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The use of municipal biomass waste should not be credited as in compliance with SB138 by combustion or for in-state production of renewable gas - keeping sources as close to the community is important for municipal accountability and truth in operation evidence. The City of Stockton has entered into contract with DTE to combust City of Stockton organic wastes because the City "could not find a use". The City has not provided evidence of any actual efforts to increase use of composted organic green wastes nor acknowledged that the City will be polluting the air of the community with criteria air pollutants and greenhouse gases. DTE is the number one source of stationary air pollution in Stockton CA. Biomass combustion creates greenhouse gases and pollutants that harm communities. Stop giving credit to accelerate the in-state production of renewable gas, including biogas and biomethane, from organic waste which ignores the secondary costs to increase these sources for profit and the pollution that arises. The proposal to retire 118.3 million cap and trade allowances from the carbon market was moving in the correct direction to reduce carbon incentives that allow continued use don't move backwards postponing retirement. Annual accountability to proposed limits must be open and transparent. No more incentives to prop up industries that continue to shirk responsibilities for environmental harms that their profits cause - especially to those overburdened communities most vulnerable to climate change induced hazards and to continued pollution relating to legacy pollution and exposure to new sources sited without full mitigation. Prohibit permitting, including exemptions and legacy exemptions of stationary sources, in disadvantaged communities that directly emit pollution (toxic air contaminants, criteria air pollutants, and/or greenhouse gases) that increases the volume or concentration of community level and regional pollution. Cumulative impacts of only stationary or only mobile sources are not enough to protect those already harmed. Cumulative impacts should include existing and projected mobile and stationary sources that increase the volume or concentration of community and areawide pollution. When will CARB engage with the Renewable Portfolio Standard certification by the California Energy Commission? Stop all incentives for continued use of fossil gas and biomass combustion.