisco, CA, California 94122

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mary Ellen Chell [mailto:mary.ellen.chell@sbcglobal.net]
Sent: Sunday, March 5, 2017 3:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mary Ellen Chell
mary.ellen.chell@sbcglobal.net
7451 Prospect Road
Cupertino, California 95014

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: MaryMargaret Flynn [mailto:mmf59@comcast.net]
Sent: Wednesday, March 1, 2017 7:55 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

MaryMargaret Flynn
mmf59@comcast.net
24 Sunnydale Ave
San Carlos, California 94070

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.25a/_7W-zBpfRhuC_-FUxS1sBQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mary Kay Benson [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 11:30 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mary Kay Benson
mkbe.sparkles3@gmail.com
701 E Lassen Ave
Chico, California 95973

<http://click.actionnetwork.org/mpss/o/1gA/kLwXAA/t.25d/sxssN1a_R3Sv2Pz0PjIRZA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Matt McWright [mailto:mmcwright@msn.com]
Sent: Wednesday, March 1, 2017 2:39 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Matt McWright
mmcwright@msn.com
250 Austin Avenue
Atherton, California 94027

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Maura Sullivan [mailto:twoms@comcast.net]
Sent: Wednesday, March 1, 2017 11:44 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.
Thank you for taking my comments into consideration.

Maura Sullivan
twoms@comcast.net
2589 Francis Drive
Pinole, California 94564

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: melissa ambrose [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:55 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

melissa ambrose
melissambrose@gmail.com
674 Precita ave
san francisco, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Melissa Murphy [mailto:meli@sonic.net]
Sent: Wednesday, March 1, 2017 4:08 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

As I drive to work each day from El Cerrito to Martinez , I see the emissions plumes from three refineries; Chevron in Richmond, Phillps 66 alongside highway 4, and Shell in Martinez. Everyone who lives or works in this refinery corridor suffers from the health effects of these emissions. The entire Bay Area and ultimately the world breaths the the toxin that refineries produce.
It's unconscionable for Air District to fail to take all possible action to reduce the impact of climate change and the negative health effects of refinery emissions. (Speaking of unconscionable, I noticed that the District has ordered documentation regarding these emissions to be destroyed ,per an article in the East Bay Express).

It's time for the Air District to serve the public like its southern state counterpart and force the refineries in the Bay Area to cut back on emissions.

Melissa Murphy
meli@sonic.net
6727 Snowdon Ave
El Cerrito , California 94530

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.25a/mZpYFlWOTZKEt95zVGsQDg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Michael Roemer [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:18 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.
The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.
The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.
The purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.
The Plan needs to provide incentive funding for the installation or change-out of fossil fuel-based space and water heaters with electric heat pumps and solar water heaters in commercial and multi-family developments (SS30 & BL2) and needs to propose a future effective date for the phase-out of these appliances.
Given the need to stop combustion and electrify to reduce both air pollution and greenhouse gases, the Plan should support the development of bioenergy only where sources are already present from current land use and should expedite permitting for biofuel projects only where necessary (EN1).

The Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area.
Thank you for your continuing efforts and I fully support your work!

Michael Roemer

mikeroemer@yahoo.com
209 Overhill Road
Orinda, California 94563-3226

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:27 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: michael sutton [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 12:32 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

michael sutton
mikesut4@gmail.com
528 c st
colma, California 94014

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Michael Tomczyszyn [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:28 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Michael Tomczyszyn
mtomczyszyn@hotmail.com
243 Ramsell St
San Francisco, California 94132-3140

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.25a/mlN7pu4pTdGvNcZghvCuaA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:06 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Michelle Miranda [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:01 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Michelle Miranda
smmiranda48@gmail.com
134 Dakota Ave. #103
Santa Cruz, California 95060

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Mike Cass [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:22 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Mike Cass
mike_e_cass@yahoo.com
31 Lakeview Ct
Novato, California 94947

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: n kaluza [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

n kaluza
natashakaluza@hotmail.com
5396 Carriage dr
el sobrante, California 94803

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nadya Tichman [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:53 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nadya Tichman
nadyatichman@gmail.com
1789 Leimert Blvd
Oakland, California 94602

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:48 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nancy Kelly [mailto:npkelly@att.net]
Sent: Wednesday, March 1, 2017 8:10 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nancy Kelly
npkelly@att.net
5601 Picardy Dr S
Oakland, California 94605-1177

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:06 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nasira Abdul-Aleem [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:01 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nasira Abdul-Aleem
nasira@gmail.com
2700 Fulton St
Berkeley, California 94705

From: Nicholas Littlejohn [mailto:nicklittlejohn@gmail.com]
Sent: Thursday, March 9, 2017 6:28 PM
To: Anja Page <kpage@baaqmd.gov>
Subject: Fwd: Undeliverable: Support for Clean Air Plan

Hello Page,

Trying to send public comment, does the email server work?

I also wanted to ask if the meeting shuttle bus is electric or uses clean fuel and if a map of the loop could be added to the description on the main website.

Thank you,
Nicholas

These are my plan comments:

---------- Forwarded message ----------
From: Nicholas Littlejohn <nicklittlejohn@gmail.com>
To: clearairplan@baaqmd.gov
Cc:
Bcc:
Date: Thu, 9 Mar 2017 20:14:39 -0600
Subject: Support for Clean Air Plan

California must take this action to protect the economy and people, especially if federal action is unlikely.

Thank you,
Nicholas

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nicholas Woodbury [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:29 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Besides that statement, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nicholas Woodbury
ncwoodbury@gmail.com
3050 Market St
San Francisco, California 94114

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nicole Fountain [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:28 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nicole Fountain
nicmasterflash@yahoo.com
38786 Cherry Ln.
Fremont, California 94536-4224

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nora Lyman [mailto:nalyman@sonic.net]
Sent: Wednesday, March 1, 2017 7:36 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nora Lyman
nalyman@sonic.net
2325 McKinley Ave., Apt. 2
Berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nora Privitera [mailto:noraprivitera@comcast.net]
Sent: Wednesday, March 1, 2017 1:25 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Climate change is already happening, so a plan with teeth is really essential. We have no time to lose. Thank you for your consideration of this letter.

Nora Privitera
noraprivitera@comcast.net
3242 Kansas Street
Oakland , California 94602

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: nora roman [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 2:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,
I am a retired Registered Nurse and I certainly have seen first hand the results of contaminated air in my 40 years of practice.
Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

nora roman
noritaroman@gmail.com
68 arnold ave
SF, California 94110

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Nurit Baruch [mailto:nuritvenus@earthlink.net]
Sent: Wednesday, March 1, 2017 1:23 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Nurit Baruch
nuritvenus@earthlink.net
2004 Eddy St.
S.F., California 94115

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/-XQ-7McvT4OT7IbQBDH1tw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Pamela Patek [mailto:pgredwoods@coastside.net]
Sent: Wednesday, March 1, 2017 10:08 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

Furthermore, the Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan needs to expand on the implementation actions in this area.

Pamela Patek
pgredwoods@coastside.net
14655 Pescadero Road
La Honda, California 94020

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Patricia Deuter [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:21 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Patricia Deuter
pattinoel1@gmail.com
22353 Happyland Avenue, Hayward 94541
Palo Alto, California 94541

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: patty linder [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 7:42 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” However, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Thank you.

patty linder
patty4282@gmail.com
839 Bend Avenue
San Jose, California 95136-1804

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Paul Donald [mailto:paul@detaildesign.com]
Sent: Wednesday, March 1, 2017 5:32 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan relies mostly on education and incentive funding to reduce greenhouse gases, but the millions for incentives won't achieve many reductions. Education and incentives are good, but regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reductions.

Thank you for your efforts in improving California's air quality. I look forward to following the progress of this Plan.

Best,
-paul

Paul Donald
San Francisco, CA

Paul Donald
paul@detaildesign.com
121 Dolores St Apt 2 San Francisco
San Francisco, California 94103

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: My Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Paul W. Rea [mailto:paulrea@sbcglobal.net]
Sent: Wednesday, March 1, 2017 4:54 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: My Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

After revelations of the destruction of documents, the public is even more concerned concerned about robust air quality enforcement.

I do thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I particularly support a key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

Despite that statement and the vision presented, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Paul W. Rea
paulrea@sbcglobal.net
730 Blossom Way
Hayward CA, California 94561

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Peggy da Silva [mailto:silvap@sonic.net]
Sent: Thursday, March 2, 2017 7:02 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs).
Stationary sources: We need very strong limits on carbon intensity at power plants; eventually we must stop using fossil fuels. Do not let petroleum refineries exceed the limits you set.
Motor vehicles: I am a bicyclist, doing all I can to travel without using my car. I am appalled that every time I am riding my bike I am surrounded by hundreds of motor vehicles spewing toxics into my lungs. Bay Area regulatory agencies are not doing nearly enough to dramatically reduce the number of cars on the road. Not just more bike lanes -- we need to reduce the number of cars.

Peggy da Silva
silvap@sonic.net
153 Vasquez Avenue
San Francisco, California 94127

<http://click.actionnetwork.org/mpss/o/_AA/kLwXAA/t.25b/BUlhjA78T_e3E3G29O39UQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:52 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Idle No More SF Bay [mailto:pennie@gatheringtribes.com]
Sent: Wednesday, March 1, 2017 2:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I live on the hill directly across from the Chevron refinery in Richmond. I have First Nations friends at the Alberta tar sands who are suffering horrendous health effects as a result of fossil fuel extraction. I also have indigenous friends in the Amazon in Ecuador who are suffering from what refineries in our communities are doing to their communities. And, my family also suffers from the emissions from Chevron that are not accounted for. We see what Chevron puts out on a daily basis, we see the flares, and we had a front row seat when the refinery exploded in 2012.

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

The purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.

Destruction of the environment that we all need to simply exist is occurring. You can help prevent that from happening.

Respectfully,
Pennie Opal Plant

Idle No More SF Bay
pennie@gatheringtribes.com
1725 Beau Rivage
San Pablo, California 94806

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/yf5hceSKSPCn2-NEcf7caw/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Perla Sandoval [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 8:37 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Perla Sandoval
perla_s.18@hotmail.com
199 Posada Del Sol
Novato, California 94949

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: phoebe schenker [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 3:48 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I agree wholeheartedly with the plan's dual goals of improving public health and protecting the environment. We need to move to a carbon neutral future if we are going to accomplish these things and i fear that the plan is overly reliant on education and incentives and does not support/lay out strong enough regulations to get us there. I believe we are already behind our current goals and would like to see an analysis of why - it is mere speculation but education and incentives are likely not sufficient in the face of artificially inexpensive fossil fuel. I'm supporter of a fully rebated carbon fee and believe we need to price carbon if we are really going to see the kinds of transformations that this plan lays out and that we so desperately need. As an architect I know there is also much more that needs to happen for the industry to be able to achieve the net zero goals we all st rive for. Until the economic equation changes around these technologies (i.e. when utility costs accurately reflect the costs to the environment and our health) it will still be an uphill battle to implement energy and water saving systems. Thank you for your time (and everything you do to help solve the climate crisis).

Sincerely,
Phoebe

phoebe schenker
phoebe_schenker@yahoo.com
1755 Broadway Apt 36
Oakland, California 94612

<http://click.actionnetwork.org/mpss/o/4gA/kLwXAA/t.25d/sYzF_Q1ZSwqfSpeFyeW33w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Phil and Lynn Fischer [mailto:lynnandphilfischer@astound.net]
Sent: Thursday, March 2, 2017 7:42 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Phil and Lynn Fischer
lynnandphilfischer@astound.net
1688 Mendocino Drive
Concord CA, California 94521-1118

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Philip Simon [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:50 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Philip Simon
philsim75@aol.com
Box 9473
San Rafael, California 94912

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Qayyum Johnson [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:28 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Qayyum Johnson
qayyumjohnson@gmail.com
1601 Shoreline hwy
Sausalito, California 94965

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:46 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: rebecca koo [mailto:memoriesjc@Hotmail.com]
Sent: Wednesday, March 1, 2017 9:42 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

rebecca koo
memoriesjc@Hotmail.com
2329 aperture cir
san diego, California 92108

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25a/zaAbht1JT3i44NalZHLX7g/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:05 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Rhoda Slanger [mailto:rhoda22@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:04 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Rhoda Slanger
rhoda22@sbcglobal.net
1207 Talbot Ave
Berkeley, California 94706

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:00 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Rich Goldberg [mailto:rgclimber@sbcglobal.net]
Sent: Wednesday, March 1, 2017 9:20 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Rich Goldberg
rgclimber@sbcglobal.net
118 Highland Ave., Penngrove, CA
Penngrove, California 94951

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:53 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: rich yurman [mailto:ryurman@newsguy.com]
Sent: Wednesday, March 1, 2017 12:39 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

rich yurman
ryurman@newsguy.com
ross st
oakland, California 94618-1905

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Robert Citron [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:12 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sincerely,
- Robert Citron
PhD Candidate (Earth and Planetary Science, UC Berkeley)

Robert Citron
ricitron@gmail.com
1620 Oregon St
Berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Robert Ortiz [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:36 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Robert Ortiz
r77ortiz@hotmail.com
25 H Lane
Novato, California 94945

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:28 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Rose Schweig [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 8:40 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Rose Schweig
Schweigr@gmail.com
2262 Summer St
Berkeley, California 94709

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:01 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: S Nelson [mailto:play@kiteisland.com]
Sent: Wednesday, March 1, 2017 8:54 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

S Nelson
play@kiteisland.com
POB 1075
BI, California 94511

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Samantha Sheldon [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 6:32 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Samantha Sheldon
srsheldon@yahoo.com
948 Notre Dame Ave
Concord, California 94518

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:27 AM
To: Clean Air Plan
Subject: FW: Please Strenthen the Clean Air Plan

-----Original Message-----
From: sandra ruliffson [mailto:s.ruliffson@comcast.net]
Sent: Friday, March 3, 2017 10:49 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Please Strenthen the Clean Air Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
The Air District should be at the limit of its authority to drive renewable energy generation, including at permitted sources and as an on-site mitigation measure for CEQA projects. The Plan need to expand on the implementation actions in this area.
The current Plan is not reducing Bay Area GHG emissions to the necessary levels and should therefore include a discussion of why that is the case and why more action needs to be taken at regional levels. We must be on target to reduce GHG levels by 2020 to the 1990 levels and it looks like we will not achieve that with the current Plan.
I write with the urgency of a citizen who is concerned about the future for my grandchildren, given what we know to be the disastrous effects of climate change if left unchallenged. Thank you.

sandra ruliffson
s.ruliffson@comcast.net
17 Orchid Drive
Larkspur, California 94939

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sara Greenwald [mailto:anderson.greenwald@att.net]
Sent: Saturday, March 4, 2017 10:06 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan.
Reducing greenhouse gases (GHGs) must of course be the top priority. Looking at the figure that shows overall GHG reductions so far and planned (Figure 3-9) I can see that the California climate program falls short. We will not be down to the goal of 1990 levels in 2020. What is the reason for this shortfall, and what does BAAQMD plan to do about that?
In addition, there is too much reliance on good intentions. Transportation emissions get particularly short shrift in this regard. Incentives and education plans such as Drive Smart are good, but not enough. For example, employers should be required to limit parking available to employees or to charge solo drivers (of non-electric vehicles) a small fee that could then be rebated to those who carpool or take public transit. A small fee in a company where most commuters drive solo would create an appreciable incentive to carpool.

Sara Greenwald
anderson.greenwald@att.net
1323 Lyon St.
San Francisco, California 94115

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sara Theiss [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:49 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Ms Reviere and Mr. Burch,

I appreciate the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support vision the Plan offers: "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy."

However, the plan lacks sufficient measures to make that vision a reality. As you know better than I, climate change has been having a deleterious effect on our state's environment for awhile, and that process appears to be speeding up. So we need more regulations in order to reduce greenhouse gases in a time frame that will meaningfully address the problems as well as meet our longer term goals. We in California are fortunate to have a legislature and population that understands the urgency of the situation and are in what may the best position we will ever be in to get effective measures enacted.

Biofuels lead to combustion and are a poor use of our state's resources - land, water and other inputs. Support for the development of biofuels needs to stop. They are now part of the problem, not the solution, and are being pushed by big ag economic interests. Regulations should stop future development of biofuels.

Why does measure SS12 permit oil refineries to exceed the carbon intensity limits and offset the excessive carbon production with increased biofuels? This is both contrary to GHGs reduction and what should be the policy on biofuels.

Overall, California needs to move away from energy that produced GHGs and pollution toward electrification and solar energy. For these reasons, I urge you to adopt measures to provide incentives to discontinue space and water heaters in commercial and multi-family dwelling and a deadline for the phase-out. Similarly the plan should be shaped with the goal of electrifying transportation as much as possible, despite what appears to be a lack of support from Washington.

Be bold! I urge you do amend the plan so that the Air District uses all its authority to push renewable energy and implementation actions in this area. Regulated sectors will sue no matter what - why self-censor at this point?

Sincerely,
Sara Theiss

Sara Theiss
saratheiss@aol.com

539 Esplanade Avenue
Pacifica , California 94044

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: sarah dorrance [mailto:sarahdav@rawbw.com]
Sent: Wednesday, March 1, 2017 9:22 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take Aggressive A to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have so very few enforceable measures for reducing greenhouse gases (GHGs). Give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet the Earth and our faraway climate goals.

sarah dorrance
sarahdav@rawbw.com
2956 22ns street
SF, California 94110

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.259/raOdaMoXSqmvXR3uguERUA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:29 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sarah Nicolazzo [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 4:47 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

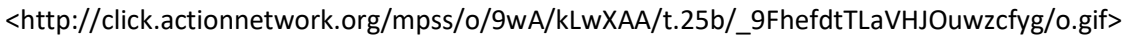
I am particularly concerned about the oil industry's attempts to expand tar sands refining in the Bay Area. The industry must be stopped from extracting tar sands if we are to have any hope of averting the most catastrophic effects of climate change, and I believe strongly that we here in California must stand in solidarity with the First Nations communities in Canada who have been devastated by the environmental destruction and toxic contamination resulting from tar sands extraction. Refining of tar sands here in the Bay Area would only worsen the negative public health impacts experienced by communities like Richmond due to pollution from the refineries. To that end, I urge the Air District to play a stronger role in regulating refineries. The Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible. The purpose of a carbon intensity rule for SS12 should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit, then immediately provide a means to avoid the limit and allow more tar sands to be processed.

Thank you for your time.

Sincerely,

Sarah Nicolazzo

Sarah Nicolazzo
sarah.nicolazzo@gmail.com
245 17th St Apt 205
Oakland, California 94612



Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Scott Grinthal [mailto:info@actionnetwork.org]
Sent: Saturday, March 4, 2017 5:10 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Scott Grinthal
sgrinthal@yahoo.com
1 De Anza Court
San Mateo, California 94402

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sharon Carew [mailto:zevio@earthlink.net]
Sent: Wednesday, March 1, 2017 8:42 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
I recently heard that leaf blowers are detrimental to air quality and to the health of people who use them. Can we encourage going back to rakes and brooms to sweep leaves.
I also feel very strongly that public transportation must be affordable, plentiful, and reliable. Why not put billboards up asking people to ditch their car 1 or 2 days a week and take Bart or the bus.
Thank You,
Sharon Carew

Sharon Carew
zevio@earthlink.net
1929 8th Street Unit A
Berkeley, California 94710

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sharon Hull [mailto:plants@cruzio.com]
Sent: Wednesday, March 1, 2017 9:49 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

The Plan shows (in Figure 3-9) that California’s climate program is not reducing Bay Area GHG emissions to the 1990 level by 2020, and it looks like we will fall farther behind. The Plan should include a discussion of why California efforts aren’t reducing the Bay Area’s GHG emissions to highlight the importance and necessity for regional action.

In addition, the Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible.

Sharon Hull
plants@cruzio.com
800 Brommer St #75
Santa Cruz, California 95062

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Shelia Numan [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 12:57 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Shelia Numan
sheilamarien4@gmail.com
230 Fancy Dance Dr.
Sparks, Nevada 89441

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Shelly Gordon [mailto:sgordon@g2comm.com]
Sent: Wednesday, March 1, 2017 9:28 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Shelly Gordon
sgordon@g2comm.com
4250 El Camino Real
Palo Alto, California 94306

<http://click.actionnetwork.org/mpss/o/_gA/kLwXAA/t.259/c311hUBpQX21Dcj_WS8SDA/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Shiva Berman [mailto:shiva94549@comcast.net]
Sent: Wednesday, March 1, 2017 8:50 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

I appreciate your work around the Draft Clean Air Plan and want to thank you for this chance to comment on what I think is of utmost importance.
I support the key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take AGGRESSIVE action to eliminate fossil fuel combustion and transition to a post-carbon economy”. However, I feel strongly that without regulation that will encourage compliance while punishing those who do not, this plan will not have the necessary Teeth (shall we say) to really make much of a difference. It also makes me wonder what is really meant by the use of the word AGGRESSIVE in the statement?

For instance, if the plan does not provide incentives funding for the installation of solar water heaters, or electric heat pumps in commercial and multi-unit developments, and does not propose a future date to phase out the existing carbon based heaters, then it is not truly making any meaningful strides forward.

As well, I am concerned with the fact that there does not seem to be enough said in the plan about holding the refinery industry accountable while allowing them to exceed the carbon intensity limits set by the plan. This compromise allows for the refineries to continue to pollute; all they have to do is change the source of their pollution.

Please feel free to contact me with any comments you may have regarding these concerns.
Respectfully,
Dr. Shiva Berman

Shiva Berman
shiva94549@comcast.net
3291 Greenhills Drive
Lafayette, California 94549

<http://click.actionnetwork.org/mpss/o/9gA/kLwXAA/t.259/5SoJ_Uk5QFKhKmyXb7GjTg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:47 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Silke Valentine [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:47 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Silke Valentine
vigyano62@aol.com
813 Paxton Villa Ct.
Novato, California CA 94947

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sophia Lehmann [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 5:56 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sophia Lehmann
sophia_lehmann@hotmail.com
1014 Mariposa Ave
Berkeley , California 94707

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.25a/34zwiecaRXSmaZBFGqGq-w/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:24 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: STACIE CHARLEBOIS [mailto:info@actionnetwork.org]
Sent: Sunday, March 5, 2017 12:58 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

STACIE CHARLEBOIS
armostacie@hotmail.com
701 GRANDVIEW RD
SEBASTOPOL, California 95472

<http://click.actionnetwork.org/mpss/o/6QA/kLwXAA/t.25d/UpME2wx1TJ-5JsAY3Ie8gQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:59 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: stephanie morris [mailto:stephaniemorris@comcast.net]
Sent: Wednesday, March 1, 2017 9:39 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

stephanie morris
stephaniemorris@comcast.net
377 Buttefield Rd
San Anselmo, California 94960

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:25 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Stephen Beck [mailto:info@actionnetwork.org]
Sent: Saturday, March 4, 2017 4:42 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan.

I like the key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Unfortunately, the plan relies mostly on education and incentive funding to reduce greenhouse gases. In addition to education and incentives, strict regulations are needed to get the job done. The Plan needs more enforceable rules requiring GHG reduction and serious penalties for non-compliance.

Sincerely,
Stephen Beck

Stephen Beck
beckstephenc@gmail.com
161 Remington Dr
Danville, California 94526

<http://click.actionnetwork.org/mpss/o/-gA/kLwXAA/t.25d/YHu0gMp5Que-TTLN8brmgQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:57 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Steve Roth [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 10:11 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Steve Roth
slroth24@gmail.com
8818 Oak Trail Dr
SANTA ROSA, California 95409

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Subrata Sircar [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:32 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs).

In particular, as much as companies hate regulations, if we do not make them reduce GHGs, they won't. It is always more profitable for them to pollute rather than modernize, so we must require that they modernize and reduce their pollution via regulation, not incentives.

Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Subrata Sircar
subrata_sircar@yahoo.com
732 Harvard Avenue
Sunnyvale, California 94087-1205

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:32 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: Sue Fox [mailto:suefox2010@gnail.com]
Sent: Thursday, March 2, 2017 6:47 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sue Fox
suefox2010@gnail.com
15 Rally
Fairfax, California 94930

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:56 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Susan Christy [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:05 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Susan Christy
suchristy@aol.com
suchristy@aol.com
CA, California 94973

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Susan Herting [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:35 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.
We need more meaningful public transportation, efforts to get away from fossil fuel combustion.
We are still lagging in our goals.
Please make any efforts to secure a healthy future Thank you

Susan Herting
sbherting@gmail.com
4988 Patterson
Oakland , California 94619

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:48 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Susanna Marshland [mailto:sbmarshland@sbcglobal.net]
Sent: Wednesday, March 1, 2017 8:31 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

I hope you will strongly consider incentivizing solar sources over biofuels, promote green buildings, focus on renewable energy generation, and hold the line on carbon limits.

Susanna Marshland
sbmarshland@sbcglobal.net
49 Avon Rd.
Kensington, California 94707

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Suzy Karasik [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:25 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Suzy Karasik
suzy.livewell@gmail.com
2940 Estates Avenue, #6
Pinole, California 94564

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: SweetGrass Longhouse [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 4:03 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,
I recently retired from teaching. In the last decades I followed the continual decline of health and well-being of my student population. Allergies and Asthma became so increasingly an issue of impact and import that I (we) had to readdress our curriculums to accomodate who could run in gym, who could attend gym, who could play outside, who could be outside, or in what weather they could be outside.
Children would have to be escorted to the Nurse's office for inhaler treatments, and others missed school all together, staying at home or being hospitalized, again causing the redevelopment of curricula to accomodate this increasingly pressing dilemma of human sustainability. The children are the canaries in the coal mine. Clean air, clean water, clean food, are all really good ideas. Sustaining human life development is also a good idea, one I have watched over my years as a teacher, become of little importance to those who would own us.

I cannot speak to other parts of the world, but American children are rapidly becoming unable to sustain health on the planet Earth. Poor air quality, chemical sprays and pesticides, Coal and smog, along with changing climate concerns are reducing our species' ability to Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

SweetGrass Longhouse
grammgrass@yahoo.com
1816 Fairview St. #2
Berkeley , California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 9:03 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Sylvia Hurdle [mailto:info@actionnetwork.org]
Sent: Monday, March 6, 2017 12:58 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thanks for the opportunity to comment on the Clean Air plan: Spare the Air--Cool the Climate. I am grateful that steps are being taken towards trying to reduce greenhouse gases. However, I question whether there are enough teeth in the bill, say, to reduce Bay Area GHG to 1990 levels, or whether there are enough regulations to significantly change current practices. In particular, we need more regulation on petroleum refineries to discourage processing extreme fuels like tar sands. Electric is the way to go--ESPECIALLY in CA that is so sun rich and has such solar potential. Also, we need to promote energy efficient appliances that do not rely on fossil fuels. For example, there are Japanese-produced electric hot water heaters (all the rage in Austrailia) that are 4 times as efficient as gas and even cost less to operate than gas, but 5 contractors we talked to about our remodel, who are fairly ecologically savvy, did not know about them. We are actually spending mon ey to educate them about such things when we should be getting a rebate for using them! I encourage you to put more teeth in this bill to make REAL change.

Sincerely,

Sylvia Hurdle

Sylvia Hurdle
sylvia_hurdle@yahoo.com
421 Taylor Ave.
Alameda, California 94501

<http://click.actionnetwork.org/mpss/o/4AA/kLwXAA/t.25e/L-AQIrWhSDuc3SSAHgj7rg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Tamara Voyles [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 12:23 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Tamara Voyles
tamaravoyles@gmail.com
2049 Blucher Valley Rd Sebastopol, Ca. 95472 Sebastopol, California 95472

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:54 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: ted rees [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 12:19 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

ted rees
trees2296@gmail.com
2296 Sun Mor Ave
mountain view, California 94040

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:55 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Tera Blackman [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 11:43 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Tera Blackman
terablackman@gmail.com
4683 Park Drive
Carlsbad , California 92008

<http://click.actionnetwork.org/mpss/o/-AA/kLwXAA/t.259/jFhGJqKwQJmar69fRjb1pQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:02 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Theresa Vernon [mailto:acuvern@tvernonlac.com]
Sent: Wednesday, March 1, 2017 8:46 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Considering that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure that we reduce GHGs in a meaningful time frame and meet our climate goals. We are past the time for going slow.

Theresa Vernon
acuvern@tvernonlac.com
2241 Grahn Drive
Santa Rosa, CA 95404

<http://click.actionnetwork.org/mpss/o/_QA/kLwXAA/t.259/g3MhOjS6RtWYdWZKhrfbnQ/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:49 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Tina Ann [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 6:12 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Tina Ann
8tinaann@gmail.com
p.o. box 265
Bolinas, Texas 94924-0265

<http://click.actionnetwork.org/mpss/o/_wA/kLwXAA/t.25a/TGuTd4tPS0eUMQLxmHoudg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Tom Heinz [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 4:20 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.”

The education goals and green house goals are great but there need to be more enforceable rules. The rules will level the playing field so everyone knows what can and cannot be done. It is the only way to move forward otherwise there will be people and companies who will slide around the goals and take unfair advantage of loop holes.

Tom Heinz
trheinz57@gmail.com
102 Clorinda Ave
San Rafael, California 94901

<http://click.actionnetwork.org/mpss/o/9wA/kLwXAA/t.25c/Zr2UV7zgQuKDdX04SSOH3g/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:50 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Trisha Burnap [mailto:trish1234@burnap.net]
Sent: Wednesday, March 1, 2017 5:42 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Trisha Burnap
trish1234@burnap.net
1803 2nd Ave
Walnut Creek, California 94597

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Valerie Love [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 3:13 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

In a time when climate denial has reached the highest halls of power in the US, it is more imperative than ever that local governments and agency act swiftly and boldly to protect this precious planet we call home.

Valerie Love
vmontanalove@gmail.com
1508 Stuart St, Unit A
Berkeley, California 94703

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:26 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Vera Loewer [mailto:veraloewer@sbcglobal.net]
Sent: Friday, March 3, 2017 4:02 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Vera Loewer
veraloewer@sbcglobal.net
636 Montezuma Drive
PACIFICA, California 94044

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:58 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Victoria Gorski [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 9:58 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

I need to add look at my address, I live directly on Sir Francis Drake Blvd in San Anselmo. There is not a minute, not one that there is not a car idling in front of my house between the hours of 3:30 pm till 6:30 pm. Every 5 minutes cars that have been at traffic lights east and west of my home are driving by. Huge trucks start driving by my home at 5 am, often so loud that they shake my windows. The increase in traffic in the last 8-10 months has been increased by 1/3 from the previous year. I'm sure of this.

It is more important now than ever that we do everything in our power to Protect the EPA, fight against big oil and coal and be leading the way of cleaner energy.

Victoria Gorski
seville22@gmail.com
1562 Sir Francis Drake blvd Apt 5
San Anselmo, California 94960

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 11:04 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: W Elahdab [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 8:15 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

W Elahdab
welahdab@yahoo.com
4201 Balfour Ave
Oakland, California 94610

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:33 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Wendy Stock [mailto:info@actionnetwork.org]
Sent: Thursday, March 2, 2017 12:16 AM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Wendy Stock
wendystock@aol.com
1306 Bay View Pl
Berkeley, California CA

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:27 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: wesley alexander [mailto:info@actionnetwork.org]
Sent: Friday, March 3, 2017 1:14 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

wesley alexander
wes.alexander.art@gmail.com
5881 pine view dr.
Paradise, California 95969

<http://click.actionnetwork.org/mpss/o/-wA/kLwXAA/t.25b/rvQhaLgZQXC5yXixJWHAYg/o.gif>

Areana Flores

From: Christianne Riviere
Sent: Tuesday, March 7, 2017 10:51 AM
To: Clean Air Plan
Subject: FW: Comments on Air District Draft 2017 Plan

-----Original Message-----
From: Ziv Tzvieli [mailto:info@actionnetwork.org]
Sent: Wednesday, March 1, 2017 4:02 PM
To: Christianne Riviere <criviere@baaqmd.gov>
Subject: Comments on Air District Draft 2017 Plan

Christy Riviere,

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: “To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy.” Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Also, the Plan states that measure SS12 would set carbon intensity limits on petroleum refineries, but says they can exceed those limits—probably from the processing of extreme fuels like tar sands—and allows them to “offset” the increase in carbon intensity by increasing biofuel production. This is not acceptable when we know transportation must be electrified to the fullest extent possible and the thousands of Californians living in the shadow of the refineries need clean air too.

Best wishes,
Ziv Tzvieli

Ziv Tzvieli
zivt@yahoo.com
2225 Woolsey St
Berkeley, California 94705

David Burch
Principal Environmental Planner, Planning & Research
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Dear Mr. Burch,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy." Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sincerely,

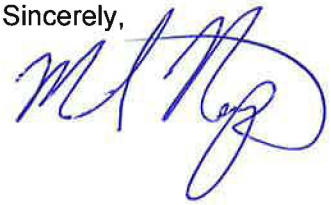
Sheila Whelan

David Burch
Principal Environmental Planner, Planning & Research
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Dear Mr. Burch,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy." Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sincerely,



David Burch
Principal Environmental Planner, Planning & Research
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Dear Mr. Burch,

Thank you for the opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I support this key statement from the document's Executive Summary: "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy." Notwithstanding that statement and the vision presented, however, the Plan seems to have few enforceable measures for reducing greenhouse gases (GHGs). Please give careful consideration to additional regulations that would assure we reduce GHGs in a meaningful time frame and meet our faraway climate goals.

Sincerely,

2017 MAR -2 AM 10: 39

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

February 23, 2017

Dear David Bunch

I am writing you concerning the draft of the Clean Air Plan (of 2017). I passionately advocate & support stabilizing the climate by aggressively acting towards eliminating fossil fuels combustion. I know it's a long, complex road; but we are past our due date; as an animal welfare enthusiast I feel so saddened that our industrial priorities have been in sacrifice, selfishly of the animals that are effected by poor air, drought due to climate change, etc. to the point; all of this effects all of us.

Though the Bay Area is environmentally forward mory - the emissions need to be reduced substantially By 2020 - SO Stationary Source Measure SS12 is too vague, and ultimately the result is that there will be more tar sands. The rule of carbon intensity simply provides the facade or gesture of decreasing carbon intensity ~~without~~ But slips in the permission of more tar sands to be processed. We NEED YOU, YOUR STAFF TO SET FIRM RULES, UNBENDING RULES— NO WISHY WASHY ~~&~~ FRAMEWORK --- THAT will create grounds to REDUCE EMISSIONS SUBSTANTIALLY By 2020 SO ~~WE~~ ARE ON TARGET. Please implement firmer rule to maintain ~~the~~ limits including no tar sands.

Thank you For Your Time

Julia

February 23, 2017

Mr. David Burch
Principal Air Quality Planner
Bay Area Metro Center
BAAQMD
375 Beale Street
San Francisco, CA. 94105

Dear Mr. Burch:

I am quite pleased to learn that you are accepting comments for the BAAQMD 2017 Clean Air Plan. Please note my suggestions.

- The Plan should include a discussion of why California efforts aren't reducing Bay Area GHG emissions to the 1990 level by 2020, and should address ~~setting~~ taking regional action.
- It would be hypocritical to adopt a GHG reduction rule that incentivizes tar sands processing.
- The Air District should not adopt rules that lower Bay Area emissions, while increasing exports of fossil fuels by enabling extreme fuel processing.

Thank you for the opportunity to comment.

Best regards,
Ann C. Reesen
606 Rains Avenue
Albany, CA. 94706.
350 East Bay member

Dear Christy Riviere, Feb. 2

I'm very enthusiastic about the Draft 2017 Clean Air Plan.

However, I think its goals need to be backed up with more enforceable rules if the plan is going to be successful.

A carbon intensity rule should hold the line or decrease carbon intensity at refineries, not just set a limit and then provide a means to avoid it. There should be no means by which tar sands could ever be processed! The offset scheme, as it stands, would allow increased biofuel production to offset increased carbon intensity at refineries. This is unacceptable.

Please consider this, and thank you for your time reading this.

Sincerely,
Sheila Thorne
1326 Spruce St.
Berkeley, CA 94709

February 23, 2017

2017 MAR -2 AM 10: 3

BAY AREA AIR QUALIT
MANAGEMENT DISTRIC

Dear Ms. Riviere:

I commend BAAQMD for developing the draft 2017 Clean Air Plan. I heartily support the Plan's goal: "To protect publ health and stabilize the climate, we must take aggressive actio to eliminate fossil fuel combustion and transition to a post-ca economy." In pursuing these goals to their maximum realizatio for a statewide clean energy economy and ensuring good public he outcomes for all California communities, I urge BAAQMD to throw its weight behind the Plan's with enforceable rules and right incentives:

- Complete electrification of public fleets within the state's transportation sector, as well as access to affordable electric vehicles for ~~the~~ traditionally-marginalized communiti
- Sufficiently sustainable and well-funded incentive dollars for energy-efficiency pilot projects for commercial and residential buildings in low-income and disadvantaged communities, identifying the right public-private partnerships to leverage effective market-based solutions.

Thank you for your consideration.

Sincerely,

Emilie Anna Reaves

Dear David Burch, 2-23-2

RE: Comments for BAAQMD Draft of the 20 Clean Air Plan

I am pleased to see an air quality action pla being drafted in my region. As an ecologist, and a citizen concerned about rising levels of carbon emmissions, this plan represents progress towards a healthier future.

I heartily support the plan goal! However, the plan needs more enforceable rule requiring tougher green house gas ~~emissions~~ reductions, as it relies heavily on incentives, which are good, but not enough in the face of climate change. We need regulations!

For instance, the plan states SS12 would set limi on petroleum refineries, and then allows for liberal offsets and plans to raise limits on Biofuels. This is upsetting. The offset scheme would allow increa biofuel production to offset increased carbon intensity from processing tar sands. This is completely backward. Electric and non-fossil fuels are the future. NOT biofuels!

Furthermore, the plan must take a tougher sta on improving alternative transportation access and

(2)

service. I am an avid cyclist, and many of
ur roads are dangerous to those who are directly
ying to curb our carbon footprint. This plan
epresents an opportunity to set goals and standards
or railways and bike lanes. Please ensure this
s included and highlighted as transportation is
such a huge portion of emmissions.

Overall, I am in support of the draft as a
ep in the right direction to curb GHG emissions.
owever, the draft as is is too ~~soft~~ ~ incentivizing
ather than enforcing standards. We need firm
uidelines and regulations rather than "suggestions"
d loose standards.

Thank you for your public service,

Nadia Stamis
436 Coventry Rd
Kensington, CA 94707

February 23, 2017

David Burch
Principal Air Quality Planner
375 Beale St, San Francisco, CA 94105

2017 MAR -2 AM

BAY AREA AIR QUA
MANAGEMENT DIST

Dear Mr. Burch,

As a citizen concerned with the lasting integrity of o
state's beautiful ecology and preserving healthy air quality for
generations to come, I commend the Bay Area Air Quality Mana
ment District for its work developing the draft 2017 Clean
Air Plan. I believe this is a powerful step in the right direct
for setting forth an actionable goal of "protecting [ed.] the publi
health and stabilizing [ed.] the climate," recognizing we "must
take assressive action to eliminate fossil fuel combustion and
transition to a post-carbon economy." Given we are currently
at ~490 ppm of dangerous CO_2 in the atmosphere -- far above
the threshold considered scientifically safe for sustaining bio-
diversity on this planet -- and many of our California communiti
suffer from adverse health impacts due to aggravated criteria
pollutants, it is critically vital we act boldly and expeditiously
on climate change. California, and specifically the Bay Area, h
significant currency on the world and national stage for leading
by example, so we are well-positioned to make a significant
impact. That being said, I urge BAAQMD to adopt more
enforceable rules for petroleum refineries to drastically redu
its climate impact. Incentives for GHG-reducing activity may seem

ective and smartly the regulated industries can get behind
theory; however, there are still gaps in the Compliance methodology
- accountability ~~mechanism~~ framework that do not translate
- the required reductions necessary for not only contributing
with the state's ambitious GHG-reducing goals, but for
~~building~~ providing a livable, equitable environment for communities of
~~living~~ colour typically impacted most by point source
llution generated by the refineries.

It is for these reasons that I specifically implore BAAQMD
, reconsider the offset scheme proposed in the Stationary
urce Measure SS12 regarding providing credits for biofuel
duction via the Low Carbon Fuel Standard framework. There
several issues with this scheme that work counter to the
ict's stated goal of "stabilizing the climate" and promoting a
st-Carbon economy." For example, there is no reason to
entivize biofuel production when concerted focus and
arcable dollars could be diverted to the far more sustainable
economically transformative efforts to electrify the trans-
rtation sector. The latter focus would also be in alignment
th the Governor's clean transportation goals for ZEV deployment
2050. The benefits of vehicle electrification would also be
t much more readily by local and regional constituents
addition to helping modernize the state grid. Shifting to
redit mechanism for biofuels production would, on the other
nd, aid the perverse and counterproductive incentive for
- sands processing that actually intensifies increases the

Carbon intensity being "limited." This is neither acceptable nor responsible authority. I know that exercising BAAQMD, through its collective intelligence, can do better in establishing enforceable rules that enable the vision with which the Plan Goals was originally written.

Thank you kindly for your time and your consideration.

Sincerely,
Emilie Anna Reaves
2219 Grant St.
Berkeley, CA 94703

Feb. 23,

Dear David Burch,

I'm very enthusiastic about the Draft 2017 Clean Air Plan.

However, I think its goals need to be backed up with more enforceable rules if it is going to be successful.

For instance, a carbon intensity rule should hold the line or decrease carbon intensity at refineries, not set a limit and then provide a means to avoid it. There should be no means by which tar sands could ever be processed. The offset scheme would allow increased production to offset increased carbon intensity at refineries, and this is not acceptable.

Please consider this and thank you for your time in reading this.

Sincerely, Sheila Thorne

1326 Spruce ST.

Berkeley, CA 947[illegible]

Dear BAAQMD people,

I am writing to ask that you add enforceable rules to your draft to assure that the Plan is real and will be carried out.

Thank you,
your constituent,
Karen Walls

BAAQMD
375 Beale St.
SF CA 94105

RECEIV
2017 MAR 6 AM
BAY AREA AIR Q
MANAGEMENT DI

QUETZAL

NATIONAL PARK FOUNDATION

Ms Karen J Walls
275 Grandview Ave
Novato CA 94945-3503

J.M. TARJETAS S.A. E-MAIL: tarjetas@pcsa.cr TEL: (506) 258-3422 FAX: (506) 258-3302
DISTRIBUIDO EN ZONA TROPICAL S.A.

OAKLAND CA 945
27 FEB 2017 PM 3 L

ALBERT EINSTEIN:
Photographed in his house in Princeton, New Jersey, 1954.

Dear Christy:

Re: the draft 2017 Clean Air Plan: Thank you for helping create the draft Plan! Its goals are laudatory. Still, SS12 is a problem + needs modifying. The offset scheme as now written would allow more biofuel production to offset increased carbon intensity from processing tar sands. You must address that! The Plan must cap or decrease refinery carbon intensity - by rule!

Thanks,
Dean Mayer

2976 Lakefield Pl.
Moraga, CA
94556

Christy Riviere
BAAQMD
375 Beale St.
San Francisco, CA
94105

RECEIVED
2017 MAR -2 AM 10:
BAY AREA AIR QUA
MANAGEMENT DIST

35-5106 ©1980 Beulah Roth
pomegranate, p.o. box 748, corte madera, calif. 94925

Member, 350.org Eq[illegible]

Relieving Tension; 22" × 30"
Wm. Lateef Yoder ©1987

Comments for BAAQMD draft 2017 Clean Air Plan

Dear Mr. Burch

I support the Plan Goal:
"To protect public health and stabalize the climate...."
In addition it is needed:

* Increase funding of the Bikeways, Roads, Lanes and Paths program
* Increase focus on providing secure bicycle parking at transit stations and stops
* Include/expand idling strategies as part of smart driving or a standalone program

Yours truely
Gaia Shafarman
350.org
6011 Hillegass Ave.
Oakland
CA 94618

David Burch
375 Beale St.
San Francisco, CA 94105

441 Grant, San Francisco, CA 94133 Tel.(415) 986-8866

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2017 MAR -2 AM 10:
BAY AREA AIR QUALITY MANAGEMENT DISTRICT

ANGEL ISLAND STATE PARK

The view south from Point Stuart reveals the west shore of Angel Island, Point Knox and San Francisco across the bay. Pride of Madeira blooms in the foreground, and the large brick warehouse and remains of the pier are at Camp Reynolds (West Garrison). This popular island State Park is accessible by ferry and private vessel.

Dear Ms. Riviere

I support the Plan Goal:
"To protect public health and stabalize the climate we must take aggressive action to eliminate fossil fuel combustion..."
In addition:

* The plan should include a discussion of why California's climate programs aren't reducing the Bay Area's GHG emissions to highlight the need for regional action.
* The offset scheme would allow increased biofuel production to offset increased carbon intensity from processing tar sands. This is not acceptable.
* There's no reason to incentivize biofuel production, when we know that transportation must be electrified to the fullest extent possible.

Yours truely
Gaia Shafarman
6011 Hillegass Ave. Oakland
CA 94618 350.org

Christy Riviere
375 Beale Street
San Francisco CA 94105

Comments for BAAQMD draft 2017

Photograph by FRANK S. BALTHIS ©1984
NATURE'S IMAGE
P.O. Box 255, Davenport, Calif. 95017
Printed in Japan

RECEIVED
2017 MAR -2 AM 10:
BAY AREA AIR QUALITY MANAGEMENT DISTRICT

FB72

I Paint My House

A woman paints *ogalu*, a pattern derived from scarification. Nri, Nigeria

© Margaret Courtney-Clarke

FROM: CLAUDIA RODRIGUEZ
240 Grand Ave. Apt 11
OAKLAND, CA 94610

Dear Christy & David

Thank you for the opportunity to comment. I support taking effective action "to protect public health & stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion & transition to a post carbon economy".

Please consider more enforceable measures for reducing green house gases. We need to do more for our environment.

BOX 6000 ROHNERT PARK CA 94927

Pomegranate

THE SCHOMBURG CENTER FOR RESEARCH IN BLACK CULTURE
THE NEW YORK PUBLIC LIBRARY

TO: CHRISTY RIVIERE & DAVID BIRCH
BAAQMD
375 Beale St. Suite 600
SF, CA 94105

I Paint My House

In their wall decoration, the women of Oualata use only their fingers to apply clay pigments combined with gum arabic, which acts as an adhesive. Oualata, Mauritania

© Margaret Courtney-Clarke

Dear Mr. Burch & Ms. Riviere,

Thank you for the opportunity to comment.

Please consider making the Air District Draft 2017 something that has firmly enforceable laws & limits in order to eliminate fossil fuel and transition to a post carbon economy. We all need cleaner air to breathe and I believe the bay area can set an example for others to have cleaner air and hopefully cleaner water as well. Thank you &

My Best,

Rose Schweiz
2262 Summer St.
Berkeley, Ca.
94709

BOX 6000 ROHNERT PARK CA 94927

Pomegranate

THE SCHOMBURG CENTER FOR RESEARCH IN BLACK CULTURE
THE NEW YORK PUBLIC LIBRARY

I Paint My House

Kassena women use coal tar mixed with sand and boiling water to paint their traditional patterns. The tar is absorbed into the mud surface of the wall and renders the surface impermeable by water. Navrongo-Saboro, Ghana

© Margaret Courtney-Clarke

DEAR CHRISTY AND DAVID,

THANKS FOR THE OPPORTUNITY TO COMMENT ON THE AIR DISTRICT'S DRAFT 2017 CLEAN AIR PLAN. I SUPPORT THIS KEY STATEMENT FROM THE EXECUTIVE SUMMARY:
"TO PROTECT PUBLIC HEALTH AND STABILIZE THE CLIMATE, WE MUST TAKE AGGRESSIVE ACTION TO ELIMINATE FOSSIL FUEL COMBUSTION AND TRANSITION TO A POST-CARBON ECONOMY." HOWEVER, THE PLAN SEEMS TO HAVE FEW ENFORCEABLE MEASURES, SO PLEASE CONSIDER ADDITIONAL REGULATIONS TO REDUCE G.H.G.'S

ANDREW COCKRELL
2262 Summer St.
Berkeley CA 94709

CHRISTY RIVIERE AND
DAVID BIRCH
BAAQMD
375 BEALE STREET,
SUITE 6000
SAN FRANCISCO, CA 94105

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BOX 6099 ROHNERT PARK CA 94927

Pomegranate

I Paint My House

Akalem Donnawanu draws a furrow pattern on the wall of her home using coal tar. Navrongo-Saboro, Ghana

© Margaret Courtney-Clarke

FROM: MIGUEL CAMPO
240 GRAND AVENUE, APT 11
OAKLAND CA 94610

DEAR CHRISTY AND DAVID,

THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THE AIR DISTRICT DRAFT 2017 CLEAN AIR PLAN. I SUPPORT THIS KEY STATEMENT FROM THE DOCUMENT'S EXECUTIVE SUMMARY. "TO PROTECT PUBLIC HEALTH AND STABILIZE THE CLIMATE, WE MUST TAKE AGGRESSIVE ACTION TO ELIMINATE FOSSIL FUEL COMBUSTION AND TRANSITION TO POST-CARBON ECONOMY". PLEASE GIVE CAREFUL CONSIDERATION TO ADDITIONAL REGULATIONS THAT WOULD ASSURE WE REDUCE G.H.G.

CHRISTY RIVIERE
DAVID BIRCH
375 BEALE STREET, SUITE 600
SAN FRANCISCO, CA 94105

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BOX 6099 ROHNERT PARK CA 94927

Pomegranate

I Paint My House

Awe Bayira and Kojigi Yire apply figurative reliefs to their clay pots before polishing the surface with a chunk of white clay. Guenon-Tipo, Burkina Faso

© Margaret Courtney-Clarke

Dear Christy + David
Thanks for the chance to comment on the 2017 Air District's Clean Air Plan. I support the key statement from the document's executive summary: To protect public health + stabilize the climate, we take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy." The vision presented seems to have few enforceable measures for reducing GHGs. Please give careful consideration to additional regulations to assure we reduce GHGs in a timely and effective manner.

Sincerely,
Tomeka Santos
Oakland, CA 94602

Principal Environmental Planner Christy Riviere
~~Bay Area~~ BAAQMD
375 Beale St suite 600
SF, CA 94105

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BOX 6099 ROHNERT PARK CA 94927

Pomegranate

I Paint My House

Nany mint Sass uses a combination of motifs representing parts of the body to create a decorative element around a doorway. The Koran forbids figurative representation of living beings; therefore, ideograms symbolize a form. Oualata, Mauritania

© Margaret Courtney-Clarke

3/2/17

Dear Ms. Riviere and Mr. Burch,

Thank you for your efforts devising the Air District's Draft 2017 Clean Air Plan. Please add enforceable measures for reducing GHGs to assure we reduce GHGs timely and effectively.

Sincerely, Linda Koffman, San Francisco 94122

BAAQMD
Att: Christy Riviere
David Burch
375 Beale St, Suite 600
SF, CA 94105

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BOX 6099 ROHNERT PARK CA 94927

Pomegranate

I Paint My House

Nine-year-old Elma, the Ndimandes' youngest daughter, learns the art of painting under her mother's guidance. Mabhoko, Mpumalanga Province, South Africa

© Margaret Courtney-Clarke

Dear Christy & David,

I would like to comment on the Air District's Draft 2017 Clean Air Plan. I agree that "aggressive action we must take to eliminate fossil fuel combustion & transition to a post-carbon economy." However, I believe the plan needs more enforceable measures for reducing GHGs. For example, the plan needs to incentivize funding for home energy efficiency (eg. changing out conventional heating with heat pumps). Thank you for your consideration.

Sincerely,

Meredith Cowart 1032 62nd st oakland ca 94608

BAAQMD
Christy Riviere
375 Beale St, ste 600
San Francisco CA
94105

BOX 6099 ROHNERT PARK CA 94927

Postage Stamp

THE SCHOMBURG CENTER FOR RESEARCH IN BLACK CULTURE
THE NEW YORK PUBLIC LIBRARY

I Paint My House

Several years from now, during her two-month puberty seclusion, Elma Ndimande will learn the fine points of the art of house painting. Mabhoko, Mpumalanga Province, South Africa

© Margaret Courtney-Clarke

Dear Christy and David,

Thank you for the opportunity to comment on the Air District's draft Clean Air Plan. I support its goal to take aggressive action to curb GHG emissions.

However, I would like to see more enforceable measures for reducing GHGs. Please consider additional regulations that would assure that reduce GHGs in the Bay Area at a fast enough rate

Sincerely, Burr Lukemon, Oakland 94608

Bay Area Air Quality District
375 Beale St, Suite 600
San Francisco, CA 94105

BOX 6099 ROHNERT PARK CA 94927

Postage Stamp

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THE NEW YORK PUBLIC LIBRARY

I Paint My House

Soninke women use only their hands and fingers to apply the earth pigments obtained from the Senegal River area. Buanch, Mauritania

© Margaret Courtney-Clarke

Dear David & Christie

Thanks so much for spearheading an important Plan for cleaner air in our area!
I want to request more movement towards electric and the measure shouldn't allow the set Carbon Intensity limits to be exceeded, even if offsets are allowed. More Regulation & Accountability! Thank! Heat Pumps!

BOX 6099 ROHNERT PARK CA 94927

Pomegranate

THE SCHOMBURG CENTER FOR RESEARCH IN BLACK CULTURE
THE NEW YORK PUBLIC LIBRARY

BAAQMB
David Burch
Principal Environmental Planner
375 Beale St
San Francisco, CA
94105

Karuna Holm
1835 Mgtu, Oakland
CA 94607

I Paint My House

Anna Ntuli in a traditional Ndebele wedding: she puts on the customary sorrowful expression of the bride and partly covers her face with an *ngurara*, which she wears for the first time. Mabhoko, Mpumalanga Province, South Africa

© Margaret Courtney-Clarke

Ms. Riviere & Mr. Burch,

I write to comment on the recent Air District's Draft 2017 Clean Air Plan. I'd like to see a plan with more enforcement teeth. Without these measures, the environment will stay gummed up!

- Derek Schoonmaker
- Oakland, CA

BOX 6099 ROHNERT PARK CA 94927

Pomegranate

THE SCHOMBURG CENTER FOR RESEARCH IN BLACK CULTURE
THE NEW YORK PUBLIC LIBRARY

Christy Riviere & David Burch
Bay Area Air Quality Managmt Dist.
375 Beale St., Ste 600
San Francisco, CA 94105

I Paint My House

Anna Mahlangu paints her home for a ceremonial occasion.
Mabhoko, Mpumalanga Province, South Africa

Dear David & Christy,

Thank you for this opportunity to comment on the Air District's Draft 2017 Clean Air Plan. I would like to see more enforceable measures for reducing GHG's. Please consider additional regulations that would assure that we reduce GHG's in a reasonable time frame in order to meet our forawy Climate goals.

Sincerely,
Julie Fishman
1507 26th Ave
Oakland, CA 94601

ZEBRA's rock!

Bay Area Air Quality Mgmt. District
David Burch & Christy Riviere
375 Beale St.
Ste. 600
San Francisco, CA
94105

I Paint My House

In their wall decoration, the women of Oualata use only their fingers to apply clay pigments combined with gum arabic, which acts as an adhesive. Oualata, Mauritania

DEAR CHRISTY AND DAVID,

I'D LIKE TO ENCOURAGE YOUR OFFICE TO CREATE MORE ENFORCABLE CLAUSES IN THE 2017 CLEAN AIR PLAN. THE ENVIRONMENT NEEDS BRAVE PROTECTION. THANKS FOR CONSIDERING,

EVAN HOLM
OAKLAND, CA
94607

DAVID BURCH & CHRISTY RIVIERA
375 BEALE ST
SUITE 600
SAN FRANCISCO, CA 94105

THE SIXTH FLOOR MUSEUM AT DEALEY PLAZA

Dallas, Texas • www.jfk.org

OAKLAND CA 945

27 FEB 2017 PM 3 L

Re: S512 of Draft 2017 Clean Air Plan

Dear David:

Thanks for your work on this plan! Great goals, but goals alone aren't enough.

Measure S512 is a problem. The offset scheme opens the door for increased CO_2 from processing tar sands. That is simply unacceptable. Please fix the rule.

Deern Mayer
Member, 350.org East Bay

276 Lakefield Pl.
Moraga, CA 94556

David Burch
BAAQMD
375 Beale St.
San Francisco, CA
94105

RECEIVED
2017 MAR 2 A
BAY AREA AIR
MANAGEMENT

President John F. Kennedy and First Lady Jacqueline Kennedy stepping off Air Force One at 11:40 am at Dallas Love Field, November 22, 1963. Several thousand spectators, and live TV cameras, greeted their arrival.

Photographer Cecil Stoughton, John F. Kennedy Library.

P600

March 9, 2017

Christy Riviere
Principal Environmental Planner
BAAQMD
375 Beale St., Ste. 600
San Francisco, CA 94105

Via email: cleanairplan@baaqmd.gov

Dear Ms. Riviere,

I am writing to you on behalf of Napa Climate NOW!, a Napa County citizen's organization advocating for smart climate action based on the latest climate science.

First, let me say how pleased we are that BAAQMD has drafted its 2017 Clean Air Plan to address air pollutants and climate pollutants under a single, unified framework. The January 10, 2017 Draft *Spare the Air, Cool the Climate* plan is certainly one of the most forward looking plans of its kind anywhere in the state, the country, or for that matter, the world. The approach – envisioning a post-carbon economy in 2050 and then working backward to identify how we can get from here to there – is an enlightened way to approach the problem. We are very grateful to be living within BAAQMD's jurisdiction, and to have this opportunity to submit comments.

I could write extensively on aspects of the Plan that we would like to commend. However, in the interest of brevity, I will confine my remarks to those areas where we believe further improvements and clarifications could be provided.

1. "Consistent with the GHG reduction targets adopted by the state of California, the plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050."

As aggressive as these targets are, much has been learned about the rapid pace of climate change in recent years to suggest that these targets may still fall short of preventing the earth from crossing critical climate change thresholds within the very near term (as soon as the next decade). We recognize that BAAQMD (and the state) are grappling with the art of the possible in setting goals. Nonetheless, it's time to reconsider and strengthen these targets in light of the fact that: 1) global temperature is now rising on a non-linear curve; 2) the earth is already experiencing temperature spikes crossing the lower Paris threshold of +1.5°C (first few months of 2016), and can expect to experience spikes crossing the +2.0°C upper Paris threshold within a decade; 3) the earth's fundamental support systems are under extreme duress – vast coral reef die-offs, deoxygenation of large areas of the Pacific Ocean, species extinctions around the globe, rising oceans and accelerating changes in the Arctic. And these, of course, are just a few of the signals. BAAQMD could play a true leadership role by challenging the state to adopt an even stronger stance.

2. "Motor vehicles and industrial sources are the largest sources of ozone precursors in the Bay area. … Bay area ozone levels and population exposure to harmful levels of smog have decreased substantially. Despite this progress, the Bay area does not yet fully attain state and national ozone standards. …rising temperatures associated with climate change are expected to increase emissions of ozone precursors and smog formation.

"Reducing emissions of super-GHGs can slow the rate of global warming in the near term. This provides an important opportunity to delay the worst effects of climate change while we develop and implement effective policies to reduce CO_2 emissions over the long term."

Your focus on further reductions in ground level ozone precursors, NOx and reactive organic compounds, with the goal of continuing progress toward state and national ozone standards, are extremely important, not only from an air pollution standpoint, but from a climate protection standpoint as well. That's because ozone in the troposphere is an extremely potent GHG. See, for instance, The UNEP/WMO Integrated Assessment of Black Carbon and Tropospheric Ozone (2011). In addition to the precursors NOx and VOCs, methane also contributes to ozone in the troposphere.

In the research paper, "Tropospheric ozone and its precursors from the urban to the global scale from air quality to short-lived climate forcer" (http://www.atmos-chem-phys.net/15/8889/2015/acp-15-8889-2015.pdf), Stevenson et al. (2013) found that increases in anthropogenic emissions are responsible for the following percentages of the 1850s–2000s ozone radiative forcing: CH4 = 44 ±12 % (1 standard deviation range, based on results from 6 different global models); NOx = 31 ±9 %; CO = 15 ±3 %; NMVOCs 9±2 %.

This is particularly important when you realize that, in addition to carbon dioxide, methane, black carbon and tropospheric ozone are the three most important climate pollutants from a radiative forcing standpoint. Together, these account for more than 95% of the excess heat (i.e., the positive "radiative forcing") in the atmosphere: about +4.3 watts per square meter (W/m^2) total. These effects are buffered to some degree by coolants such as SO_2, accounting for about -1.9 W/m^2. (Obviously, SO_2 is a significant air pollutant, but its climate cooling effects must be included as part of a comprehensive accounting.)

There is a clear, causal link between the level of excess heat (radiative forcing, or RF) in the atmosphere and the rise of global temperature. As one rises, so too, inevitably, will the other. Given today's net RF anomaly of about +2.4 W/m^2, it is clear that global average temperature will continue to rise to well over +1.5°C, and with the projected RF anomaly rising to+2.6 W/m^2 (anticipated to be reached within the next decade), global average temperature will inevitably reach the +2.0°C threshold.

Note, also, that the 20-year GWP for methane of 86 referenced in this Plan does not take into account methane's effects as a precursor in the formation of tropospheric ozone.

In summary, efforts to reduce emissions of all ozone precursors should be strengthened even further.

3. "… emissions of those GHGs with very high global warming potential, such as methane, black carbon, and F-gases, which we refer to as 'super-GHGs' in this document."

We appreciate the use of the term "super-GHGs" to convey their importance. However, since black carbon is not a gas, and in fact, behaves quite differently than a gas both in the atmosphere and when it deposits back onto the earth's surface, we believe that you should consider changing this to "super climate pollutants". This terminology would be more consistent with the terms now being used by other leading climate scientists and the state.

4. "Table 5-6 Natural and Working Lands Control Measures"

While this table mentions urban tree planting, we did not see anything in this report about forest and woodland preservation. From a carbon sequestration standpoint, active forest management and protection of woodlands from encroaching development should be a critical component of any climate plan.

5. GWP values are typically expressed based upon how much a given GHG will contribute to global warming over a 100-year time frame. The 100-year time frame is appropriate for CO_2 and other gases that have a relatively long atmospheric lifespan. However, certain GHGs, such as the super-GHGs discussed below, exert their impact in heating the climate in a much shorter time frame. So, in the case of these super GHGs, a 20-year time frame provides a more realistic means to express their global warming potential.

While this is certainly a step in the right direction for addressing the super-GHGs, it has become apparent to many climate scientists that the GWP approach of determining an equivalency, whether over 100 years or 20 years, for climate pollutants of mixed types (gases, particulates, aerosols) introduces tremendous uncertainties – up to one-million-fold! For this reason, there is international movement toward adopting a different approach that focuses on the relative radiative forcing of different climate pollutants, which provides a single, integrated framework for evaluating all climate pollutants, whether short-lived or long-lived. I am happy to share more details with you on this.

Our proposal would be that, in addition to the approach you are using, that you also calculate the current emission tables in the plan (e.g., Table 3.4, 3.5) in terms of RF, and in addition, maintain an accounting of the RF reduction values for each improvement strategy. This would enable you to more effectively prioritize strategies going forward, and direct resources accordingly. Again, I would be happy to provide details.

In conclusion, let me reiterate once again how proud we are of the excellent work that BAAQMD is doing to help us address our climate crisis. We would welcome opportunities for further dialogue.

Best regards,

Linda Brown
Napa Climate NOW!

Areana Flores

From: Nick Lapis <nicklapis@cawrecycles.org>
Sent: Friday, March 10, 2017 5:40 PM
To: Christianne Riviere
Subject: Comment on 2017 Clean Air Plan

Ms. Reviere,
I apologize that I missed the deadline for comments on your Clean Air Plan.

I'm with Californians Against Waste, and we are statewide membership-based environmental organization that works on waste issues. I've worked with your several of your colleagues in the past, but I don't recall if we've met.

My organization has been heavily involved in policy development surrounding several issues discussed in your plan, especially compost regulation, landfill regulation, rangeland carbon sequestration, food waste prevention, anaerobic digestion, Short Lived Climate Pollutants, and consumption based climate accounting. In fact, I was amazed to see how much overlap there was between the plan and the work my organization does, so we would like to collaborate on its implementation.

One area that specifically stood out to me was the proposal to adopt a compost rule. We were heavily involved with the development of the rules at both the San Joaquin and South Coast air districts, and, based on that experience, we believe that great care must be taken to avoid inadvertently increasing VOC emissions through increased land application of uncomposted greenwaste and traditional disposal. There are cost-effective ways to reduce emissions from composting facilities, but there are also many ways to inadvertently displace or increase emissions. Could we schedule a time to discuss all this in greater detail?

My organization was also deeply involved in the landfill methane regulations at the Air Resources Board, and, to a lesser degree, with the federal NSPS update and NESHAP regulations for landfills. There are some clear and obvious strategies that could be implemented to reduce emissions from those facilities and I'd love to share them with you.

Please don't hesitate to let me know if I can provide any additional information.

Nick Lapis
Director of Advocacy | Californians Against Waste
916.443.5422 | 415.845.6335 (m)

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Gary Hedden Email Address or Phone Number: patgaryh@gmail.com

Organization Represented: Los Altos Environmental commission

Address: 605 Harrington Ave

City: Los Altos State: CA Zip: 94024

Please list what sector this applies to, if applicable: energy

PUBLIC COMMENT:

I am very interested in the reach codes to improve energy efficiency in building construction.
Thank you for researching this.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Linda Ziff **Email Address or Phone Number:** lindaziff37@gmail.com

Organization Represented: Greentown Los Altos

Address: 510 Torwood Lane

City: Los Altos **State:** CA **Zip:** 94022

Please list what sector this applies to, if applicable: Particulate matter, toxic air contaminants

PUBLIC COMMENT:

Thanks for all you do to curb the use of gas leaf blowers. In Los Altos, they are BANNED, but still seen all over town.

Outdoor wood burning pizza ovens should be outlawed. Our next door neighbors billows smoke for hours on end every weekend. They have a large and well equipped kitchen so the

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: RANI FISCHER Email Address or Phone Number: _____

Organization Represented: 350.org

Address: _____

City: SUNNYVALE State: _____ Zip: 94087

Please list what sector this applies to, if applicable: CLIMATE

PUBLIC COMMENT:

Please ~~support~~ subsidize fuel switching and electric car chargers. Thanks!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mike Balma **Email Address or Phone Number:** mike.balma@yahoo.com

Organization Represented: Carbon Free Mountain View

Address: 1884 Applotree Lane

City: Mountain View **State:** CA **Zip:** 94042

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: Climate Action Plan

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mary Dateo **Email Address or Phone Number:** mdateo@sbcglobal.net

Organization Represented:

Address:

City: **State:** **Zip:**

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

- Natural & Working lands should explicitly say — no more building on open space or minimize expansion into open space
- Soil management & Carbon sequestration should include suburban & urban spaces
- Work: Local conservation resources — explicitly state →

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

"better management / conservation of storm water"

As traffic is reduced, conversion of over-capacity street lanes to green belts & bike lanes.

Agriculture – mini farms closer to urban consumers to reduce transportation

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: BRUCE KARNEY Email Address or Phone Number: bkarney@comcast.net

Organization Represented: CARBON FREE SILICON VALLEY

Address: 833 BUSH ST.

City: MTN. VIEW State: CA Zip: 94041

Please list what sector this applies to, if applicable: GHG REDUCTION

PUBLIC COMMENT: IT'S URGENT TO SET GHG REDUCTION BUDGETS (GOALS) AT THE COMMUNITY LEVEL. SEE ATTACHMENT FOR CFMV/CFSV's RECOMMENDATIONS.

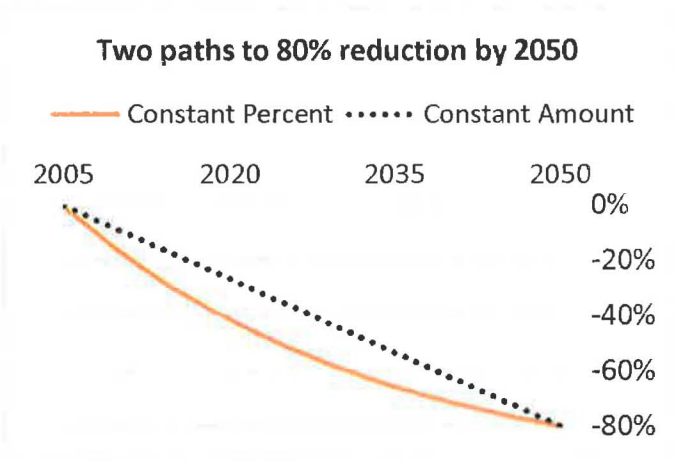
Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

How Cities Can Meet California's GHG Reduction Requirements

By Carbon Free Mountain View (carbonfreemountainview.org) **Sept. 15, 2016**

Set annual GHG emission budgets

1. Set *annual* GHG emission budgets through 2050 that meet or beat AB 32 (2006) and SB 32 (2016) mandates. We recommend that the budgets follow a "constant percent" reduction path, not a "constant amount" path[1]. The graph shows how these paths differ. Specifically, adopt the budgets shown on Page 2 for your community's "Base Year."



Prioritize high impact GHG reduction programs

2. Estimate the "cost per metric ton of CO_2e" for every proposed GHG reduction program and do the most cost-effective programs first.

Insure that the emissions budget is balanced every year

3. Measure the community's GHG emissions *annually* and publish a comparison of actual emissions to the emissions budget as early in the following year as possible.[2]

4. In years when emissions are lower than the budgeted level, "bank" the difference to offset emissions in future years. In years when emissions exceed the budgeted level and previously banked credits are not available, purchase and retire certified unbundled Renewable Energy Credits (RECs) to balance the emissions budget.

Eliminate the GHG impact of large new developments

5. Starting in 2018, require occupants of large[3] new non-residential[4] and mixed-use buildings to purchase 100% GHG-free electricity in perpetuity for the portion of their usage that exceeds what is generated on-site or at a dedicated off-site renewable energy facility. PG&E, Community Choice Energy agencies, and direct access electricity suppliers will all offer 100% GHG-free electricity in the Bay Area by 2018.

6. Starting in 2020, require developers of large[3] new non-residential and mixed-use buildings to submit an estimate of the non-residential portion of the building's lifetime GHG emissions, using a standard third-party-developed methodology[5] that includes the GHG impacts of vehicle travel to and from the development, before receiving construction permits.

7. Starting in 2022, require developers of large[3] new non-residential buildings to purchase and retire enough certified RECs to offset the non-residential portion of the building's estimated lifetime GHG emissions prior to receiving an occupancy permit.

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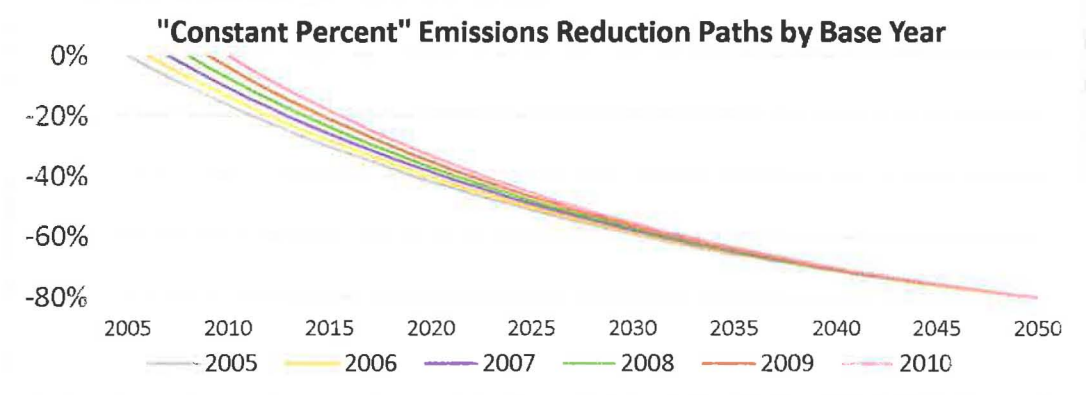
[1] Straight-line targets defer the largest percentage reductions into the 2040s.
[2] The cost of doing this is about $10,000 and can be outsourced to vendors specializing in this kind of work.
[3] "Large" would be defined as a specific size in the range of 20,000 – 50,000 sq. ft.
[4] The focus is on non-residential development because residential buildings constructed in California after 2019 will be required to be "Zero Net Energy" and will, therefore, have minimal direct GHG impact.
[5] The methodology will need to be developed and approved between now and 2019.

Base Year →	2005	2006	2007	2008	2009	2010
Annual Reduction %	-3.51%	-3.59%	-3.67%	-3.76%	-3.85%	-3.94%
Budgetary Year	**Recommended Emissions Budget as a % of the Base Year's Emissions**					
2005	**0.0%**					
2006	-3.5%	0.0%				
2007	-6.9%	-3.6%	0.0%			
2008	-10.2%	-7.1%	-3.7%	0.0%		
2009	-13.3%	-10.4%	-7.2%	-3.8%	0.0%	
2010	**-16.4%**	**-13.6%**	**-10.6%**	**-7.4%**	**-3.9%**	**0.0%**
2011	-19.3%	-16.7%	-13.9%	-10.9%	-7.6%	-3.9%
2012	-22.1%	-19.7%	-17.1%	-14.2%	-11.1%	-7.7%
2013	-24.9%	-22.6%	-20.1%	-17.4%	-14.5%	-11.4%
2014	-27.5%	-25.4%	-23.0%	-20.5%	-17.8%	-14.9%
2015	**-30.0%**	**-28.0%**	**-25.9%**	**-23.5%**	**-21.0%**	**-18.2%**
2016	32.5%	30.6%	-28.6%	-26.4%	-24.0%	-21.4%
2017	-34.9%	-33.1%	-31.2%	-29.2%	-27.0%	-24.5%
2018	-37.2%	-35.5%	-33.7%	-31.8%	-29.8%	-27.5%
2019	-39.4%	-37.8%	-36.2%	-34.4%	32.5%	30.4%
2020	**-41.5%**	**-40.1%**	**-38.5%**	**-36.9%**	**-35.1%**	**-33.1%**
2021	-43.5%	-42.2%	-40.8%	-39.2%	-37.6%	-35.7%
2022	-45.5%	-44.3%	-42.9%	-41.5%	-40.0%	-38.3%
2023	-47.4%	-46.3%	-45.0%	-43.7%	-42.3%	-40.7%
2024	-49.3%	-48.2%	-47.0%	-45.8%	-44.5%	-43.0%
2025	**-51.1%**	**-50.1%**	**-49.0%**	**-47.9%**	**-46.6%**	**-45.3%**
2026	-52.8%	-51.9%	-50.9%	-49.8%	-48.7%	-47.4%
2027	-54.4%	-53.6%	-52.7%	-51.7%	-50.7%	-49.5%
2028	-56.0%	-55.3%	-54.4%	-53.5%	-52.6%	-51.5%
2029	-57.6%	-56.9%	-56.1%	-55.3%	-54.4%	-53.4%
2030	**-59.1%**	**-58.4%**	**-57.7%**	**-57.0%**	**-56.2%**	**-55.2%**
2031	-60.5%	-59.9%	-59.2%	-58.6%	-57.8%	-57.0%
2032	-61.9%	-61.3%	-60.7%	-60.1%	-59.5%	-58.7%
2033	-63.2%	-62.7%	-62.2%	-61.6%	-61.0%	-60.3%
2034	-64.5%	-64.1%	-63.6%	-63.1%	-62.5%	-61.9%
2035	**-65.8%**	**-65.4%**	**-64.9%**	**-64.5%**	**-64.0%**	**-63.4%**
2036	-67.0%	-66.6%	-66.2%	-65.8%	-65.4%	-64.8%
2037	-68.1%	-67.8%	-67.4%	-67.1%	-66.7%	-66.2%
2038	-69.2%	-69.0%	-68.6%	-68.3%	-68.0%	-67.6%
2039	-70.3%	-70.1%	-69.8%	-69.5%	-69.2%	-68.8%
2040	**-71.4%**	**-71.1%**	**-70.9%**	**-70.7%**	**-70.4%**	**-70.1%**
2041	-72.4%	-72.2%	-72.0%	-71.8%	-71.5%	-71.2%
2042	-73.3%	-73.2%	-73.0%	-72.8%	-72.6%	-72.4%
2043	-74.3%	-74.1%	-74.0%	-73.9%	-73.7%	-73.5%
2044	-75.2%	-75.1%	-74.9%	-74.8%	-74.7%	-74.5%
2045	**-76.1%**	**-76.0%**	**-75.8%**	**-75.8%**	**-75.7%**	**-75.5%**
2046	-76.9%	-76.8%	-76.7%	-76.7%	-76.6%	-76.5%
2047	-77.7%	-77.7%	-77.6%	-77.6%	-77.5%	-77.4%
2048	-78.5%	-78.5%	-78.4%	-78.4%	-78.4%	-78.3%
2049	-79.2%	-79.2%	-79.2%	-79.2%	-79.2%	-79.1%
2050	**-80.0%**	**-80.0%**	**-80.0%**	**-80.0%**	**-80.0%**	**-80.0%**



Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Louise Yost **Email Address or Phone Number:** www.ehnca.org

Organization Represented: Environmental Health Network

Address: lowyoyoyo@gmail.com

City: _____ **State:** _____ **Zip:** _____

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT: Next step - form coalition to require regulation about fabric softener + laundry products pollution. It affects everyone, esp. those w/ asthma, emphacema, lung problems, chemical sensitivity. We support regulation.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Miya Kitahara Email Address or Phone Number: miya@stopwaste.org

Organization Represented: StopWaste

Address: 1537 Webster St.

City: Oakland State: CA Zip: 94612

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

NW: in NW1 & NW2 include urban/suburban application of compost + mulch

WA: wherever "green waste" mentioned, explicitly add "food waste" if appropriate.

BL2: we support the Air District's leadership to help local governments overcome regulatory and technical barriers.

CBE1: please continue to include this in GHG conversations.

Thank you!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Kristen Caven **Email Address or Phone Number:** idlefreeoakland@gmail.com

Organization Represented: Idle Free Oakland

Address: 3056 Champion St

City: Oakland **State:** CA **Zip:** 94602

Please list what sector this applies to, if applicable: Transportation

PUBLIC COMMENT: Additions:

TR-7 – Safe Routes – Include no-idle zones & signage at school drop-off zones

TR-12 – (p. TR-53) · ~~Reducing~~ → Avoiding idling when stopped over 30 seconds (p. TR-54) · · · acceleration, deceleration [insert: idling], and maintaining... (fix typo)

TR-13 p. TR-57 · · · Various forms, including... [add bullet: – NO IDLING signage for schools, businesses and public spaces]

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

TR-14 – Regulate stop lights so 1st 3 cars turn engines off unless clean air vehicles (Switzerland)

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Maren Poitras Email Address or Phone Number: maren.poitras@gmail.com

Organization Represented: _____

Address: 82 Crystal Cove Ct.

City: Richmond State: CA Zip: 94804

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT: Please pass ~~Rule Section~~ 12-16. To achieve emmission reductions we need to create an enforceable cap. And restricting refining of dirty tar sands oil would also be socially beneficial.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Anita Rees **Email Address or Phone Number:** reesfam@sbcglobal.net

Organization Represented: –

Address: 942 Fountain St.

City: Alameda **State:** Ca **Zip:** 94501

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT: Happy to see the outreach and education effort. Thank you for your work. I'd like to encourage the BAAQMD to push constantly to set higher goal to clean our air up. For example, passing Rule 12-16 to cap Refinery emissions would be a significant move for the Bay Area's health + welfare. We should be leading in all ways to reduce GHG's and encouraging - carrot + stick - the fast reduction of fossil fuel use and production. Thanks.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: BARBARA KHINE Email Address or Phone Number: (510) 923-1295

Organization Represented: 350 BAY AREA; #1000 GRANDMOTHERS

Address: 6146 OCEAN VIEW DR

City: OAKLAND State: CA Zip: 94618

Please list what sector this applies to, if applicable: LOWER GHGS, LESSEN PARTICULATES, SHIFT TO RENEWABLE ENERGY

PUBLIC COMMENT:

VERY INSPIRING PLAN BUT NO MENTION OF CAPPING REFINERY EMISSIONS, WHICH IS AN ESSENTIAL COMPONENT!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Gina Bliss **Email Address or Phone Number:** gina@climateready solutions.com

Organization Represented: Climate Ready Solutions

Address: 6475 Colby St

City: Oakland **State:** CA **Zip:** 94618

Please list what sector this applies to, if applicable: Nat + Working Lands

PUBLIC COMMENT:

what about forest maintenance — reducing the amount of combustible materials in densely forested areas to reduce the risk of wildfire? perhaps there are other means to keep the forests healthy + reduce wildfire risk as well.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: _____ **Email Address or Phone Number:** _____

Organization Represented: _____

Address: _____

City: Berkeley **State:** CA **Zip:** _____

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

- would like to see ocean acidification addressed because it affects ability of ocean plants to create oxygen we breathe.
State of CA is doing research on how to address at coastlines with strategic seaweed planting
- Also how institutions invest affects air quality because if they support fossil fuel burning, it is counterproductive

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Gina Blus **Email Address or Phone Number:** See other card

Organization Represented:

Address:

City: **State:** **Zip:**

Please list what sector this applies to, if applicable: waste

PUBLIC COMMENT:

not just ~~South~~ local businesses need to be involved - changing packaging practices + both incenting / mandating zero waste packaging will be essential. Manufacturers, distributors + retailers all need to be part of the zero-waste transition. Consumers need to be educated on what's possible + what to demand. Look to Germany for ideas!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Heather MacLeod Email Address or Phone Number: macleodphd@gmail.com

Organization Represented: First Unitarian Church Oakland, & Alameda Interfaith Climate Action

Address: 3001 Ashbrook Ct

City: Oakland State: CA Zip: 94601

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: WOW!!! This is progress! A year or 2 ago you weren't even looking at greenhouse gasses or refineries! Yay! Keep up the great work!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mr. David Gassman
389 Belmont St Apt 111
Oakland, CA 94610
(AMNESTY INTERNATIONAL)

Email Address or Phone Number: DFGaffman@Aol.com

Organizat Sunflower Alliance

Address:

City: State: Zip:

Please list what sector this applies to, if applicable: What's the Problem

PUBLIC COMMENT: The health impact of tar sands crude will be enormous. It is very dirty, containing all sorts of TACs. We need Rule 12-16 to help keep tar sands in the ground. The more oil there is, the cheaper it will be, thus producing more GHG.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mr. David Gassman
389 Belmont St Apt 111
Oakland, CA 94610

Email Address or Phone Number: DFGassman@AOL.com

Organiz: Sunflower Alliance

Address:

City: State: Zip:

Please list what sector this applies to, if applicable: Partners

PUBLIC COMMENT: The goal being to have clean air & protect the climate, it is necessary to adopt Rule 12-16 ~~on~~ putting a cap on GHGs, PM, NOx & SOx.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mr. David Gassman — Email Address or Phone Number: DFGassman@AOL.com

Organization: AMNESTY INTERNATIONAL — Sunflower Alliance

Address: 389 Belmont St Apt 111

City: Oakland, CA 94610 — State: — Zip:

Please list what sector this applies to, if applicable: What does the AD plan do?

PUBLIC COMMENT: It will be that much harder to limit the burning of oil and the production of GHG if tar sands crude oil is allowed to be refined. We need Rule 12-16 to cap the amount of GHG, PM & the TAC or it will not be possible to reduce GHG.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mr. David Gassman

Email Address or Phone Number: DFGassman@AOL.com

Organiz: AMNESTY INTERNATIONAL Sunflower Alliance

Address: 389 Belmont St Apt 111

City: Oakland, CA 94610 State: Zip:

Please list what sector this applies to, if applicable: Draft Regulation 6

PUBLIC COMMENT: It will not be possible to effectively reduce PM unless rule 12-16 is adopted. Tar sands oil will be brought in containing various TAC, PM_{10}, $PM_{2.5}$ & NO_x.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

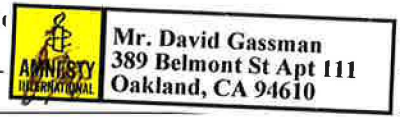
Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: _____ **Email Address or Phone Number:** DFGassman@AOL.com

Organizati Sunflower Alliance



Address: _____

City: _____ **State:** _____ **Zip:** _____

Please list what sector this applies to, if applicable: Vision for 2050

PUBLIC COMMENT:

If proposed rule 12-16 is not adopted it will be impossible to limit PM and tar sands crude will damage air quality & damage climate protection.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: LAURIE UMEH **Email Address or Phone Number:** Lumeh2@yahoo.com

Organization Represented:

Address:

City: Oakland **State:** **Zip:** 94601

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

Could we possibly have a campaign in our area to try to get building owners (eg stores, theaters, restaurants — public buildings & workplaces) to ↓ energy use by dialing back their air conditioning?

Thanks!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Susan Harris **Email Address or Phone Number:** susanlharris@mac.com

Organization Represented: Self, MoveOn

Address: 4171 Shafter Ave

City: Oakland **State:** CA **Zip:** 94609

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

Transportation: include self-driving cars.

Stationary Sources: consider "subsidies"/grants/incentives to oil refineries to help them with the costs of plugging leaks.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Tom Yamaguchi **Email Address or Phone Number:** tomyamaguchi@mac.com

Organization Represented: self

Address: 1015 Channing Way

City: Berkeley **State:** CA **Zip:** 94710

Please list what sector this applies to, if applicable: transportation / housing

PUBLIC COMMENT:

Supporting increased use of biking and walking means more affordable housing, higher densities for cities. We need to get people to understand that opposing housing density means fewer people can walk or bike to shopping, ~~and~~ work, and other destinations. Bus transit is less efficient, as well, with urban sprawl.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Karen Cook **Email Address or Phone Number:** Karen.Cook@acgov.org

Organization Represented: Alameda County

Address:

City: Oakland **State:** **Zip:**

Please list what sector this applies to, if applicable: Consumption / Materials

PUBLIC COMMENT:

(1) Partner w/ local govts on sourcing low-carbon products, especially concrete & asphalt. West Coast Climate & Materials Mgt Forum has compile research and strategies from state & locals on west coast.

(2) Consider co-benefits w/ green jobs of supporting robust reuse, remanufacturing, deconstruction efforts that reduce consumption.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: MaryAnn Mead Email Address or Phone Number: meadsjc@msn.com

Organization Represented: Oakland Urban Forestry Forum + Hayward LOAN

Address: 1741 Brockhurst Oakland 94611

City: _____ State: _____ Zip: _____

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

I plan to go to the website & review - but I spend quite a bit more around the tree issue. One problem I have noticed is treating NS other trees - (you should not do that). Right now Oak (native) are dying due to "sudden oak death" a fungus spreading quickly in the area. Meanwhile →

Please leave completed comment card at the sign-in desk or with an Air District staff person.
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some people are anxious to destroy eucalyptus trees because they burn! (not native – but successful in arid environments – which overall (except this winter) includes the bay area – these trees are no more likely to burn than native bays or other trees. Also fruit trees are rarely 'native'; Popular palm trees are fairly common (not native) —

Instead of fussing – native when the Bay Area environment has changed due to urbanization look for healthy trees and trees that seem to survive — that will also expand your choices of trees —

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: TONY FISHER Email Address or Phone Number: (408) 255-0944

Organization Represented: COALITION FOR CLEAN AIR

Address:

City: SACRAMENTO State: CA Zip:

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: EXECUTIVE SUMMARY - PARTICULATE MATTER (PM2.5) & TRANSPORTATION - TRUCKS

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Ella Teevan **Email Address or Phone Number:** eteevan@fwwatch.org

Organization Represented: Food & Water Watch

Address: 1814 Franklin St. Ste. 1100

City: Oakland **State:** CA **Zip:** 94612

Please list what sector this applies to, if applicable: GHG / refinery emissions – oil industry

PUBLIC COMMENT:

Food & Water Watch represents 93,000 supporters in the 9 Bay Area Counties. We urge the Air District to implement numeric caps on refinery emissions (Rule 12-16) for the health of refinery corridor communities & our climate.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Ellen Kerr **Email Address or Phone Number:** ellenmariekerr@yahoo.com

Organization Represented:

Address:

City: **State:** **Zip:**

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: Golden Gate Park and other parks in the Bay Area should not have so much grass that needs to be watered. Native plants that do not need water should be substituted

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Ellen Kerr **Email Address or Phone Number:** ellenmariekerr@yahoo.com

Organization Represented:

Address:

City: **State:** **Zip:**

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: The conservatory of flowers should have an exhibit, on native plants that don't need water that could substitute for all those flowers, and be an educational tourist attraction

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Ellen Kerr **Email Address or Phone Number:** ellenmariekerr@yahoo.com

Organization Represented: _____

Address: _____

City: _____ **State:** _____ **Zip:** _____

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT: We need more tall buildings with green roofs

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so. 415-407-0237

Name: John Anderson Email Address or Phone Number: pstonoanderson@gmail.com

Organization Represented: 350 San Francisco

Address: 1323A Lyon St.

City: San Francisco State: CA Zip: 94115

Please list what sector this applies to, if applicable: Agriculture

PUBLIC COMMENT: We need a "sustainable" label, similar to "organic"
It would be useful for Bay Area consumers to have access to information on the impact of products, ideally at point of sale. Products, especially food, that have been produced with sustainable practices would be easier to buy if that information was available through some objective agency, not just the seller advertising it. It would especially be useful to identify feed-lot free meat and vegtables raised with no-till agriculture.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so. 415-407-0237

Name: John Anderson Email Address or Phone Number: p8ton.anderson@gmail.com

Organization Represented: 350 San Francisco

Address: 1323A Lyon St.

City: San Francisco State: CA Zip: 94115

Please list what sector this applies to, if applicable: waste, agriculture

PUBLIC COMMENT:

- It would be useful to have estimates of the amount of compost that could be generated if the Bay Area communities go to 100% organic matter composted.
- Could carbon farming include non-agricultural areas, like private yards, or golf courses?
- wetlands will have to be built up to avoid loss with sea level rise. Is there an opportunity for sequestration there? Are there strategies or technology to maximize incorporation of organic carbon in growing wetlands?

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Mark Roest **Email Address or Phone Number:** _____

Organization Represented: _____

Address: _____

City: _____ **State:** _____ **Zip:** _____

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

See attached.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Connect with Karen Schkolnik
Connect with Innovation Idea.

MARKLROEST@GMail.com
650-888-3665
BOARD OF DIRECTORS, GREEN FLEETS GROUP
VOLUNTEER, 350.ORG
MKTG + INTERNATL DEVELOPMENT, SEAWAVE BATTERY, INC.
MEMBER, ELECTRIC VEHICLE CHARGING ASSOC.

I HAVE A BUSINESS MODEL FOR PARTNERSHIPS WITH BREATHE CALIFORNIA, CARB, CEC's, BAAQMD, CITY OF OAKLAND, etc. to get charging stations installed at about 1/2 average cost per port for residential multi-unit, workplace, and other places where top quartile of SB 75 (poverty + diesel health impacts) are likely to stay for 4 hours or more. It involves rotating Level 2 charging among 4 vehicles per primary circuit. And forming long-term carpools with 4 people per Nissan Leaf bought at auction after lease ends - one w/ dc credit, 3

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Lyzett Lavenant Email Address or Phone Number: lyzettl lovely_lyzett@yahoo.com

Organization Represented: SJSU

Address:

City: San Jose State: CA Zip: 95112

Please list what sector this applies to, if applicable: Air District

PUBLIC COMMENT:

I found the areas based on agriculture, natural and working lands and waste very informative and made me think of alternative ways that we could impact these areas. Overall very good well organized!

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Lani Renshaw Email Address or Phone Number: lanirenshaw@yahoo.com

Organization Represented: SJSU student

Address: _____

City: _____ State: _____ Zip: _____

Please list what sector this applies to, if applicable: Air District

PUBLIC COMMENT: Chad White was amazing, very informative and fun to talk too. Catches your attention & keeps it. Learned a lot and fun to talk too, he seems very passionate. (Give him a raise because he deserves it!)

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Stew Plock Email Address or Phone Number: Stewplock@gmail.com

Organization Represented: 350 Silicon Valley

Address: 917 El Carjon Way

City: Palo Alto State: Ca Zip: 94303

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

(1) ANXIOUS to see if the DISTRICT CAN move this May to limit GHG emissions from Bay Area refineries - as a positive step towards the 2017 Plan

(2) where is MEASURE in the plan?

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Allen CARROLL **Email Address or Phone Number:** allen-carroll@sbcglobal.net

Organization Represented: 350 Si Valley

Address: 26 Ryland Park Dr.

City: San José **State:** CA **Zip:** 95110

Please list what sector this applies to, if applicable: Electricity.

PUBLIC COMMENT:

(1) Altamont Pass Wind farm: Use This land for combined wind & solar installation

(2) PG&E: Advertise Their "Solar Choice" plan (100% solar) Increase The amount of power available in Solar Choice (presently limited to ~250 MW)

(3) Lower The Cap & Trade Cap to raise The price of carbon to at least $30/ton

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Stephen Rosenblum **Email Address or Phone Number:** pol1@rosenblums.us

Organization Represented: 350.org

Address: 212 Santa Rita Ave

City: Palo Alto **State:** CA **Zip:** 94301

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: Plan needs to consider implementing Mobility as a Service. It is being tested in Helsinki. Contact me for further info

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Lisa Baffi Email Address or Phone Number: LBAFFI@gmail.com

Organization Represented: 350 Marin

Address:

City: Corte Madera State: Zip:

Please list what sector this applies to, if applicable: Animal Agriculture

PUBLIC COMMENT:

Interesting info to explore on solutions + people to collaborate with

BrennSmith - Greenwave.org

Bioneers.org

Project Drawdown - Paul Hawken - book coming out 4/17

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Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Kelsey Poole Email Address or Phone Number: KelseyLpoole@gmail.com

Organization Represented:

Address:

City: San Rafael State: Zip: 94901

Please list what sector this applies to, if applicable: Waste, transport

PUBLIC COMMENT:

Waste- My apartment doesn't have a compost option, you should require they provide services

Transport- The buses are often late, making it harder to use public transit

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Tom Heinz Email Address or Phone Number: tmheinz57@gmail.com

Organization Represented: _____

Address: 102 Clarinda Ave

City: San Rafael State: CA Zip: 94901

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

We need to regulate emissions from restaurants

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Jennifer Tomlin **Email Address or Phone Number:** 608-609-4441

Organization Represented: United Nam

Address: 240 Del Casa Dr

City: Mill Valley **State:** **Zip:**

Please list what sector this applies to, if applicable: Homeowner | Rural Living

PUBLIC COMMENT:

(1) Because of CA water shortages we should look at the idea of composting toilets. They work really well.

(2) Re-introduced clothes lines. Dryers are largely unnecessary.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Joan McClure Email Address or Phone Number: joan swan mcclure@gmail.com

Organization Represented:

Address: 1979 La Corso Ct

City: Walnut Creek State: CA Zip: 94598

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: My concern is what is coming from the Federal govt. — new administration. I want CA to remain strong and dedicated in all areas affecting global warming and pollution. I can't believe they've already changed regulations to allow coal dust into streams. Our local and state governments can make a difference

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Jan Warren Email Address or Phone Number: jvwarren1947@yahoo.com

Organization Represented: Interfaith Climate Action Network of CCC

Address: 3202 Primrose Lane

City: Walnut Creek State: CA Zip: 94598

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:
I like the # of times you mentioned areas disproportionaly impacted by air pollution. My favorite charts were on 3/27. I think there needs to be better education on the Bay Area GHG footprint due to consumption. I got some of my questions. Where can I submit other questions? While I was there an attendee told me she heard the Air District was going to add another Open House in Martinez. I think that's a good idea.

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Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: MARTI ROACH Email Address or Phone Number: martiroach@sbcglobal.net

Organization Represented:

Address:

City: Moraga State: CA Zip: 94556

Please list what sector this applies to, if applicable:

PUBLIC COMMENT: Being a hub for dev + production of innovative energy + energy efficiency requires engagement of private sector.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: MARY ROACH Email Address or Phone Number: _____

Organization Represented: _____

Address: _____

City: Moraga State: CA Zip: 94556

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

Re Agriculture + Soil

Engage w/ agro-ecology + healthy soils groups to deepen knowledge on the Agriculture transition required eg CalCAN, Assoc of Irritated Citizens - (Tom Frantz - on EJAC Board)

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: MARTI ROACH Email Address or Phone Number: _____

Organization Represented: _____

Address: _____

City: Moraga State: CA Zip: 94556

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

1. Re waste: ensure, polices + incentives to reduce + eliminate all excess packaging

2) Re Water: We are losing snowpack, need new ways to capture + store water AND Reduce non-permeable surfaces.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Ralph Hoffmann Email Address or Phone Number: ralphcalphbe@sbcglobal.net (925)938-3816

Organization Represented: Contra Costa Spare-the-Air Resource Team, Contra Costa Senior Mobility Action Council

Address: 1655 N. California Blvd, #204

City: Walnut Creek State: CA Zip: 94596-4458

Please list what sector this applies to, if applicable: _____

PUBLIC COMMENT:

Insufficient warnings about the effects of global warming on increased precipitation and wind. Rain can cure droughts and wind can generate electricity, both good effects. Beyond that however wind and rain can cause hurricanes, flooding, tidal waves, vehicular accidents, boating accidents and have many other negative consequences.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Dot Lohikoon **Email Address or Phone Number:**

Organization Represented: Contra Costa County

Address:

City: **State:** **Zip:**

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

THIS WAS AN EFFICIENT WAY TO GET THE INFO. YOU MIGHT CONSIDER SOME SORT OF PRESENTATION, AND BE MORE EXPLICIT ABOUT FORMAT OF THE EVENT.
I/O LOVE TO BE IN BETTER COMMUNICATION WITH OTHER SUSTAINABILITY COORDINATORS/DIRECTORS. CAN BAAQMD CONVENE, OR DOES THAT HAPPEN ELSEWHERE?

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Kathy Kerridge Email Address or Phone Number: kkerridge@sbcglobal.net

Organization Represented: Benicians for a Safer Healthy Community

Address: 771 West 'I' Street

City: Benicia State: CA Zip: 94510

Please list what sector this applies to, if applicable: You need a sector on food.

PUBLIC COMMENT:

While it may be hard to track what we eat & how we produce it impacts GHG emissions. One of your strategies should be back yard/community food producing gardens. A permaculturaI garden uses compost they have produced - cutting down on waste, they grow their own food - no transportation GHG & they use grey water and rooftop water harvesting which saves water & therefore GHG. Sustainable Solano is an organization promoting this.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Chris Benz Email Address or Phone Number: christinabbenz@gmail.com

Organization Represented: Napa ClimateNOW!, Napa Sierra Club

Address: 315 Greenbach St

City: Napa State: CA Zip: 94559

Please list what sector this applies to, if applicable:

PUBLIC COMMENT:

Super-GHG's - Black Carbon

Napa has ag burning of grapevines and burning of trees cut due to land conversions.

Please look for alternatives to ag/forest waste burning such as incentivizing biomass gasification power plants.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Jim Wilson **Email Address or Phone Number:** jplandatosi@gmail.com

Organization Represented: Napa Vision 2050

Address: 5000 Monticello Road

City: Napa **State:** CA **Zip:** 94558

Please list what sector this applies to, if applicable: All

PUBLIC COMMENT:

We want to change "rule" and "regulation" to "protection". The former are negative in tone and frame issues as costly and bredensome to industry. The later term, "protection", is about the public, and environment, so that the framework is positive, for example; Protection 13-1, as opposed to Rule 13-1.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Sheryle Paukert Email Address or Phone Number: spaukert@hotmail.com

Organization Represented: Milliken Creek Farms

Address: 1607 McKinley Rd

City: Napa State: CA Zip: 94558

Please list what sector this applies to, if applicable: Agricultural Burning

PUBLIC COMMENT:

Please provide help in eliminating all agricultural Burnings. Black Carbon + smoke are a real problem here in the Napa Valley.

The burning of the large piles of vines & metal on the South side of Trancas in Oct/Nov 2016 caused massive clouds of thick smoke which traveled north to my home and West to my office where my asthmatic employee had to go home.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Bay Area Air Quality Management District Comment Card

~ 2017 Clean Air Plan: Spare the Air, Cool the Climate ~

Persons wishing to submit written comment are encouraged to do so.

Name: Amber Paukert Email Address or Phone Number: AmberArgo@yahoo.com

Organization Represented: None

Address: 1161A La Loma Dr

City: Napa State: CA Zip: 94558

Please list what sector this applies to, if applicable: Agriculture, Rules/Regulations

PUBLIC COMMENT:

Please promote and pass regulations regarding alternatives to agricultural burning. In Napa, when vineyards burn vines, the sky is full of smoke. Though it will cost money, we know the wine industry can afford to spend some money for alternatives to burning, but they may also need incentives as well as regulations.

Please leave completed comment card at the sign-in desk or with an Air District staff person.
Written comments will be accepted until February 28, 2017.

Our children often don't like even playing outside when the vineyards are burning.

From: Bill Martin <bill@californiageo.org>
Sent: Friday, February 24, 2017 2:17 PM
To: Henry Hilken; Josh Pollak
Subject: Geo bore fields can sub for methane combustion and cooling tower waste
Attachments: Geo loopfield project engineering 2-23-17.pdf

Gentlemen,

Thank you for the completed draft of your Bay Area Air Quality Management District's Climate Protection Plan, and for its mention of geo heat pumps to combat emissions from buildings.

I am sending you a PDF of a just-posted article on geo loop fields from one of the prominent designing engineers in the country, Ed Lohrenz. The photo that leads this LinkedIn post is of previous drilling on the Centennial, Colorado IKEA store site. There are 130 boreholes of 500 foot depth there. This project is somewhat unique, even among geo heat pump installations, in that it rejects heat at night via concrete flatwork around the building, and makes stored ice by night for daytime cooling to minimize peak electrical loads.

Such is the leverage that can be provided by good design work and a willing developer. I hope that your Climate Plan will usher more builders in this far greener direction.

This winter, an additional bore field at Ohlone College was begun. When complete, it will contain 380 grouted geo boreholes and is a first in Alameda County on the Bay side of the East Bay hills.

Thank you for allowing me to provide input to the Climate Plan process,

Bill Martin, President (530) 394-8224
CALIFORNIA GEO
California Geothermal Heat Pump Association
www.CaliforniaGeo.org

cc: CaliforniaGeo membership

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Installing vertical ground heat exchangers on a commercial geothermal system project

Most Building Owners wanting a Geothermal Heat Pump System don't get one.

Published by Ed Lohrenz on LinkedIn, February 23, 2017

Mechanical engineers tend to be risk adverse…with good reason. If the systems they design don't work they are liable and their insurance rates will probably take a hit. So if you want a geothermal heat pump system in your new building project the chances are many engineering firms will either suggest "those systems don't work", or "they're so expensive you'll never get a payback".

But if the designer knows how to optimize the building and building systems to work well with a ground heat exchanger (GHX), the cost premium for the system should be about $3.00 to $5.00 / ft2 of building ($32 - $53 / m2). Depending on the cost of natural gas or other fuels available and the cost of electricity, the simple payback of a well-designed system should be in the range of 3 – 8 years.

It's worth remembering that many commercial buildings, even those in cold climates (I'm from Winnipeg where -40° is not uncommon) can be "cooling dominant". That means more heat is rejected to the GHX annually than is taken from it and that the GHX will tend to warm up over time (unless steps are taken to avoid that), and heating efficiency will improve. It also implies that cooling loads are greater than heating loads and that cooling efficiency and cooling energy costs need to be considered.

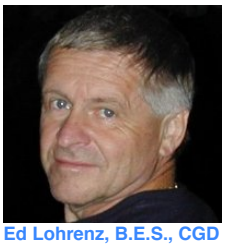
"Optimization" is not the same as "value engineering". Often, when builders want to reduce the cost of the system, what they mean when they say value engineering, is how much they can cut out of the system but still be able to meet the peak heating and cooling requirements. Optimization is finding ways to improve the building envelope, select glass or lighting that will reduce cooling loads, or considering things like energy recovery on the ventilation air to change the building loads so that the size and cost of the GHX can be reduced and at the same time operate at temperatures that allow the heat pumps to work more efficiently.

When considering optimization strategies, cost of the building or building systems might increase…but the size and cost of the GHX will be reduced enough to offset the additional costs in the building. Engineering firms don't want to reduce the cost of the mechanical systems. That's because their fees are often a percentage of the cost of the mechanical system…creating an incentive to make the system as expensive as they think the building owner will bear. They'd rather see a system with 100 boreholes at a cost of $1 million than a system that's been optimized and the cost is only $600 thousand.

There's definitely more work involved in designing and implementing a ground source heat pump system than a conventional system. More detailed energy modeling is needed when designing a geo heat pump system, and often numerous iterations of the energy model are needed to find the right solution. There's additional work in designing the GHX in on top of the building system. Quality assurance / quality control programs and commissioning requirements of the GHX needs be more rigorous… since the expensive GHX is buried, sometimes under the building and it's difficult or impossible to change or repair. And the building owner or operator needs training and a more detailed operating manual because operating these systems is a little different than operating a conventional system. And a designer should be charging more for designing a ground source heat pump system than a conventional system…but perhaps a percentage of cost of building a system is perhaps not the right approach if you want an optimized system.

If it sounds more complicated designing a ground source system, that's because it is. It sometimes requires "outside the box" thinking when looking for heat sources or heat sinks to balance energy loads to or from the ground. I've seen snow melt systems used to get rid of excess heat. Or rejecting heat from computer server rooms or restaurant coolers into the GHX rather than an air cooled condenser. Or integrating thermal energy storage into the system to reduce peak heat rejection to the GHX.

I've found it's a lot more fun than simply changing the title blocks from the last set of drawings! And I've had the opportunity to work on some pretty interesting projects.



Ed Lohrenz, B.E.S., CGD
Founder at GEOptimize Inc.
Winnipeg, Manitoba, Canada

California Council for Environmental and Economic Balance
101 Mission Street, Suite 1440, San Francisco, California 94105
415-512-7890 phone, 415-512-7897 fax, www.cceeb.org

December 2, 2016

Mr. Victor Douglas
BAAQMD
375 Beale Street, Suite 600
San Francisco, CA 94105

RE: Proposed Regulation 11, Rule 18 and Regulation 12, Rule 16

Dear Mr. Douglas,

We appreciate the opportunity to submit these comments on behalf of the California Council for Environmental and Economic Balance. CCEEB is a non-profit and non-partisan coalition of business, labor, and public leaders that advances strategies for a sound economy and a healthy environment. We have many members that operate facilities in the air basin and are subject to proposed Regulation 11, Rule 18 (Reg. 11-18). CCEEB has been active in this rulemaking since July, and we thank staff for expanding its outreach to stakeholders over the past couple of months. Reg. 11-18 is a significant new rule and will likely have significant compliance costs for many businesses. We offer a number of initial questions and suggestions on Reg. 11-18 below, and look forward to working with staff to further refine this rule.

In terms of proposed Regulation 12, Rule 16 (Reg. 12-16), CCEEB must repeat our concerns as stated in our letter to you from September 9, 2016, and we include by reference those comments here. Additionally, CCEEB agrees with analysis in the draft staff report that calls into question the District's authority to implement Reg. 12-16. We include in our comments here more details about our reasoning for this position.

Comments on Regulation 11, Rule 18

Clarify Authority in Staff Report

In meetings with stakeholders, staff has explained that Reg. 11-18 is not based on District authority under AB 2588, the Air Toxics "Hot Spots" Information and Assessment Act (1987), and as such, it differs from the statewide program codified in Sections 44300-44394 of the California Health and Safety Code. CCEEB asks that staff clarify its authority for Reg. 11-18 and identify the relevant state and federal codes, particularly those sections related to establishing Best Available Retrofit Control Technology for Toxics (TBARCT). We note that other air districts in California continue to regulate existing facilities under AB 2588,

based on regularly updated emission inventories and health risk assessments (HRAs), in addition to review of new and modified sources under New Source Review.[1]

Provide Opportunity for Facilities to Conduct HRAs and Enhance Review Process

The October 14, 2016 Initial Study for Reg. 11-18 indicates the District will use independent contractors to conduct HRAs due to a lack of staff resources necessary to carry out this work. CCEEB recommends that Reg. 11-18 be revised to provide an opportunity for facility operators to voluntarily conduct and submit HRAs for the purposes of complying with the rule. Any facility-submitted HRA would follow District HRA guidelines and be subject to review and approval by District staff. The advantages of facility-submitted HRAs are efficiency and accuracy; facility operators will have detailed knowledge of and data on equipment, operations, emissions monitoring and modeling, inventory reporting, emission factors, proximity of workers and nearby residents ("receptors"), and local meteorology. Such facility-specific information would help facilitate the efficient and accurate preparation of HRAs. Should staff find it necessary to reject a submitted HRA, the District could require the facility to resubmit the HRA with amendments.

Allowing facilities to conduct and submit HRAs is a standard practice. For example, Regulation 2-5-401 requires a permit applicant to submit an HRA, following the District's HRA guidelines. Similarly, under AB 2588, the state Legislature requires facilities to submit HRAs (H.&S.C. Section 44360(b)(1)). CCEEB believes that facility-submitted HRAs would in no way diminish the stringency or transparency of Reg. 11-18; rather, it would increase transparency, streamline the review process, and focus staff resources on reviewing HRAs or preparing HRAs for only those that choose to have the District do this analysis. Additionally, the BAAQMD could submit HRAs to the Office of Environmental Health Hazard Assessment (OEHHA) for review and comment, as is done under AB 2588 and H.&S.C. Section 44361.

Need Process to Reconcile Potential Disputes over Risk Reduction Plan Disapprovals

CCEEB wishes to work with staff to develop a dispute resolution process in cases when a facility needs to challenge or question a final action to disapprove a risk reduction plan. While we hope such instances would be rare in occurrence, CCEEB believes a dispute resolution mechanism is warranted given the unclear process to be used to make TBARCT determinations and the current lack of guidance available on what would be considered TBARCT for new and modified sources.

Explain Interaction of New Source Review Rules with Reg. 11-18

The District's New Source Review rules (Regs. 2-1, 2-2 and 2-5) require new or modified sources to apply for a project permit. Under Regulation 2, Rule 5 (Reg. 2-5), any source

[1] From the October 2016 Draft Staff Report (page 28): "The Air District adopted its Air Toxics New Source Review program at about the same time it started its activities to assess existing facilities under the Hot Spots Act. As a result, sources that existed in the late 1980's have been reviewed under the Hot Sports program and sources that were constructed or modified after the late 1980s have been reviewed under the Toxics NSR program."

with an estimated risk greater than 1-in-a-million and/or a chronic hazard index greater than 2.0 would be required to apply Best Available Control Technology for Toxics (TBACT).

Proposed Reg. 11-18 would require an existing facility to reduce risks below 10-in-a-million. To do so, a facility would likely need to apply for an NSR permit for a new or modified source, which in turn could trigger TBACT requirements. If a facility could not reduce below the Reg. 11-18 risk action levels, it would be required to install Best Available Retrofit Control Technology for Toxics (TBARCT) on all "significant sources," which, by definition, would also trigger TBACT under Reg. 2-5. We ask staff to explain how this process would work in practice, and to clarify whether a significant source would need to apply TBARCT, TBACT, or both.

Establish a Technical Working Group and Define TBARCT as Part of Rulemaking

CCEEB reiterates our request that the District establish a technical working group to help advise staff in developing a process to make TBARCT determinations and in defining TBARCT for specific sources. We believe such an effort is being planned, and thank staff for considering our past comments.

We also repeat our request that TBARCT be defined as part of the Reg. 11-18 rulemaking, as we see this as necessary for preparing the socioeconomic analysis as required by state H.&S.C. Section 40728.5, including analyses to determine the range of probable costs, the impact of the rule on regional employment and the economy, the availability of cost-effective alternatives, and the emission or risk reduction potential of the rule. Moreover, understanding what would be considered TBARCT helps inform regulated businesses as to what would be required under Reg. 11-18 and what compliance options would available to them, which in turn could prompt useful public participation and comments on the draft rule. This is especially important given that Reg. 11-18 is remarkable both in terms of the total number of facilities affected as well as the many different facility types that will become subject to the rule.

In addition, we note that the current unavailability of TBARCT guidelines discourages early actions to reduce risk. Facilities that take early action and install risk reduction technologies voluntarily in attempt to decrease risk below the notification thresholds could be burdened with additional cost if these reductions turn out later not to meet the TBARCT standard.

More generally, CCEEB believes that the District should allow adequate time to develop sound, scientifically based rules, and to conduct a fair and transparent public participation process. Conversely, we are concerned if rules are rushed to hearings before staff has fully developed implementation details and compliance pathways.

Modify Reference to MACT in Definition of TBARCT

Reg. 11-18 defines TBARCT as the most stringent of certain retrofit emission controls, including, "[t]he most stringent emission control for a source type or category specified as

MACT by U.S. EPA…" Reg. 11-18-204.4. "MACT" is simply defined as "[a]n emission standard promulgated by U.S. EPA pursuant to Section 112(d) of the Clean Air Act." [Reg. 11-18-212.] However, for many source categories that could be subject to Reg. 11-18, EPA has promulgated both new source and existing source MACT standards under Section 112(d) of the Clean Air Act. Clearly, the District's intent is that TBARCT can be no less stringent than an existing source MACT standard. However, TBARCT cannot and should not be defined in reference to new source MACT standards, which may be unachievable, infeasible, or prohibitively costly for existing sources subject to TBACT. CCEEB would ask that the District revise the definition to clarify that, for existing sources that have not previously been subject to the new source MACT standard promulgated by EPA for that source type or category, TBARCT shall be no less stringent than any relevant existing source MACT standard.

Provide Public Information Templates as Part of Staff Report

The draft staff report indicates that the District will provide facility information to the public via email notices, social media, the District's website, opt-in mailings, and community meetings. However, the draft report does not describe how these communications will be managed or what content will be provided. Risk communication is an important but too often contentious subject; context is key.

Facilities have a direct and significant interest in how their operations are viewed by their neighbors, and many have ongoing community outreach and public relations efforts. The District should be sensitive to this dynamic, and avoid risk communication that is confusing or unduly politicizes toxic risks. It is also critical that the District put risks from air toxics into context so that it is readily and clearly understood.

CCEEB requests that staff provide templates for how toxic risks from facilities will be described and communicated, such as through an appendix to the staff report. We also request that staff include in this simple background information, including but not limited to the degree to which risks from air toxics have been steadily decreasing in the air basin, the proportionate contribution of different source types (mobile, stationary, and area) to ambient risks, as well as an explanation of the difference between background or ambient risk and risk from a single, local source.

Finally, CCEEB recommends that facility information be limited to only those facilities above risk action levels, and that only final, District-approved documents be released. This helps interested public focus on facilities with the highest risks, rather than having to sort through documents for a 1000+ facilities, many of which may not pose real public health concerns. At a minimum, we ask staff to remove reference to draft HRAs since the preparation, review, and approval of HRAs follow strict, objective scientific guidelines and are not meant to be changeable or subjective based on public comments.

How Would APCO Shorten Risk Reduction Plan Time Periods?

Reg. 11-18-402.2 states that the APCO may shorten the three-year time period allowed to implement risk reduction plans if (a) the APCO finds that it is "technically feasible and economically practicable," or (b) the facility is in a CARE designated area and exceeds a significant risk threshold (i.e., either a cancer risk threshold of 1-in-a-million, a chronic HI of 0.20, or a acute HI of 0.20). CCEEB asks staff to clarify how the APCO would determine what is "technically feasible and economically practicable," and how or on what basis the APCO would determine the appropriate time period.

For facilities in CARE communities, how short would the time period be, and would it be the same for all facilities in those areas? Would the APCO use discretion, shortening the time period for some facilities but not others, or in some communities but not others, and if so, what criteria would these decisions be based on? What if a facility in a CARE community could not reduce risks in the shortened time period? Would an extension be needed? We note that CARE designations closely follow transportation corridors, congestion, and emissions of air toxics and other pollutants from mobile sources, particularly diesel particulate matter. In many cases, the incremental contribution of a stationary source facility could be de minimis.

What Would Prompt an Updated Risk Reduction Plan?

Reg. 11-18-405 gives the APCO the authority to require the facility to update its risk reduction plan "if information becomes available…regarding the health risks posed by a facility or emissions reduction technologies that may be used by a facility that would significantly impact health risks…" We ask staff to clarify this section in the rule and in the staff report. Specifically, we ask staff to explain what new information it is anticipating in regards to health risks. For example, is the concern that actual health risks are above what was estimated in the emissions inventory and HRA? And if so, what level of an increase would prompt the APCO to act? What happens if the increase was due to an increase in production but still within permit limits and the facility was on track to meet all Reg. 11-18 requirements?

In terms of "emission reduction technologies," does this mean that the APCO could force a facility to change its plan whenever a new control technology or risk reduction measure becomes available? What if risk reduction projects were already underway? What time period would be given to the facility, or would the clock restart after the updated plan was approved? Would the District determine economic impacts based just on the updated plan, or would it calculate total costs for the initial approved plan plus added costs for updating the plan? Could the APCO apply Reg. 11-18-405 multiple times, so that a facility was caught continuously updating a plan (and investing in risk reduction projects) whenever new technologies became available? What if the facility demonstrates that it will get below the risk reduction threshold in the time provided – could it then dispute the requirement to update its plan or seek a variance from the Hearing Board? CCEEB has serious concerns with this language as written and would like to better understand what is intended.

CEQA Analysis Should Include the Original 25-in-a-million Alternative

In July, staff presented a proposal for Board approval that set a first phase of Reg. 11-18 with a risk reduction threshold of 25-in-a-million. While we recognize that staff has revised its proposal and is no longer recommending the phased approach in the draft rule, we ask again that the 25-in-a-million option be included in the CEQA analysis as an alternative and that it be used to compare compliance costs and incremental health benefits, and to establish reasonable cost ranges in the socioeconomic report.

Comments on Regulation 12, Rule 16

District Staff Are Correct that Reg. 12-16 Would Be Inconsistent with District's Authority

The draft staff report provides staff's analysis that the fixed numeric caps on refinery emissions proposed by draft Regulation 12, Rule 16 are inconsistent with the requirements of the federal Clean Air Act (CAA) and California law. [*Draft Staff Report, Draft Regulation 12, Rule 16: Petroleum Refining Facility-Wide Emissions Limits and Draft Regulation 11, Rule 18: Reduction of Risks from Air Toxic Emissions at Existing Facilities*, Oct. 2016 ("draft staff report"), pages 17-20.]

In particular, staff notes that both the CAA and California law require permitting programs that allow for criteria pollutant emissions to increase at one location so long as those emissions are offset by reductions elsewhere. *Id*. at 17. CCEEB agrees with staff's analysis of this inconsistency. Additionally, by essentially imposing a construction moratorium upon refinery expansion when none is authorized or warranted under the CAA, Reg. 12-16 would stand as an obstacle to the accomplishment and execution of the full purposes of the objectives of Congress in enacting the CAA and designing a program for controlling emissions from new and modified sources. *See Hines v. Davidowitz*, 312 U.S. 52, 67 (1941).

As the draft staff report indicates, proposed Reg. 12-16 would address pollutants of primarily regional or global concern by limiting those pollutants from one particular sector, even though the concentrations of criteria pollutants are roughly the same in refinery communities as in other urbanized areas of the region. *See* draft staff report at page 18. California law imposes several requirements for new rules, including that the air district demonstrate the rule's "necessity" (Cal. Health & Saf. Code § 40727(b)(1)). The District would be challenged to demonstrate the necessity of a rule targeting an individual sector and its emissions, when the impacts from that sector are, as staff acknowledges, indistinguishable on a regional scale from those of other sectors. In light of the regional and global impacts associated with the emissions targeted by Reg. 12-16, CCEEB also agrees that the theoretical co-benefits associated with regulating criteria and greenhouse gas (GHG) emissions, so as to limit localized refinery communities' exposure to pollution (*see* draft staff report at page 20), cannot provide legal justification for such a rule.

CCEEB also agrees with staff that the Reg. 12-16 caps on GHG emissions would fail to satisfy state law because facility-specific caps are fundamentally inconsistent with the Air Resources Board Cap-and-Trade Program. *See* draft staff report at page 19. The State's Cap-and-Trade Program has been carefully designed to achieve the maximum technologically feasible and cost-effective reductions in GHG emissions through use of market forces, while also minimizing emissions leakage. *See* Cal. Health & Saf. Code §§ 38562(a), (b)(8). Placing caps on facilities in the Bay Area would frustrate the efficiency goals of the Cap-and-Trade Program, as recognized by District staff. *See* draft staff report at page 19 ("There is a fundamental inconsistency between a 'cap and trade' program that by its nature contemplates changeable caps versus one that fixes caps at one level, in that the latter has the potential to frustrate the efficiency goals of the former."). It would also potentially result in emissions leakage to sources elsewhere in the state or out-of-state, thus achieving no net reduction in GHG emissions. Even assuming the District were legislatively delegated the authority to promulgate such a rule, doing so would run afoul of the requirement that district rules must be consistent and in harmony with existing State law (*see id*. § 40727(b)(4)), and not be arbitrary, capricious, or without a reasonable or rational basis. *See S. Cal. Gas Co. v. S. Coast Air Quality Mgmt. Dist*., 200 Cal. App. 4th 251, 267-68 (2011).

CCEEB thanks staff for considering our comments on proposed Regulations 11-18 and 12-16 and we look forward to seeing your response. We also appreciate recent staff efforts to notify and engage potentially affected industry on Reg. 11-18, and we continue to support a full public participation process for rule development. CCEEB is committed to working with the staff and the Board of the District in refining Reg. 11-18 and addressing the questions and concerns we outline in this letter. Please contact me or Janet Whittick of CCEEB at any time should you have questions or wish to discuss our comments further. I can be reached at (415) 512-7890 ext. 115 or billq@cceeb.org; Ms. Whittick is available at ext. 111 or janetw@cceeb.org.

Sincerely,

Bill Quinn
CCEEB Chief Operating Officer and Bay Area Partnership Project Manager

cc: Mr. Jaime Williams, BAAQMD
Mr. Eric Stevenson, BAAQMD
Mr. Gerald D. Secundy, BAAQMD
Ms. Janet Whittick, CCEEB

Western States Petroleum Association
Credible Solutions • Responsive Service • Since 1907

Bob Brown
Director, Bay Area Region

March 9, 2017

Ms. Christy Riviere via email (criviere@baaqmd.gov and cleanairplan@baaqmd.gov)
Principal Environmental Planner
Bay Area Air Quality Management District (BAAQMD)
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: WSPA Comments on 2017 Draft Clean Air Plan/Regional Climate Protection Strategy

Dear Ms. Riviere:

The Western States Petroleum Association (WSPA) is a non-profit trade association representing twenty-six companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Arizona, Nevada, Oregon, and Washington. Our members in the Bay Area have operations and facilities regulated by the Bay Area Air Quality Management District (District).

WSPA appreciates the opportunity to offer technical comments and input on the 2017 Draft Clean Air Plan/Regional Climate Protection Strategy. These comments reflect the input of our five refinery member companies. We have organized our comments in the five sections to follow.

Purpose and Vision

The District's Plan states several goals that contradict each other. In the Executive Summary (page ES1), the Plan states,

> *"Population exposure to unhealthy levels of ozone and particulate matter, and cancer risk from exposure to toxic air contaminants, have all been greatly reduced."*

And then continues on the same page to state,

> *"To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy."*

Further, on page 8 of Chapter 1: Purpose and Vision, the District's Plan states,

> "*To achieve the 2050 vision, we need to reduce motor vehicle travel and to eliminate combustion of gasoline and diesel in motor vehicles.*"
>
> "*Nearly 90 percent of the motor vehicle fleet will need to be zero emission."*

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This is in contrast with the U.S. Energy Information Administration's reference case projections that overall petroleum liquids consumption will be higher in 2050 than 2015 despite gasoline consumption being projected to decrease 20% by 2050.[1]

WSPA does not believe it is warranted or within the authority of the District to use its Clean Air Plan policies to seek elimination of fossil fuel usage considering the improvements to air quality and the public demand for energy.

Overestimation of Health Impacts

The Plan's opening statements in the Executive Summary acknowledge that air quality now is the best it has been in decades (page ES1), and that Bay Area air quality (which the Plan identifies as including average $PM_{2.5}$ concentrations of 8.7 $\mu g/m^3$) meets both the national and California Ambient Air Quality Standards for $PM_{2.5}$ (12 $\mu g/m^3$ annual average, 35 $\mu g/m^3$ 24-hour average) which are set at a level "*requisite to protect the public health*", "*allowing an adequate margin of safety*".

However, the District then identifies that the same $PM_{2.5}$ (excluding diesel $PM_{2.5}$) is currently resulting in 2,500 premature deaths per year and an annual cost of $21.6 billion dollars, "*based on the assumption that every 1.0 $\mu g/m^3$ reduction in $PM_{2.5}$ concentration results in a one percent reduction in mortality rate for individuals over 30 years old*" citing a 2006 document that was not published in a peer-reviewed journal.[2]

This assumption is not representative of the spectrum of more recent peer-reviewed scientific literature, which includes papers that identify many questionable assertions in this analysis. Citing more recent peer-reviewed research, Moolkavgar has pointed out in his 2016 report,

> "*[there is a] fundamental assumption that the observed associations between fine particulate matter and mortality...are causal....Even if one accepts the qualitative conclusion that fine PM at the contemporary low levels in the United States is causally associated with mortality, surely a quantitative assessment of risk requires a less cavalier attitude....*"[3]

The 2016 comments by the Clean Air Science Advisory Committee (CASAC) on EPA's Integrated Review Plan for the PM NAAQS[4] included several questions regarding the determination of causality. An article by the former chair of CASAC concludes that,

[1] EIA, Annual Energy Outlook 2017 (released: January 5, 2017), http://www.eia.gov/analysis/projection-data.cfm#annualproj, Reference case, Table A2.
[2] Appendix C (especially Figure C-2).
[3] Suresh H. Moolgavkar, "Fine Particulate Matter Pollution and Mortality", *Risk Analysis* **36(9)** (2016), pp. 1766-1769.
[4] Dr. Ana Diez Roux (CASAC), letter (including attachment) to Gina McCarthy (EPA) "Re: CASAC Review of the EPA's Integrated Review Plan for the National Ambient Air Quality Standards for Particulate Matter (External Review Draft – April 2016)", August 31, 2016. Available from https://yosemite.epa.gov/sab/sabproduct.nsf/264cb1227d55e02c85257402007446a4/9920C7E70022CCF98525802000702022/$File/EPA-CASAC+2016-003+unsigned.pdf.

> *"[a] key policy-relevant question...is for what levels of ambient pollutant concentration is there a causal and significant relationship?"*[5]

The Society of Risk Analysis' journal *Risk Analysis* published a "Special Issue on Air Pollution Health Risks"; the editor for that issue concluded that,

> *"In the areas where $PM_{2.5}$ is at or near the current U.S. annual standard of 12 $\mu g/m^3$, causality should be considered as questionable.*"[6]

Statements that call into question the validity of precise estimates of causality have been repeated elsewhere[7] and contradict the unsubstantiated assertions in the District's Plan (Appendix C7):

> *"Currently, Bay Area $PM_{2.5}$ concentrations average about 8.7 $\mu g/m^3$, or about 5.7 $\mu g/m^3$ above natural background levels. Thus, total elimination of anthropogenic $PM_{2.5}$ is estimated to reduce the death rate by about 5.7 percent for those over 30, or about 2,500 deaths per year*."[8]

The District's Plan states that the dollar value of reducing 1 ton per year of $PM_{2.5}$ emissions (i.e., 0.0027 tons per day, out of the 47 tons per day of $PM_{2.5}$ that the District identified in its 2015 emissions inventory[9]) is approximately $560,000.[10]

This has an equivalent health impact of a single household burning 200 lbs. of firewood annually in their fireplace, with firewood costs of $636[11]. It is unclear to WSPA how the District can then justify that emissions of up to 10 tons per year of $PM_{2.5}$ are not significant under CEQA,[12] or that sources with emissions of less than 0.05 tons per day (10 lb/day) can be exempted from needing air permits under Regulation 2 Rule 1.

For toxic air contaminants, the District's Plan implies that the best estimate of actual health risk is that which is based on guidance from the Office of Environmental Health Hazard Assessment (OEHHA). This is in direct conflict with OEHHA's 2015 Guidelines that state,

> "*...there is a great deal of uncertainty associated with the process of risk assessment....The assumptions used in these guidelines are designed to err on the side of health protection in order to avoid underestimation of risk to the public...."*

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[5] H. Christopher Frey, "Dose-Response Models are Conditional on Determination of Causality", *Risk Analysis* **36(9)** (2016), pp. 1751-1754.
[6] D. Warner North, "Introduction to Special Issue on Air Pollution Health Risks", *Risk Analysis* **36(9)** (2016), pp. 1688-1692.
[7] e.g., see Dominici et al., "Particulate Matter Matters", *Science* **344** (2014), pp. 257-259.
[8] Page C/7.
[9] BAAQMD, "Summary of Emissions by Source Category, Annual Average Emissions tons/day, All Sources, Bay Area, Year 2015", spreadsheet provided by Phil Martien (BAAQMD) to Todd Tamura (Tamura Environmental, Inc.) in response to 1/24/17 Public Records Request No. 2017-01-0190, March 3, 2017.
[10] Page C/3, Table C-2.
[11] Based on ARB's emission factor (Oct. 2015 rev.) of 22.7 lb $PM_{2.5}$ per ton of wood: i.e., (22.7 lb $PM_{2.5}$/ton wood) × (200 lb wood/2000 lb/ton) × $560,000/(ton/yr $PM_{2.5}$) × (ton/yr)/(2000 lb/yr) = $636
[12] BAAQMD, "California Environmental Quality Act Air Quality Guidelines", updated May 2011, p. 2-2.

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> *"Risk estimates generated by [a health risk assessment] should not be interpreted as the expected rates of disease in the exposed population but rather as estimates of potential for disease, based on current knowledge and a number of assumptions."*[13] *[emphases added]*

The National Research Council's Committee on Risk Perception and Communication has noted,

> *"The incentives to slant the presentation of information to support an issue one believes to be important can be strong. But in order to strengthen their credibility, public service organizations, and especially those in government, must resist this temptation.*"[14]

WSPA urges the District to accurately present information that properly reflects the full spectrum of peer-reviewed and credible knowledge on these subjects. This should be accomplished by (a) identifying the well-documented uncertainties about causality and the overestimation of risk, (b) estimating the extent of conservatism being applied, and (c) determining what a "best guess" of the impacts are likely to be, not just the "worst case" or "potential" risk.

Tradeoffs in Pollutant Decreases versus Increases

The District's Plan needs to acknowledge that reducing one pollutant can create increases (i.e., tradeoffs) in others. The District's Plan advocates for reductions in NO_x by citing that increased NO_x can contribute to ozone. However, the District's Plan acknowledges in Appendix D that NO_x reductions actually increase ozone concentrations in urban parts of the Bay Area.[15]

> *"Figures D-5a-d shows zone concentrations for the base and control cases. NOx and VOC emission reductions each has less than 2 percent impact on ozone at most Bay Area stations on most summer days."*
>
> *"A 20 percent reduction in anthropogenic NOx emissions, however increase ozone 1-2 percent"*

Combustion equipment can be tuned for maximum fuel efficiency or minimum NO_x, but either way there is a tradeoff. District requirements to immediately reduce emissions from a component leak may need to be met with custom-designed equipment that has to be manufactured and transported into the Bay Area from out of state. The Plan should identify these tradeoffs, especially since the District's Plan is multipollutant focused.

The District's analysis of how changes in emissions of PM and PM precursors will affect changes in ambient PM concentrations[16] is far too simplistic. There should be a greater discussion on the issues of long-range transport, PM formation and re-volatilization, limiting reagents with regard to ammonium salt

[13] OEHHA, "Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments", February 2015, pages 1-5 and 1-6.
[14] National Research Council, Committee on Risk Perception and Communication, *Improving Risk Communication*, Washington DC: National Academy Press, 1989, p. 122.
[15] Appendix D, pages D/8 and D/9.
[16] BAAQMD, "Multi-Pollutant Evaluation Method: Technical Document, 2016 Update, November 2016, available from http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/mpem_nov_dec_2016-pdf.pdf?la=en.

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formation, and known inaccuracies/uncertainties in regional emissions inventories. This level of important analysis has been omitted from the District's Plan.

Lastly, the District's Plan identifies the need for higher-efficiency buildings, but neglects mentioning the potential health impacts on indoor air quality with lower air exchange rates.[17]

Greenhouse Gases

WSPA has previously submitted comments regarding the legal vulnerability of the District's proposed localized regulation of greenhouse gases (GHGs). There is publicly available information from both the California Air Resources Board and the Intergovernmental Panel on Climate Change regarding the efficacy of regulating sources that are already covered by the state's Cap and Trade Program. Climate change is a global issue that accordingly needs to be addressed on a wider scale than solely within the District's boundaries.

The Plan should be clear on its objective as it relates to climate change in order to avoid unintended consequences, and specifically the potential for costly, ineffective and inequitable climate policies and regulations.

On page ES-2, the Plan describes the District's climate change goal or target as:

> *"Consistent with the GHG reduction targets adopted by the state of California, the plan lays the groundwork for a long-term effort to* ***reduce Bay Area*** *GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050." [****emphasis added****]*

While consistent with the state's goals, reducing Bay Area GHG emissions may not necessarily mitigate climate change for reasons described further below. Instead, the District is urged to reframe its Plan's goals for climate change in terms of a net reduction in global greenhouse gases, the appropriate metric of progress against climate change.

This can be accomplished by,

1) revising the proposed control measures/strategies to reflect that climate change is unlike the air quality impacts associated with the National Ambient Air Quality Standards (NAAQS) that the District has traditionally regulated,

2) refraining from adopting direct and localized regulation of source categories that produce carbon-intensive goods, which consumers demand, and

3) working with source categories to address how existing District regulations may hinder a source's efforts to improve efficiency or to comply with state regulations to mitigate climate change, such as fuel standards.

[17] National Academies of Sciences, Engineering, and Medicine. 2016. *Health risks of indoor exposure to particulate matter: Workshop summary*. Washington, DC: The National Academies Press. doi: 10.17226/23531. p. 17.

Climate change is unlike the air quality impacts associated with the NAAQS because climate change is a global issue, resulting from total global greenhouse gas emissions, whereas air quality impacts associated with the NAAQS are localized and have a direct link to quantities of local or regional criteria pollutant emissions. This is in contrast to criteria pollutants, where the location of a net reduction determines whether there is an improvement to air quality.

Direct and localized regulation of GHGs will create two unintended consequences. First, locally regulating source categories which produce carbon-intensive goods will simply displace GHG emissions to another location and have a zero to negative impact on climate change. This phenomenon occurs because the economy and supply chain of carbon-intensive goods and energy is integrated globally.

The Plan appears to recognize this point on page ES-2, where it states,

> *"…we can only stabilize the climate by slashing demand for fossil fuels"*,

but this point is effectually ignored in the proposed stationary control measures.

The second unintended consequence is the inequitable regulation of stationary sources. This occurs because a regulating authority of another California jurisdiction may have a different climate change goal, even though the pollutant has no distinction in terms of localized air quality impacts.

For example, the BAAQMD may require a local source category to achieve a GHG emissions standard while another air quality management district in the state may require a different GHG standard. The direct regulation of greenhouse gases on any source category should be handled by the California Air Resources Board to prevent inequitable regulation of sources by individual air districts.

Socioeconomic Analysis

The District's draft socioeconomic analysis report is based on values that are either poorly referenced (e.g., "Source: BAAQMD") or incompletely supported. The Plan does not clearly identify what specific values were used from the reference or how the District used those values in its calculations. The District claims that the costs of 17 control measures are "known" before most of those rules have even been drafted, and provided no supporting details on how those figures were estimated.

WSPA appreciates the BAAQMD's consideration of our comments and we look forward to your responses. If you have any questions, please contact me at this office, or Kevin Buchan at (925) 266-4083 or email kevin@wspa.org.

Sincerely,

Cc: Kevin Buchan, WSPA

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350 Bay Area

March 9, 2017

Christy Riviere & David Burch, Principal Environmental Planners
Bay Air Quality Management District
375 Beale St., Suite 600
San Francisco, CA 94105

Dear Ms. Riviere and Mr. Burch,

Thank you for the opportunity to review and provide comments on the Air District's Draft 2017 Clean Air Plan: Spare the Air - Cool the Climate. 350 Bay Area is pleased with the broad, comprehensive vision put forth in the Plan, as well as all the effort expended to provide the supporting technical information and regulatory context for action. Without all the very hard work that went into this document, we and other members of the public would not have been able to comment so meaningfully or participate so fully in the policy process.

We are very invested in making the Plan's Vision for 2050 a reality. We couldn't agree more with the clarion goal expressed on page one of the Executive Summary:

> "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy."

The alignment of the Air District's Plan with the California Air Resources Board's Scoping Plan Sectors is very helpful, and we appreciate that our representatives were able to participate in sector-specific stakeholder discussions that helped inform this Plan's bold 2050 vision. In order to effectively translate the vision into practical and aggressive near-term and medium-term action to eliminate fossil fuel combustion, we think it is imperative to continue that stakeholder process. To allocate resources efficiently for both the Air District and its stakeholders, we suggest that the Air District select a subset of the nine sectors for intensive planning and continue to meet with stakeholders in those sectors with the explicit goal of finding pathways to deep reductions in fossil fuel combustion as rapidly as is technologically feasible and/or as has been achieved in practice.

We note that the Executive Summary (E/5) highlights key elements of the control strategy for Stationary Sources, Transportation, and Buildings. Perhaps these three sectors should be targeted for intensive ongoing stakeholder involvement.

You will find attached both a copy of this letter for record-keeping, as well as 350 Bay Area's specific comments on the Plan. We look forward to working together to achieve the region's climate and public health goals and ensure a stable and healthy future for Bay Area residents.

Sincere regards, on behalf of over 12,000 350 Bay Area members,

Jed Holtzman
Senior Policy Analyst

Janet Stromberg
Bay Climate Action Plan Lead

350 Bay Area comments on Draft 2017 Clean Air Plan

Executive Summary

1) ES/2, Goals and Objectives: We suggest that this section be edited to include reducing emissions of fine particulate matter and reducing exposure to toxic air contaminants as explicit goals and objectives of the Plan. This is particularly critical for PM, since other sections of the Plan state that: (1) $PM_{2.5}$ poses the most serious threat to public health in the Bay Area and (2) Bay Area $PM_{2.5}$ and PM_{10} emissions exceed state standards.

2) ES/2, Goals and Objectives, ¶1 references: "a long-term effort to reduce GHG emissions . . . by 2030." That's only 13 years from now. We'd argue this is not such a long-term effort anymore, nor should it be viewed like one.

   Given the last Clean Air Plan was released in 2010, we could expect just one more iteration of Air District planning between the release of this 2017 Plan and the critical 2030 goal that looms so staggeringly on Figure 3-9. In that context, a more emergent, immediate-term perspective and more aggressive action now seem warranted. Additionally, we are not on track to meet even the short-term 2020 GHG goal in the Bay Area—now just three years away. Any and all Plan language suggesting that the hard decisions and serious actions don't need to be taken until some future time will not be helpful for achieving the region's necessary climate goals or the Plan's vision for 2050.

3) ES/4, Particulate matter: This section says that "the Bay Area currently meets national and state standards for both daily and annual average levels of $PM_{2.5}$," however Table 2-2 (2/6) indicates that the Bay Area is not in attainment of the state's annual $PM_{2.5}$ standard. One of these is incorrect.

4) ES/5, The 2017 Control Strategy, ¶1 says: "The proposed control strategy is *designed to complement efforts* to improve air quality and protect the climate that are being implemented by partner agencies at the state, regional and local scale" (emphasis ours). In most cases, however—mobile sources being the obvious exception—the buck stops *here at the Air District*, not somewhere else.

   The first line of California Health & Safety Section §39002 states: "Local and regional authorities have the primary responsibility for control of air pollution from all sources other than vehicular sources." That includes stationary and "area" sources, and the language could not be clearer. The proposed control strategy needs to *lead, focus, and drive* efforts elsewhere, not complement them.

5) ES/5, The 2017 Control Strategy, 2nd bullet: "Reduce emissions of "super-GHGs" such as methane, black carbon and fluorinated gases <u>from all key sources</u>." *This change should be pushed through to the analogous locations on 1/18, 5/2, and 5/35.*

6) ES/5, Stationary Sources: The Stationary Source Strategy includes (1) improving combustion efficiency at the largest sources, (2) reducing methane emissions, and (3) reducing TAC emissions; however, there is no specific goal of reducing GHG and PM emissions, despite those causing the greatest social and public health costs to the region. There's also no mention here of the need to reduce the use of combustion for heat and power, i.e.,

decarbonization. Improving efficiency will not necessarily reduce PM and GHG emissions if it is not an explicit goal.

Meanwhile, there are ample opportunities to decarbonize operations at Bay Area facilities—indeed, the brewing and server farm sectors have already taken significant steps. In the foreseeable future, energy storage capacity will obviate the need for back-up generators, which have been permitted by the thousands by the Air District. The Air District should consider prohibiting the installation of diesel back-up generators, and move toward phasing out the use of natural gas-powered back-up generators from non-critical operations.

It is within the Air District's purview to prohibit the sale of gas-powered appliances and other fossil fuel-using devices when there are proven alternatives. The first page of the Plan's Executive Summary states: "To protect public health and stabilize the climate, we must take aggressive action to eliminate fossil fuel combustion and transition to a post-carbon economy." Further on in Chapter 1, the Plan asserts that it is based on the "all feasible measures approach" to attaining the ozone standard. Reducing fossil fuel combustion—by more means than just efficiency improvements—is already a feasible means of reducing ozone precursors at many stationary sources, as well as PM, TAC and GHG emissions, and this should be included as a core of the Stationary Source control strategy.

Air District staff across all divisions are the most deeply knowledgeable experts in Bay Area stationary source processes and emissions. Engineering staff expertise in particular should be leveraged for more than just permitting and fee collection; it should, rather, be put to work researching feasible alternatives to combustion that have already been achieved in practice around the world, as well as investigating best practices to increase combustion efficiency.

With the above comments in mind, we recommend:

1. The Stationary Source Strategy should explicitly include decarbonization and reducing combustion as a way to reduce all pollutants, but particularly PM and GHGs.

2. The Stationary Source Strategy should include mid-sized and smaller sources in the near term, not just the largest ones. Combustion reduction solutions for small and mid-sized sources may be more readily available and quicker to implement. Air District engineering staff are already working on a daily basis with these facilities and can engage in some of the rule development and implementation work more easily than can staff without the direct technical and regulatory knowledge and experience for various specific source categories.

7) ES/5, Stationary Sources, 1st bullet: "Decrease emissions of GHGs and criteria air pollutants through a region-wide strategy to reduce combustion and improve combustion efficiency at industrial facilities, beginning with the three largest sources of emissions: oil refineries, power plants and cements plants."

8) ES/6, The Air District's Tools and Resources: In addition to Rulemaking, Funding, Best Practices, Outreach & Education, and Advocacy, the Air District's authority under the California Environmental Quality Act (CEQA) should be included as a tool the Air District can use actively. Like the permit program, CEQA is a critical regulatory vehicle to: (1) mitigate emission increases due to population and economic growth and (2) highlight, promote, and even require the use of emerging strategies for reducing emissions. CEQA is a particularly important tool for mitigating emissions in the building and transportation sectors as part of land use planning,

but is also relevant for large stationary source projects. *The Air District's use of the CEQA process for mitigation is mentioned in later chapters, but should also be included explicitly in the list of tools and resources in the Executive Summary, Table 5-13, etc.*

9) ES/6, What the 2017 Plan Will Accomplish:

   a) It would be helpful to show the link between which policy tools—Rulemaking, Funding, Best Practices, Outreach & Education, Advocacy, and CEQA (per our comment above)—will be used to achieve each of the key priorities and key control strategy elements for the three high-priority sectors (Stationary Sources, Transportation, and Buildings), similarly to the way ARB shows them in the Scoping Plan (on pp. ES 4-5 and in Table II-1 Proposed Scoping Plan Scenario, pp. 34-35, of that document). We would like to see a table summarizing the emission reductions forecast for each sector, based on the detailed information in Appendix H, coupled with a short description of the policy tool(s) that will achieve the reductions for that sector and the amount of reductions expected from the use of each policy tool in that sector.

   b) When we see the emissions reductions that are estimated to result from this large, multifaceted, and impressive Plan all the way through to 2030—the midrange climate goal from which a huge gulf of achievement still separates us—we of course want to know: are these reductions significant? How do they square with Figure 3-9? These things are what need to be communicated to the public, not a tons per day figure. We request these emissions reductions be expressed in a form that makes them more meaningful to the public. We suggest the format used in Chapter 2, Footnote 9 (i.e., "decrease an average of X% per year, with an overall reduction of Y% over that period").

      Our calculations show that the comprehensive suite of control measures in the Plan will, by 2030, reduce daily ROG emissions by 4.6%, daily NO_x emissions by 2.9%, daily $PM_{2.5}$ emissions by 6%, and yearly GHG emissions by 5% (100-year GWP) or 5.8% (20-year GWP). We would like to see those estimated reductions fleshed out and expressed in a format such as that suggested above.

      Looking just at the GHG numbers vis-à-vis Figure 3-9, it seems very clear that this Plan—representing a comprehensive view of Air District action over perhaps half of the time remaining for action before we reach the state's midrange climate target—leaves us vastly, vastly short of where we need to be. Perilously short. We understand that the emissions reductions estimated are deliberately conservative, as the Plan seems unable to estimate the emissions reductions from many of the control measures in Appendix H; however, it appears that we are well outside the ballpark of anything that is going to get us down that dotted line on Figure 3-9. Does this control strategy really encompass "all feasible measures"?

Chapter 1

10) 1/1, Introduction, ¶2: "If left unchecked, climate change will have major impacts on the region's natural systems, water and food supply, economy and infrastructure." *Please also push through to the analogous location on 3/2, ¶1.*

11) 1/2, Goals and Objectives of the 2017 Plan: Since the Bay Area is not in attainment with California's $PM_{2.5}$ and PM_{10} standards, the Plan should include numeric baseline emissions and estimated emission reduction objectives for these pollutants that would assure attainment. This is of particular importance because the Air District acknowledges that PM pollution poses the number one health threat to Bay Area residents. The Plan should clarify whether or not the California Health and Safety Code imposes any planning requirements in response to non-attainment of PM standards. If the state does not, the Air District needs to rise to the challenge on its own because of the demonstrated impact on health and mortality posed by PM emissions.

12) 1/2, Protect Air Quality and Health at the Regional and Local Scale: The Plan states on ES/4 and elsewhere that PM is found to have negative health impacts at levels even below current standards; therefore, another bullet needs to be added here, e.g., "Where feasible, reduce health-harming pollutants below state and national standards."

13) 1/3, Updating the Bay Area's State Ozone Plan: The Plan states that "reducing emissions of ozone precursors by 5 percent per year is not achievable," so the Air District is using an "all feasible measures" approach. The public needs a clearer understanding of how much progress toward attainment a 5% reduction per year would represent, and how that compares to the reductions this Plan will accomplish. To that end, the Plan should state the numeric baseline emissions of ozone precursors (2015 or 2016) and the estimated ROG and NO_x emission reductions that would assure attainment of the federal and California ozone standards, as well as the numeric reductions over time to be achieved by this Plan.

14) 1/3, Goals and Objectives of the 2017 Plan, 3rd bullet: This undersells the achievement of your Regional Climate Protection Strategy. We suggest, e.g., "Lead the Bay Area toward its 2030 and 2050 climate targets through a comprehensive, multi-sectoral climate protection strategy utilizing the full toolkit of Air District capacity and authority."

15) 1/4, Protecting the Climate, ¶1: With respect, the Air District's work for "more than a decade to reduce GHG emissions and protect the climate" has not yet wrought a significant amount of GHG reduction toward the 2020 goal, according to Figure 3-9. We would appreciate a qualifier to this effect be appended to this first sentence.

16) 1/4, Protecting the Climate, ¶5: In addition to transportation infrastructure and power distribution systems, we suggest that heavy industrial facilities should be highlighted as at risk as well. *Please push through to the analogous location on 3/7, ¶1.*

17) 1/7, Where We Live and Work, 1st bullet: "Buildings will need to be energy efficient and powered, cooled and heated by clean energy"

18) 1/7, Where We Live and Work, 2nd bullet: "Wood burning and fossil fuel combustion will need to have been eliminated"

19) 1/7, Eliminate the Use of Fossil Fuels in Buildings, 4th bullet: We do not support language as permissive as "Biogas can be used as a replacement." All references to biogas need to make clear that it will be used only as created by agricultural/husbandry/wastewater processes in which we are already engaged, and only where logistically necessary (i.e., in applications that cannot be electrified) or where it can be utilized on-site to offset energy load.

20) 1/8, Eliminate the Use of Fossil Fuels in Buildings (cont.): "Because it will be very difficult to achieve near-zero carbon emissions from existing buildings, all new construction should be zero-net carbon or carbon-negative."

21) 1/8, How and Where We Travel, 3rd bullet: "Remaining ~~D~~diesel fuels will need to come from renewable sources"

22) 1/10, Promote Zero-Emission Vehicles and Renewable Fuels (cont.): "The shift toward electrification of the transportation sector will require significant public and private investment, as well as new technology to improve battery efficiency and to develop renewable forms of diesel and other liquid fuels where still necessary."

23) 1/10, What We Produce, 2nd bullet: "~~Increased a~~Access to clean energy for people of all income levels"

24) 1/10, What We Produce, 3rd bullet: "~~Significant~~ Nearly complete fuel-switching from fossil fuels to electricity"

25) 1/10, Switch from Fossil Fuels to Electricity: Suggest combining this with "100 Percent Renewable Power Supply."

26) 1/10, Oil Companies/Refineries Will Transform: "By 2050 Bay Area industries will ~~be~~ need to be powered by renewable electricity wherever feasible, with renewable fuels making up the difference ~~and biofuels~~, the carbon-intensity of products manufactured in the region will need to be greatly reduced, and a significant percentage of the light-duty vehicle fleet will be hybrid electric or fully battery-powered."

27) 1/11, 100 Percent Renewable Power Supply: "However, with directed investment, continued research and development of battery and other technologies, and supportive policy interventions such as carbon pricing, the Bay Area ~~could~~ will have carbon-free electricity by 2050. Community choice programs are on the way to making this a reality."

28) 1/11, What We Consume: This only includes food consumption as an example. We would recommend that a second example be added. Given their increased salience in the Bay Area consumption inventory versus the national inventory, we would suggest goods or services.

29) 1/12, What We Consume, 1st bullet: In order for Bay Area residents to reduce their consumption of carbon-intensive foods, they will need accurate information about the carbon impact of their food in just the way nutritional information is listed. How will that be provisioned? The goal should also be to reduce the overall carbon intensity of the food supply, including that from transport, packaging, distribution, etc. We support putting the burden on producers before consumers. Most consumers simply inhabit the system with which they're presented. Suggest, e.g., "Food producers/vendors will reduce the carbon intensity of the food supply and provide information on the carbon impact of their goods, enabling Bay Area residents to reduce their consumption of carbon-intensive foods." *These changes should be pushed through on the analogous bullet on ES/4.*

30) 1/12, Low-GHG Diet: This section seems overly long and specific; while food represents 19% of Bay Area GHG emissions by consumption vs. 18% nationally, this section is longer than, e.g., the equivalent section on switching from fossil fuels to electricity, which would reduce emissions far more. It also neglects to mention the huge GHG burden of the transport, packaging, and distribution of the food to the consumer.

31) 1/13, Putting Organic Materials to Productive Use: "Many farms also generate vegetative material as a by-product of food production. In current practices, some of this material is left in place to decay, some is sent to landfills, and some is burned—all resulting in GHG emissions. This waste material can instead be redirected to create compost for use as a soil amendment in agricultural and rangelands, augmenting the carbon sequestration abilities of these lands."

32) 1/14, Putting a Price on Carbon, ¶2: "The revenues from a carbon tax could be used to fully offset costs for low-income households, as well as to fund clean energy or clean vehicle projects in low-income communities, actions that lower GHG emissions for all of us."

33) 1/18, Reduce Super-GHGs: Please add wastewater systems to the list of methane sources in the last sentence. *Please also push this through to 3/12, Methane.*

34) 1/19, Decarbonize the Energy System: "This requires a two-pronged effort to reduce the carbon intensity of electricity, in combination with switching from natural gas to electricity to power, heat and cool our buildings; and replacing gasoline and diesel-powered vehicles with zero-emissions cars and trucks powered by clean electricity or other renewable fuels."

Chapter 2

35) 2/2, Linking Air Pollution to Public Health, ¶2: This text references the air quality improvements described in Appendix C. The modeling data in Figure C-2 illustrates that $PM_{2.5}$ and GHGs are responsible for almost all of the health and social costs from Bay Area air pollution. It also shows that there are *huge* public health benefits to reducing combustion of fossil fuels, even ignoring the climate protection benefits entirely.

    Do the control measures in the Plan reflect that reality? Are you going after all the biggest gains and synergies in public health and climate protection? Are you doing everything in your power and authority to reduce and eliminate quantifiable health and social costs from wood burning, diesel and gasoline engines, natural gas combustion, and petroleum refining in our communities' airshed?

36) 2/4, Table 2-1, $PM_{2.5}$: It is worth noting that wood burning, diesel engines, gasoline engines, burning natural gas, commercial cooking, mobile sources, landfills, livestock, wastewater treatment, refineries, and ships are all sources of both fine PM, which causes the vast majority of pollution-related health costs in the Bay Area, *and* GHGs, which endanger a stable and healthy future for the region. *Thus, binding regulations to reduce emissions—including with future effective dates—must be utilized on these sources as soon as possible, wherever possible.*

37) 2/7, Technical and Analytical Tools: We suggest that the Air District add an approach to include an evaluation of how the elimination of fossil fuel and wood combustion over time and across all sectors would impact emissions of criteria air pollutants, TACs, GHGs, and super-GHGs; how those reductions would impact progress toward attainment of the ozone and PM standards; and, using the Multi-Pollutant Evaluation Method, what associated health outcomes/benefits the region could expect.

    We would like to see an analysis of different combustion reduction timeline scenarios across sectors comparing readiness to deploy, feasibility, cost, health outcomes, etc. This could be a very useful tool for long-range strategy development.

38) 2/7, Air Quality Monitoring Network: We suggest that the Air District investigate possible technologies it can use to upgrade its air monitoring infrastructure. In order to achieve the goal of "eliminating disparities in exposure to air pollution between communities," the Air District must be able to track with high resolution how pollution moves throughout the region. There are several technologies to consider, but we highlight one here: hyperspectral imaging. For each pixel of an area that a hyperspectral imaging camera photographs, it records a full spectrum of visible or infrared light. This is useful because different chemicals have different spectral fingerprints. The camera could be trained on a refinery to monitor the chemicals coming out of an exhaust valve and observe how those plumes of chemicals diffuse through the area. We believe that this and other imaging and sensing technologies could benefit the Air District's mission and are worth of investigation.

39) 2/10, Profiles of Key Pollutants: The Plan should include an explicit discussion correlating emission data, monitoring data, and modeling results to show the estimated ROG, NO_x and PM emission reductions needed in order to attain the ozone and PM standards.

40) 2/14-15, Figures 2-4/2-5: Both figures should include lines forecasting the emission reductions that will result from implementing the 2017 Plan, additional lines showing possible reductions from ARB's contemplated motor vehicle emission standards, and indicate the emissions reduction goals needed to attain the standards.

41) 2/15, Particulate Matter: Figures analogous to Figures 2-4 and 2-5 should be added showing annual average $PM_{2.5}$ and PM_{10} emissions trends for 1990-2030. The figures should include lines forecasting expected PM emission reductions resulting from this Plan and measures implemented by ARB, and indicate the emission reduction goal needed to attain the PM standards.

42) 2/21, ¶1: Combustion, combustion, combustion. Once again, the same offender is the culprit. Reduce combustion and you improve PM, GHG, TAC, and ozone all at once. *That* is a true multi-pollutant approach. Is this Plan doing everything technically feasible to get us to the Plan's Vision for 2050?

43) 2/21, ¶2: TAC exposure impact is valued based on cancer risk, however the Plan states that neurological damage, hormone disruption, developmental defects, and other permanent injuries may also result from TAC exposure. How are these additional negative health impacts/costs valued? If they are not fully integrated into cost models, are the TAC risk estimates not severely underrepresenting the potential harm from exposure, and thus are the health benefits of reducing them not even higher?

    Appendix C highlights that valuation of health effects from pollution, and thus valuation the benefits of pollution control measures, is limited to specific negative health outcomes, not a fully comprehensive set of known negative health effects from criteria pollutants and TACs, which your own Plan outlines in fuller breadth than the MPEM tool. To assign a cancer death that can be attributed to benzene emission a monetary value in your health burden and cost/benefit accounting while excluding, for example, the monetary cost of a child born with birth defects because of the same benzene exposure seems arbitrary. Doing so also clearly understates the economic cost of the pollution and inaccurately weights cost/benefit analyses against pollution control.

44) 2/22, ¶1: We hope that the data in Figure 2-10 is being acted upon by ARB and MTC. The contribution of construction equipment to TAC exposure risk is ludicrously high and is clearly a locus for immediate action. Much of this equipment must be diesel-powered to be so dirty—how can the Air District help engender a move towards new technologies?

45) 2/25, ¶2: You mention that we are currently in attainment for national standards, but need to also mention here that we are not yet attaining state standards, in addition to the "no safe threshold of exposure" comments.

Chapter 3

46) 3/15, The Importance of Reducing Super-GHGs: We see that the Plan "places a high priority on measures to reduce emissions of super-GHGs," while considering effective policies to reduce CO_2 emissions a "long term" proposition. While we concur with the importance of reducing super-GHGs whenever and wherever possible, it is *this Plan*—coming just three years before the state's first climate goal, only 13 years before the midrange goal—that must do a meaningful amount to "develop and implement effective policies to reduce CO_2 emissions over the long term." The real work of reducing combustion cannot be pushed further into the future while action on ARB's SLCP Strategy is double-counted as Plan action.

    Chapters 2 and 3 of the Plan are full of the horrific damages caused by fossil fuel combustion for power, heating, and driving on both public health and the climate (and through the climate, public health again). Chapter 2 and Appendix C show the vastly disproportionate impact to public health caused by fine PM emissions, while Chapter 3 catalogues the dystopia that awaits us if we do not rectify our greenhouse gas imbalance very rapidly. Combustion of fossil fuels connects these two central foci of the Plan and, indeed, the Air District's mission, and the Plan's highest priority should be to develop and implement the strategies and regulations that are required to protect public health *and* the climate all in one, *by reducing combustion*.

    Eliminating a unit of combustion not only prevents criteria pollutants and GHGs from being released, but also protects residents from dozens or hundreds of combustion co-pollutants, most of which the Air District will never have the time, resources, or personnel to characterize, let alone to monitor or control. Reductions in fine PM, TACs, GHGs, and other co-pollutants will result in economic benefits worth hundreds of millions of dollars per year by reducing health care costs, improving productivity, reducing lost work and school days, and reducing necessary future expenditures on climate adaptation and disaster response.

47) 3/16, Figure 3-6: The 2010 Plan shows that Transportation accounted for 36% of the 2009 CO_2e inventory. The 2017 Plan shows Transportation CO_2e emissions as 40% of the 2015 inventory. What explains the difference?

48) 3/17: Figure 3-7 shows that approximately 27.6% of total Bay Area GHG emissions come from passenger cars and trucks, comprising about 15 million vehicles. Meanwhile, Figure 3-8 shows that approximately 16% of total Bay Area GHG emissions come from oil refineries, which number only five. There is clearly a much lower bar for achieving emissions reductions from stationary sources like refineries than there is from engaging with the owners and manufacturers of 15 million different vehicles, and achieving maximal reductions in emissions from stationary sources should be a top priority for Plan implementation.

49) 3/18, Table 3-2: The 2017 Plan shows that the oil refinery sector CO_2e emissions were 14.4 MMT. The 2010 Plan shows refinery emissions in 2009 were 15.3 MMT, about a 1 MMT reduction from 2009 to 2015. What was the cause of this reduction? Is this reduction expected to be sustained?

50) 3/19, Historical and Projected Bay Area GHG Emission Trends:

    a) We strongly believe this section needs to detail more clearly the emission trends in each sector and reductions to come in each sector from state requirements already in place. Estimates for these already exist. The 2010 Clean Air Plan states that 2009 CO_2e emissions were 98.7 MMT; it includes Table 2-12, which shows 2005 and 2009 emissions and forecasts for 2012, 2015, and 2020. The 2017 Plan states 2015 CO_2e emissions were 89.8 MMT, but does not explain how the 9% emission reduction

since 2009 was achieved. We suggest the inclusion of a discussion of the sources of the reductions from 2009 to 2015 and whether these reductions will be sustained. We additionally suggest a companion table to Figure 3-9 (similar to Table 2-12 in the 2010 Clean Air Plan) containing, for each sector, the level of emissions every five years from 1990 to 2015, the emissions forecast from 2015 to 2050, and the Air District's projections of emissions reductions expected from state requirements, i.e., "taking into account state policies and regulations already adopted, as well as those that are likely to be adopted and implemented over the next 10 to 15 years." This information will highlight gaps in achievement and important opportunities for Air District action to meet the region's climate goals.

b) Please also include discussion highlighting why state programs will not bring the Bay Area's 2020 GHG emissions to 1990 levels.

51) 3/19, Figure 3-9:

a) Figure 3-9 is our lodestar. Figure 3-9 is the whole banana. Figure 3-9 makes eminently clear that *extremely steep, unceasing, year-on-year reductions of GHGs are necessary, beginning immediately* in order to have any hope of meeting the interim or long-term targets.

b) What is the slope of the dotted line? **That is, how many MMT of CO_2 must be reduced each year from the region's current position in order to reach, and then keep pace with, the dotted line as it travels downward?**

c) Given that our calculations show just a 5-5.8% reduction in annual GHG emissions by *2030* as a result of this Plan's control measures, **how does this Plan compare with the yearly reductions that are mathematically necessary beginning immediately?**

d) Figure 3-9 shows that GHGs have continued to increase in the Bay Area since the adoption of the 2010 Clean Air Plan, and Appendix F shows that many of its control measures are carried forward in pretty much the same condition in the current Plan. To be clear, this kind of action on the 2017 Plan will *not* get the region to the 2030 or 2050 goals.

e) **How does your control strategy impact Figure 3-9?** This is an extremely critical piece of the entire Plan, and it is missing. The public and your Board need to see this! In addition to adding that information to Figure 3-9, we suggest that a figure or figures be added to show the expected GHG emission reductions in each sector resulting from the Plan.

52) 3/20, Stationary Sources: We categorically reject the assertion that "Bay Area and California refineries are expected to export more product to consumers outside of California in future years to offset the expected decrease in demand by in-state consumers." Such a scenario baldly privileges oil company profits over serious local health impacts, which themselves amount to staggering economic costs. All of this, of course, runs entirely counter to the mission of the Air District and the intent of the State of California to reduce gasoline consumption over time. It is not incumbent on communities that adjoin refineries and other stationary sources to internalize the ugly externalities of multinational commodity trade. Rather, it is incumbent on the Air District to protect the health and safety of the communities under its jurisdiction to the maximum extent feasible.

53) 3/20, Energy: The 2030 RPS figure should be 50%, based on SB 350.

54) 3/20, Buildings: These base assumptions seem unusually liberal for the Air District, when factoring in suburban building. It seems like actual reductions from this sector under business-as-usual will be even lower. What is the basis for these projections?

55) 3/20, Agriculture and Waste: A 75% diversion rate for the whole Bay Area in just three years seems incredibly unlikely. It seems like actual reductions from this sector under business-as-usual will be even lower. What is the basis for these projections? Are they realistic?

56) 3/22, Figure 3-10: It would be good to note somewhere on this figure, for the purposes of orienting one to the Y-axis, that pre-industrial CO_2 concentrations were around 270 ppm.

57) 3/25, Consumption-Based GHG Emissions Inventory: Figure 3-14 shows the Bay Area's consumption-based GHG inventory, with detail in six overall categories. It would be helpful to see the data presented in at least a couple of additional ways, for example: (1) similar figures showing the consumption category breakdowns for each of the nine Bay Area counties within the Air District and (2) similar figures showing broadly what the average consumption category breakdowns look like in the different geographic areas that are generally red, yellow, or green on Figure 3-12.

58) 3/28, Bay Area residents have a key role to play: We are only supportive of this consumer pressuring/shaming campaign *after* substantial rulemaking to reduce combustion pollutants and super-GHGs is underway and the Air District is truly doing all that *it* can do. The Air District needs to lead *by example*, not just prescribe metropolitan behavior change. *Real emission reductions from sources subject to Air District rulemaking cannot be hampered or delayed.*

59) 3/29, Food is a major source of GHG emissions: "Bay Area residents can also reduce their GHG footprint by decreasing consumption of processed foods, meat and dairy products, and food imported over long distances. Eating less meat and dairy would also provide public health benefits ~~for many people~~. <insert footnote here to study of your choice>"

60) 3/29, We still have a long way to go: The Plan states, "It will be a major challenge to achieve emission reductions of this magnitude, while maintaining the standard of living to which we are accustomed." Yet the Plan neglects to mention that if we do *not* make the emission reductions described, that standard of living is all but guaranteed to evaporate. This point needs to be made very clear. The choice to take climate action is taken not i*nstead of* maintaining our society's standard of living, but rather in an explicit attempt to preserve it.

61) 3/29, Summary: "Although these impacts are expected to intensify in the future and negatively affect air quality and public health in the Bay Area, aggressive near-term efforts to reduce emissions of super-GHGs—including methane, black carbon and F-gases—as well as to reduce combustion of fossil fuel for power, heating/cooling, and transportation can help decrease the speed and severity of climate change over the next several decades."

Chapter 5 & Volume 2 Control Measures

62) 5/1, Climate and Air Pollution Control Strategy, 3rd bullet: "~~Serve as a climate protection strategy~~ Safeguard the region's future by reducing emissions of greenhouse gases (GHGs) across the full range of economic sectors"

63) 5/2, Control Strategy by Economic Sector: Since the Air District has identified Stationary Sources, Transportation, and Buildings & Energy as key focus areas, we suggest that ongoing stakeholder groups for each of them be set up to work with District staff to further discuss and develop specific strategies to achieve the short, medium, and long-range emission reductions necessary, as well as help scope out education and partnership campaigns.

64) 5/3, Stationary Sources, ¶3:

    a) "The Air District has developed a Refinery Emissions Reduction Strategy to reduce criteria air pollutant emissions by 20 percent from oil refineries and to reduce exposure, described in more detail in Chapter 4."

    Exposure to what? By how much? If you are mentioning the RERS here, it needs to have a minimum level of detail.

    b) "In addition, three of the proposed control measures in the Plan support and expand the climate component of the Refinery Strategy work by requiring improved refinery emissions inventories, fenceline monitoring and feedstock data (SS10), and by limiting GHG emissions from these facilities (SS11 and SS12)."

    The inclusion of SS11 in the Plan strikes us as disingenuous and somewhat alarming. SS11 is clearly instantiated in Regulation 12-16, on which we and many other stakeholders have been involved in working for years, and against which the executive staff and legal counsel of the Air District have fervently opined for years, to the point of unprecedentedly hand-picking an Advisory Council guaranteed to issue a report disapproving of the regulation and bringing ARB leaders in multiple times to strike jurisdictional fear in the Board of Directors and the Advisory Council. If staff is actively advocating against a measure, the Air District cannot also include it to inflate the comprehensiveness of its planning efforts. The inclusion of this measure greatly alarms us vis-à-vis what it represents about the genuine dedication the Air District has to do what is necessary to achieve its policy goals. If there are any other elements of the control strategy with the same lack of epistemological certainty as SS11, this Plan is worth only the paper on which it's printed. **We would ask that any measures Air District staff is actively opposing be removed from the control strategy.**

    c) The characterization of SS12 as "limiting GHG emissions" is totally inaccurate, as the description of the control measure clearly states that "(e)mission reductions are not expected from this measure" and, to the contrary, that "facility GHG emissions may still increase." If it is going to be mentioned in the text, it needs to be reformulated to accurately reflect the effects of its implementation.

65) 5/4, Stationary Sources, ¶1: This section nearly omits, and greatly underrepresents, the importance of reducing combustion of fossil fuels for achieving both public health and climate protection benefits. Super-GHGs are important, but there needs to be far more balance in the Plan's priorities. Eliminating combustion in

a feasible and responsible manner will take many tiered actions over an extended period of time. Air District action *must* push that process along in parallel with quick action on super-GHGs. The longer the glide path for business as usual, the less private and social economic disruption will be expected to occur. The Air District is not doing industry any favors with respect to their business planning by delaying meaningful action on combustion (including regulatory actions with future effective dates).

66) 5/4, Table 5-1: We ask that you consider where Bay Area refining will need to be in 2030 and 2050 for the region to meet its climate targets. Do SS1-SS12 ensure that those emissions are being reduced in a commensurate fashion through 2030? If not, how do you plan to achieve those reductions?

67) SS4: 5/5: "Review the results of refinery flare monitoring . . . in the Bay Area ~~to~~ and identify amendments that ~~may~~ will make the rules more effective at reducing emissions."

68) SS5:

a) 5/5: The Air District must take decisive action. You do not need a plan/strategy to simply "consider" something. In that vein: "~~Consider amendments to~~ Amend Air District Rule 9-1 to achieve the lowest . . ."

b) The Regulatory Context and Background for SS5 demonstrates there is no question that an SO_2 limit of 10 ppm at sulfur recovery units is achieved in practice. The two Bay Area units needing the deepest reductions to comply with 10 ppm are so old, they could easily be considered well past their design lives. Surely the multi-year avoided costs of either not replacing or controlling them better long ago indicate that this control measure should presume a baseline emission reduction to 10 ppm. The only consideration at stake here is whether an even lower limit of 5 ppm should be established.

c) SS-14, Implementation Actions: We propose changing Implementation Actions for SS5 to read:

- ~~"Consider a~~Amend~~ments to~~ Rule 9-1, *Sulfur Dioxide* to achieve an SO_2 limit of 10 ppm ~~the lowest SO_2 emission feasible~~ through increased efficiency of sulfur recovery units and improved tail gas treatment ~~(i.e., an SO2 limit of 10 ppm).~~, or
- Consider amendments to Rule 9-1 to achieve the lowest SO_2 emission feasible through installation of wet caustic scrubbers (i.e., an SO_2 limit of 5 ppm)~~.~~," and
- Review cost effectiveness and incremental cost effectiveness of controls required to achieve the SO_2 limit~~s~~ of 5 ppm ~~and 10 ppm~~."

69) SS6: 5/5: "~~Consider amendments to~~ Amend Rule 9-1 ~~that would~~ to reduce the sulfur limits . . ."

70) SS7:

a) Please clarify if all sources subject to the South Coast Air Quality Management District limit of 0.14 pounds of SO_2 per ton of acid produced (10 ppmv) are able to comply. If not, please explain the basis for the Air District's proposed limit of 0.2 pounds per ton of acid produced, a level that is 43% higher than the South Coast limit. Merely citing ten year-old permit requirements from jurisdictions that may or may not be as rigorous as we expect in the Bay Area is not sufficient. Also, please provide an

estimate of the expected reductions in secondary $PM_{2.5}$ emissions expected in Table H-1, were the limit set at 0.14 or 0.2 pounds per ton of acid produced.

b) Please include mention of PM throughout all sections of the Plan where SS7 is mentioned and associated pollutants are noted (e.g., Table 5-1 and other places).

c) The Implementation Action language should assert that a limit will be established, not merely considered. A limit of 0.2 pounds of SO_2 per ton of acid produce is well documented to have been achieved in practice for at least the past ten years. If sources are complying with the South Coast requirement, the lower limit of 0.14 pounds should be established. Air District Regulation 9-1 hasn't been amended since 1995, over twenty years ago. It's long past the time where such equivocal language as "consider amendments to Rule 9-1" is a remotely acceptable stance. This is especially true because it is also a $PM_{2.5}$ reduction measure, and the Air District has long established that fine PM is the most serious health threat to Bay Area residents.

d) Please make the following change on 5/5 and SS-20, Implementation Actions: "~~Consider amendments to~~ Amend Rule 9-1 ~~that would~~ to limit SO_2 emissions . . ."

71) SS9:

a) Trying to shoehorn Enhanced NSR Enforcement for Changes in Crude Slate into the definition of Alter under 2-1-233 is misguided, unnecessary, and could create confusion. By its very nature, a change in crude slate results in a change in emissions, and already meets the descriptions in 2-1-233 and 2-1-234 of a "physical change, change in the method of operation, or other similar change at an existing source that may affect air pollutant emissions." Thus, a change in crude slate is already subject to Rule 2-1-233 or 2-1-234 as currently written. The fact that the Air District has not recognized this for refinery crude formulations before now is an oversight that needs to be corrected. The change needed is in Air District permitting procedure, not the language of 2-1-233 or 2-1-234.

b) A more appropriate first-stage approach to SS9 would be for Air District engineering staff to expand the number of material codes for the refining process to include expected crude slate formulations and conservative estimates for Emission Factors associated with each of those crude slates. New emission factors can be added as new crude slate formulations are proposed for use. The identification of changes in upstream inputs, process-specific calculations, and resultant emission factors is all standard practice for how the Air District calculates and tracks emissions via the permitting process.

c) In order for "Enhanced NSR Enforcement for Changes in Crude Slate" to have meaning going forward (i.e., to be able to determine whether a change in crude slate formulation triggers review as an alteration or a modification), baseline crude slate formulations need to be established for each refinery and expressed as reasonable permit limits based on historical operating assumptions. This would be accomplished through adoption and implementation of Rule 12-16.

72) SS11:

a) The Plan states that the Refinery Emissions Reduction Strategy "ensures that refineries are taking the strongest feasible steps to reduce emissions and minimize their health impacts on neighboring residents and the region as a whole." SS11 is both eminently feasible and fundamentally reasonable: If

you're heading north, and you need to go south, the first sensible thing to do would be to stop going in the wrong direction.

b) SS11 will prevent GHG emissions from refineries from increasing. SS12 will not; it allows GHG emissions from refineries to *rise*, even while the Plan asserts they must be lowered. The RERS is supposed to *reduce* emissions from refineries, but if the Air District is not ready to do that here, these facilities must at least be forced to stop making our collective problem deeper and more difficult to address successfully. We strongly support SS11.

73) SS12:

a) The title of the measure on SS-12 and elsewhere needs to be revised to remove the word "Limit," as the description of the control measure clearly states that "facility GHG emissions may still increase."

b) To that end, we believe we are well past the point where the Air District's climate planning should include measures which state "GHG emissions may still increase." Does the baseline carbon intensity figure for each facility that is proposed by this control measure decline (rapidly) over time like the dotted line in Figure 3-9? If not, why not? Given that carbon intensity "limits" can be exceeded, it seems this measure leaves refineries perfectly free to pollute all they want, including free to pollute local communities in the Air District to generate product for export. *The region needs real GHG emission reductions, including from refineries.*

c) We don't believe it is accurate to state (Regulatory Context and Background) that "(t)he emission profiles, and resulting climate and health impacts, of these new sources of crude oil are not well understood." There are assays for both diluted bitumen and Bakken crude that are used to calculate emissions from transporting and processing these crudes. Air District and refinery industry engineers do this sort of calculation as a matter of course. The reason refineries are adding hydrogen capacity is precisely because they understand the increased emissions resulting from processing tar sands, and they are gearing up to pre-clean it. The emissions from the hydrogen plants are also well understood.

d) This control measure would allow refiners to increase their carbon intensity by purchasing allowances in the Low Carbon Fuel Standard (LCFS) pollution trading market. This accounting scheme does not ensure local reductions of PM, GHGs, and TACs, shirking the Air District's core mission to protect public health and climate—and perpetuating the refining industry's own shirking, the externalization of its costs as damages to public health and climate borne by all of us. The purpose of a carbon intensity rule should be to hold the line or decrease carbon intensity at refineries, not pretend to set a limit then provide a means to avoid the limit and allow more tar sands to be processed.

e) The offset scheme would allow increased biofuel production to offset increased carbon intensity from processing tar sands. The lifecycle improvement from the use of biofuels is not well understood, so errors or purposeful misrepresentations can easily be made. There's no reason for the Air District to incentivize biofuel production in this way, when we know transportation must be electrified to the fullest extent possible, and when the Bay Area is already showing significant leadership in the transition to electrified transportation.

f) The Air District's Board of Directors passed a Resolution opposing the Canadian Tar Sands project. It would be hypocritical to adopt a GHG reduction rule that incentivizes tar sands processing.

g) As you must know, the LCFS exempts all emissions associated with refined fuels that are exported for use outside the state from its allowance purchase requirements—and Bay Area refineries already increase exports when statewide demand for fuels declines, a trend which the Plan states as a fact to be accepted will likely *increase* over time as regional demand declines. Thus, this measure would encourage each refiner to gain a competitive advantage by refining cheaper, higher-carbon oil and further increasing production for export. That would increase emissions from higher-carbon refining for export and shift tailpipe emissions elsewhere as more refined fuels are exported. The higher-carbon refining for export also would worsen disparate localized health impacts and environmental injustice. Refinery GHG and particulate emissions are strongly correlated, and low-income communities of color already are disproportionately burdened by refinery emissions of this toxic GHG co-pollutant. Therefore, the design of this measure is fatally flawed.

   If you're heading north, and you need to go south, the first sensible thing to do would be to stop going in the wrong direction. This measure does not even ensure that our emissions stop increasing. Meanwhile, the economic benefits to reducing PM and GHG are staggering, even by your conservative valuation.

   SS12 needs to require a direct emissions control approach instead of pollution trading or it should be dropped.

74) SS13:

a) 5/6: "In addition, ~~consider~~ amend~~ing~~ Rule 8-37 to limit emissions. . ."

b) SS-35, Federal: This section needs to be updated to reflect the severe changes to the federal regulatory environment on methane (and across the board).

c) SS-36, State: Additionally, this section needs an update. It currently states that most aspects of ARB's oil and gas rule will come into effect on January 1, 2017, which has now passed. What is the current status of ARB's methane rule?

d) SS-37, Implementation Actions, ¶1: "The Air District will also ~~consider~~ <u>propose</u> amending Rule 8-37 to ensure it properly addresses local needs . . ."

e) It is inexcusable, knowing what we know now, to regulate natural gas and crude oil production, processing, and storage and *not* regulate methane. This exemption should have been removed many years ago and should be done without any further delay.

   Air District compliance and enforcement staff has long been aware of the vast amount of leaking from Bay Area gas wells and the potential fire and explosive hazards that represents. The time to clean up these dangerous and climate-destroying operations is long overdue. The 2010 Clean Air Plan pointed this out, and the exemption for methane was removed from Regulation 2; however, methane exemptions were left intact in virtually all the Regulation 8 rules. SSM 4 from the 2010 Plan promised to "reconsider" the methane exemption in Rule 8-37 and control excess emissions. This action never

happened. In fact, Rule 8-37 hasn't been amended in 27 years. Air District staff understand very well how to control venting and leaks, so there is no reason to hold back on amending Rule 8-37, and every reason to act quickly. It is highly likely compromises will be made in state rulemaking that needn't restrict local action. To be clear, *there is no reason to delay the commitment to amend Rule 8-37.*

f) The first order of business under this control measure appears to be waiting for ARB to complete its oil and gas rule, followed by a gap analysis to determine further Air District action that will be necessary. Meanwhile, methane continues to be vented to the atmosphere. *Waiting for ARB to progress further is not a control measure and is only acceptable if a backstop comes online very rapidly, as spelled out in SS16 (Regulation 8-2).*

g) We do not seek duplicative regulation; at the same time, redundancies are common when dealing with issues of public safety and welfare and are a far better outcome than falling short on such matters! Regulation of deadly air pollutants is no different. The Air District, not ARB, has primary responsibility for protecting public health and climate in the region. You can and should lead action in this area, not just follow behind.

h) The emissions reductions listed for this measure seem to arise wholly from those strategies in ARB's rule—which should be counted as state actions and not regional actions. The emissions reduction estimates omit any mention of reductions achieved through amending Regulation 8-37.

i) We ask that you consider what status oil and natural gas production, processing, and storage operations in the Bay Area will need to have in 2030 and 2050 for the region to meet its climate targets. Does SS13 ensure that those emissions are being reduced in a commensurate fashion through 2030? If not, how do you plan to achieve those reductions in the region?

75) SS14:

a) 5/6: "Estimate the magnitude and approximate composition of the fugitive emissions from Bay Area capped wells~~.~~ and rapidly ~~E~~establish emission limits for methane. . ."

b) SS-40, Brief Summary: "This control measure seeks to . . . gas wells, and to ~~explore~~ propose rulemaking to address these emissions."

c) SS-41, Implementation Actions, 3rd bullet: "~~Consider~~ Propose rulemaking for these facilities . . ."

d) The first order of business under this control measure appears to be engagement with DOGGR (good luck!) and research activities, followed by emissions inventorying, before finally rulemaking can be considered. Meanwhile, methane continues to be vented to the atmosphere. Given the miniscule cost of a well plug versus the staggering cost to public health of TAC and GHG emissions from these sources, rulemaking must be frontloaded. *We support your plan of action on this measure only if a backstop comes online very rapidly, as spelled out in SS16 (Regulation 8-2).*

e) We do not seek duplicative regulation; at the same time, redundancies are common when dealing with issues of public safety and welfare and are a far better outcome than falling short on such matters! Regulation of deadly air pollutants is no different. The Air District, not ARB or DOGGR, has primary

responsibility for protecting public health and climate in the region. You can and should lead action in this area, not just follow behind.

76) SS15:

a) The first order of business under this control measure appears to be waiting for CPUC to complete its lengthy SB 1371 regulatory process, followed by a gap analysis to determine further Air District action that may be necessary. Meanwhile, methane continues to be vented to the atmosphere. *Waiting for CPUC proceedings to transpire is not a control measure and is only acceptable if a backstop comes online very rapidly, as spelled out in SS16 (Regulation 8-2).*

b) We also have grave concerns regarding the robustness of CPUC's eventual regulation in this area, given the infamously unduly cozy relationship the agency has with the party that owns 90% of the gas pipeline in the Air District.

c) "Phase 2" of the potential Air District program in this area calls for an audit of the pipeline system. In the case of PG&E, however—who owns the preponderance of pipeline in the region—we already know they were unable to provide federal and state regulators with basic information on a surprising portion of their pipeline network following the San Bruno pipeline explosion. We would hope this audit would utilize the extensive record in that proceeding and not spend critical time duplicating the same data set.

d) We do not seek duplicative regulation; at the same time, redundancies are common when dealing with issues of public safety and welfare and are a far better outcome than falling short on such matters! Regulation of deadly air pollutants is no different. The Air District, not ARB, CEC, CPUC, CUPA, or PHMSA has primary responsibility for protecting public health and climate in the region. You can and should lead action in this area, not just follow behind.

e) Where will the natural gas distribution system in the Bay Area need to be in 2030 and 2050 for the region to meet its climate targets? Does SS15 ensure those emissions are being reduced in a commensurate fashion through 2030? If not, how do you plan to achieve those reductions in the region? *Rulemaking needs to be added to this control measure to ensure GHG reductions from natural gas distribution systems that are not covered by SS13.*

77) SS16:

a) 5/6: This control measure needs to be expanded upon and separated into its component parts here and in Volume 2 to ensure a lack of duplicative actions or double-counting. The public is much more interested in seeing forward-looking control measures in the Plan that are focused on basin-wide emission reductions than they are in seeing the Air District enumerate regulatory actions that you're already taking or have already taken; however, the action as presented is too expansive to be actionable. It is unclear precisely what additional actions are included in this control measure, as it mentions actions already taking place under SS13-SS15, WA1-WA2, WR1, and AG2-AG4, among others.

b) SS-49, Regulatory Context and Background, ¶2: This section needs to be updated to reflect the severe changes to the federal regulatory environment on methane (and across the board).

c) SS-50, Regulatory Context and Background, ¶3: ARB's methane reduction goals may be 40-45 percent below current levels by 2030, but we may need to reduce methane emissions more in the region if, e.g., we are behind our emission reduction targets for CO_2.

d) It is good to see action on SS16 prioritized for 2017, as we recognize the importance of acting quickly to mitigate super-GHGs. With this in mind, we find the Implementation Action commitments overly cautious. Rather than "consider amending Regulation 8-2 to prohibit significant leaks of methane throughout the Air District," a first priority should be a *commitment* (not a consideration) to amend Regulation 8-2 to prohibit significant methane leaks *and* to delete this exemption, since "best modern practices" have been proven inadequate:

> 8-2-110 Exemption, Natural Gas: Emissions from any operations consisting entirely of natural gas, provided best modern practices are used, are exempt from this Rule.

e) Furthermore, the Air District should *commit to* (not consider) removing the methane exemption from all existing rules. The *2010* Clean Air Plan already made the case for doing this, as does the 2017 Plan.

f) SS-51, Prohibit Significant Methane Leaks: "To prevent this potential scenario, the Air District will ~~consider~~ propose rule amendments to Rule 8-2 . . ."

g) SS-51, Natural Gas and Oil Production: "In addition to collaborating with ARB staff on their oil and gas rule, the Air District will ~~consider~~ propose amending its existing rule . . ."

h) SS-52, Composting and Anaerobic Facilities: "The Air District will ~~consider~~ propose a rule requiring best practices . . ."

i) SS-52, Publically Owned Treatment Works: "The Air District will seek . . . at POTWs in order to inform ~~potential~~ rulemaking to address these potent greenhouse gases."

j) SS-52, Remove Methane from Relevant Rules: "Air District staff will examine emissions and other relevant data to determine ~~if~~ where removing the exemption from these rules would result in methane emissions reduction, and then make those changes."

k) SS-52, Implementation Actions, 2nd bullet: "~~consider~~ amend~~ing~~ Regulation 8-2 . . ."

l) SS-53, Implementation Actions, 2nd bullet: "~~consider removing~~ remove the methane exemption . . ."

m) It is totally flabbergasting that the Air District has continued to fail to regulate methane in 49 out of 53 rules in Regulation 8, despite clear knowledge for an entire generation of its destructive power. Needless to say, a much more proactive approach from the Air District will be necessary to achieve the region's climate targets. This blanket exemption should have been removed many years ago and should be done without any further delay!

78) SS17:

a) We suggest this measure's title be changed to "Permit Review for GHGs."

b) The Air District's Climate Protection Program dates back to 2005. In all this time, the Air District's only permit-related regulatory action has been to:

- Establish a BACT threshold in Regulation 2-2 for new and modified sources so high that it will never be triggered (75,000 tons per year), and
- Amend Regulation 2-1 to exempt all other new and modified sources of GHG emissions from any permit review at all:

> **2-1-319 Source Expressly Subject to Permitting Requirements:** Notwithstanding any exemption contained in Section 2-1-103 or Sections 2-1-114 through 2-1-128, any source meeting any of the following criteria shall be subject to the requirements of Section 2-1-302:
>
> 319.1 The emission rate of any regulated air pollutant (except greenhouse gases) from the source is greater than 5 tons per year, after abatement.

We find this simply astounding. The Air District's lack of serious action aimed at stationary sources for so many years has much to do with the founding of 350 Bay Area and was the specific prompt for the creation of its Bay Climate Action Plan campaign.

c) At last, 12 years since the Climate Protection Program was created, the Air District will set a meaningful BACT threshold for GHG emissions. *We propose that the threshold be set at 500 pounds per day.*

d) We absolutely expect this Plan to incorporate a commitment to delete the GHG exemption in Regulation 2-1-319.1 and set an appropriate threshold for when GHG emissions from new and modified sources will become subject to permit requirements. *We propose that threshold be set at 2,500 tons per year.*

e) In addition to removing the GHG exemption from Regulation 2-1 and setting a lower BACT threshold for GHGs, Regulation 2-2 should be overhauled to provide a complete framework to regulate GHG emissions from new and modified sources. Here are brief examples of program improvements needed:

1. A GHG emission threshold to determine when a new or modified source requires permit evaluation
2. A no-net GHG emissions increase program that assures impacted communities are not burdened with increased emissions, and
3. A regulatory requirement to require review of clean energy alternatives to proposed new and modified sources and abatement devices.

79) SS18:

a) 5/6: This control measure needs to be expanded upon and separated into its component parts here and in Volume 2 to ensure a lack of duplicative actions or double-counting. The public is much more interested in seeing forward-looking control measures in the Plan that are focused on basin-wide

emission reductions than they are in seeing the Air District enumerate regulatory actions that you're already taking or have already taken.

b) The technologies for electrifying the buildings and transportation sectors are already being deployed; the primary obstacle to get on track maximizing GHG reductions from these sectors is a lack of political will. It is generally understood that decarbonizing industry will take longer, however. This isn't merely a matter of finding add-on controls, as has been much of the focus of air pollution control for decades, nor is it solely a matter of finding clean replacement technologies. In many instances, it will require re-engineering efforts and the rebuilding of portions of our industrial infrastructure. The Basin-Wide Combustion Strategy Implementation Actions should include education and collaboration components focused on different operational and source-type sectors. We encourage the Air District to hold community forums for operators, researchers, and interested members of the public to inform all parties about the Air District's deep de-carbonization goals and encourage working partnerships to find solutions, including incentive funding, assistance from our educational institutions, and increasing regulatory action. All stakeholders need to be involved in this effort.

c) SS-60, Regulatory Context and Background, ¶2: "The second phase would involve developing . . . through increased efficiency and regular use of BACT to substitute electric applications for combustion wherever feasible."

d) SS-61, Phase 2: "Combustion sources will be evaluated in order to identify cost-effective and technically feasible efficiency and technology improvements that would result in GHG and criteria emission reductions. These evaluations . . . and 2) the energy efficiency and new technological opportunities available for each source-type."

e) SS-61, Implementation Actions, 2nd bullet: "promote energy efficiency and technological improvements . . ."

f) SS-61, Implementation Actions, 4th bullet: "prioritize the evaluation . . . and the energy efficiency and new technological opportunities for each source-type"

g) This measure would, among other things, set CO_2/barrel limits on each refinery's emissions. That of course requires a reliable and transparently verifiable CO_2/barrel measurement. Yet the emissions/barrel refined products metric suggested in the description of this measure cannot be verified, established as an emission limit, or enforced based on publicly reported data at this time. The Air District has not reported publicly on any refiner's product volumes and, indeed, has said that it cannot do so due to confidentiality concerns. Thus, it is very unlikely that you could verify, establish, and enforce reliable and effective limits on GHG emissions per gallon of refined product.

On the other hand, the emissions/barrel oil refined metric that the Air District has proposed in discussions of Regulation 13-1 has been shown in publicly reported data to be a reliable metric for refinery emissions associated with changes in oil quality. Therefore, SS18 should be revised to include limits based on refinery emissions per barrel of oil refined.

h) Increasing combustion efficiency is great; however, given the advanced nature of the climate crisis and the gulf separating our society from its climate targets, we need to be thinking about how we are going

to phase out most sources of combustion in the next 30 years. This rule does not even take a stab at envisioning that. Where will fossil fuel combustion in the Bay Area need to be in 2030 and 2050 for the region to meet its climate targets? Does SS18 ensure those emissions are being reduced in a commensurate fashion through 2030? If not, how do you plan to achieve those reductions in the region?

i) To that end, **we urge the Air District to add a Stationary Source Control Measure to specifically identify and mandate decarbonized abatement to the fullest extent possible.** This has been presented as **SSX1**, at the end of the Stationary Source Control Measures in our comments.

j) We also suggest promoting clean energy generation at stationary sources wherever feasible through permitting requirements and CEQA mitigation guidance to reduce or offset fossil fuel combustion.

80) SS19:

a) 5/7: "Amend Rule 9-13 to impose a standard for SO_2 consistent with . . . detached plumes, and ~~consider~~ propose amendments to the rule to reduce GHG emissions."

b) The Bay Area's only cement manufacturing plant is one of the region's ten largest industrial sources of GHGs. The Plan tiptoes into the subject of partial fuel switching from petroleum coke to, maybe, 10% biomass, but sets no actual standard, and doesn't project any GHG reductions from such an effort. There is already existing research demonstrating the feasibility of using biowaste for fuel at cement manufacturing plants. This is one discrete industrial sector where fuel switching is actually ready to be tried.

c) We urge the Air District to actually set a path for GHG reductions from cement manufacturing. At minimum, state explicitly that the Air District will develop a new rule based on existing studies that would set a percent waste biofuel requirement with a future effective date, or even a series of future effective dates with increasing fuel switching requirements. This is a tangible opportunity for the Bay Area to show real climate protection leadership.

81) SS20: 5/7: "~~Consider reducing~~ Reduce public exposure to toxic air contaminants . . ."

82) SS22:

a) Stationary gas turbines are GHG sources; why are GHGs not targeted in this measure? Is reducing NOx from GHG sources without concurrently reducing GHG a good use of a multi-pollutant strategy and Air District resources? Will this source category be covered under SS18 rulemaking?

b) What technology will need to be active instead of stationary gas turbines by 2030 and 2050 for the region to meet its climate targets? How do you plan to engender that technological change in the region?

83) SS23:

a) If LAER emission levels for landfill gas flares are achieved in practice around the country, there shouldn't be much of a question that those emission levels should be mandatory for Bay Area landfill gas flares. We note that no technical issues or impediments are identified for this new rule. A

technology both achieved in practice and applied uniformly for a source category should be considered RACT.

b) If not included under this control measure, we want to ensure that regulation of GHG emissions from all biogas and non-refinery flares are included in WA1 and WA2.

84) SS30:

a) 5/8: "Reduce NO_x emission limits on new and replacement central furnace installations. ~~Explore potential~~ Propose Air District rulemaking options ~~regarding the sale of~~ to eliminate the use of fossil fuel-based space and water heating systems for both residential and commercial use over time."

b) What will need to be happening with residential and commercial furnaces in 2030 and 2050 to ensure the region meets its climate targets? These devices will need to be phased out. *Rulemaking options must be considered that reduce and eliminate the use of fossil fuel-based space and water heating over time.* Given an average product life of 20 years, it's critical to start sending the market signal now for sources like these. Clean space heating technologies are already being installed in new and existing Bay Area homes. In the context of aiming to 2050 or even 2030, it is not too soon to contemplate the day when the sale of fossil fuel furnaces could be prohibited.

c) The Air District can use its authority under CEQA to propose GHG mitigation for new buildings to include requiring that a certain percentage of units in new developments use clean energy for space heating. This would help move the needle toward clean heating becoming standard practice.

85) SS31: Please prioritize black carbon in this and all subsequent PM control measures, wherever possible. As both a source of fine PM and a super-GHG, reducing black carbon will have the greatest benefits in the short term for public health and the climate.

86) SS32:

a) 5/8: "Reduce emissions of DPM and black carbon from BUGs through Draft Rule 11-18, resulting in reduced health risks to impacted individuals, and in climate protection benefits. Propose Air District rulemaking options to eliminate the use of fossil fuel-based BUGs over time."

b) What will need to be happening with diesel backup generators in 2030 and 2050 to ensure the region meets its climate targets? These devices will need to be phased out. *Rulemaking options must be considered that reduce and eliminate the use of fossil fuel-based backup generators over time.*

c) Gas-powered BUGs should be substituted for diesel models to reduce PM, BC, and TAC until electric alternatives reach practical feasibility. The trend is already moving away from installing new diesel generators to installing gas-powered ones instead. This is because improvements to gas generator design have obviated the need for diesel fuel, as well as the fact that particulate controls on diesel BUGs are unreliable and degrade over time. There is at least one Bay Area business that applied for, and was actually issued, permits to install bypass valves to avoid even using the installed particulate control, in blatant violation of conditions established in the same permit. Diesel BUGs are problematic and virtually unnecessary in 2017. It is time to ban them altogether, unless there is a proven use that cannot be served by a gas-powered generator.

d) There is a disturbing trend in which Bay Area residents are installing BUGs. Certainly there is no reason for these to be diesel-powered, and reasonable people could question whether they should be permitted at all. Installation of diesel-powered BUGs at residences should be banned, and the Air District should publicly address the question of whether they should be permitted at all.

87) SS33: 5/8: "~~Consider~~ Propose PM limits . . ."

88) SS34: 5/8: "~~Consider~~ Propose further limits . . ."

89) SS38: 5/9: "~~Consider~~ Propose applying the Air District's . . ."

90) **SSX1 (Proposed) Decarbonize Abatement Devices and BACT Determinations:**

a) The Basin-Wide Combustion Strategy set out in SS18 does not address combustion-based control devices. We urge the Air District to add this Stationary Source Control Measure to specifically identify and mandate decarbonized abatement to the fullest extent possible.

b) An excellent candidate for immediate action is the replacement of thermal oxidizers with catalytic oxidizers. We know there are operations that cannot be controlled by catalytic oxidation; however, many sources currently using thermal oxidizers could be abated without combustion.

c) The BACT Handbook should be updated to mandate fossil-free options where they are feasible and cost-effective, and/or available and used in practice.

d) The Air District should develop RACT Rules to require replacement of existing fossil fuel-using abatement devices with alternatives, to the extent they are already achieved in practice.

e) **SSX1 should be added to the 2018 Regulatory Schedule.**

91) TR1: Take more actions to promote telecommuting, including more proactive education efforts. The Bay Area is the birthplace of telecommuting and has a booming economy of technology companies. Where better to pioneer clean air teleworking?

92) TR2:

a) Amend Rule 14-1 Bay Area Commuter Benefits Program as follows:

14-1-301 Commuter Benefit Options: No later than six (6) months after adoption of this rule by the District Board of Directors and Concurrence by the MTC Commission, whichever is later, each employer subject to this rule Must offer, either directly or through a TMA as defined in Section 14-1-212, at least ~~one~~ two of the following commuter benefit options to all covered employees.

In the three years since Rule 14-1 was adopted, many employers are already stepping up to offer improved commuter benefits for their employees, and there is general awareness (and dismay) about the Bay Area's abysmal traffic congestion. Unfortunately most employers have opted to only to offer employees the opportunity to avoid paying taxes on their commute costs, as provided by 14-1-301.1. It's time to expect more. It is reasonable for employers subject to Rule 14-1 to either offer an employer-paid benefit for transit costs or employer-provided transit. We can't clean the air, protect

the climate, improve the quality of life for commuters, and improve worker productivity unless all do their part.

b) Offer coordination and technical assistance to connect businesses and shuttle providers. Help shuttle providers form combined services that cover more than one building or location. The cost of constructing and operating buses is less than that of trains in most areas.

c) Link the award of Transportation Funds for Clean Air grants to localities adopting BAAQMD-identified best practices for:

1. Transportation Demand Management policies for new development
2. Transit benefits ordinances, and
3. Parking policies

93) TR3-TR5:

a) These are listed as funding-only measures. We suggest the opportunity to facilitate best practices on local and regional transit. How can the Air District partner with MTC, CalTrans, cities and counties, and other stakeholders to promote climate- and health-friendly bus and rail service that is efficient and accessible?

b) We suggest working with MTC and North Bay transit providers to provide east-west transit service in the North Bay as one productive measure.

94) TR6: This is listed as a funding-only measure. Can the Air District partner with MTC, CalTrans, cities and counties, and other stakeholders to further reduce emissions from freeway operations? For example, policies could be enacted to ensure road maintenance projects that reliably cause traffic buildups are conducted in low-smog conditions where feasible.

95) TR7:

a) Increase funding of the Bikeways, Roads, Lanes and Paths program.

b) Increase the measure's focus on providing secure bicycle parking at transit stations and stops.

96) TR8: Continue and expand funding for introducing electric car sharing into underserved communities.

97) TR12:

a) Include/expand idling strategies as part of smart driving or a stand-alone program.

b) Create a program to provide school districts with signs for school districts regarding anti-idling laws and fines.

c) Pilot a program to allow for trained citizen enforcement of anti-idling laws, based on a program under consideration by New York City.

98) TR14:

a) Increase funding for the vehicle buyback program and "Plus Up" program and provide incentives towards purchase of zero-emission vehicles. Regional clear air funds should exclusively go towards zero-emission vehicles. Funding a transition technology like plug-in hybrid vehicles that still combust fossil fuels and emit PM, GHGs, and other pollutants does not make sense when zero-emission technology exists.

b) Increase funding for both workplace charging and public on-street charging, using grants or a revolving fund.

99) TR16: 5/12: "~~Consider~~ Propose a rule that sets . . ."

100) TR17: The Air District should link up with the international effort to limit aviation emissions. We may be able to pilot metropolitan-scale solutions for the international community.

101) TR19: We would like to ensure that the level of incentive funding in this measure is directly correlated with the amount of emissions reduction the new vehicles achieve.

102) TR20: This is listed as a funding-only measure. We recommend working as well with the state and with Port Commissions in the region to strengthen rules surrounding emissions of ships while at port.

103) TR22: We would like to ensure that the level of incentive funding in this measure is directly correlated with the amount of emissions reduction the new engines achieve.

104) TR23: This is listed as a funding-only measure. With regard to gas-powered leaf blowers and similar devices, in light of the fact that some cities have banned them for years and their disproportionately large emissions profiles, incentive funding is insufficient. **This control measure needs to be a regulation banning the sale of gas-powered leaf blowers and similar devices in the Bay Area.**

TR-100, ¶4 states: "Electric powered equipment has begun to gain market share, particularly with lawnmowers, chainsaws, leaf blowers and other small equipment used by homeowners." The region has passed the point where incentive funding makes sense. Sale of gas-powered items listed above needs to be phased out. How exactly will climate targets be reached if actions like this one are not taken?

If a cleaner technology is achieved in practice, it becomes mandatory for everyone. That's how the air gets cleaner. This should be no different. We propose setting a four-year timeline for banning gas-powered versions of this equipment, along with an education/compliance campaign to get it implemented. The Air District knows how to get this done very well. **TR23 should be added to the 2017 Regulatory Schedule.**

105) 5/16, Energy, 7th bullet: "Support the development of bioenergy to displace electricity generated from fossil fuels <u>for applications where renewable electricity is unsuitable</u>."

106) 5/16, Energy, 8th bullet: "Expedite Air District permitting for new renewable energy~~, biofuel,~~ and high-efficiency combined heat and power (CHP) facilities<u>, as well as for biofuel facilities where necessary</u>."

107) EN1:

a) 5/16: This control measure needs to be expanded and separated into its component parts here and in Volume 2 to ensure a lack of duplicative actions or double-counting.

b) EN-2, Regulatory Context and Background: With the launch of PCE and SVCE, the formation of CalCCA, and a lot of action on CPUC proceedings, your section on CCAs needs an update.

c) Implementation Actions, 1st bullet: What actions does this implementation action actually result in? What does this *mean*? *How* specifically will engaging with load-serving entities maximize the amount of renewable electricity in the Bay Area?

d) Implementation Actions, 2nd bullet: It is a bit late to be providing start-up funding for CCAs in the region, given that most are already operational, but not *too* late: Contra Costa County could certainly use the promise of this funding immediately! The CCA development process there is at a critical phase, as county supervisors decide whether to pursue their own local program in the county or to join another, either MCE or Alameda County's incipient program. A lack of start-up funding, financing options, and institutional capacity are all major obstacles to development and launch of many CCA programs, and Contra Costa's is no exception. We urge Air District staff to reach out immediately upon receipt of this comment to discuss potential facilitation and funding roles the Air District might be able to play for Contra Costa County's CCA development.

   We would also note Solano County, the cities of Napa County, and San Jose as other remaining targets for Air District intervention. Financing assistance may continue to be useful for newly operational programs for some time after launch until they reach full operational strength.

e) Implementation Actions, 3rd bullet: We do not support language as permissive as "Support the development of bioenergy to displace electricity generated from fossil fuels." The fossil fuel industry will attempt to transition to other, lower-carbon fuels and to maintain that market as long as possible, despite the necessity and feasibility of electrification and extensive decarbonization. We are also wary of overly incentivizing the combustion of biomass—thus incentivizing the preservation, rather than reduction, of biomass sources—when we could be reducing waste over time through efficiency, biomimicry, and technological improvement, and instead be using renewable electricity for those applications. We believe the listed stakeholders are all reasonable ones with which to discuss the use of biomass. *In general, however, all references to bioenergy need to make clear that it will be used only where logistically necessary (i.e., for applications that cannot yet be electrified), where it can be utilized on-site to offset energy load, or as created by ongoing operations of other processes.* The language in the draft Plan is too permissive and open-ended.

f) Implementation Actions, 3rd bullet: "Support the development of bioenergy to displace electricity generated from fossil fuels<u>, for necessary applications and/or where sources are already present</u>. Track and participate . . . and waste management <u>agencies</u> to increase use of <u>existing</u> biomass in electricity production <u>and on-site load reduction</u>. The Air District's role may . . . technologies and applications, ~~expedite~~ <u>alter</u> Air District permitting of biofuel facilities . . ."

g) Implementation Actions, 4th bullet: "Expedite Air District permitting for new, large-scale renewable energy generation facilities~~, biofuel facilities,~~ and high-efficiency CHP facilities<u>, as well as for biofuel facilities where necessary</u>."

h) Implementation Actions, 5th bullet: "~~Explore developing~~ <u>Develop</u> grant and/or incentive programs . . ."

i) The control measure seems exclusively focused currently on power plants; we suggest the control measure be expanded to include the possibility of requiring renewable electric generation at permitted sources to offset on-site GHG emissions, as well as the use of on-site renewable electric generation in CEQA mitigation guidance.

j) We also encourage the control measure to be expanded to include advocacy efforts on behalf of community choice programs in regulatory (CPUC, CEC) and legislative settings. The model of Community Choice Energy has been attacked in some way in each of the last few legislative sessions, and the future of the model has been seriously impacted by multiple CPUC decisions in the last few years. The need for advocacy in these forums is ongoing.

108) EN2: This control measure needs to be expanded and broken down into more actionable items. Energy efficiency programs exist from the local to the federal level, and all are administered differently. We suggest that the Air District could play a broader role on energy efficiency than that envisioned here, similar to the clearinghouse and coordination role that you played on Climate Action Plans with the cities and counties in the region.

109) BL1:

a) The Air District appears to have listed several useful actions and organizations that would identify the means to support energy efficiency and solar improvements in various building sectors. You may also wish to partner with Lawrence Berkeley National Laboratory (LBNL) through their High Performance Buildings for High Tech Industries program to improve the energy efficiency of Data Centers, Labs and Clean Rooms.

b) The Air District may also wish to explore the possible application of LBNL's "ENERGY STAR Guides for Energy and Plant Managers."

110) BL2:

a) This control measure needs to be expanded and separated into its component parts. We suggest as examples of additional feasible actions a rule or model ordinance involving distributed generation at commercial/industrial sites and a rule or model ordinance for zero-net energy or carbon-negative buildings.

b) 5/19: "~~Explore potential~~ Propose Air District rulemaking options ~~regarding the sale~~ to eliminate the use of fossil fuel-based space and water heating systems for both residential and commercial use. ~~Explore~~ Provide incentives for property owners. . ."

c) We recommend the Air District look at the possibility of incentive funding the installation or change out of fossil- based space and water heaters with heat pumps and solar water heaters in commercial and multi-family developments. We also recommend consideration of incentive funding for the replacement of other old electricity-based appliances such as refrigerators with new energy-efficient appliances. The funding would complement other utility and tax rebates in these sectors as well as for single-family homes.

d) The Air District may also consider the 2009 “Mayor’s Task Force on Existing Commercial Buildings – Final Report for the City and County of San Francisco” as a model for addressing the reduction of energy use in commercial buildings. It includes recommendations for an ordinance to require ENERGY STAR benchmarking beyond the 2007 California Assembly Bill 1103 and an energy audit of every commercial building in San Francisco. Since the report was completed, the recommended ordinance, “Existing Commercial Building Energy Performance Ordinance,” was unanimously passed by the city’s Board of Supervisors and signed by Mayor Lee in February of 2011.

e) In addition to recognizing the importance of reducing operating energy, steps should be included to reduce the embodied energy of materials and equipment. As operational energy goes down, the significance of energy embodied in materials increases. Currently, over a building’s whole life, embodied energy accounts for roughly 20% of a building’s total GHG footprint. However, in the first 20 years of a building's life, this can be 50% or more. In addition, as we approach zero-net operating energy, these numbers increase, eventually reaching 100%.

   Low-carbon materials provide net GHG emissions reductions now, when GHG emissions reductions are most effective and are needed most because of the delayed impact of GHGs and the self-reinforcing loops that GHGs trigger. Low-carbon construction can reduce the embodied energy of a typical building by 30 to 50%, with 20% achieved through simple substitutions.

   Rapidly renewable plant materials, wood, earth, and stone are the primary low-carbon construction materials. Use of rapidly renewable plants and wood products can actually sequester atmospheric carbon and could be assembled to create a carbon-negative house. Metal and plastics in general have a very high carbon footprint and should be avoided where possible. Concrete, while lower in embodied energy per pound, is used in such great quantities that its global warming impact tends to dwarf that of other materials used in construction. Where concrete is necessary, materials with a global warming potential 30% or more below standard mixes, as established by the NRMCA, should be specified.

f) Equally troubling is the high global warming potential of several commonly used insulation materials. Because of the chemicals commonly used to expand the foam, extruded polystyrene and closed cell spray polyurethane have an extremely high lifetime global warming potential. In a 2010 study by Buildinggreen.com (“Avoiding the Global Warming Impact of Insulation,” by Alex Wilson, Environmental Building News, Vol 19.6), the payback from using extruded polystyrene and closed-cell spray polyurethane foam as an additional insulation layer on the outside of a 2 x 6 framed and insulated house was a minimum of 30 years for a house in a very cold climate like Boston. With less than half of the heating and cooling loads of Boston, the payback time in Berkeley for a similar house would be a lot longer. Another study by Passive House researcher Rolf Jacobson shows payback periods of 20+ years from using these high global warming potential insulations to meet Passive House energy efficiency goals. (“Comparing 8 Cold Climate PH Houses,” by Mary James, Home Energy Magazine, Oct. 2014)

   By limiting the global warming potential of insulation materials to 0.05/sq. ft./R, highly insulated buildings will generally pay back the added carbon footprint of this extra insulation in five years at most. The only insulations that currently don’t meet this standard are extruded polystyrene and

closed-cell spray polyurethane. Manufacturers are developing safer alternative methods of expanding the foam.

g) Finally, while heat pumps are essential to decarbonizing buildings, emphasis should be put on supporting heat pumps that rely on refrigerants with a low global warming potential. The most commonly used refrigerants, R134a and R410a, have a very high global warming potential (GWP) of 1430 and 2100, respectively, over a 100-year time period (IPCC 2007). While it is not known what the rate of leakage is for refrigerants, they can lower the environmental and GHG benefits of specific heat pump models. There are heat pumps, such as the Sanden heat pump water heater, that use CO_2 as a refrigerant, which is preferable from both a climate and public health perspective.

111) BL3: We support Air District incentive funding of energy-efficient pilot projects for both commercial and residential buildings.

112) BL4: Given its focus on both parking structures and residential and commercial rooftops, we strongly recommend integrating a renewable electric generation component into this measure.

113) AG4: SS16 states that methane regulation would be included in AG4, thus GHGs should be added under pollutants affected.

114) WA1: 5/24: "~~Propose amendments to~~ Amend Air District Rule 8-34 to increase stringency . . ."

115) WR1:

a) 5/25: "Initiate a process to better understand and quantify GHG emissions at POTWs. ~~Explore~~ Engage in rulemaking to reduce GHGs . . ."

b) We suggest as additional opportunities for action under this measure a rule or set of best practices on energy efficiency upgrades for water distribution and treatment systems and a rule or model ordinance covering renewable generation on public infrastructure.

116) 5/27, Black Carbon, ¶1: The text states that "BC emissions are projected to increase beyond 2020 as . . . the number of diesel engines in service grows." This prediction is incompatible with Air District success. *In order to protect public health and meet the region's climate targets, diesel engines will need to be eliminated wherever feasible.*

117) SL1: The black carbon-related elements of this control measure are not listed. Please include them. We also suggest splitting this measure into separate measures on methane, black carbon, and refrigerants.

118) 5/31, Protecting Public Health, ¶4: Expected emission reductions from the Plan should be stated as "*at least* X tons per day," etc., given that so many measures do not have emissions gains calculated for them. *This should be pushed through to ES/6.*

119) 5/34, Protecting the Climate, ¶3: Because so many control measures do not have emission reductions calculated for them, and because health costs from pollution are substantially undervalued by the MPEM, the economic value of the benefits from the Plan's control strategy will be significantly higher than the estimated value. "Using a social cost of $62 . . . the anticipated GHG reductions from the 2017 Plan control strategy will have a value of ~~approximately~~ at least $275 million per year . . ."

120) 5/35, Protecting the Climate, ¶3: Given that the estimated emission reductions achieved by the Plan's control strategy by 2030 are far, far short of what is needed for the region to meet its climate targets, we reject as false the statement that "(t)he control strategy described in the 2017 Plan should serve as a solid foundation to guide our efforts to reduce emissions of air pollutants and GHGs over the next five to ten years." In ten years, it will be 2027, with the state's interim climate goal just around the corner. Will the Air District be poised to meet or exceed that goal for the Bay Area?

121) 5/37, Reduce Demand for Fossil Fuels, ¶1: Making combustion more efficient is great, but we also need to be reducing it.

122) 5/37, Reduce Demand for Fossil Fuels, ¶2: This is wholly inaccurate. The description of SS12 clearly states that "(e)mission reductions are not expected from this measure" and, to the contrary, that "facility GHG emissions may still increase."

123) 5/38, Table 5-12:

a) We would like to see TR23 to the 2017 Regulatory Schedule and SSX1 added to the 2018 Regulatory Schedule.

b) SS12, SS39, TR1, TR2, AG4, WA3, WR1, and SL1 all include rulemaking as an implementation tool and include GHG as one of the pollutants reduced, however none are included in the rule development schedule listed here. Is this an oversight or are these "paper projects"? Given that the entire control strategy falls far short of the emissions reductions the region needs, we cannot see portions of it fall through the cracks.

Appendices

124) B/1, Public Outreach: One of staff's goals to guide public outreach was to "inform a wide range of stakeholders and members of the public about the . . . plan," however, the report says the Air District used as primary outreach mechanisms "the 2017 Plan website; notices sent to the plan e-mail list serve; and Plan public workshops, open houses, (and) community meetings." It is unclear to us how the Air District would reach a wide range of members of the public if outreach primarily relied on resources that were already connected to the Plan. In truth, we do not believe there has been a substantial amount of broad outreach and education about the Plan or the Regional Climate Protection Strategy to the vast majority of the public or to stakeholders who are not already engaged with the Air District. The Air District already has a strong connection with the public through the Spare the Air campaign. We think this connection—and even the Spare the Air campaign itself—have been underutilized as outreach tools in spreading the word about the Plan beyond already engaged Air District stakeholders to the average Joe and Jade.

125) B/2, Outreach to multilingual communities: Engaging impacted communities and multilingual communities in particular was also an important goal for staff's outreach on the Plan, and we are curious what the extent and outcome of those efforts were. Certainly, we believe that simply posting open house information in multiple languages on the low-profile 2017 Plan website and having materials available in a few languages at open houses (should anyone who speaks one happen to come to the event) falls short of *outreach* or engagement with those communities per se.

126) Appendix F, Implementation Status of 2010 Control Measures: The 2010 Plan proposed 45 robust control measures, however the emissions reduction benefits from them are unclear. Figure 3-9 shows that GHG emissions in the Bay Area have increased since the adoption of the 2010 Plan, and Figure 2-13 suggests no particular impact on PM_{10} or $PM_{2.5}$ from the control strategy. In addition, seven of the 18 stationary source control measures adopted, a full 39%, were never implemented and are simply carried forward into the 2017 Plan, seven years later. It goes without saying that forward-thinking action will be required to bring us to our region to its interim and long-term climate policy goals, and implementation of the current Plan will have to happen with implacable regularity and robustness. *This Plan cannot be implemented like the last one was.*

127) Appendix G, Evaluation of Control Measures: We found this procedural information interesting and appreciate its provision and the comprehensive search for feasible measures. We would like to highlight, however, that it appears approximately ¾ of the measures considered for inclusion in the Plan's control strategy were existing ideas—in some cases, long-existing ideas: 216 from recently adopted plans and 64 from the 2010 Clean Air Plan process, out of 366 reviewed. If the Air District hopes, as stated in the Plan, to *lead* the state and the nation towards the Vision for 2050 by providing a metropolitan-scale model for others to follow, it will of course need to keep thinking big and will by definition need to do more than implement existing ideas at some point.

Of the 86 remaining measures reviewed, which were new ideas, we are very disappointed to see that only 17 measures were suggested by Air District staff, among the best poised people in the world to be able to propose novel, innovative, and effective measures to reduce GHGs, fine PM, and other pollutants.

128) Appendix H, Emission Impacts of Control Strategy: We appreciate the incredible difficulty and art involved in estimating emissions reductions from these control measures, but with so many blank spaces, the

cumulative effect of this shortcoming ends up underselling the Plan considerably in terms of the economic, health, and social benefits it will create. Providing a conservative estimate is one thing; making no attempt to offer even a ballpark estimate is another. When the individual variations from the true value of emission reductions are as gargantuan as a value of zero for decarbonizing the Bay Area's entire energy supply, it threatens to make any estimation of reductions from the Plan—and any comparison between control measures vis-à-vis their relative priority for implementation—a meaningless exercise.

Could some of the impacts of these control measures not be expressed in a range, where multiple scenarios are modeled? For example, since many of the impacts of the control measures are expressed in terms of 2030, scenarios projected for EN1 might be "region goes 100% renewable by 2030," "region goes 50% renewable by 2030," etc.

AMERICAN LUNG ASSOCIATION®
IN CALIFORNIA

March 9, 2017

Bay Area Air Quality Management District
Board of Directors
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: Spare the Air, Cool the Climate 2017 Clean Air Plan

Dear Board of Directors,

The American Lung Association in California applauds the Bay Area Air Quality Management District for the Spare the Air, Cool the Climate 2017 Clean Air Plan, which provides an ambitious blueprint that will help speed the transformation to a carbon-free future needed to protect public health and climate. We appreciate the air district's leadership in utilizing all tools and strategies possible to achieve the greatest reductions in air and climate pollutants that can serve as a model for the rest of the state and country.

We strongly support the wide range of control measures proposed, including limiting combustion from oil refineries, power plans and cement plants; stopping methane leaks, reducing exposure to toxics, putting a price on driving, advancing electric vehicles, promoting clean fuels, accelerating low carbon buildings and more energy choices, and promoting electric heating. In addition to incentives and voluntary measures, we urge the Air District to maintain as much as possible a focus on regulations to secure the reductions needed.

We also strongly support the Air District's approach in developing a multi-pollutant plan that addresses both criteria pollutants, toxic air contaminants, and greenhouse gases, including CO2, methane, nitrous oxide, black carbon, among others. The role of black carbon, methane and fluorinated gases in accelerating climate change calls for strong and immediate action to reduce these harmful pollutants. In addition to the well-documented threats posed by particle and ozone pollution, the growing scientific research and knowledge of the threats posed by unmitigated climate change support the need for strong and elevated action. The Air District's plan is an important response to this growing realization that climate change is first and foremost a public health issue.[1]

[1] The 2016 US Global Change Research Program report "The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment" detailed many climate change public health threats due to:

We highlight the following measures to support regional and statewide efforts to improve air quality, reduce climate pollutants, and protect health.

Stationary Sources

- **Work closely with local jurisdictions to pursue the elimination of residential wood burning** as a key step to reduce climate and local air quality impacts and promote the most efficient electric heating technologies in new construction and remodels. (SS30, SS34)
    - Incentive funds available to reduce emissions caused by residential wood burning should be used for electric heating, ie ductless mini-split electric heat pumps, rather than natural gas (a fossil fuel).
- **Pursue additional limits on emissions and carbon intensity in the refinery sector,** including the proposed facility wide refinery limits (SS11) and climate impacts limit (SS12)
- **Support proposed methane control measures,** including capped wells, natural gas distribution and the development of a Basin Wide Methane Strategy. (SS14, 15, 16)
- **Coordinate with the California Air Resources Board to track local emissions of criteria air pollutants, toxics, and greenhouse gases** in support of the ARB Cap and Trade Adaptive Management Program. (SS14, SS16, SS18, SS39)

Transportation

- **Work with local jurisdictions to accelerate electric vehicle adoption and infrastructure, community outreach and education**. (TR14, TR15)
- **Support the Sustainable Freight Plan that accelerates widespread electrification of the freight sector** and capping reductions at freight facilities that draw significant diesel emissions burdens to local communities. (TR18, TR19)

The American Lung Association in California appreciates the opportunity to comment on the 2017 Clean Air Plan and looks forward to working with the Air District to support these policies and programs.

Sincerely,

Jenny Bard

Jenny Bard, Director, Health Partnerships
American Lung Association in California

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increasing air pollution, extreme heat, drought, wildfires, water and food security, expanded diseases, extreme weather and mental health impacts.

STOPWASTE
at home • at work • at school

StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

March 8, 2017

Christy Riviere
Principal Environmental Planner
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Dear Ms. Riviere,

We are pleased to submit the following comments on the Air District's 2017 Clean Air Plan and Climate Protection Strategy. In general we strongly support the Plan's measures and implementation actions. We look forward to continuing to work toward our common goals with the Air District in collaboration with other state and local agencies.

StopWaste currently leads initiatives in the waste, water, and buildings/energy sectors in Alameda County and the Bay Area. Our comments address measures in the Buildings, Energy, Natural Working Lands, Transportation, and Waste sectors. In regard to Greenhouse Gases and Climate Change, we have provided a Further Study Measure to address embodied emissions of the materials consumed by Bay Area residents through a Consumption-Based Emissions Inventory (see Attachment). In Energy Control Measures, we offer suggestions to address electricity demand, including emerging technologies, such as energy storage and automated demand response technologies. We address measures in Waste by providing relevant research on emissions of compost feedstocks along with strategies for dovetailing Air District rules with state and local diversion goals.

Please feel free to reach out for clarification and follow-up dialog. We look forward to combining our efforts to maximize our collective impact.

Sincerely,

Wendy Sommer

Wendy Sommer
Executive Director

Member Agencies:
Alameda County
Alameda
Albany
Berkeley
Dublin
Emeryville
Fremont
Hayward
Livermore
Newark
Oakland
Piedmont
Pleasanton
San Leandro
Union City
Castro Valley Sanitary District
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BAAQMD 2016 Clean Air Plan and Climate Protection Strategy Draft Control Measures
StopWaste Comments March 8, 2017

Consumption Based Emissions Inventory (CBEI)
(Executive Summary, p3 and Chapter 3: Greenhouse Gases and Climate Change Impacts, pp25-29)

We commend the Air District for its leadership on measuring and addressing consumption-based emissions. The research and products made available to local governments have enabled them to consider this lens even with their ongoing resource constraints that would prohibit them from pursuing their own CBEI analyses. We believe that the global nature of climate change requires addressing both in-boundary emissions sources and embodied emissions of materials consumed by a community.

CBEI addresses leakage inherent in geographically based inventories, which can have the unintentional consequence of encouraging out-sourcing of commercial activities and their related emissions to other jurisdictions or regions. This can have detrimental impacts to the local economy, creates an artificial conflict of interests between local government priorities of sustainability and economic development, and only relocates total GHG emissions without reducing them (and possibly increasing them).

To continue to advance progress on addressing consumption-related emissions, we recommend adding a Future Study Measure FSM_WA1: Consumption-based Emissions Reductions. We offer potential ideas in the attachment to our comments.

BL2: Decarbonize Buildings

1. Thank you for incorporating our comments on the previous draft of BL2. We support the implementation actions and look forward to the Air District's guidance for local government permitting and enforcement options to encourage low/zero carbon technology.

   We note that the co-benefits section on p. BL-10 describes a benefit for peak power reduction for reducing cooling load. At the same time, the additional heating load on the electricity grid from fuel switching, particularly for residential space heating, may coincide with the evening net peak period expected in the future (see comment under EN2).

EN1: Decarbonize Electricity Generation

2. This measure promotes an increase in co-generation. Co-generation of wood chips is established but declining due to economic factors. In the current context, we recommend that composting is prioritized as a main option for woody materials, given the need identified in measure NW1 to provide compost for carbon sequestration.

EN2: Decrease Electricity Demand

3. Increasing intermittent renewables on the grid increases the variability of emissions by hour. CAISO, CEC, and other grid-related agencies are increasingly concerned with time-of-use (TOU). The demand response strategies described on EN-9 are important. We encourage the Air District to track the anticipated trends which show a shift of net "peak" hours from traditional daytime peaks to a steep ramp-up in the evening (5-9 pm); and explore promoting emerging technologies that support load shaping, including automated demand response and energy storage technologies. We recommend adding demand response and storage (providing guidance for local government permitting and IOU rate structures) to the last implementation action bullet regarding working with local governments. Additionally, the Air District could offer guidance on which types of energy efficiency measures would specifically reduce peak load.

NW1: Carbon Sequestration in Rangelands

4. StopWaste supports the Air District's control measure to increase carbon sequestration in rangelands across the Bay Area by providing technical and research assistance to local government and regional agencies and private owners of rangelands. As the Plan notes, successful implementation of this measure will require adequate availability of composting material. With SB 1383 and AB 1826 in place, California will see an increase in organics diverted from landfill; the challenge will be capacity to produce compost. We encourage the Air District to further support this measure and help foster the development of both new composting facilities and capacity at existing facilities. We suggest incentivizing conversion of open windrow systems to aerated static piles (ASPs), which accommodate two to three times the volume of material on site, while reducing overall emissions from composting by 80%, according to the Plan. We suggest that the Air District consider the baseline of emissions from windrows when permitting facilities converting to ASPs, and acknowledge the reductions in emissions from that baseline, rather than treating emissions from ASP systems as additional emissions.

NW2: Urban Tree Planting

5. We support the Air District's measure to promote the planting of urban trees and the action to develop a model municipal tree planting ordinance and recommendations. To best achieve the goal of this measure and reduce criteria pollutants and GHG's, we recommend including the following in any model ordinance and/or guidelines:

    a. Required minimum rootable soil volume for street trees to grow to full size. We suggest referencing the City of Emeryville's landscape requirements[1] and minimum rootable soil volumes. Another helpful resource is DeepRoots web page of municipal codes.[2]

    b. Compliance with the state's Model Water Efficient Landscape Ordinance (MWELO), which requires the use of 4 cubic yards per 1000 square feet of compost and 3 inches of mulch to create healthy soil.

[1] http://www.ci.emeryville.ca.us/1086/Climate-Resilient-Street-Trees
[2] http://www.deeproot.com/blog/blog-entries/soil-volume-minimums-organized-by-stateprovince

c. Prioritize the planting of large stature trees where appropriate as they have exponentially larger positive impacts for clean air, storing carbon and reducing stormwater runoff than small stature trees.

d. Support sustainable landscape standards. For example, the Bay-Friendly Rated Landscape Scorecard awards points for the planting of large stature trees.[3]

SS38. Odors

6. StopWaste supports amending Regulation 7 to strengthen odor standards and enhance enforceability. To meet the goal of enhancing enforceability, we recommend that the Air District add an Implementation Action to collaborate with CalRecycle in developing standards and leverage existing enforcement efforts by Local Enforcement Agencies (LEA's). In practice, this measure could include the development of monitoring and detection methods to accurately identify odor sources, especially where multiple potential sources exist, and providing training and resources for Air District, CalRecycle, and LEA staff to provide consistent enforcement.

WA1: Landfills

7. StopWaste has reviewed Air District documents that contribute to the development of the proposed control measures. We recommend that the Air District revisit its GHG emissions assumptions about landfill gas capture rates in the Base Year 2011 Emissions Inventory. The methodology for landfill fugitive emission sources assumes 75% of landfill gas is captured. However, the majority of organics decompose within a short period of time after delivery to the landfill and before the installation of any gas recovery system. Typically landfill gas collection systems do not become operational for 2-3 years after the waste has been deposited, whereas emission fluxes for organics decomposing in landfills occurs within 0-90 days of deposition. This means the majority of landfill Criteria Air Pollutants and GHG emissions are fugitive area source emissions not quantified by the Air District's emission inventory.

WA2: Composting and Anaerobic Digestion

8. StopWaste recommends that the Air District create separate measures and separate emission reduction goals for composting facilities and Anaerobic Digestion facilities (ADF), because they are two distinct and separate processes with different goals, systems , inputs and outputs, co-benefits, and emissions.
    a. Composting produces compost through controlled aerobic decomposition. WA3 Co-benefits section (p WA-12) states that composting produces biogas, which is inaccurate. ADF's produce biogas through an anaerobic process, which leaves behind the byproduct of digestate (as noted in the measure).
    b. Composting is conducted typically in an open or covered aerated system. Anaerobic digestion is a closed system to maximize gas collection.
    c. Compost facilities process a wide variety of feedstocks. ADFs handle a narrow range of organic materials with higher nitrogen and moisture content.

[3] http://rescapeca.org/rated-landscapes/

d. Compost is a valuable soil amendment (as noted in NW1) with multiple benefits to the soil, including improved carbon sequestration, increased water holding capacity, reduced erosion and sedimentation, improved beneficial soil biology, and plant resistance to disease. Biogas is a renewable energy source, but it also produces a digestate that is often land applied. Land application of digestate results in emissions. Composting the digestate before land application, however, would reduce these emissions and create a valuable soil amendment with all the benefits of compost.
e. Composting generates fewer VOCs and GHGs than ADF.

9. StopWaste supports the Air District in developing emission limits for composting in the Bay Area. We recommend that the Air District develop specific rules and mitigation measures for the Bay Area through a collaborative process with affected parties, as in the San Joaquin, South Coast, and Mojave Districts. We recommend modeling the process used in those Districts, rather than applying the same or similar rules to the Bay Area, for the following reasons:

    a. The Bay Area is much closer to being in attainment for ozone than the other Districts, and could likely reach attainment through less aggressive limits.

    b. Applying the SJVPCD and SCAQMD rules directly to the Bay Area will likely result in an overestimation of GHG and CAP emissions for Bay Area composting facilities. This is because the organic material stream in the Bay Area is predominantly green waste and food waste, whereas the feedstock in San Joaquin is largely manure and agriculture waste. Emission factors for manure and agricultural wastes are higher than those for green waste.

    c. The current rules for San Joaquin and South Coast Districts appear to overestimate the VOC emissions from composting. A 2011 UC Davis study and others have found that most VOC emissions from composting green waste are non-reactive/low reactive compounds and do not contribute to ground level ozone formation.[4,5,6]

    StopWaste recommends adding an Implementation Action to review and incorporate research on VOC emissions from typical Bay Area composting feedstocks to determine emissions reductions. Developing rules, emission standards, and measures based on Bay Area-specific conditions and feedstocks will help avoid unintended consequences of applying the more stringent regulations from other districts, such as slowing expansion of composting facilities, which will be needed to meet the goals of the Short Lived Climate Pollutant plan and other state measures.

10. As noted in the plan, open windrow composting reduces VOC and GHG emissions from green waste compared to natural decomposition or landfill.[7] Properly managed ASPs can reduce emissions even further compared to windrows, but they are a significant capital investment for a facility, so should be incentivized rather than required. To support expansion of composting capacity and reduce emissions, StopWaste makes the following two recommendations:

[4] Kumar A, Alaimo CP, Horowitz R, Mitloehner FM, Kleeman MJ. and Green PG. 2011. Volatile organic compound emissions from green waste composting: Characterization and ozone formation. ATMOSPHERIC ENVIRONMENT v45 (10): 1841-1848

[5] Chou CH, Büyüksönmez F. 2006. Biogenic Emissions from Green Waste and Comparison to the Emissions Resulting from Composting (Part 1: Ammonia). Compost Science and Untilization, v14 (1): 16-22

[6] Green, Peter, "Biosolids Co-Composting VOC and Ozone Formation Study," prepared for the Water Environment Research Foundation and the California Assoc. of Sanitation Agencies, June 1, 2011.

[7] Büyüksönmez F, Evans J. 2007. Biogenic Emissions from Green Waste and Comparison to the Emissions Resulting from Composting Part II: Volatile Organic Compounds (VOC'S). Compost Science and Utilization, v15 (3): 191-199

a. That the Air District reinforce CalRecycle's existing BMPs for compost facilities to control emissions, rather than setting emission limits so low that all facilities must use ASPs or be fully enclosed to comply.

b. That the Air District add an Implementation Action to incentivize development of new ASP facilities or conversion from open windrows to ASPs with grants and access to technical assistance.

11. In reviewing this measure and its source material (the Base Year 2011 Emission Inventory), it appears that Air District is overestimating volumes of organic materials being processed at compost facilities, and therefore the emissions associated with composting. The Inventory estimates the volumes of materials processed based on bulk density of the finished product, rather than feedstock. This leads to an overestimate because significant volume reduction (about 50%) takes place during composting. The Inventory lists an estimate of 565 pounds per cubic yard, which is in the range of bulk density of finished compost, as the bulk density for green waste. However, green waste is estimated by Cal Recycle as 108-343 pounds per cubic yard. StopWaste recommends that the Air District revise the tonnage and corresponding emissions estimates based on the appropriate bulk densities for the typical Bay Area feedstocks, using CalRecycle's conversion factors here: http://www.calrecycle.ca.gov/lgcentral/library/dsg/IOrganic.htm

12. StopWaste recommends that the Air District use and account for in their emission goals the most current accepted tools available for determining GHG impacts such as the life cycle analysis widely accepted by the WARM Model v14, which calculates the climate impacts of alternative methods of managing waste. For example, 200 tons of food waste and mixed organics in equal proportions landfilled will result in an emission of 32 MTCO2E, while the same material composted will result in a net reduction of 34 MTCO2E (a 66 MTCO2E differential), and if anaerobically digested, would result in a reduction of 13 MTCO2E (a 45 MTCO2E differential).

WA3. Green Waste Diversion

13. StopWaste recommends that the Air District add an Implementation Action to partner with CalRecycle to align efforts in creating model waste reduction programs or model policies. StopWaste recommends that the model policy for Zero Waste goals include waste reduction/prevention. Zero Waste is an aspirational goal which requires changing the structure of our global economy. In some countries, such as in Japan and parts of Europe, Zero Waste policies have resulted in the increased use of incineration in order to avoid landfilling. In Alameda County, a county charter initiative amendment, "Measure D", bans incineration of garbage in unincorporated areas of the county. Rather than a Zero Waste goal, StopWaste strives for a waste diversion goal of less than 10% of readily recyclable/compostable materials in the landfill by 2020, while also focusing on source reduction and waste prevention.

14. StopWaste recommends that the Air District add a Further Study Measure to address the Land Farming Source Inventory Category to limit emissions from land application of green waste and uncomposted biosolids. We also recommend that the emission factor for this source be updated to reflect emissions from natural decay, rather than composting, which is currently used. Land application or farming of these raw materials results in higher GHG emissions than does composting, so the emissions from this source is likely underestimated.

15. StopWaste supports the Air District's Implementation Action to support the reduction of green waste going to landfill. Reducing wasted food at the source has lower emissions than processing food waste

through composting or AD.[8] In addition, decreasing the overall volume of organics going to composting and AD could free up capacity at existing facilities. Therefore, we encourage the Air District to increase support for model policies, legislation, ordinances and programs that prioritize food waste prevention and the recovery of edible surplus food to feed people and/or animals.

16. StopWaste supports the Air District's Implementation Action to reduce emissions from food waste through advocacy for state and federal tax incentives for commercial food donation. A significant barrier to food rescue and recovery is donor concern about liability. Therefore, we encourage the Air District to advocate for increased protection to individuals and/or organizations under the existing federal Bill Emerson Good Samaritan Act and newly proposed California Good Samaritan Act (AB 1219).

[8] https://www.epa.gov/warm/versions-waste-reduction-model-warm#WARM Tool V14

ATTACHMENT: Suggestions for FSM_WA1: Consumption-based Emissions Reductions

StopWaste recommends adding a Further Study Measure to address the embodied emissions of the materials consumed by Bay Area residents as illustrated by the Consumption-Based GHG Emissions Inventory (CBEI) and for which solutions are discussed in Chapter 3 (pp 3/25-3/29). StopWaste offers the following content for consideration to include in a Further Study Measure.

Background and discussion (for summary, purpose, and measure description)

This measure would explore options for consumer education and enabling economic models that address sustainable material use and consumption, specifically for goods and food.

Increasing the availability of low-carbon goods and food and educating consumers to choose them reduces the total embodied greenhouse gas (GHG) emissions related to consumption by Bay Area residents. Although the emission reduction may occur outside of the Bay Area, the global net impact is an emissions reduction. For GHG's, the global scale is the appropriate scale for evaluation and is a more accurate assessment of existing and potential emissions leakage due to outsourcing industrial and commercial operations.

The consumption-based emissions inventory (CBEI) estimates that approximately 50 million MTCO2e are emitted on a global scale due to Bay Area residents' material consumption, including goods, food, housing construction materials, and vehicles. The Air District can make progress toward addressing embodied emissions by partnering with organizations that are pursuing aligned initiatives, and making CBEI common practice by encouraging other government entities to consider a CBEI lens. Further study may lead to the design of actions to enable circular economic models and consumer behavior change.

Sample implementation actions to consider

While recognizing that FSM's do not detail implementation actions, below are examples to illustrate the types of actions that could address materials-related consumption-based emissions.

Partnerships and Alignment

- Encourage CARB and other regional air districts to conduct their own CBEI.
- Collaborate with other initiatives, such as the West Coast Climate and Materials Management Forum, Urban Sustainability Directors Network, and the Ellen MacArthur Foundation.
- Identify policies and regulations that impede consumption reduction impacts, such as Federal bills that promote overproduction regardless of demand.

Enabling Circular Economy

- Promote circular economy principles in the built environment, such as extending the useful life of buildings, optimizing use of existing buildings and reducing the need for new construction, and creating a loop for recycled building materials.
- Facilitate the development of economic models that optimize material use, including remanufacturing; resale and sharing; product service contracts (vs product sales); virtualization;

product redesign for durability, disassembly, and recyclability; and extended producer responsibility (EPR) with reverse logistics.

- Work with local government planning, building and economic development departments to develop strategies to create regulatory conditions conducive to circular economy models.

Consumer Education

- Promote food recovery and food waste prevention, partnering with Food Too Good To Waste and local county initiatives. (also in Waste sector control measures)
- Promote low-carbon food options that also benefit public health, such as minimally processed foods, fruits, grains, and vegetables. Consider partnering with health care providers on public awareness campaigns.
- Promote durable, reusable, pre-owned, remanufactured, recycled content, and sharing options for goods such as clothing, electronics, appliances, and furnishing. Promote prolonging the useful life of goods.
- Promote local service industries, which typically have a lower emissions per dollar spent than goods on average.

Potential magnitude of emissions reductions

While recognizing that FSM's do not quantify emissions reductions, the following estimates are provided only to illustrate potential magnitude of impact on global GHGs by addressing consumption-based emissions. Note that the quantification methodology is overly simplified and the impact assumptions are not yet based on any empirical evidence. Quantifications will require additional research.

Example Strategy	**Impact Assumption** (assumed per-unit impact if not 100% reduction)	**Category Total** (MMTCO2e)	**Global Emissions Net Reduction** (MTCO2e, rounded)
Reduce overall food consumption and waste	10% reduction in generated food	22	2,000,000
Shift food consumption from high-carbon to low-carbon options	5% shift from meat to grains (80% reduction)	6.5	260,000
Reduce number of cars purchased/owned in Bay Area	10% reduction in car ownership	3.8	380,000
Reduce amount of first-hand clothing purchased	10% reduction in new clothes purchases	4.8	480,000
Optimize building material usage through remodel, sharing, etc.	5% reduction in construction materials	3.4	170,000
Extend life of furnishings by 25%	10% of furnishing kept longer (25% reduction)	4.2	100,000
Shift dollars spent from goods to services	10% shift in spending (40% reduction per dollar)	20	830,000

Global emissions reductions = assumed uptake % * % reduction impact per unit * total consumption-based emissions for the affected category

March 9, 2017

SUBMITTAL VIA EMAIL TO: cleanairplan@baaqmd.gov

Mr. Josh Pollak
Environmental Planner
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

SUBJECT: COMMENT LETTER ON BAAQMD DRAFT 2017 CLEAN AIR PLAN: SPARE THE AIR, COOL THE CLIMATE - A BLUEPRINT FOR CLEAN AIR AND CLIMATE PROTECTION IN THE BAY AREA

Dear Mr. Pollak:

The Bay Area Clean Water Agencies Air Issues and Regulations Committee (BACWA AIR) appreciates the opportunity to comment on the Bay Area Air Quality Management District's (BAAQMD) Draft 2017 Clean Air Plan (Draft Plan). BACWA is a joint powers agency whose members own and operate publicly-owned wastewater treatment works (POTWs) that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay (SF Bay) Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. The AIR Committee is a coalition of SF Bay Area POTWs working cooperatively to address air quality and climate change issues, under the guidance of BACWA.

The BACWA AIR Committee agrees with the overarching goals of the Draft Plan - to protect the public and stabilize the climate. In fact, POTWs can help the Bay Area achieve these goals by supporting and complying with the identified control measures individually or regionally. While there are many control measures that are relevant to POTWs that we intend to engage in discussions with BAAQMD staff, we have provided comments below on specific key focus areas of the Draft Plan for your consideration.

Limiting Fossil Fuel Combustion

The Draft Plan calls for developing a region-wide strategy to improve fossil fuel combustion efficiency and eventually reduce fossil fuel combustion at industrial facilities, beginning with the three largest sources: oil refineries, power plants, and cement plants. Most POTWs in the Bay Area produce a low carbon, renewable fuel (digester gas) from the anaerobic digestion of sludge that can be used onsite for renewable electricity production or used at industrial facilities to offset fossil fuel (natural gas) combustion. BACWA would like to work with BAAQMD staff in

the development of this strategy to identify opportunities where POTWs can support the air district achieve its goal to limit the combustion of fossil fuels by replacing it with a low carbon, renewable digester gas.

Stop Methane Leaks

The Draft Plan calls for overall reduction in methane emissions from landfills, and oil and natural gas production and distribution. Extending the discussion provided above in support of limiting combustion at industrial facilities by capturing and beneficially using the digester gas (primarily methane) at POTWs, BACWA members are in a unique position to support this measure as well. As many POTWs have excess capacity in their existing anaerobic digesters, they are in a position to accept diverted organic waste (i.e., food waste) from landfills and co-digest it with sludge to generate even more digester gas. BAAQMD has very ambitious goals for the diversion of organics from their landfills, calling for 100 percent diversion by 2035. The only way to accomplish this within that time period and at a cost effective rate, is to consider the use of existing infrastructure (anaerobic digesters at POTWs) located in the hearts of Bay Area communities that can both process the material and generate renewable useful byproducts (digester gas and biosolids). BACWA strongly recommends including POTWs in the discussions of and development of solutions to this control measure.

Reducing Exposure to Toxics

BACWA supports the efforts to reduce emissions of toxic air contaminants (TACs). BAAQMD staff is already in the process of adopting more stringent limits and methods for evaluating toxic risks at existing and new facilities. BACWA is involved in the rule-making process, providing information on the planning challenges and economic impacts to POTWs. Unfortunately, the response times and potential cost requirements of projects necessary to comply with the proposed Rule 11-18 are unreasonable in order to get the required approval from their elected boards and public stakeholders. Additionally, the proposed rule is challenging the potential to divert organics from landfills to POTWs (making use of existing infrastructure) and generate more digester gas for beneficial use, since the increase of digester gas implies an increase in a potential source of TACs if combusted. There are various ways to avoid an increase in TAC emissions with the increase in digester gas, via air pollution control devices or incorporating an alternative use (i.e., transportation fuel). BACWA strongly recommends that BAAQMD carefully consider the comments submitted December 2nd, as well as the information provided in the March 9th workshop that BACWA held with BAAQMD staff focused on POTW impacts.

Promoting Clean Fuels

The Draft Plan also calls for promoting the use of clean fuels and low or zero carbon technologies in trucks and heavy-duty vehicles. Digester gas produced at POTWs is a low carbon renewable fuel that can be processed into transportation fuel to offset fossil fuel use in trucks and heavy-duty vehicles. Some BACWA members have already considered this as part of their planning efforts and can provide information on the economic and market feasibility of these types of projects. BACWA encourages BAAQMD staff to consider this as an option for the beneficial use of digester gas at POTWs.

Limiting Greenhouse Gases from POTWs

BAAQMD staff correctly noted that BACWA members are concerned about potential regulatory action inadvertently discouraging digester gas recovery and use as a fuel substitute. For example, Best Performance Standards for limiting air emissions from engines and boilers can be difficult for digester gas fired engines and boilers to meet cost-effectively. The air district has decided to

initiate a process to better understand and quantify greenhouse gas (GHG) emissions at POTWs (both water and wastewater treatment facilities), to explore rulemaking to reduce GHGs emitted directly within POTWs (nitrous oxide and methane), and to work with POTW operators and existing organizations, such as BACWA, to obtain funding for the development of green infrastructure in POTWs. This measure will also explore the potential to streamline the permitting process to promote digester gas recovery, as well as address potential cross-media regulatory issues (such as Water Board regulations on nutrient removal). BACWA very much looks forward to partnering with BAAQMD staff in this process to address GHGs at POTWs.

Finally, in order to implement projects at POTWs that address the various needs of the Draft Plan in a cost effective manner (by making use of existing infrastructure) without placing an undue burden on their rate payers, there is a need for funding. We understand that BAAQMD projects distributing ~$288 million between 2017 and 2024 to support implementation of control strategies. We ask that BAAQMD carefully consider funding projects at POTWs that not only have the potential to divert food waste from landfills and reduce the associated methane, but generate renewable resources that further offset dependence on fossil fuels and support the overall decarbonization of the Bay Area energy and fuel system.

Thank you for the opportunity to comment on the Draft Plan. BACWA supports BAAQMD's goal to protect the Bay Area's air quality, and asks staff to carefully address BACWA's concerns. We would be happy to discuss any questions regarding these comments. Nohemy Revilla and Randy Schmidt, BACWA AIR Committee Co-Chairs, can be reached at NRevilla@sfwater.org and RSchmidt@centralsan.org, respectively.

Sincerely,

David R. Williams

David R. Williams
BACWA Executive Director

Cc: BACWA Executive Board
Nohemy Revilla, BACWA AIR Committee Co-Chair
Randy Schmidt, BACWA AIR Committee Co-Chair
Courtney Mizutani, BACWA AIR Committee Project Manager
Sarah Deslauriers, BACWA AIR Committee Project Manager

BAAQMD 2017 CAP Draft Control Measures Review

CalRecycle Staff Comments (March 9, 2017)

Contact: Dr. Crystal Reul-Chen, Crystal.Reul-Chen@calrecycle.ca.gov.

Control Measure #	Suggestions
WA1: Landfills	CalRecycle staff comments: From studies of the decomposition of organic materials in compost piles (Kumar et al., 2011) and in chipped and ground green waste that is land applied similar to landfills (Burger et al., 2015), the largest non-methane organic compound (NMOC/VOC) emissions from organic materials at the landfill are likely to occur during the first week and last no longer than the first few months. According to rule 8-34, emissions controls at landfills are not installed and activated until 2-5 years from this point. It would therefore seem that VOC emissions from landfills are similar to those from uncontrolled windrows at compost facilities. However, greenwaste alternative daily cover is often applied to the active face of landfills, and, according to rule 8-34, is six inches of approved material. This material is not typically finished compost, but rather a material that does not have as absorbent/adsorbent qualities for controlling VOC emissions. From this understanding, CalRecycle hypothesizes that if using a six-inch finished compost cap (as suggested in WA2) for compost piles, that this would then control VOC emissions better than on the active face of a landfill. A better control of NMOC might be to compost organic materials, and thus prevent the need for increased methane collection from organic materials in the future (i.e., WA3). We recommend establishing baseline emissions from the active face of a number of landfills in the Bay area over a 90-day time period in order to better assess the difference in NMOC emissions from landfills versus compost facilities with the potential to credit compost facilities for reducing bay area wide NMOCs (VOCs) emissions. *Previous comments from August 2016: CalRecycle is pursuing a contract with ARB to conduct a study to assess the current methane collection efficiency at landfills as well as GHG emissions to better inform their decision-making process. Additionally, regarding installation and efficiency of methane collection, typically methane collection is phased in over the lifetime of the landfill, e.g., the working face does not have gas collection installed. See the Air Resource Board's compost emission reduction factor (CERF) for landfill gas collection efficiency assumptions used over the landfill lifetime http://www.arb.ca.gov/cc/waste/cerffinal.pdf).*
WA2: Composting/AD	CalRecycle staff comments: CalRecycle is supportive of environmental regulations for the health and safety of Californians and the environment. We hope to work collaboratively to accomplish air quality and waste diversion goals that are supportive of air and water quality, especially the long-term reduction of GHGs, and potentially the reduction of the ground-level ozone forming pre-cursors, NO_x and VOCs (see comment from page 5-23). CalRecycle staff suggests a holistic approach to the regulation of these growing (compost) and newer (anaerobic digestion) means of processing greenwaste materials. Thank you for incorporating our previous comments.

	Previous comments: The SJVUAPD and SCAQMD rules cited for this suggested control measure are for composting and would potentially be appropriate references if the digestate from an anaerobic digestion facility is being composted. A number of composting best management practices (BMPs) reduce GHG and VOC emissions, including the use of aerated static piles (ASPs), such as solar-powered positively aerated static piles capped with pseudo biofilters, which have been demonstrated to reduce VOC emissions by up to 99% (http://www.calrecycle.ca.gov/organics/air/, http://www.valleyair.org/Grant_Programs/TAP/documents/C-15636-ACP/C-15636_ACP_FinalReport.pdf), and negatively aerated static piles with biofilters that have been demonstrated to reduce methane emissions by about 73 percent (http://www.calrecycle.ca.gov/publications/Documents/1544/201501544.pdf) compared to windrow composting. Generally, anaerobic digestion facilities have minimal GHG and VOC emissions for the in-vessel operations and may potentially reduce emissions, depending on where the waste would otherwise go. Feedstock preparation and/or digestate handling may be exceptions. Additional research may be needed to further assess air quality issues related to digestate. Here are links to our Anaerobic Digestion Program EIR and guidance documents (http://www.calrecycle.ca.gov/SWFacilities/Compostables/AnaerobicDig/default.htm#EIR) and our new in-vessel digestion regulations (http://www.calrecycle.ca.gov/Laws/Regulations/Title14/ch32a1.htm#Article1).
WA3: Green waste diversion	CalRecycle staff comments: We are happy to partner with BAAQMD on developing model policies to "reduce the amount of green waste going to landfill," and encourage BAAQMD to be part of the development of the regulation that will come out of SB1383 requiring the reduction of 75 percent of organic materials headed to landfills by 2025. We caution against assuming that "waste that is diverted from a landfill with a high gas capture rate and sent to a compost facility could result in an increase in VOCs," and encourage BAAQMD to incorporate our comments from WA1 into this draft control measure, and to follow and participate in our research on this issue. Thank you for incorporating our previous comments and for encouraging the use of compost in urban areas and working lands. *Previous comments: This control measure could be enhanced by providing support for climate-appropriate landscapes that utilize the watershed approach as well as native and drought-tolerant plants in order to decrease greenwaste generation. Also, these landscapes would likely decrease the need for the use of small engines needed to maintain lawns, and may also result in a reduction in NO_x and unburned hydrocarbons emissions.* *Regarding the concerns about VOC emissions reduction trade-offs, CalRecycle funded research studies on VOC emissions from compost as well as VOC emissions from uncomposted chipped and ground greenwaste, which determined that VOCs emitted from the composting process are lower in reactivity to form ozone than from uncomposted chipped and ground greenwaste (http://www.calrecycle.ca.gov/publications/Documents/1531/20151531.pdf). Landfill emissions are uncontrolled until gas collection systems are in place during which time landfill VOCs may be similar to the research results for uncomposted chipped and ground greenwaste. Using compost best management practices (BMPs) such as using a solar-powered positively aerated static pile capped with a pseudo biofilter reduces VOC emissions by 99 percent (http://www.valleyair.org/Grant_Programs/TAP/documents/C-15636-ACP/C-15636_ACP_FinalReport.pdf). CalRecycle is pursuing a contract with the Air*

	Resource Board to determine VOC emissions from landfills at various stages of landfill gas control and cover (e.g., active working surface, intermediate, and final cover) that may further inform this question.
WA4: Recycling	CalRecycle staff comments: We offer our support to "develop or identify and promote model ordinances requiring or facilitating: community-wide zero waste goals; recycling of construction and demolition materials in all commercial and public construction projects" *CalRecycle has a long history of working with other agencies on similar efforts. For example, CalRecycle staff has been working with the CA Building Standards Commission and the Department of Housing and Community Development to develop CALGreen* (http://www.bsc.ca.gov/Home/CALGreen.aspx) *for nearly 10 years.* . Thank you for incorporating our previous comments. *Previous comments: Currently this section only mentions asphalt, concrete and cement products in paving for re-use. We would suggest adding language about general C&D and building material re-use on projects and language encouraging de-construction in the "Implementation Action" list. Suggested language could include:* • *Encourage the re-use of C&D and other building materials, such as fixtures, trim, mulch from lumber, etc., instead of using virgin materials on building projects, where applicable.* • *Encourage deconstruction where demolition is required by allocating time into the project timeline.*
WR2: Water Conservation	CalRecycle staff comment: Our previous comments still apply. *Previous comments: CalRecycle suggests referencing DWR's Model Water Efficient Landscape Ordinance (MWELO; http://www.water.ca.gov/wateruseefficiency/landscapeordinance/), which "promote the values and benefits of landscaping practices that integrate and go beyond the conservation and efficient use of water." The MWELO requires landscape installations to apply compost and mulch to conserve water. Local agencies are required to either adopt the MWELO or a local ordinance that is at least as effective in conserving water as MWELO. We would be happy to share with you our extensive summary of research (over 100 articles) on the positive effects of compost and mulch on water conservation.*
NW1: C Sequestration Rangelands	CalRecycle staff comment: In addition to our previous comments addressing the emission reduction trade-offs of N_2O, we are also the technical manager for a project with UC Berkeley through the 4th California Climate Change Assessment regarding further quantifying GHG emissions and other co-benefits from the composting process and GHG emissions reductions from the application of compost to various working lands throughout the state. This project is scheduled to be completed by the end of the year, and we are happy to share those results with the BAAQMD. *Previous comments: Results from a study of the application of compost in two agricultural settings (almond orchards and tomato fields) suggest that concerns for increasing N_2O emissions may be unfounded as no significant difference was demonstrated in N_2O emissions from areas with compost and areas without compost (Horwath et al., 2015). As well, we support the use of compost over uncomposted chipped and ground greenwaste as direct land application of uncomposted greenwaste can result in increased emissions of N_2O over background soil emissions, if not tilled in (Burger et al., 2015).*
NW2: Urban Tree Planting	CalRecycle staff comments: We encourage BAAQMD to incorporate the use of compost and mulch into this urban tree planting control measure. Compost offers many co-benefits to the ones already listed in NW2: Urban Tree Planting, including decreasing the

	need for irrigation and encouraging soil health. We offer MWELO (see comment WR2: Water Conservation as an example of how to incorporate the use of compost and mulch into voluntary guidelines. CalRecycle is happy to collaborate on developing guidelines for the use of compost and mulch for urban tree planting in the Bay area.
NW 3: Carbon Sequestration in Wetlands	CalRecycle staff comments: We encourage BAAQMD to incorporate the use of compost into the "technical and research assistance, policy support and incentive funding to local governments and regional agencies" (USEPA, 1997) as you pursue the sequestration of carbon in wetlands. Compost will help restore needed water absorption capacity and increase organic matter content in wetlands, helping San Francisco Bay neighboring communities adapt to increases in rising sea levels. CalRecycle can assist BAAQMD in creating guidance in this area.

Additional comments from the CAP 2017:

On page 5-23 *"In addition to reducing GHG emissions, composting organic waste, rather than sending it to landfills, provides other benefits. Applying compost to gardens and urban landscapes reduces the need for artificial fertilizers and pesticides."* CalRecycle is seeking funding to study further quantification of two of these additional benefits related to reducing ground-level ozone formation (smog).

BAAQMD suggests that digestate leads to an increase in methane in landfills in this section of the CAP 2017: *"As noted in the background section, materials and byproducts of the anaerobic digestion process must be properly integrated into other waste management processes. Leachate and wet (or heavily inoculated) end products can cause pockets of methane to form in landfills or may overwhelm wastewater treatment control systems. A holistic approach to composting and anaerobic digestion regulations will ensure that emissions are not diverted to other operations rather than ultimately controlled. Should the adoption of best management practices prove to be too costly, more organic material may end up being trucked outside of the Air District. This would result in increases in emissions of methane from the landfills and combustion emissions associated with truck traffic."* We could not find any supporting references as suggested in the CAP 2017 for this, and would like to be involved in discussing research into this topic, and options for the proper management of digestate.

References:

Burger, M; Zhu, X.; Green, P. March 2015. Research to Evaluate Environmental Impacts of Direct Land Application of Uncomposted Green and Woody Wastes on Air and Water Quality. CalRecycle. http://www.calrecycle.ca.gov/Publications/Documents/1531/20151531.pdf

Horwath, WR; Zhu Barker, x; Bailey, SK; Burger, M; Kent, ER; Paw U, KT. October 2015. Research to Evaluate Nitrous Oxide (N_2O) Emissions from Compost in Support of AB 32 Scoping Plan Composting Measure. http://www.calrecycle.ca.gov/Publications/Documents/1544/201501544.pdf

United States Environmental Protection Agency (USEPA). October 1997. Innovative Uses of Compost Reforestation, Wetlands Restoration, and Habitat Revitalization. EPA530-f-97-046. https://nepis.epa.gov/

9 March 2017

Christy Riviere, Principal Environmental Planner
David Burch, Principal Environmental Planner
Josh Pollak, Environmental Planner
Bay Area Air Quality Management District
375 Beale Street, Suite 600
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COMMUNITIES FOR A BETTER ENVIRONMENT

via electronic mail to:
cleanairplan@baaqmd.gov
criviere@baaqmd.gov
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jpollak@baaqmd.gov

Re: **Supplemental Comments of Communities for a Better Environment (CBE) on the Draft 2017 Clean Air Plan**

Dear Ms. Riviere and Messrs. Burch and Pollak,

As stated in our 3 March 2009 preliminary comments, CBE applauds the Draft 2017 Clean Air Plan's clear description of the deep emission cuts needed to protect our health and climate and the feasibility of decarbonizing electricity, electrifying transportation, and transforming our built environment to meet this existential need. At the same time, CBE is concerned that the Plan does not address the essential need to achieve this new, fundamental transformation of our energy system by assuring social justice through a new, real, and funded Just Transition policy for workers and disparately affected communities, and that its proposed emission cutting measures fall short. We incorporate our 3 March 2009 comments by reference and respectfully offer the following additional comment.

SS11: Revise description to reflect reversal of Air District "leakage" conclusion.

"Leakage" is "a reduction in emissions of greenhouse gases within the state that is offset by an increase in emissions of greenhouse gases outside the state." Health & Safety Code §38505(j). Reversing its earlier analysis, the Air District Staff now concludes that draft measure SS11 does not have the potential to result in "leakage." Plan DEIR at 3.3-24. This revised conclusion is undisputably correct: DM SS11 (Rule 12-16) itself ***could not*** cause "a reduction in emissions … that is offset" elsewhere. Designed to prevent refinery emissions from increasing, this measure would set emission limits at levels that each affected facility already complies with. (Id.) However, the Air District Staff has previously (and incorrectly) stated publicly that, because proposed Rule 12-16 could

result in "leakage," it conflicts with the state's cap-and-trade scheme. Further, as a consequence of that incorrect conclusion, the Air District Staff has previously asserted (also incorrectly) that the District lacks authority to adopt this measure. Thus, the District Staff's revised and corrected conclusion that draft measure SS11 (Rule 12-16) would ***not*** be expected to result in "leakage" is crucial information about the effects of this measure and the District's authority to adopt it. The public, including public representatives on the District's Board of Directors, must know this to properly consider SS11 (Rule 12-16), but this crucial information is not disclosed in the Plan's description of the measure. Therefore, the description of DM SS11 must be revised to include this conclusion.

FSM SS6: Revise to address potential interaction with statewide carbon tax.

The Draft Clean Air Plan (Plan) includes FSM_SS6, discussing a carbon pollution fee.

The Plan notes that "placing a fee on the carbon pollution generated by fossil fuels creates an incentive to all those that consume fuels – individuals, businesses, industry – to reduce use." The CAP notes that such a carbon pollution fee would reduce combustion emissions, including climate and local criteria and toxic pollution, as less fossil fuels are processed in response to reduced demand.

The Plan further describes two existing fee programs in place in the Bay Area associated with GHG emissions: first, BAAQMD's GHG fee on permitted facilities; and second, California's Cap and Trade Program.

The Plan notes that further study is required to design this stationary source measure, including determining the appropriate level and how the revenues should be spent. The Air District should also investigate how such a fee would interplay with a statewide carbon pollution fee, or "carbon tax," should California adopt a similar measure of its own. This additional investigation should be described in the revised draft measure.

SS1, SS5, SS6, SS7, SS8, SS12, SS18, SS20, SS21, SS22, SS30, SS31, SS34, TR17, TR18, TR19, TR20, TR21, TR22, TR23, EN1, FSMSS1, FSMSS2, FSMSS14, and FSMBL1: Revise to address cumulative emission impacts of fossil fuel infrastructure inertia that threaten to foreclose achieving health and climate protection goals.

Although the Plan identifies the essential need for transition to a "post-carbon" energy system in order to achieve deep emission cuts, it does not consider infrastructure inertia effects on cumulative emissions that could foreclose its climate protection goals.

"Infrastructure inertia" refers to the resistance of infrastructure to change. Infrastructure inertia created by major capital projects for new fossil fuel plants creates a commitment to new emissions for 30–50 years, a dead-end in the path to a sustainable climate, and a threat to future generations' environment and economy. (*See* e.g., Davis et al., 2010; Williams et al., 2015; Stern, 2016). All fossil fuels have infrastructure inertia but oil is the most entrenched. (Farrell and Sperling, 2007.) The Air District has acknowledged that Bay Area refineries are likely to switch crude slates, that a switch to higher-emitting

oil could be inextricably linked to new infrastructure projects, and that this new refining infrastructure can be expected to operate for several decades. (*See* DM SS9; Rule 12-16 Draft Staff Report at 8; refinery project descriptions in BAAQMD permit files.)

"Cumulative emissions" refers to both the co-emission of multiple pollutants and the accumulation of past, present, and future emissions emissions over time. Cumulative emissions cause climate impacts over time frames spanning many decades. (*See* e.g., Allen et al., 2009; Meinshausen et al., 2009.)

Each of the Plan's measures identified above could result in new, expanded, or modified fossil fuel infrastructure that would continue to emit GHGs and GHG co-pollutants. (Plan vol. 2; Plan DEIR.) For example:

- Construction or modification of equipment to capture a larger fraction of the emissions generated by petroleum coke combustion in catalytic cracking (SS1) and to reduce emissions incrementally through incremental improvements in refinery efficiency (SS18) could inadvertently facilitate project "potential-to-emit" findings that enable new, expanded and modified oil refining infrastructure.
- SS12 would encourage refining cheaper, higher-carbon oil and increasing refinery production for export, thus encouraging new, higher-emitting refinery infrastructure. (*See* CBE's 3 March 2017 comments on this Plan.)
- EN1 "would promote an increase in cogeneration" that could burn natural gas fuel.
- TR19 could replace older, dirtier diesel truck engines with new diesel truck engines.
- SS34 as drafted could replace wood stoves with gas-fired home heaters or heaters using electricity that could be supplied by continued burning of natural gas.

At the same time that these measures could prolong emissions from fossil fuel use, the incremental emission cuts expected from all the Plan's measures combined total only a fraction of the deep cuts needed to achieve the Air District's climate protection goals.

Thus, the cumulative emissions from fossil fuel infrastructure inertia that could result from these measures have the potential to foreclose achieving climate and health goals, but failing to consider these impacts, the Plan fails to identify or address them.

Further, draft measure SS11 (Rule 12-16) addresses exactly such impacts, but the Plan fails to identify the urgent need for this measure. The need for this "backstop" against increased emissions from potentially irreversible infrastructure projects to refine higher-emitting grades of oil has been acknowledged by the Air District, and the District has committed to prioritize this measure. (*See* 30 May 2012 Concept Paper; Resolution 2014-7; July 2016 Board Meeting archive.) The Plan does not disclose or address this priority. Delaying this measure risks commitments to new infrastructure for "tar sands" oil that could still be operating in 2050. This switch to tar sands oil could, in the plausible worst case, increase regional refinery $PM_{2.5}$ and CO_2 emissions by as much as 390–990 metric tons/year and 5.9–16 million metric tons/y, respectively, by 2030–2050. (*See* CBE 2 December 2016 Technical Report on scope or Rule 12-16 CEQA review.)

Therefore, the Air District should address cumulative emissions impacts of infrastructure inertia by revising the Plan's draft measures in two specific ways:

- Draft measure SS11 should be revised to prioritize Air District action to develop and implement this measure (proposed Rule 12-16) as expeditiously as possible.
- Draft measures SS1, SS5, SS6, SS7, SS8, SS12, SS18, SS20, SS21, SS22, SS30, SS31, SS34, TR17, TR18, TR19, TR20, TR21, TR22, TR23, EN1, FSMSS1, FSMSS2, FSMSS14, and FSMBL1 should be revised to include, in the Plan's description of each measure, the following rule development commitment:

  This measure will be developed, reviewed periodically, and revised as needed, to ensure that the measure does not contribute to future commitments to new, expanded, or modified fossil fuel infrastructure that have the potential to impair or foreclose the achievement of long-term health and climate goals, including but not limited to the reduction of GHG emissions by 80 percent from 1990 levels by 2050.

Add a new "Community-based Just Transition Support" further study measure.

This measure would provide transition assistance for workers and residents in low-income communities that are disparately impacted by co-located fossil fuel infrastructure, to be designed by each community based on its site-specific circumstances and needs, by providing funding support through expansion of existing District fee programs.

The fundamental transition to a "post carbon" energy system that the Plan correctly asserts as necessary to achieve its goals implies a need for economic transformation. Indeed, where resources need to move out of polluting activities "transitory assistance may be needed, such as worker retraining programs" and more. (IMF, 2015.) The geographic dispersal of the energy supply system that deep decarbonization requires (Williams et al., 2015) means a major shift from "old" to "new" jobs. The "total net change" of ≈ 122,000 jobs estimated in Table 4 of the Plan's Socioeconomic Analysis is only the bare beginning of this foreseeable jobs shift. The economy-wide changes and jobs shifts will not magically protect individual worker or community needs: organized local action is needed. The old Oil Chemical and Atomic Workers Union, CBE, and other community and environmental justice groups have long termed these needed, worker- and community-based, policy actions collectively a "Just Transition Program."

Low-income communities nearest the region's major fossil fuel industries and workers in those plants have disproportionate needs for Just Transition support. In particular, oil refining provides fewer direct jobs per dollar economic activity than any other sector in the statewide economy (U.S. Economic Census), but those thousands of jobs are in the communities hosting refineries—demonstrating both disparate legacy impacts and disparate transition risks in refinery towns' local economies. The Bay Area hosts the second largest oil refining center in western North America. (*Oil & Gas Journal*) and low-income communities of color are disparately impacts by refinery emissions of GHG co-pollutants (Pastor et al., 2010; OEHHA, 2017). These disparate cumulative impacts of past and future pollution and economic disruption warrant focused protection. Indeed,

Air District policies and the Plan itself require that the District ensure that the energy transition needed to achieve Plan goals will come with environmental and social justice.

Finally, the Plan relies on local and often voluntary measures to achieve its goals, and the Plan's and Air District's social justice and environmental justice policies acknowledge the right as well as the need for community self-determination in those local actions. Locally-based decisions also are necessary because post-carbon energy technologies require distributed placement (Williams et al., 2015), requiring local land use decisions, and because local jobs programs provide essential support for renewable and efficiency build-out. But expanding those local efforts requires funding for air quality and climate protection the District, rather than the cities, has primary regional authority to collect fees to achieve.

Thus, achieving Plan goals requires the community capacity-building that Just Transition policies would provide, and it appears necessary and appropriate for existing District fees to be scaled up to fund the local community actions the Plan measures rely on local communities to achieve, toward these goals. Therefore, the Plan should include a further study measure—"Community-based Just Transition Support"—as described above.

Thank you for your consideration of our comments, and if you have a question about them, please feel free to contact us.

In Health,

/S/

Greg Karras
Senior Scientist

/S/

Roger Lin
Staff Attorney

Copy: Interested organizations and individuals

3 March 2017

COMMUNITIES FOR A BETTER ENVIRONMENT

Christy Riviere, Principal Environmental Planner
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dburch@baaqmd.gov
jpollak@baaqmd.gov

Re: **Draft 2017 Clean Air Plan; Preliminary Comment, Draft Measures SS12 and SS18**

Dear Ms. Riviere and Messrs. Burch and Pollak,

CBE applauds the Draft 2017 Clean Air Plan's clear description of the deep emission cuts needed to protect our health and climate and the feasibility of decarbonizing electricity, electrifying transportation, and transforming our built environment to meet this existential need. At the same time, CBE is concerned that the Draft Plan does not address the essential need to achieve this new, fundamental transformation of our energy system by assuring social justice through a new, real, and funded Just Transition policy for workers and disparately affected communities—and that its proposed emission cutting measures fall short. We anticipate providing detailed comment on these matters in the coming weeks.

By this letter CBE respectfully offers preliminary comments suggesting solutions to two serious problems in the Draft Plan's proposed emission control measures identified below.

SS12: Revise to require direct control or reject.

Draft measure SS12 would allow refiners to increase their carbon intensity by purchasing allowances in the Low Carbon Fuel Standard (LCFS) pollution trading market. The LCFS exempts all emissions associated with refined fuels that are "exported" for use outside the state from its allowance purchase requirements—and Bay Area refineries already increase exports when statewide fuels demand declines. Thus, this measure would encourage each refiner to gain a competitive advantage by refining cheaper, higher-carbon oil and further increasing production for export. That would increase emissions from higher-carbon refining for export, and shift tailpipe emissions elsewhere as more refined fuels are exported. The higher-carbon refining for export also would worsen disparate localized health impacts and environmental injustice. Refinery GHG and particulate emissions are strongly correlated (OEHHA, 2017) and low-income communities of color already are disparately burdened by refinery emissions of this toxic GHG co-pollutant (Pastor et al., 2010). Therefore, the design of this draft measure is fatally flawed. Draft measure SS12 should be revised to require a direct emissions control approach instead of pollution trading, or DM SS12 should be rejected.

SS18: Revise to use an emissions/barrel oil refined metric.

Draft measure SS18 would among other things set CO_2/barrel limits on each refinery's emissions. This requires a reliable and transparently verifiable CO_2/barrel measurement. The emissions/barrel ***oil refined*** metric that the District Staff proposes in its concept paper for Rule 13-1 has been shown to be a reliable metric for refinery emissions associated with changes in oil feed quality based on publicly reported data. (*See* Karras, 2010; Abella and Bergerson, 2012; Gordon et al., 2015.) In contrast, the emissions/barrel ***refined products*** metric suggested in draft measure SS18 cannot be verified, established as an emission limit, or enforced based on publicly reported data at this time. The Air District has not reported any refiner's products volumes publicly, and moreover, it has said it cannot do so due to confidentiality concerns. Thus, it is very unlikely that the District could verify, establish, and enforce reliable and effective limits on emissions/barrel of refined products. Therefore, draft measure SS18 should be revised to include limits on refinery emissions/barrel of oil refined.

Thank you, in advance for your consideration of these preliminary comments, and if you have a question about them, please feel free to contact us.

In Health,

Greg Karras
Senior Scientist

Roger Lin
Staff Attorney

Copy: Interested organizations and individuals

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March 9, 2017

Mr. Henry Hilken
Director of Planning and Climate Protection
Bay Area Air Quality Management District
Submitted electronically via hhilken@baaqmd.gov

Ms. Abby Young
Climate Protection Manager
Bay Area Air Quality Management District
Submitted electronically via ayoung@baaqmd.gov

Re: Comments on the January 10, 2017 Draft Clean Air Plan

Dear Henry and Abby,

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), we provide comments on the Draft Clean Air Plan (CAP or "draft Plan") and supporting documentation, as released by the District in January of this year. CCEEB is a coalition of business, labor, and public leaders that advances strategies for a sound economy and a healthy environment. We have many members that operate facilities in the air basin. Additionally, CCEEB represents a large number of sources statewide regulated by the Air Resources Board (ARB) for greenhouse gas (GHG) emissions, and has played an active and ongoing role in developing state GHG laws and programs. We appreciate the opportunity for continued engagement with you and the District, and the many opportunities for public participation in the planning process. In our review of the draft Plan, we note four overarching themes to our comments. They are as follows:

- **A bold vision for climate change**. The Plan is intended to reach regional 2030 and 2050 climate targets, affecting all aspects of the economy, energy systems, transportation, and built environment. In doing so, the Plan must be clear about District objectives and the time needed to achieve them. It must also describe a clear pathway that ensures a smooth and equitable transition. Towards this end, the Plan should distinguish between quantifiable near-term and mid-term measures, and those that are long-term and aspirational.

- **Alignment with State and Federal Programs**. The draft Plan should expand its discussion of interactions with state air and climate plans, as well as state and

federal incentive programs. For example, future-year emission projections should account for commitments in the post-2020 Scoping Plan (2017 revision) and the 2017 State Implementation Plan, particularly the Air Resources Board's Mobile Source Strategy.

- **"Show Your Work."** It is unclear how staff arrived at some emission and cost estimates for control measures, and what assumptions were used. Sharing this work would increase transparency and allow full evaluation of the draft Plan.

- **Use the Plan to Set Priorities.** The final adopted Plan should guide rulemaking, establish priorities for Board and staff, and set expectations among District partners. Abrupt or arbitrary deviations from the Plan divert District resources away from measures prioritized for air quality and public health benefits.

We offer more detailed comments below, as well as comments on specific measures.

Climate Change: Setting a Transition Pathway, Aligning with State Programs

Aligning with State Programs

The draft Plan sets forth a bold vision of a post-carbon Bay Area. In addition to the regional GHG goals of 40 percent emissions reduction by 2030 and 80 percent by 2050 from 1990 levels, the Plan envisions what actions are needed in the region. For example, the Plan envisions Bay Area industries transitioning to carbon-free electricity and biofuels by 2050, and the majority of trips taken by active transport, transit, or ride sharing. Less clear is the transition pathway to achieving these objectives, or the role the District hopes to play. Adding explicit discussion of how the District and the Bay Area fits within state programs could help pinpoint what actions we need to take regionally versus where it makes sense to support statewide efforts.

One important state effort is implementation of SB 350. The draft Plan briefly notes that SB 350 requires investor-owned utilities to procure 50 percent of electricity from renewable sources,[1] and a doubling of energy efficiency in existing buildings.[2] SB 350 is not mentioned again in the draft Plan, and presumably, GHG reductions required by it are not part of the District's future year projections. We suggest that staff's analysis explicitly consider how SB 350 will reduce regional GHG emissions, how energy generators and providers are likely to respond to SB 350 mandates, and where District actions can add the most value, aligning with state efforts without interfering or overlapping. For example, how should utilities balance the state objectives of electrifying transportation as quickly as possible and expanding procurement of renewable energy with the District's priority of electrifying the industrial sector? We

[1] BAAQMD Draft Clean Air Plan, *Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area*, page 4/21.
[2] BAAQMD Draft Plan, page 1/7.

note that ARB's post-2020 approach to industry focuses on energy efficiency, process changes, and technology development – not outright electrification.[3]

Similarly, the regional economy operates within statewide, inter-state, national, and often international systems. As the draft Plan acknowledges, the success of our climate change efforts ultimately depends on changes to these broader systems. This is why regulations at the highest level possible are the most effective. Consider the state cap-and-trade program, which seeks to minimize economic and emission leakage outside of California, yet assumes that instate production and economic activity will shift to the most energy-efficient and low-emission facilities. How would District regulations, overlaid on top of state requirements, affect this shift to the most efficient production?

For example, under SS11, a Bay Area refinery would need to "cap" total emissions under permitted levels, and then, under SS18, meet a CO2 "intensity cap" and increase combustion efficiency. This would be in addition to projects undertaken for compliance with cap-and-trade, the Low-Carbon Fuel Standard, and the 20 percent energy efficiency measure currently under development at ARB. If District programs increase relative costs for Bay Area refineries, it's more than plausible that some level of refining production could shift to Southern California *even if Bay Area refineries are more energy efficient*, i.e., District rules would distort cap-and-trade's price signal, thereby rewarding more carbon-intensive facilities, and leaking GHG emissions.[4] Should production shift to the growing number of international refineries producing California-compliant fuels, an even greater level of emissions leakage would occur,[5] a perverse outcome called out by the District's Advisory Committee in its January 2017 report to the Board:

> *"Climate change is one-world in scope, driven not just by GHG emissions from a single facility, localized area, or even a large geographical region, but by the worldwide total of all GHG emissions."*
>
> *"Because the petroleum industry is globally integrated, the Council considers it likely that such excess crude over the cap (and the GHGs associate with that production) will be displaced from the Bay Area and relocated to refineries elsewhere, out from underneath the [regional] caps and negating their intended climate benefit."*

[3] Several ARB programs incentivize electrification of combustion equipment, such as forklifts, lawn mowers, and container handling equipment, and ARB sets emission standards for combustion equipment. However, the Scoping Plan does not target wholesale electrification of the industrial sector for its 2030 targets.
[4] The 2015 example of the shutdown at the Torrance refinery highlights the role international refineries are now having on California's fuel market. No longer is California an island of boutique fuels; demand can and is being met increasingly by foreign refiners – adding to the lifecycle emissions of fuel consumed instate.
[5] This also raises ethical questions about Bay Area exporting environmental harms to low-cost jurisdictions, where environmental and occupational health and safety protections are more lax, yet the produced energy and goods are consumed locally.

> *"The Council is concerned that merely shifting Bay Area refinery GHG emissions to other location outside the Bay Area will not truly reduce total global GHG emissions, and as a result, will not provide the climate protection expected and needed."*

This example of leakage is not unique to refineries, and holds true for other carbon-intensive industries directly regulated by ARB. Unless staff has fully investigated such interactions, we recommend that control measures seeming to overlap with state programs be re-categorized as Further Study Measures, and urge staff to partner with ARB to evaluate these measures. [6] Furthermore, because of the high potential for leakage, we believe it would help if the District reframe its 2030 and 2050 goals based on net GHG reductions. If too much emphasis is placed on reducing *regional* emissions and leakage occurs, emissions are only displaced—not reduced—with the real risk of increasing net *global* emissions. Goals based on net GHG reductions, on the other hand, recognize leakage risk and align with approaches at the state level, where programs are evaluated on a lifecycle basis, sectors are evaluated for trade exposure, and control measures are carefully designed to avoid leakage.

The District should also consider whether a control measure adds unnecessary costs or process steps for activities already underway, even if there is no direct interference. For example, EN2 calls on the District to work with electricity providers to develop messaging about peak demand use— work that is already happening under CEC, CPUC, and EPA programs. How, then, is the District proposing to add value? It may help to revisit the District's multi-sector gap analysis, in which many of these same questions were raised.

Encouraging GHG Reduction Projects, Supporting Adaptation Planning

There are two general areas where District efforts are clearly beneficial. First are District efforts to support projects undertaken to implement AB 32 and SB 350, such as EN1 and permit streamlining for large-scale renewables, biofuel, and combined-heat-and-power projects. We think this concept could be expanded to support and encourage other GHG reduction projects. Additionally, the District should examine where its policies may unintentionally impede GHG reduction projects, such as placing barriers on industries trying to produce low-carbon products to meet instate demand.

The second area is support for adaptive strategies. Although the draft Plan rightly identifies the need for adaptation planning alongside GHG mitigation, it does little to describe the role the District will play in supporting its partners at the Bay Conservation and Development Commission, the Bay Area Regional Collaborative, and other local and regional bodies. We think this area could be expanded.

Provide Climate Leadership, Develop Model Programs

[6] Specific measures to evaluate could include, but are not limited to, SS11, SS18, EN1 and EN2.

Finally, we strongly support the discussion on page 1/6 about the need to provide climate leadership to "inspire action across the nation and around the world." To this end, we recommend the District add an objective that it will design its climate policies in ways that can and will be replicated by other jurisdictions.[7] A measure of success would be whether or not other agencies follow the Bay Area's example and adopt similar measures. Generally, we believe policies that can be copied in other areas will ultimately yield the greatest climate change benefit.

The BAAAQMD has already taken positive steps in this direction. See, for example, staff's work to develop a consumption-based GHG inventory, and the draft Plan's recognition that, "The decisions we make as individual consumers—about which goods and services we purchase, how and where we travel, and what foods we eat—have a great impact on our 'GHG footprint,' both at the household and regional scale."[8] It is this area where the District can have great impact, building model programs and tools to reduce per capita emissions. There is no better region to advance this work; the Bay Area has an ideal mix of innovative businesses and committed citizens, which need only be leveraged in the District's work.

Importance of Local and Regional Transportation and Land Use Planning

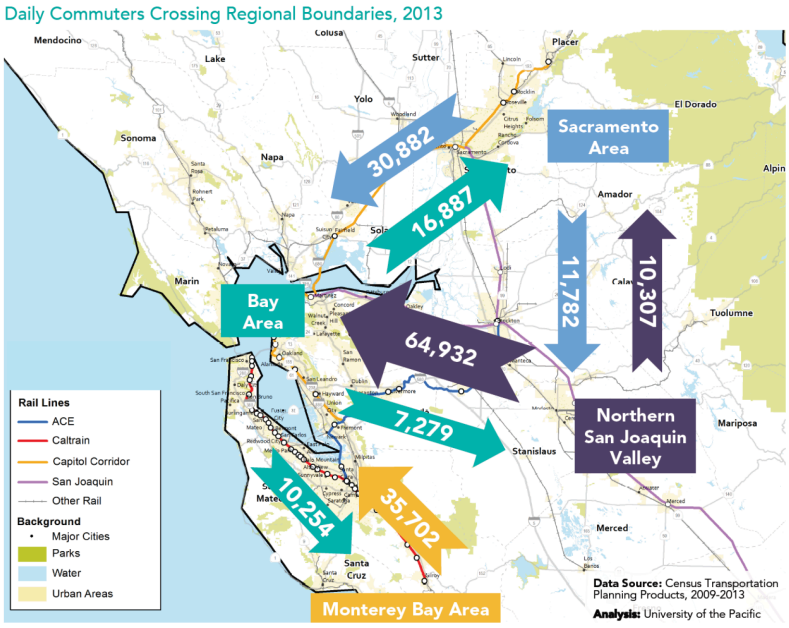
Some actions uniquely lend themselves to local and regional leadership, as described in ARB's Scoping Plan (see Chapter V and Appendix B). This is due to the unique authority given to local government over transportation and land use, and includes community-scale plans, efforts to reduce per capita GHG emissions, CEQA review by lead agencies, transportation and land-use measures to reduce vehicle miles traveled, adoption of local codes and ordinances to promote green building, projects undertaken at municipal utilities and transportation agencies, and technical assistance provided to ARB and state and local partners.

The need is great. Transportation and land use challenges may prove the hardest climate problems to overcome. For example, the Bay Area Council Economic Institute released an August 2016 report *Another Inconvenient Truth: To Achieve Climate Change Goals, California Must Remove Barriers to Sustainable Land Use* that found the lack of affordable housing in the Bay Area and the region's failure to build in Priority Development Areas has led to outsourcing of housing to inland regions far from job centers, which in turn increases commute times and vehicle miles traveled. This phenomenon hits low- and middle-income families hardest; the lack of housing is the

[7] In the final proposed Scoping Plan (January 20, 2017 draft), ARB makes clear the importance of linking to broader systems: "From its inception, AB 32 recognized the importance of California's climate leadership and engagement with other jurisdictions, and directed CARB to consult with the federal government and other nations to identify the most cost effective strategies and methods to reduction GHGs, manage GHG control programs, and to facilitate the development of integrated and cost-effective regional, national, and international GHG reduction programs." Page 28. https://arb.ca.gov/cc/scopingplan/scopingplan.htm

[8] 2017 Draft CAP, page 1/11.

leading cause of poverty and low-income families are the ones most likely to be displaced far from job centers.



"In 2015, the Bay Area economy added 133,000 jobs but only 16,000 units of housing. The surge in demand and the dearth of supply have caused home prices to soar and anyone who does not own their home to become increasingly at risk of displacement. The median home price in the Bay Area is now $712,000, up 80 percent since 2009, and is fast approaching the pre-recession peak of $729,000 in 2007. Congestion in the region is also on the rise, climbing 33 percent from 2010 to 2014. The Bay Area is now tied with Los Angeles in hours of traffic delay and congestion cost per commuter and ranks just behind Washington DC, the most congested region in the country."

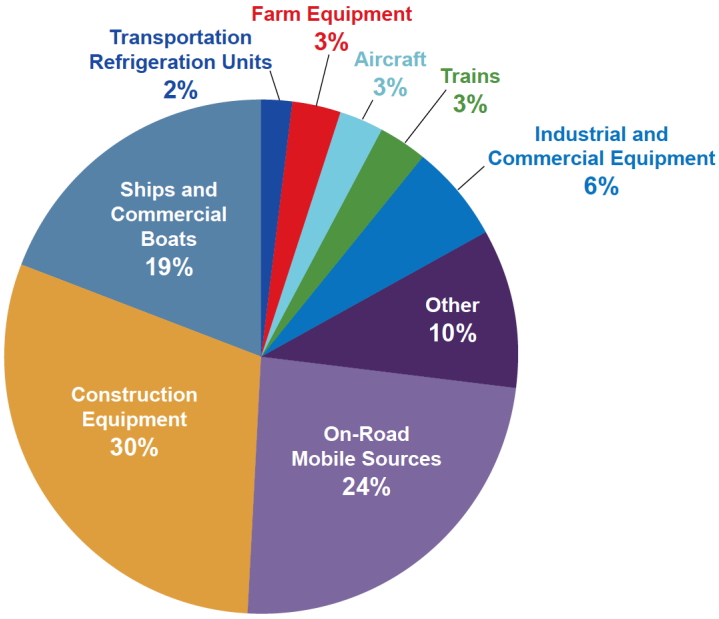
While the draft Plan includes a number of measures directed at clean transportation, urban forestry and green spaces, rehabilitation of the built environment, and other sustainable community strategies, these measures could unintentionally propel gentrification in economically disadvantaged communities. At the same time, the draft Plan does little to address the bigger drivers of regional GHG emission increases—or the growing quality of life inequities across regions. We believe this should be part of the District's approach to climate change.

Criteria Pollutants and Air Toxics: Reaching Attainment, Reducing Disparities

CCEEB supports the draft Plan's goal of reaching state and federal air quality standards, which establish health-protective air pollution levels for ozone precursors and particulate matter. We also support the objective of reducing exposures, particularly in District-identified CARE communities, and continuing to reduce emissions from criteria pollutants and toxic air contaminants (TACs) from all major sources.

The goal of eliminating community-level disparities in cancer risk is laudable but difficulty to implement in practice. The District has tight control over permitted industrial sources and commercial equipment, but this category represents only 6 percent of cancer-risk weighted emissions.

Figure 2-10. **Cancer-Risk Weighted TAC Emissions by Emission Source Category, 2015**



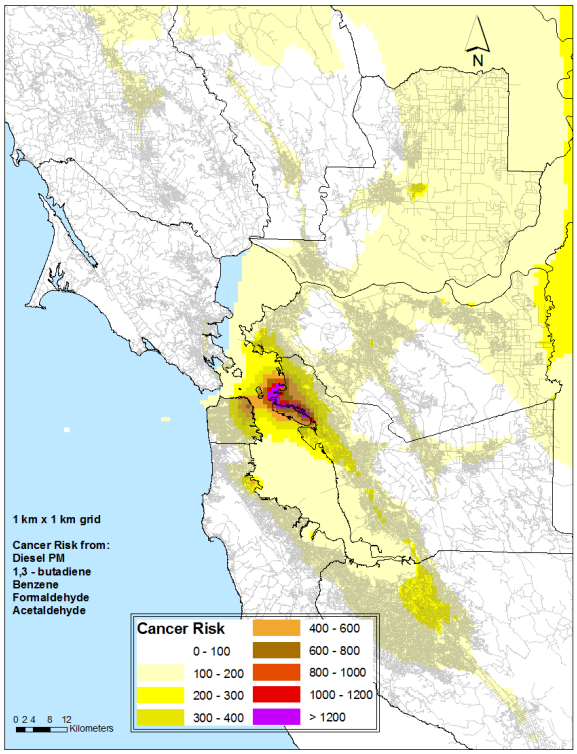


Figure 2-10 of the draft Plan shows that most risk comes from on-road and off-road mobile sources regulated by ARB and federal EPA, and outside District direct authority. The District has shown the geographic distribution of cancer risk from TACs through its CARE modeling. Here we see the communities in southeastern San Francisco, West Oakland, and East Oakland along the 880-corridor have relatively high risk compared to other neighborhoods. (It's notable that relative risks in other CARE communities—Redwood City, San Jose, and Concord—have decreased, and overall cancer risk in the region has declined 83 percent since 1990.) From a priority setting perspective, efforts to reduce exposure from mobile sources around transportation corridors would have the highest public health benefit. Attention to these same sources would also reduce PM2.5, which the draft Plan notes is the pollutant of most concern in terms of health.

Smart Investments Achieve Public Health Benefits and Decreases Disparities

The District's administration of mobile and area source incentive programs is a key tool to reducing TAC and PM2.5 emissions, particularly in CARE communities. As the draft Plan notes, the District has provided nearly $250 million in funding over the past five years, and anticipates investing another $288 million through 2024. The vast majority of these funds come from state and federal programs, not District revenues. CCEEB has long supported incentive programs, and is a recognized industry leader on state legislation funding incentive programs. Securing incentive funds, and justifying investments in public health, is far from easy, nor are outcomes certain. CCEEB, with many agency, industry, and environmental partners is, beginning a new round of advocacy in support of ARB's Mobile Source Strategy, which calls for significant investments above and beyond existing air and climate incentive programs, to accelerate deployment of clean technologies. We hope the BAAQMD joins these efforts.

Evaluate Distributional Impacts from the CAP

To help the District meet its goal of eliminating community-level disparities, we recommend that staff do the following analyses to evaluate impacts in CARE communities.[9] First, we strongly recommend the District conduct distributional impact analysis to estimate community-level emission reductions and public health benefit from proposed control measures, comparing CARE communities to non-CARE communities. This could be done through in-house enhancements to the Multi-Pollutant Evaluation Methodology (MPEM), as noted in the MPEM Technical Document, page 42. The MPEM analysis could later be adjusted to evaluate ex post results from the Plan.

Second, we ask staff to include, as an appendix, a table listing sources of incentive funding, total amounts invested per year, and the breakdown of funds by county, or by community (e.g., CARE vs. non-CARE), to the extent information is available. This increases transparency in how funds are allocated and ensures District investments further the goal of reducing disparities. Staff already tracks Carl Moyer investments to satisfy AB 1390, which requires 50 percent of funding to benefit low-income communities. Similarly, ARB sets guidelines for agencies administering cap-and-trade revenue to meet targets in SB 535 and AB 1550. This is particularly important for programs that may be attractive to middle- and high-income households, which tend to have an advantage competing for limited rebates and grants. Smart and transparent investments play an important role and should not go overlooked. For example, looking at 2015 Greenhouse Gas Reduction Fund allocations in the Bay Area, we see the unexpected result that investments tended to benefit people living in high-income counties San Francisco (30 percent or $90 per capita) and Marin (6 percent or $56 per capita), as opposed to Alameda (17 percent or $27 per capita) and Contra Costa (11

[9] The recently adopted Air Quality Management Plan for the South Coast provides a good example of a distributional analysis. See the final Socioeconomic Report (March 3, 2017) for the AQMP and appendices 6-A and 6-B. http://www.aqmd.gov/docs/default-source/clean-air-plans/socioeconomic-analysis/final/sociofinal_030817.pdf?sfvrsn=2

percent or $24.36 per capita). This outcome might signal a need to rethink investment priorities and administration at the District.

"Show Your Work": Improving Transparency and Robustness of CAP Analysis

Climate Change Analysis

Figure 3.9 shows projected Bay Area emissions by sector, with a large gap between business-as-usual and regional goals. This would be cause for alarm, however, the draft Plan then makes the caveat that these projections do not include "potential emission reductions from additional state actions that may be included in the Scoping Plan update…"[10] It would seem District analysis, then, also excludes the many coordinated plans across state agencies referenced in the Scoping Plan and typically made part of ARB emissions analysis. [11]

We believe omitting state plans is a mistake. First and most importantly, all scenarios in the Scoping Plan are designed to, "[e]nsure the State achieves the 2030 target."[12] We firmly believe ARB will adopt a Scoping Plan this summer that achieves state targets. Second, the Scoping Plan includes quantified reductions from known commitments, showing a 21 percent reduction from the business-as-usual reference case from these efforts alone. These reductions are not part of District analysis, which instead relies on the BAU reference case. Third, the draft Plan wrongly assumes the post-2020 cap-and-trade will retain the current allowance and reduction formula (page 3/20). Nothing in the Scoping Plan or proposed amendments to the cap-and-trade regulation support this assumption.

We would like to work with staff to improve the post-2020 regional emissions projections and properly account for state commitments. While we understand the District is determined to adopt its Clean Air Plan ahead of ARB's adoption of the Scoping Plan, we think there is still room to improve Figure 3.9 in the final draft CAP.

Table H-1 and Calculating Emission Impacts from Control Measures

We recommend using tons per day (tpd) rather than pounds per day and million metric tons of CO2e rather than metric tons for greenhouse gases. This makes for easier

[10] Draft Plan, page 3/19.

[11] The final proposed 2017 Scoping Plan takes into account implementation of existing plans and programs, such as SB 350 (50% renewable energy, doubling of energy efficiency, and other mandated targets), the Low Carbon Fuel Standard, the Mobile Source Strategy, SB 1383 and the Short Lived Climate Pollutant Plan, and the Sustainable Freight Strategy. The proposed scenario assumes implementation of a 20% refinery energy efficiency measures and a post-2020 cap-and-trade program, in addition to existing commitments. See Table II-1, pages 34-36. See Tables II-3 III-1 for estimated emission reductions, by sector and by program. The Scoping Plan anticipates further reductions from additional plans and programs, such as SB 375, the State Implementation Plan, Forest Carbon Plan, and AB 341 and AB 939, that are not quantified as part of ARB's scenario planning.

[12] 2017 final proposed Scoping Plan, page 45.

comparison to the initial control measure descriptions released early in 2016, as well as comparison to ARB and other air districts where tons per day, tons per year, and million metric tons are common metrics. Use of pounds per day is confusing and seems to artificially inflate the numbers.

MPEM Estimates of Benefits

We appreciate Table C-1 in Appendix C that lists the health endpoints used in the MPEM and CAP analysis. However, we question the use of $62/ton for the social cost of carbon, as it oversimplifies work done by EPA. District staff applied a discount rate of 2.5 percent without much explanation other than arguing that typical discount rates of 3 percent to 7 percent "would reduce the value of future benefits to near zero in today's dollars, but this would raise ethical issues since putting a near-zero value on future benefits suggests that as a society we do not care about the future beyond a generation or two."[13] Due to the change in its calculation method, the District's estimate of GHG benefits per ton jumps 198 percent over what was used in the 2010 Clean Air Plan.

CCEEB recommends the District use a range of discount values (5 percent, 3 percent, and 2.5 percent) to estimate the social cost of carbon, consistent with the approach ARB used in the 2017 Scoping Plan.

We also recommend the addition of a table that shows cost estimates for each of the three "tiers" staff used to evaluate control measures, i.e., 1) avoided costs related to health impacts, 2) premature mortality, and 3) the social cost of GHGs. This is important because, unlike the first two tiers, *the social cost of carbon represents benefits that may never be realized regardless of whether or not the Plan is successful*. As a global pollutant, action taken in the Bay Area or California alone cannot realize GHG benefits (conversely, if the majority of areas took action and the Bay Area did nothing, the region would realize benefits as a free rider). Avoided costs from health impacts and premature mortality, on the other hand, represent actual benefits to be gained in the region through regional actions. Blurring the types of benefits together undermines the usefulness of economic analysis, makes it difficult to assess the relative importance of individual measures, and implies the social cost of carbon can be made real through the CAP.

Stationary vs. Area Sources

Recently, staff has begun categorizing small residential sources as "stationary sources" rather than the more typical category of "area sources." This seems to inflate the proportional contribution of regulated stationary sources in emission inventories, and is misleading. Moreover, the inconsistent use of categories makes staff analysis difficult to follow. For example, the discussion of SS18—the basin-wide combustion strategy—states that stationary sources account for over half of all GHG emissions at 40 MMT

[13] BAAQMD Multi-Pollutant Evaluation Methodology Technical Document: 2016 Update, November 2016, page 42.

CO2e annually. However, this number includes residential and commercial fuel usage, which isn't commonly referred to as a "stationary source" for the purposes of air quality and climate planning (and wouldn't be subject to SS18 at any rate).[14] Table 3-2, on the other hand, more properly attributes residential and commercial fuel usage to the Buildings Sector (residential and commercial *electricity* use, on the other hand, appears to be part of Electricity Sector emissions).

CCEEB recommends that staff refer to residential and non-regulated commercial sources as "area sources." This conforms to practices used at other air agencies. SS18 should be revised so that emission estimates reflect only those sources actually affected by the measure.[15]

Comments on Specific Measures

SS9: Crude Slate Changes and SS17: GHGs in Permitting/BACT
These two measures propose changes in federal Clean Air Act New Source Review permitting that go beyond the scope of federal requirements and EPA guidance. We will continue to work with staff on the development of these measures, as well as other proposed changes to Regulation 2 as discussed in the September 30, 2016 Training Session on Regulation 2.

SS18: Basin-wide Combustion Strategy
The discussion for this measure incorrectly assumes that a rate-based standard for carbon intensity does not limit production at a facility and "Therefore, it would reduce the economic incentive for industry to move outside of the Bay Area…"[16] While CCEEB agrees that SS18 is not a *direct* mandate limiting production—as is SS11—it could indirectly lead to lost production. For example, in cases where energy efficiency projects are infeasible due to cost constraints or because return on investment is higher at facilities outside the Bay Area, production is likely to shift, resulting in emission and economic leakage.

Phase 2 of the measure, which proposes mandatory energy efficiency through rulemaking, appears at odds with state requirements, as it would eliminate flexibility given to facilities under cap-and-trade to plan projects holistically and optimize time schedules. Facilities also have a business reason to implement projects that are cost effective and technologically feasible. Unfortunately, SS18 seems designed to force

[14] Table IV-1 in the Regulation 6 Workshop Report (page 6-20) similarly categorizes residential space and water heating, wood stoves, and fireplaces as "stationary sources" of combustion. These residential sources—not subject to Reg. 6—account for nearly 70 percent of emissions from the category.
[15] Comparing SS18 with Table 3-2, it is unclear what accounts for the 30 MMT CO2e attributed to industrial combustion in SS18, even after removing residential and commercial fuel use and imported electricity.
[16] Page SS-60

projects that would either be implemented anyway (and in that case, does the District or ARB take credit?) or are cost prohibitive and risk leakage of emissions.

We are also concerned with the assumption that SS18 will reduce regional GHGs by 5 percent, based on staff interpretation of ARB energy audits, and the further assumption that PM2.5 emissions will be similarly reduced. We ask staff to provide a technical discussion of how it arrived at these conclusions. We also disagree with the assumption that there is no direct emissions tradeoff; it is well established that certain control technologies worsen combustion efficiency, such as diesel PM filters and wet scrubbers. We commit to working with staff to resolve these issues and refine SS18, and strongly recommend that ARB be engaged in the rule development process for proposed Regulation 13, Rule 1 to ensure alignment with state climate programs that regulate GHG emissions from these same sources.

SS20: Air Toxics Risk Cap and Regulation from Existing Facilities

We have several concerns with proposed Regulation 11, Rule 18, which we described in our December 2, 2016 written comments to the District (Attachment 1). The problems we identify remain, including but not limited to the need for dispute resolution, clarification of interactions with Regulation 2 New Source Review, the need for technical working groups to assist with TBARCT determinations, and clarification of how approved risk reduction plans could later be altered by the District or compliance times shortened. In discussions with staff, the suggestion to convene technical working groups was well received, but the District has not yet taken steps to do so. We strongly urge staff to convene these groups immediately. We note that a new round of community open houses has been scheduled – our experience is that the open house format is not conducive to in-depth technical discussions with facility operators, and that information provided by staff in these meetings is overly general and disjointed. In other jurisdictions (and, in the recent past, at the BAAQMD), staffs prepare technical presentations on proposed rulemakings, followed by interactive discussions with interested stakeholders who share questions and ideas and work together to resolve issues. Important here is the interaction among the entire group and the shared understanding formed among stakeholders and staff. Given the wide scope and broad reach of Reg. 11-18, adherence to the District's Rule Development Policy is of utmost importance.[17]

CCEEB questions the discussion of the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) on page 4/7 of the draft Plan. This successful program—which has resulted in significant risk reductions from stationary sources—continues to be implemented statewide through air district rules and programs. CCEEB has worked for the past several years with the District, the Office of Environmental Health Hazard Assessment (OEHHA), the California Air Pollution Control Officers Association, and ARB,

[17] See http://www.baaqmd.gov/rules-and-compliance/rule-development. In particular, we point to Step 3: Host Stakeholder Meetings and Step 5: Conduct Public Workshops.

and the South Coast AQMD to implement changes to the ATHS program based on a new AB 2588 health risk assessment (HRA) methodology approved by OEHHA. However, in discussions of Reg. 11-18, District staff has stated on several occasions that AB 2588 is a "one and done" statute, and that requirements to conduct quadrennial inventories, HRAs, public notification, and risk reduction plans have sunset. Staff believes that only the annual inventories and AB 2588 fees are ongoing, and thus the sunset of AB 2588 is justification for a new regulatory approach under Reg. 11-18.

If this is the case, page 4/7 should be revised to clarify the District's legal interpretation of AB 2588. The draft Plan currently implies that the entirety of AB 2588 still applies and is in effect, and that Reg. 11-18 is in addition to the ATHS program.

Thank you for considering our comments. Should you have questions, please contact me billq@cceeb.org or 415-512-7890 ext. 115, or Janet Whittick at janetw@cceeb.org or ext. 111.

Sincerely,

Bill Quinn
CCEEB Chief Operating Officer and Bay Area Partnership Project Manager

cc: Gerald D. Secundy, CCEEB
Janet Whittick, CCEEB
Kendra Daijogo, The Gualco Group, Inc. and CCEEB consultant

March 9, 2017

Jack Broadbent,
Chief Executive Officer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Subject: Comments on the Bay Area Air Quality Management District Clean Air Plan

Dear Mr. Broadbent,

Thank you for the opportunity to comment on the 2017 Draft Clean Air Plan. The document clearly sets forth the challenges ahead for our region to continue to grow while reducing air pollution and carbon emissions. As the transportation agency for the City and County of San Francisco, we share the region's goals for environmental sustainability, equity, and economic vitality, and look forward to working with the District to achieve them.

In general, the plan successfully conveys the magnitude of change needed and, equally important, that only a multipronged approach can achieve state and regional targets in air quality and greenhouse gas emissions. However, we feel the plan could be stronger in some ways. The plan identifies the insufficiency of current regional, state, and national policies to achieve the State and District's 2030 and 2050 goals, but the plan's recommendations generally fall within the landscape of those policies. While the District's direct rulemaking authority may be limited, there is room in the Plan for stronger advocacy for the policies that will be necessary.

In addition, please consider the following specific comments:

Page	Section	Comment
ES-3, 1-8	How and Where we Travel	Please place active transportation modes - bicycling, walking, and transit - ahead of electric vehicles. The bullet regarding the mode share should be placed first. Further, there is not consensus among researchers that non-electric autonomous vehicles will result in VMT reductions, so emphasis should be on electrification.
ES-5	Transportation	In addition to directing development to those locations that are well-served by transit, we need to provide high-quality transit service that attracts passengers and the capacity to accommodate them comfortably.
1-9	Reduce Motor Vehicle Travel	We agree that the transportation landscape includes many new services, products, and technologies. We hope that the District can guide the conversation about leveraging these changes to benefit the environment.
1-10	Promote Zero-Emission Vehicles and Renewable Fuels	Consider also mentioning that the benefit of electric vehicles depends on the state energy mix.

1-14	Pricing	The pricing language is vague and should emphasize how pricing policies and revenue could be used to transform the sector to meet goals of the Plan.
4-9	Grants	The plan has previously recognized public transportation as an important strategy for reducing greenhouse gas emissions, but none of the grant programs listed in Table 4-3 directly relate to it. Are there opportunities to develop additional grant programs to strengthen this strategy?
5-10	Key elements	Instead of "alternative means of transportation" please specify, "walking, bicycling, and transit." We would prefer to avoid language that portrays SOV travel as the default and everything else as an "alternative."
5-11	Transportation Control Measures	For TR3 and TR4, please clarify what constitutes bus and rail "projects" - continuing to support transit operations and maintenance, not just capital projects, is important to further regional sustainability goals.
5-11	Transportation Control Measures	On TR6, the correlation between freeway performance and greenhouse gas emissions is unclear, due to increased VMT and induced demand.
5-12	Transportation Control Measures	Can we be stronger than to "encourage" planning for bicycle and pedestrian facilities? We will need to provide actual incentives for jurisdictions to include bicycle and pedestrian facilities in their plans. Are there funds that can be conditioned on having these elements present, like the Caltrans Bicycle Transportation Account?
5-32	Dollar value of Health Benefits	Does this table include health benefits from reductions in colllisions? Using US DOT guidelines, SFMTA and the SF Department of Public Health have determined that the cost of a traffic injury to society ranges from $27,300 for a minor injury to $9.6 million for a fatality.[1]

We appreciate the District's work on this plan and would be happy to provide any additional information for any of these suggestions. We look forward to being a partner in helping the Air District to achieve the region's environmental goals.

Regards,

Lucas Woodward

Lucas Woodward
Regional Planning Lead, San Francisco Municipal Transportation Agency

Cc: K. Breen, T. Doherty, S. Jones, SFMTA

[1] U.S. Department of Transportation: "Guidance on Treatment of the Economic Value of a Statistical Life (VSL) in U.S. Department of Transportation Analyses – 2016 Adjustment" 2016.

East Bay Regional Park District

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February 28, 2017

Christy Riviere
Principal Environmental Planner
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

RE: Comments on BAAQMD's Draft 2017 Clean Air Plan

Dear Ms. Riviere:

The East Bay Regional Park District (Park District) appreciates the opportunity to comment on the Bay Area Air Quality Management District's Draft 2017 Clean Air Plan. The Park District is the largest regional park district in the United States, with over 121,000 acres protected from development located within Alameda and Contra Costa Counties.

The Park District would like to emphasize to the Air District that our agency is keenly interested in this effort and is supportive of the strategy in the Clean Air Plan. As a manager of natural and working lands, the Park District's comments are focused on that area in the 2017 Clean Air Plan.

Carbon Sequestration in Rangelands

The Park District manages a significant area of rangelands (79,000 acres) that are sequestering carbon. Most of this land is periodically grazed for vegetation management. The Park District recently updated a carbon sequestration study that found its 121,000 acres of regional parkland sequesters 300,000 tons of carbon dioxide equivalents.

The Park District is particularly interested in working with the Air District on off-site mitigation of GHG emissions through carbon sequestration projects, such as soil carbon. The Park District is also interested in collaborating on developing guidance and/or best practices on soil management to maximize GHG sequestration.

Carbon Sequestration in Wetlands

As mentioned above, the Park District recently updated a carbon sequestration study for our parklands in addition to managing 55 miles of San Francisco Bay shoreline properties. The Park District is also currently working on a number of wetland restoration projects, including the 150-acre Dotson Family Marsh located in Richmond that have numerous co-benefits for carbon sequestration, habitat restoration, and recreation. We are interested in learning more about the assistance, such as incentive funds to enhance carbon sequestration, to agencies such as ours that are working to protect and restore wetlands in the San Francisco Bay.

The Park District is also interested in how we can generate renewable energy. In 2016, the Park District completed a solar panel installation project at Shadow Cliffs Regional Recreation Area in Pleasanton that will generate 1.2 megawatts of energy annually, enough to offset nearly all of the agency's electricity use. The Park District is exploring biomass utilization as a pilot project to reduce its carbon footprint in terms of transporting and disposing this material to landfills. Biomass utilization is another source of clean energy that as a special district we could provide to the rest of the region.

The Park District would like to explore these practices further and welcomes hearing more from the Air District about this initiative. We appreciate the opportunity to provide our comments on this important effort.

Sincerely,

Sandra Hamlat
Senior Planner

cc: Ms. Abby Young, Climate Protection Manager

Erik Ferry Grantrai$ing $ervices for Bay Area public-benefit organizations

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03/01/17

Christy Riviere
David Burch
Principle Environmental Planners
BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street Suite 600
San Francisco, CA 94105

Dear Christy and David,

I'm writing first, to applaud the Air District for compiling a meaningful series of strategies & objectives in your recent *Spare The Air, Cool The Climate* Draft 2017 Clean Air Plan. You and the District have done a great service to Bay Area communities thereby. All the more so if The District will ensure that its best aspects become policy and practice, of course.

After scanning the document and reading 350.org Bay Area's analysis of it, allow me to provide the following suggestions:

1. I would urge disallowing 'offsets' for petroleum refineries exceeding emission limits by producing more biofuels or other compensations, such as carbon-trading. Such devices only delay the necessary. Refineries should both keep within emission limits AND produce more biofuels (ultimately of course, refineries should be decommissioned as quickly as possible and their constituent materials refabricated into post-carbon renewable energy infrastructure). The situation has gone too far to allow half-measures such as 'offsets.' Experience tells us all that this and every other available loophole will be exploited to the hilt by our regional petroleum interests.
2. Kudos for identifying many educational and positive monetary incentives to help move the ball on post-carbon energy strategies via the Draft Plan. But there's a lack of regulatory sticks on the other side of the equation. I would favor our collective investment in **more** *positive incentives* for our Bay Area fossil-fuel energy companies to get serious about post-carbon and carbon-neutral renewables ALONGSIDE *greater regulations with teeth*. The profound financial and consequent political power of the regional fossil-fuel industry will be moved by nothing less.
3. I'm a fan of biofuels . . . to a point. A decentralized solar, wind, and tidal electrical generating system sited primarily upon the existing massive collection capacity of the current built environment should be emphasized however. Use your authority to bring this on more strongly. As you know, the combustion of even carbon-neutral biofuels will produce additional air pollution in a region which already has plenty.
4. I agree with 350.org's assertion that we need a more aggressive timetable and set of incentives for the phasing-out of combustion-based heating systems. To quote 350.org's comment: "*The Plan needs to provide incentive funding for the installation*

Areana Flores

From:	John Holtzclaw <john.holtzclaw@sierraclub.org>
Sent:	Wednesday, March 8, 2017 10:44 AM
To:	Clean Air Plan
Cc:	Jean Roggenkamp; Darrell Clarke; Steve Sondheim; Brionté McCorkle; Akshai Singh; Ken Hughes; Payton Chung; Tim Frank; Jodie Van Horn; Michael Bosse; Egon Terplan; Jeremy Madsen
Subject:	Comments on Draft "Spare the Air and Cool the Climate"
Attachments:	LSE htg,cool energy - Courcelles.docx; LEM TPT Print.pdf; LEM- SF VMT map - enhanced.pdf

BAAQMD Blueprint Committee,

Please accept my comments on the Bay Area Air Quality Management District's (BAAQMD) draft Blueprint for Clean Air and Climate Protection in the Bay Area. I will not be able to attend the 9 March forum.

I have read the Executive Summary, and find much to praise in the approach and recommendations. You may have covered my suggestions below in the detailed document, however, I think it is important to cover these issues in the summary too, which is all most people will read, and it sets the tone for the whole Blueprint.

The success of the energy and climate emissions recommendations depends on the region's cities and counties developing in a more location efficient pattern. Curbing excess emissions from transportation, construction materials, heating and cooling buildings and personal consumption are all heavily dependent on development patterns. Compact mixed-use development not only reduces auto ownership and driving, but also saves building materials, and lowers the energy to heat and cool buildings. Apartments and condos in compact infill are generally smaller than single family houses, lowering furnishing requirements, and lighting and appliance energy use. Achieving these savings to meet the Blueprint's goals requires ramping up a land use campaign. I urge the District, along with sister agencies, to launch a major campaign to publicize the benefits of denser, mixed-use infill and complete streets, along with increased public transit. These benefits include not only the reduction in climate change and toxic emissions, but also shorten personal trips, allowing more to be walked or cycled, improving public health thru increased physical activity. With this information campaign, and a campaign for cities to relax lot size and building height limits, and allow coffee houses, markets and restaurants in all neighborhoods, we have a chance to meet the Blueprint's goals. Without such an effort, we risk getting our exercise when swimming home.

Buildings

Mid- and High-rise apartment/condo buildings appear to require more **building materials** until one considers that one block of 1000 dwelling units/acre (18 to 40 stories depending on the size of the units) houses as many households as 330 blocks of 3 du/acre single family houses (the average in sprawl). This square mile plus of housing

has to be supplied with utilities and roads, and accessed thru new highways and roads. All these construction materials have embedded energy and emissions costs. A study by Phillips & Gnaizda in the CoEvolution Quarterly, Summer 1980, compared new sprawling homes in Davis, CA, designed to California's rigid energy conservation standards, to a typical apartment house on dense Nob Hill, San Francisco. They found the Davis homes use 5 times more copper pipe than than the Nob Hill apartments. And use 35 times more land (think loss of forests, natural areas or farmlands), need 15 times more roadway, use 4 times more lumber, require mail carriers to travel 300 times as far, use 70 times more water, need 5 times more heating, and require 4 times more driving.

Multi-unit buildings share walls and ceiling/floor between units, reducing **heating and cooling** costs. The London School of Economics studied the year around heating, cooling, lighting and appliance energy for urban and suburban neighborhoods in greater London, Paris, Berlin and Istanbul. The most energy efficient was Courcelles (Paris, 17 arrondissement), a mixed-use neighborhood with 6 to 10 story chuck-a-block apartment houses. (Google view and links to study attached. The Arc de Triomphe with 12 streets radiating from it is center left, and the Seine at bottom.) Corucelles apartments use about 1/10 as much heating-cooling-lighting-appliance energy as typical American suburban houses.

Water consumption also varies by residential density. At the 7 December 2016 meeting of the ABAG's Regional Planning Committee (RPC), Mark Boucher, Bay Area Flood Protection Agencies Association (BAFPAA; don't worry, these acronyms will not be on the final exam) related that "high density" San Francisco used 50 gal/day-capita, while the average Californian used over 200 gal/day. That suggests that increasing the density from 3 hh/ra to 50 hh/ra decreases water consumption to 1/4 or less. These savings may result from less lawn to water and fewer cars to wash. It has been reported that 20% of CA energy consumption is used to move water around!

Transportation

Historically our cities and regions grew in a transportation-efficient pattern: towns founded near ports or rail stops or near energy sources, residents got around locally primarily by walking. As cities grew, multi-family, multi-story buildings replaced single-family structures, with restaurants, stores, offices and other services mixed-in with housing to keep trips short and walkable. As cities expanded, public transportation grew: horse-drawn carriages took to rail, horses later replaced by cable or electrified rail or by diesel or other internal combustion vehicles. Surface lines were replaced by elevated or underground lines. But the "last mile" was a foot trip, so neighborhoods remained mixed-use and walkable.

As the automobile industry developed and personal autos became a symbol of success, a new growth paradigm developed: single family, single use neighborhoods linked by auto. Model zoning laws were developed, and propagated by Secretary of Commerce Herbert Hoover, and guided development when housing construction resumed after WW2. This zoning mandates up to 5 vehicle off-street (garage) parking per house, wide streets and big side- and front-yard setbacks, while prohibiting markets in residential areas. Some cities even prohibit sidewalks. This zoning was required in order to qualify for federal

home loans. Federal housing programs, including mortgage guarantees and tax write-offs, have pumped trillions of dollars into housing construction. Meanwhile, central cities were redlined, denying loans to maintain, restore or buy housing. Consequently, their buildings deteriorated. These policies have been softened recently, but financing housing integrated with local shopping, or housing with less than one parking place per unit, is still a challenge.

Additionally, federally funded freeway construction bulldozed vast tracks of central city housing and commerce, destroying and dividing neighborhoods while bringing in hazardous traffic, noise and pollution. These same freeways connected central city jobs to vast stretches of farmland and natural areas, facilitating sprawl housing development, while loading infrastructure costs onto the rest of the community.

Back to the Future. This history helps us identify the elements of location efficient neighborhoods: higher density and mixed-uses to shorten trips, walkable-bikeable streets, and good public transit for the longer trips. The Location Efficiency study analyzed the impact of 14 primary variables on vehicles/household (Veh/Hh) and Vehicle Miles Traveled per household (VMT/Hh) for all the residential neighborhoods (generally census tracts) in metropolitan Chicago, San Francisco and Los Angeles (journal article and SF Bay Area VMT/Hh map attached, and summarized here). Household density (Hh/RA) reduced Veh/Hh and VMT/Hh more than any other variable. It does, however, correlate highly with mixed-uses, so the impact of high density also includes high mixed-uses (aka shorter trips). Family income ($/Hh) and family size (Pop/Hh) came in 2nd and 3rd in reducing Veh/Hh and VMT/Hh. Next was transit service (Zon Tr Dens), followed by Pedestrian & Cycle Friendliness. The highest density analyzed was around 500 Hh/RA, and the only two zones with Veh/Hh or VMT/Hh as low also had high density and high mixed use (Local Shopping), and additionally had very low incomes ($/Hh). There is no indication that even higher densities wouldn't reduce Veh/Hh and VMT/Hh further. The average resident of San Francisco's fairly dense North Beach neighborhood drives 1/4 as much as average suburban residents, while the average Manhattanite drives 1/9 as much.

Another study was reported in the 22 Feb 17 Streetsblog:
"A new study of travel and development patterns in Massachusetts sheds light on what can be done to cut down on traffic [PDF], Bill Holloway reports at the State Smart Transportation Initiative. The researchers identified six factors that affect the amount people drive in the state:
1. Land use mix (average distance between homes and the nearest retail establishment)
2. Household density (households per square mile of land area)
3. Sidewalk coverage (percentage of road miles with a sidewalk at least 3 feet in width)
4. Transit access (average distance between homes and the nearest transit stop)
5. Intersection density (number of intersections per square mile)
6. Managed parking (block groups with a single-use parking structure within 1 mile scored 1, others scored 0)
"All of these factors were found to play a significant role in driving mileage, but two were especially important:
Among the built environment variables evaluated, land use mix (the average distance between homes and the nearest retail establishment) and household density had the

largest impacts on passenger VMT. Other built environment variables found to exert significant influence on passenger VMT include sidewalk coverage, intersection density, managed parking, and the distance from homes to the nearest transit stop.
"By enacting policies to change these built environment variables, Massachusetts could reduce statewide passenger VMT by 13.6% below the business-as-usual scenario by 2040. If policies to shift projected population gains in the state towards lower-VMT communities are enacted in addition to these built environment changes, VMT could be reduced by a total of more than 15%."
Holloway's points 3 and 5 are included in the Location Efficiency study's Pedestrian & Cycle Friendliness.

The Blueprint (p ES/3) cites the need to reduce **Particulate Matter (PM)** and black carbon by eliminating wood burning. To achieve this PM reduction goal we must also eliminate diesel buses, and delivery and garbage trucks, from urban and suburban neighborhoods. These vehicles expose concentrated, often low income, populations to very fine particulates (PM 2.5). The District should lead a movement to electrify these fleets.

I hope these comments are useful, and feel free to contact me for additional information.

John Holtzclaw
Member, Association of Bay Area Governments' (ABAG) Regional Planning Committee (~38 years)
Retired member, BAAQMD's Advisory Council (24 years)

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https://get.google.com/albumarchive/106591176442410420182 2016 & counting
https://get.google.com/albumarchive/110103514848893704173?source=pwa 1962 thru 2015, try Iran 2015, NYC 2015

Don't believe everything you think.

Santa Clara Valley Transportation Authority

February 28, 2017

Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Attention: Josh Pollak

Subject: Draft 2017 Clean Air Plan

Dear Mr. Pollak:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft 2017 Clean Air Plan. We have the following comments.

Transportation Control Measures

VTA notes that measure TR-2, "Trip Reduction Programs" listed under Table 5.2 Transportation Control Measures does not discuss establishing specific vehicle trip reduction targets or including periodic monitoring of trip generation upon project completion and an enforcement mechanism if the target is not met. VTA encourages BAAQMD to include target-based trip reduction measures and monitoring as part of its Clean Air Plan guidance and review processes for projects across the Bay Area. A framework and documented process can be referenced in VTA's 2014 Transportation Impact Guidelines (TIA), section 8.2.2, page 39. The VTA TIA Guidelines are available at http://www.vta.org/cmp/tia-guidelines.

VTA is currently planning to change its transit service in late 2017 to coincide with the start of BART service to Santa Clara County, as part of the Next Network (nextnetwork.vta.org) operating plan. Following extensive outreach on the draft plan, a final plan is expected to be approved by the VTA Board of Directors in April 2017. The Next Network plan and a supplemental transit study titled "Core Connectivity," explore adaptable service models for underserved areas or locations with discontinued service. VTA encourages BAAQMD to extend Transportation Control Measure TR-8, "Ridesharing, Last-Mile Connection" listed under Table 5.2 to all organizations, public agencies or entities interested in piloting or conducing first/last-mile studies or programs.

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San Jose, CA 95134-1927

Administration 408-321-5555
Customer Service 408-321-2300

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans

BAAQMD1601