

From: Vargas, Susan [<mailto:susankul@stanford.edu>]
Sent: Thursday, September 11, 2014 4:47 PM
To: Gallenstein, Christopher@ARB
Subject: US EPA Proposed Carbon Pollution Emission Guidelines for Existing Electric Utility Generating Units - 111(d)

Dear Mr. Gallenstein,

Unfortunately, I was not able to join Tuesday's scoping meeting, but I very much appreciate your making the presentation available to interested parties. After reviewing it, I would like to submit two comments for state agency consideration.

First, I suggest California set an interim emission target *before* 2029 – perhaps 2020? Otherwise, we could be trying to close a large gap in the final year.

Second, I think it is very important to insist on mass-based rather than rate-based calculation metrics. While it's great that California is more energy efficient on a per-capita basis than the rest of the country, for example, the rate of GHG emissions is ultimately irrelevant if the total mass does not go down. We might cook more slowly if the rate of emissions drops, but we will surely cook if gross emissions stay steady or grow.

Thank you for the opportunity to comment.

Sincerely,
Susan Vargas

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