Comment 1 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Michael
Last Name: Black
Email Address: one4michaelg@mindspring.com
Affiliation:

Subject: feereg09
Comment:

```
This proposal is ridiculous.  It is costly to working people and
tax payers alike-with negligible enviromental benifits.

I oppose this, and urge your agency to do the same.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-08 19:19:17

No Duplicates.

Comment 2 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Craig
Last Name: Richardson
Email Address: craig.richardson@elpaso.com
Affiliation: El Paso Nat Gas Co & Mojave Pipeline Co

Subject: EPNG and Mojave Pipeline Co Comments
Comment:

```
El Paso Natural Gas Company and Mojave Pipeline Company submits the
attached comments on the AB 32 Implementation Fee.
```

Attachment: www.arb.ca.gov/lists/feereg09/3-el_paso_natural_gas_company_and_mojave_pipeline_ab_32_implementation_fee_comments.pdf

Original File Name: El Paso Natural Gas Company and Mojave Pipeline AB 32 Implementation Fee Comments.pdf

Date and Time Comment Was Submitted: 2009-06-17 13:15:19

No Duplicates.

Comment 3 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Geoffrey
Last Name: Stearns
Email Address: membership.services@sierraclub.org
Affiliation:

Subject: Sierra Club Membership Services
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/4-sierra.pdf

Original File Name: Sierra.pdf

Date and Time Comment Was Submitted: 2009-06-18 11:11:39

1200 Duplicates.

Comment 4 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Thomas
Last Name: Meagher
Email Address: meagherthomas@yahoo.com
Affiliation: Marin County Resident

Subject: AB 32
Comment:

```
Dear Ms. Nichols and CARB:

The Sierra Club has asked for my support for AB 32 but I can not
so support it.

The legislation needs full attention of the Assembly - at that can
not be given with the budget - and even reasonable costs of a
well-balanced measure can't be expected to be carried in this
economy. California is a place that deserves the steady attention
to her betterment - but efforts like AB 32 can not always be
implemented regardless of economic realities.
It is not time for this bill.

Yours - TJ Meagher
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-18 12:52:03

No Duplicates.

Comment 5 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: Southern California Public Power Author

Subject: Comment
Comment:

```
Southern California Public Power Authority Comment on Proposed AB
32 Implementation Fee Regulation
```

Attachment: www.arb.ca.gov/lists/feereg09/6-300226001nap06180901.pdf

Original File Name: 300226001nap06180901.pdf

Date and Time Comment Was Submitted: 2009-06-18 19:34:29

No Duplicates.

Comment 6 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Michelle
Last Name: Tsutsui
Email Address: mrs.tsutsui@gmail.com
Affiliation:

Subject: Health Impacts of Diesel Pollution
Comment:

Dear Chairman Nichols,
I am writing to thank you for your leadership as the California Air Resources Board (CARB) moves forward in the fight against global warming and to support the Administrative Fee regulation coming up for a vote on June 25, 2009.

A stable funding source is needed in order to continue the important work of CARB and other state agencies to implement California's global warming strategies. The proposed AB 32 administrative fee provides that funding in an equitable manner by imposing a fee on major sources of greenhouse gases in California, rather than continuing to rely on state funds.

In light of the state's already dire budget situation, adopting the fee regulation is a responsible action to provide the resources necessary to administer key strategies and regulations to curb greenhouse gas emissions from all sectors of the economy.

I strongly support adoption of the fee to ensure that CARB maintains momentum toward meeting the state’s greenhouse gas reduction goals. Thank you again for your leadership and I again urge you to adopt the AB 32 administrative fee.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 09:04:09

91 Duplicates.

Comment 7 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Mark
Last Name: Reback
Email Address: mark@consumerwatchdog.org
Affiliation:

Subject: Polluters should pay for cost of implementing AB 32!
Comment:

```
The big corporate polluters should pay for the cost of implementing
AB 32!
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 09:25:58

No Duplicates.

Comment 8 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Ricardo U.
Last Name: Berg
Email Address: ulysses129@hotmail.com
Affiliation:

Subject: AB 32 Cost of Implementation Fee
Comment:

```
I am very in favor of supporting your proposed fees. I would prefer
to breath cleaner air that dirty air.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 09:32:09

No Duplicates.

Comment 9 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Robert
Last Name: Brandin
Email Address: rwbrandin@aol.com
Affiliation:

Subject: AB 32
Comment:

```
Nothing is more precious and completely necessary than the air we
breathe.  We must support all efforts to improve air quality.  I
urge you to support the adoption of AB 32.......
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 09:52:28

No Duplicates.

Comment 10 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Jan
Last Name: Cortez
Email Address: rcortez1@san.rr.com
Affiliation:

Subject: Administrative Fees Needed for AB32
Comment:

Dear Ms. Nichols,

I support clean air and strategies to reduce global warming. AB32 implementation is very important to reduce greenhouse gas emissions. I support the payment structure of charging fees from polluters to pay for implementation of AB32.

Thank you, Jan Cortez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 10:07:15

No Duplicates.

Comment 11 for Administrative Fee Regulation (feereg09) - 45 Day.

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

Subject: BP Americica Inc.
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/37-bp_ab32_fee_ltr_-_6_09.pdf

Original File Name: BP AB32 Fee ltr - 6 09.pdf

Date and Time Comment Was Submitted: 2009-06-22 10:21:38

No Duplicates.

Comment 12 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Lee
Last Name: Frank
Email Address: bg214@sbcglobal.net
Affiliation:

Subject: Support AB 32
Comment:

Because of the 2/3 requirement, California's legislature can't do much to gain sorely needed revenue. Fining polluters is one acceptable way to help solve the problem. It seems more than reasonable to me to fine polluting industries who until now have profited very well from their activities while getting off scot free as they threaten all living things, who are of course at the mercy of their pollutants. At the very least we should charge them for slowly killing us--with two excellent outcomes: The state will start to fill its coffers, and the industries will begin to think about controlling and even ending their discharge of pollutants.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 10:57:52

No Duplicates.

Comment 13 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Tom
Last Name: de Guzman
Email Address: ruthandtom@webtv.net
Affiliation:

Subject: CARB
Comment:

```
Yes, I support the legislation. Let the major polluters fund the
peoject.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 10:59:06

No Duplicates.

Comment 14 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Ware
Last Name: Kuschner
Email Address: kuschner@stanford.edu
Affiliation: Stanford University

Subject: Air pollution
Comment:

```
Dear Chairman Nichols,

Please support the Administrative Fee regulation coming up for a
vote on June 25, 2009.  I strongly support adoption of the fee to
ensure that CARB maintains momentum toward meeting the state's
greenhouse gas reduction goals.

Thank you again for your leadership and I again urge you to adopt
the AB 32 administrative fee.

Ware Kuschner, M.D.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 11:21:51

No Duplicates.

Comment 15 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Michael
Last Name: Denton
Email Address: gigantesmike@aol.com
Affiliation:

Subject: Reducing Greenhouse Gas Emissions
Comment:

Dear Michael,

Support Fees on Polluters to Fund Global Warming Programs

The California Air Resources Board (CARB) will vote next week on whether major polluters should fund California's fight against global warming. The AB 32 Administrative Fee regulation would provide a stable funding stream paid by major pollution sources for CARB and the other agencies charged with implementing California's global warming plan rather than relying on already burdened state funds. Without urgent action, global warming will continue to worsen air pollution in California by accelerating ozone formation and causing increased emissions from power plants, air conditioners and other sources.

California's leadership on global warming should be funded by California's leading polluters.

The administrative fee would be charged to utility companies, refineries, cement manufacturers and other major sources of greenhouse gases based on their annual pollution levels to support AB 32 staffing needs. This fee will raise the necessary funds to support the important work of CARB and other state agencies in implementing measures to reduce greenhouse gases under California's AB 32 Scoping Plan and to ensure those measures do not result in adverse public health outcomes.

Polluters don't want to pay.

This regulation is opposed by the California Chamber of Commerce, the Western States Petroleum Association and a long list of business and industries who would benefit from not paying fees for their emissions and leave CARB without a consistent, stable source of funding for AB 32 programs. We need your help to ensure that California continues the fight against global warming and that the administrative fee regulation is adopted to support this important work.

Please voice your support for the Administrative Fee regulation to CARB Chairman Mary Nichols by pasting the message below into the Air Resources Board's comment page:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=feereg09&comm_period=A

--

Dear Chairman Nichols,

I am writing to thank you for your leadership as the California Air Resources Board (CARB) moves forward in the fight against global warming and to support the Administrative Fee regulation coming up for a vote on June 25, 2009.

A stable funding source is needed in order to continue the important work of CARB and other state agencies to implement California's global warming strategies. The proposed AB 32 administrative fee provides that funding in an equitable manner by imposing a fee on major sources of greenhouse gases in California, rather than continuing to rely on state funds.

In light of the state's already dire budget situation, adopting the fee regulation is a responsible action to provide the resources necessary to administer key strategies and regulations to curb greenhouse gas emissions from all sectors of the economy.

I strongly support adoption of the fee to ensure that CARB maintains momentum toward meeting the state’s greenhouse gas reduction goals. Thank you again for your leadership and I again urge you to adopt the AB 32 administrative fee.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 13:36:41

1 Duplicates.

Comment 16 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Susan
Last Name: Goldsborough
Email Address: susangoldsborough@comcast.net
Affiliation: Families for Clean Air

Subject: AB 32
Comment:

Dear CARB,

It is clear that during this fiscally shaky time, we cannot count on California state to fund global warming strategies. Instead we would like to see fees levied on all major sources of greenhouse gases. Homeowners should pay license fees in order to use their fireplaces, wood stoves, charcoal bar-b-ques, and fire pits. We pay for licenses to fish and hunt. Why not licenses to burn biomass? Just as industry has to operate under strict guidelines and pays for permits to burn, wood burners should do the same - operate under strict guidelines and pay to burn.

Sincerely,
Susan K. Goldsborough
Executive Director
Families for Clean Air

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 15:35:07

No Duplicates.

Comment 17 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Michaeleen
Last Name: Mason
Email Address: mmason@wspa.org
Affiliation:

Subject: WSPA Comment Ltr on the AB 32 Administrative Fee Regs
Comment:

```
On behalf of Catherine H. Reheis-Boyd, Executive Vice-President and
Chief Operating Officer, Western States Petroleum Association,
please accept our comments.
```

Attachment: www.arb.ca.gov/lists/feereg09/74-wspa_comment_ab32_fee_prpsl.pdf

Original File Name: WSPA Comment AB32 Fee Prpsl.pdf

Date and Time Comment Was Submitted: 2009-06-22 16:01:04

No Duplicates.

Comment 18 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: jan
Last Name: lochner
Email Address: 4lochs@comcast.net
Affiliation:

Subject: Diesel pollution
Comment:

```
If someone has to pay, why not those who gained?  If not at the
source, then where?
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 17:21:15

No Duplicates.

Comment 19 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Wendy
Last Name: Weikel
Email Address: ww4nature@yahoo.com
Affiliation:

Subject: Responsibility Greenhouse Gas Emissions
Comment:

Polluters should pay. We need government that focuses us on responsible behavior. We need to be responsible for what we are doing to our earth habitat. Polluters and Emitters should pay for their errant ways. This will encourage us to change. The fees should be enough to encourage better behavior. Wendy Weikel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 22:12:05

No Duplicates.

Comment 20 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Stephen
Last Name: Hansen
Email Address: hansens2@pacbell.net
Affiliation: Cal. Med. Assn.

Subject: AB 32 fees
Comment:

```
Please adopt--time is precious
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 22:16:49

No Duplicates.

Comment 21 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Kirsten
Last Name: Perez
Email Address: kirstenkpleanne@yahoo.com
Affiliation:

Subject: Global Warming Programs
Comment:

```
Please adopt the AB 32 administrative fee! Curbing green house
gasses is vital to the health of every Californian and is an
important step to stopping global warming. Giving polluters a fee
is the fairest option to quell green house emissions! Thanks....
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-22 23:45:41

No Duplicates.

Comment 22 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Evelyn
Last Name: Kahl
Email Address: ek@a-klaw.com
Affiliation: Alcantar & Kahl

Subject: AB 32 Revised Adminsitrative Fee Regulations
Comment:

```
Please See Attached
```

Attachment: www.arb.ca.gov/lists/feereg09/101-adminfee_alcantarkahl.pdf

Original File Name: Adminfee_AlcantarKahl.pdf

Date and Time Comment Was Submitted: 2009-06-23 10:03:26

No Duplicates.

Comment 23 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Luci
Last Name: Ungar
Email Address: plinkpink@aol.com
Affiliation:

Subject: Environment
Comment:

```
Please support the current bill that will regulate polluters!
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-23 12:21:57

No Duplicates.

Comment 24 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Julie A.
Last Name: Fitch
Email Address: ska@cpuc.ca.gov
Affiliation: California Public Utilities Commission

Subject: AB 32 Fee on the Retail Providers and Marketers of Imported Electricity
Comment:

```
Please See Attached Document:
```

Attachment: www.arb.ca.gov/lists/feereg09/104-cpuc_arb_ab32_admin_fee_reg_let.pdf

Original File Name: CPUC_ARB_AB32_admin_fee_reg_let.pdf

Date and Time Comment Was Submitted: 2009-06-23 13:16:05

No Duplicates.

Comment 25 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: jon
Last Name: schell
Email Address: schmelkes@aol.com
Affiliation:

Subject: pollution
Comment:

```
make the polluters pay
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-23 14:14:40

No Duplicates.

Comment 26 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Robert
Last Name: Vinetz
Email Address: rvinetz@pol.net
Affiliation:

Subject: AB 32, the Administrative Fee regulation
Comment:

Dear Chairman Nichols,

As a pediatrician and director of the pediatric asthma program for a 6-office community clinic organization caring for over 7000 children, I urge you and the California Air Resources Board to support AB 32, the Administrative Fee regulation.

This Administrative Fee regulation will have a great and positive impact on both individual health (children with asthma, for example) and on the health of our planet's ecosystem. The stable funding source it provides is vital, literally health-protecting and life-saving. Opponents, I believe, are looking at this fee through a lens focused on a too-narrow view of the public and private good. We must pay, sooner or later...either now for prevention...or later and much more for trying to correct the damage to our health and environment.

I thank you for your consideration and attention to this issue and urge you to adopt the AB 32 administrative fee.

Robert Vinetz, MD, FAAP
Los Angeles, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-23 15:45:41

No Duplicates.

Comment 27 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Patricia M
Last Name: French
Email Address: trish.french@kernrivergas.com
Affiliation: Kern River Gas Transmission

Subject: Comments of Kern River Gas Transmission
Comment:

```
Please see attached acrobat file entitled California Air Resources
BoardKern River CommentsJune 23 Comments Final.pdf

Thank you for your consideration of the same.
```

Attachment: www.arb.ca.gov/lists/feereg09/108-june_23_comments_final.pdf

Original File Name: June 23 Comments Final.pdf

Date and Time Comment Was Submitted: 2009-06-23 17:01:11

No Duplicates.

Comment 28 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: jim
Last Name: bianchi
Email Address: jim.bianchi@sbcglobal.net
Affiliation:

Subject: Living polluters
Comment:

There is no argument that methane is 10 times more active as a greenhouse gas than is CO2. What are you doing to regulate agricultural factories we call feedlots? Cows, pigs, sheep, goats, etc. when considered together, and when the methane multiplier is considered, put 100s of tons of greenhouse gas emissions into the atmosphere every day. Time for you to get to work on the farm/ranch lobbies and get them to pay for their pollution; better yet, compel them to enclose feedlots, and capture and burn methane, then capture the resulting CO2 for use as oil field purging gas, or other uses.

License and issue permits to own horses, dogs, cats, and other mammals that emit methane and CO2.

License and issue permits to permit humans to exercise, since we burn more calories and therefore emit more CO2 when exercising than when not. Since the more we exercise, the more we burn, charge extra fees and issue licenses to all sporting events such as soccer games, football games, track meets, baseball games, and so on, since they invite the burning of calories and emission of CO2 purely for the sake of entertainment. Tax the admission tickets with a CARB emissions tax.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-23 18:24:51

No Duplicates.

Comment 29 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: gale
Last Name: de long
Email Address: montygale@yahoo.com
Affiliation:

Subject: ADOPTION OF AB 32
Comment:

I strongly urge CARB to definitely ADOPT the Proposed AB 32 Cost of Implementation Fee Regulation and Proposed Amendment to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

CA has made wonderful progress retarding the growth of pollution. We need to continue this drive SO THAT WE CAN CONTINUE TO BREATH CLEAN AIR THAT DOES NOT DAMAGE OUR LUNGS AND THOSE OF OUR CHILDREN.

PLEASE ADOPT AB 32!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-24 09:33:23

No Duplicates.

Comment 30 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Catherine M
Last Name: Stites
Email Address: cstites@mwdh2o.com
Affiliation: Metropolitan Water District

Subject: MWD Comments on May 8, 2009 ISOR
Comment:

```
MWD Comments on May 8, 2009 ISOR
```

Attachment: www.arb.ca.gov/lists/feereg09/117-mwd_comments_on_isor__final_4-24-09_.pdf

Original File Name: MWD Comments on ISOR (final 4-24-09).pdf

Date and Time Comment Was Submitted: 2009-06-24 10:55:19

No Duplicates.

Comment 31 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Joy
Last Name: Warren
Email Address: joyw@mid.org
Affiliation: Modesto Irrigation District

Subject: Modesto Irrigation District Comments on AB 32 Cost of Implementation Fee Regulation
Comment:

```
Attached please find Modesto Irrigation District Comments on
Proposed AB 32 Cost of Implementation Fee Regulation in .pdf
format.  Should you have any questions, please do not hesitate to
contact Joy Warren at (209) 526-7389.

Thank you.

Linda Fischer
Legal Assistant to Joy A. Warren
Modesto Irrigation District
(209) 526-7388
lindaf@mid.org
```

Attachment: www.arb.ca.gov/lists/feereg09/118-docs_n179499v3_mid_comments_on_carb_administrative_fee_regulation.pdf

Original File Name: DOCS_n179499v3 MID Comments on CARB Administrative Fee Regulation.pdf

Date and Time Comment Was Submitted: 2009-06-24 11:13:38

No Duplicates.

Comment 32 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Will
Last Name: Barrett
Email Address: wbarrett@alac.org
Affiliation:

Subject: Environmental and public health support for AB 32 administrative fee
Comment:

```
Please find the attached letter of support for the proposed AB32
administrative fee regulation from public health and environmental
organizations.
```

Attachment: www.arb.ca.gov/lists/feereg09/119-supportforadministrativefee_6.24.pdf

Original File Name: SupportforAdministrativeFee_6.24.pdf

Date and Time Comment Was Submitted: 2009-06-24 11:21:22

No Duplicates.

Comment 33 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Glenn
Last Name: Brownton
Email Address: gbrownton@hotmail.com
Affiliation:

Subject: Form Letter 4
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/120-form___4.pdf

Original File Name: Form # 4.pdf

Date and Time Comment Was Submitted: 2009-06-24 15:14:48

65 Duplicates.

Comment 34 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Cindy
Last Name: Parsons
Email Address: cindy.parsons@ladwp.com
Affiliation: Los Angeles Department of Water & Power

Subject: Comments on AB32 Implementation Fee Regulation
Comment:

See attached comments

Attachment: www.arb.ca.gov/lists/feereg09/124-ladwp_comments_on_ab32_fee_regulation__6-24-09_.pdf

Original File Name: LADWP Comments on AB32 Fee Regulation (6-24-09).pdf

Date and Time Comment Was Submitted: 2009-06-29 15:33:41

No Duplicates.

Comment 35 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Brenda
Last Name: C e d a r b l a d e
Email Address: brendacedarblade@yahoo.com
Affiliation: Ag.Neighbor Industrial Cement Operation

Subject: Support AB 32 & Take Measures To Stop Outdoor Sand Blasting
Comment:

Dear Ms. Mary Nichols,

I am writing to support you on regulating Industrial polluters that lead to increasing national global warming and local health issues. Thank you for looking out for the little guys and population affected by their offsite impacts.

I found that under a California loop hole intended to allow property owners to sand blast the exterior of their buildings from 1978, this Pre-cast company could actually sand blast 6 tons of abrasive per day at cement walls outside with no protection to keep their toxic cement dust from blowing on our food supply and adjacent properties. This dust contains a tiny particle that can be carried in the wind miles away and can lead to silicosis and other health related problems. Our County Supervisors did not put any measures in place to protect the neighboring properties from this outdoor sand blasting activity. Their high dollar attorneys told the county it was to costly to sand blast inside.

My interest is a personal issue and describes how these Industrial giant polluters avoided regulation. We moved to Yolo County and located in an agricultural area. The Industrial users found this area as cheap ground and could strip it of its groundwater, pollute and are not under a watchful eye. The county changed our agricultural zoned area in the Draft EIR for the General Plan to a 120 acre Industrial park, in the middle of the best Class 1 soils in California. The beautiful productive agricultural land was bought last year by Danny Ramos of Ramos Oil, Clark Pacific – Precast Concrete and other Industrial type interests.

Industrial by definition has off site impacts. The cement companies are the worst polluters. Specifically the large Industrial cement company that is relocating from West Sacramento next door to us with batch plants, outdoor sandblasting and such. They build complete sky scrapers, buildings and parking structures for other cities, this means all of the impacts these cities would have are now being placed on the backs of the properties that surround this plant. Their trucks drive down the road with the structures and one can watch the cement dust blowing off the structures in the wind and out into the ag fields. This cement pre cast company is in the middle of an agricultural area and negatively impacts adjacent organic farms producing our nations food supply on the West and South sides, homes for developmentally disabled to the West and our ranch to the East and the Nelson Ranch Foundation which helps adults with disabilties. We have tall trees

with nesting Swainson Hawks and I am worried this cement dust will affect their young. If these Industrial companies had moved to the City they would be on water and sewer and more scrutiny; but it was cheaper to buy off the politicians and locate and pollute on county land.

The people that lived and worked next to their plant in West Sac., sought me out when they learned I was fighting the comapny. Hispanic men that worked at this factory in West Sac. who did the sand blasting spoke to me and they mentioned breathing/lung issues and said they mainly did it dry to see and get the finish on the walls etc... The neighbors around their plant in West Sac. described issues of dust that blew over from the cement factory and scratched their windows, paint on cars and would end up in their homes. These people said they tried to do something about it, and went to the city but no one listened and they were up against big money Industrial groups and unions. After dealing with Yolo County, I am begining to share their sentiments.

This company gets a lot of government work and funding, and should be required to protect the environment from harm. However, they also have deep pockets to politically fight regulation. I hope you can implement measures to correct this loop hole that allows outdoor sand blasting and to regulate these polluters.

Nancy, thank you for taking these guys on and please forward this to the appropriate departments.

Sincerely,

BrendaECedar-blade
remove AT change to @ in email:-brendacedarbladeATyahoo.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-29 20:27:44

No Duplicates.

Comment 36 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Albert
Last Name: batteate
Email Address: batteatelivestock@hotmail.com
Affiliation:

Subject: cabover trucks truck and trailer
Comment:

I have cabover truck and trailers combos cattle trucks the lenght for a combination of this sort is 65 feet the trucks have a 28'box and they pull a 28' trailer thes combinations where the standard truck to haul livestock because of the nather of roads And terane they had to navagate there are still a lot of cattle ranches & Sheep ranches that require this type of truck to get there livestock to market and seasonal grassing alotments

We transport our cattle from mountain pastures spring to the organ borderFall pastures 450 moma cows & calves that equates to someware around 30,000 per year .now the problem the truck companeys that are left dont have many of thes units left so there is already a shortage of them every spring and fall.

with the new law on diesel trucks thes will not be leagal soon.

The truck manufactures no longer make cabover trucks and if they did no one could aford to have them setting around 75% of the time.

so how are we supost to ship our cattle from pasture to pasture or to market the other option is i understand the older trucks are ok to run 15,000 miles a year so shood I buy 4 more and put cowboys driving them to move our catte !

I realy think that would put people at risk of injury the roads thes trucks drive are narrow windy mountain roads with grades 20%

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-30 18:24:24

No Duplicates.

Comment 37 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Paul
Last Name: Andersen
Email Address: paul.andersen@rosettaresources.com
Affiliation:

Subject: AB 32 Survey too costly
Comment:

```
Additional cost to supply data to goverment agencies drivers the
cost of business in Ca to a point with business leave Ca.

We (business) want and will be in compliance with rules we
understand and rules that fit our industry.  Rules then are
writting without imput from private section usual means "square
pegs in a round hole".

Compliance is less than attainable and no one wins.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-07-04 19:38:56

No Duplicates.

Comment 38 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Susie
Last Name: Berlin
Email Address: sberlin@mccarthylaw.com
Affiliation: Northern California Power Agency

Subject: Comments on AB 32 Cost of Implementation Fee Rulemaking
Comment:

```
Resubmitted Comments of the Northern California Power Agency on the
Original AB 32 Cost of Implementation Fee Rulemaking, dated June
24, 2009.
```

Attachment: www.arb.ca.gov/lists/feereg09/137-comments_re_admin_fee_rulemaking_-_ncpa__6-24-09_.pdf

Original File Name: comments re Admin Fee Rulemaking - NCPA _6-24-09_.pdf

Date and Time Comment Was Submitted: 2009-07-06 09:26:24

No Duplicates.

Comment 39 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Bob
Last Name: Epstein
Email Address: Non-web submitted comment
Affiliation:

Subject: Environmental Entrepreneurs
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/139-bob.pdf

Original File Name: Bob.pdf

Date and Time Comment Was Submitted: 2009-07-23 13:34:51

No Duplicates.

Comment 40 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Jim
Last Name: Hancock
Email Address: jimhancock@cox.net
Affiliation:

Subject: El Cajon Resident
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/140-jim.pdf

Original File Name: Jim.pdf

Date and Time Comment Was Submitted: 2009-07-23 13:36:11

No Duplicates.

Comment 41 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Andrew
Last Name: Stein
Email Address: astein@tst-inc.com
Affiliation:

Subject: AB 32 costs
Comment:

My business manufacturers aluminum ingot and billet for sale in California and around the world. Today it is very difficult to compete in the world market. Recently a new competitor from India started importing my products to California. I am loosing market share to companies outside California and now from foreign imports. More costs will guaranty that the 200 California residents that I employ will have a less secure future.

Please dont add taxes and fees to us!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-07 14:41:35

No Duplicates.

Comment 42 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: BILL
Last Name: FELL
Email Address: A356T6@AOL.COM
Affiliation:

Subject: AB 32
Comment:

SIRS;

AS EMPLOYMENT AT OUR FACILITY HAS BEEN REDUCED FROM 220 TO >90, AND MANUFACTURING RUNNING AWAY FROM CALIFORNIA AT RECORD PACE, I MUST VOICE MY THOUGHTS AS TO WHAT AB32 WILL DO TO OUR BUSINESS.

WE DID MOST OF OUR BUSINESS IN CALIFORNIA 25 YEARS AGO WITH A 100 OR SO MAN SHOP. 80% IN STATE, 20% OUT OF STATE.
NOW WE ARE 80% OUT OF STATE AND 10% OUT OF COUNTRY AND 10% IN STATE.

TO ADD FEES AND EXPENSE TO OUR PRODUCTS, THAT WE MAKE FOR OTHER MANUFACTURERS, THAT ARE FREE TO PURCHASE FROM OTHER STATES AND OTHER COUNTRIES, WILL PUT US OUT OF BUSINESS. 57 YEARS OF EMPLOYEES THAT PAY TAXES IS OUR HISTORY. PLEASE DONT MESS THIS UP.
BILL FELL

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-19 08:46:16

No Duplicates.

Comment 43 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Amber
Last Name: Riesenhuber
Email Address: amber@iepa.com
Affiliation: IEP

Subject: IEP's Comments on the Proposed Changes to the AB32 Administrative Fee Regulation

Comment:

```
IEP's Comments on the Proposed Changes to the AB32 Administrative
Fee Regulation
```

Attachment: www.arb.ca.gov/lists/feereg09/143-comments_of_the_independent_energy_producers_association_on_ab_32_administrative_fee_proposed_changes__final__version_9-2-09.doc

Original File Name: Comments of the Independent Energy Producers Association on AB 32 Administrative Fee Proposed Changes Final Version 9-2-09.doc

Date and Time Comment Was Submitted: 2009-09-02 16:14:47

No Duplicates.

Comment 44 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Joy
Last Name: Warren
Email Address: joyw@mid.org
Affiliation: Modesto Irrigation District

Subject: Modesto ID's Comments on Revisions to Proposed Fee Regulation
Comment:

```
Please see attached comments submitted by Modesto ID.
```

Attachment: www.arb.ca.gov/lists/feereg09/144-docs_n191042_v1a_mid_comments_on_revised_proposed_administrative_fee_regulation.pdf

Original File Name: DOCS_n191042_v1A MID Comments on Revised Proposed Administrative Fee Regulation.pdf

Date and Time Comment Was Submitted: 2009-09-03 07:58:37

No Duplicates.

Comment 45 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Michaeleen
Last Name: Mason
Email Address: mmason@wspa.org
Affiliation: Western States Petroleum Association

Subject: WSPA Comment Letter
Comment:

```
Please accept WSPA's Comment Letter.
```

Attachment: www.arb.ca.gov/lists/feereg09/145-wspa_comments_on_ab32_fee_regulation.pdf

Original File Name: WSPA Comments on AB32 Fee Regulation.pdf

Date and Time Comment Was Submitted: 2009-09-03 11:57:05

No Duplicates.

Comment 46 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Seema
Last Name: Srinivasan
Email Address: sls@a-klaw.com
Affiliation:

Subject: Comments on Administrative Fee Regulation
Comment:

```
Attached are comments by CAC/EPCU on the Draft Administrative Fee
Regulation
```

Attachment: www.arb.ca.gov/lists/feereg09/146-cac.epuc_comments_admin_fee__090209_.pdf

Original File Name: CAC.EPUC Comments Admin Fee (090209).pdf

Date and Time Comment Was Submitted: 2009-09-03 11:59:21

No Duplicates.

Comment 47 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Jerry
Last Name: Frost
Email Address: jfrost@kernoil.com
Affiliation: Kern Oil & Refining Co.

Subject: Comments on Proposed AB 32 Cost of Implementation Fee Regulation
Comment:

September 2, 2009

Mr. Jon Costantino
Manager, Climate Change
Planning Section
Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

SUBJECT: Proposed AB 32 Cost of Implementation Fee Regulation ¡V Comments

Dear Mr. Costantino:

Kern Oil & Refining Co. (Kern) is one of only two remaining small refiners in California producing transportation fuels. Kern is the only small refiner in California producing CARB reformulated gasoline and Ultra Low Sulfur Diesel. Kern is on record with the Board, and continues to advocate for consideration for small refiners.

The two remaining small refiners producing transportation fuels are ¡§family owned¡¨ and are not owned or operated by publically traded integrated oil companies and do not have upstream oil and gas production or downstream marketing and retail stations. Small refiners are clearly being disproportionally economically impacted by the AB 32 regulations.

In follow up to the information staff presented at the August 25, 2009 public workshop, and for the record, Kern is providing the following comments relating to the proposed AB 32 Cost of Implementation Fee Regulation.

CARB estimates $63.1 million dollars is needed for the FY 2009/10 collection to administer the AB 32 Program and for debt repayment. Based on CARB¡¦s fee allocation proposal, the refiner sector is expected to pay $33.8 million or 53.4% of the total $63.1 FY2009/10 program fees. However, based on CARB¡¦s GHG Scoping Plan emissions inventory refineries only represent 6% of the total GHG emissions, yet refineries are being assessed 53.4% of the total annual fees to fund the program. This is clearly an unfair, inequitable and disproportional economic impact to refiners. Kern recommends the fees for refineries be assessed in a way that more fairly reflects the proportionality of refinery emissions as compared to the total GHG inventory.

Kern is opposed to payment of a fee on gasoline and diesel production. Refiners are already required under the Scoping Plan to implement stationary source controls and in addition, refineries must also meet the costly challenges of the Low Carbon Fuel Standard (LCFS). It is, however, reasonable to assess a fee based on the actual facility GHG emissions from refineries and other sectors subject to AB 32. However, Kern is strongly opposed to staff¡¦s proposal that refiners also pay additional fees for every gallon of transportation fuel delivered to the market.

Kern has recommended the fee ¡§tax¡¨ be placed at the retail sales pump and full disclosure be made at the pump so the public clearly understands why each gallon of fuel purchased has increased in cost. Unfortunately, CARB has indicated they do not have the manpower to collect the fees from such a large population of retail stations throughout the State.

CARB wrongly assumes that refiners can ¡§pass-through¡¨ the fee. This is a misconception since the ability to pass-through costs are controlled by market forces beyond the control of any one individual refiner. However, refiners do have the ability to pass-through costs of fees or taxes if the fees or taxes are known in advance and are assessed by the governmental agency, and equitably applied to all refiners. Currently, it appears the AB 32 fee (cost/gallon) will not be known until the fiscal year ends and CARB then determines how much was spent during that year, at which time the fee will then be calculated and communicated to refiners. This process will not provide refiners with the ability to pass on the fee for that prior year.

Kern offers the following suggestion that would help the ability of refiners to pass-through the fees.

„X CARB must create a budget in advance, divide that by the estimated gallons to be assessed (historical data and information is available) and publish a rate (cost/gallon) to be in effect for that fiscal period. This published rate needs to be provided to refiners in advance of the annual fiscal cycle.

„X Refiners would then include the fee as a line item on the invoice generated at the fuel transfer rack. This would be consistent with the method of pass-through for State Board of Equalization (BOE) fees and taxes (e.g., Supplier of Motor Vehicle Fuel Fee, Supplier of Diesel Fuel Fee, and Prepayment of Sales Tax), all of which are computed as a cost per gallon to facilitate their inclusion on an invoice.

„X Industry payments could be made to CARB monthly, quarterly, or annually based on sales volumes for the related period. This would be consistent with the payment of BOE fees and taxes.

„X If AB 32 Program costs are more or less than budget estimate, the differences can then be rolled into the subsequent year¡¦s rate calculation.

In summary, pass-through costs of the fee can only be accomplished if CARB estimates a budget for the fiscal year, establishes a fixed rate, and communicates the rate to refiners in advance of the fiscal cycle. This process will allow refiners the ability to legally include the fee as a line item on the sales invoice to the customer. Refiners would then make payments to CARB on a periodic

schedule.

Kern appreciates this opportunity to provide comment and we are committed to continue working with Staff throughout this regulatory process.

Sincerely,

COPY

Robert Richards
EHS Manager
Kern Oil & Refining Co.

cc: Jeannie Blakeslee, CARB
Bruce Tuter, CARB

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-03 13:03:03

No Duplicates.

Comment 48 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Julee
Last Name: Malinowski-Ball
Email Address: julee@ppallc.com
Affiliation:

Subject: CBEA Comments Re CARB AB 32 Administration Fees
Comment:

```
CBEA Comments Re CARB AB 32 Administration Fees
```

Attachment: www.arb.ca.gov/lists/feereg09/148-arb_ab_32_admin_fees_lt_09-02-09_finalr.pdf

Original File Name: ARB AB 32 Admin Fees lt 09-02-09 FINALr.pdf

Date and Time Comment Was Submitted: 2009-09-03 13:05:55

No Duplicates.

Comment 49 for Administrative Fee Regulation (feereg09) - 45 Day.

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

Comment 50 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Susie
Last Name: Berlin
Email Address: sberlin@mccarthylaw.com
Affiliation: Northern California Power Agency

Subject: Comments on 8/25 AB32 Fee Workshop
Comment:

```
Northern Califoria Power Agency (NCPA) Comments on August 25
Workshop on AB32 Cost of Implementation Fee
```

Attachment: www.arb.ca.gov/lists/feereg09/150-comments_re_8-25-09_admin_fee_workshop__9-2-09_.pdf

Original File Name: comments re 8-25-09 admin fee workshop _9-2-09_.pdf

Date and Time Comment Was Submitted: 2009-09-03 13:48:04

No Duplicates.

Comment 51 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Kristin
Last Name: Grenfell
Email Address: kgrenfell@nrdc.org
Affiliation: NRDC

Subject: Coalition Comments on Fee
Comment:

```
We respectfully submit these comments.
```

Attachment: www.arb.ca.gov/lists/feereg09/151-2009-09-02_letter_to_carb_re_admin_fee.pdf

Original File Name: 2009-09-02_Letter to CARB re Admin Fee.pdf

Date and Time Comment Was Submitted: 2009-09-03 14:58:49

No Duplicates.

Comment 52 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Joe
Last Name: McCawley
Email Address: joseph.mccawley@sce.com
Affiliation: SCE

Subject: SCE comments to AB32 Admin Fee Reg - Workshop #4
Comment:

```
The attached contains SCE's comments to the proposed/possible
changes discussed during the Aug 25th Workshop.
```

Attachment: www.arb.ca.gov/lists/feereg09/152-sce_comments_ab32_admin_fee_wksp__4.pdf

Original File Name: SCE Comments_Ab32 Admin Fee_Wksp #4.pdf

Date and Time Comment Was Submitted: 2009-09-03 16:26:41

No Duplicates.

Comment 53 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: Southern California Public Power Author

Subject: SCPPA Further Comment on Proposed AB 32 Implementation Fee Regulation
Comment:

```
Please find attached the Southern California Public Power Authority
Further Comment on Proposed AB 32 Implementation Fee Regulation.
```

Attachment: www.arb.ca.gov/lists/feereg09/153-300226001nap09030901.pdf

Original File Name: 300226001nap09030901.pdf

Date and Time Comment Was Submitted: 2009-09-03 16:54:44

No Duplicates.

Comment 54 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Charles
Last Name: White
Email Address: cwhite1@wm.com
Affiliation:

Subject: SWICS letter on CARB GHG fees
Comment:

```
If you have any questions, please contact Chuck White.
```

Attachment: www.arb.ca.gov/lists/feereg09/154-swics_letter_on_carb_ghg_fees_090209.pdf

Original File Name: SWICS letter on CARB GHG fees 090209.pdf

Date and Time Comment Was Submitted: 2009-09-04 09:39:13

No Duplicates.

Comment 55 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Bernie
Last Name: Fox
Email Address: Non-web submitted comment
Affiliation:

Subject: Financial Benefits Group
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/155-bernie.pdf

Original File Name: Bernie.pdf

Date and Time Comment Was Submitted: 2009-09-10 08:49:12

No Duplicates.

Comment 56 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: KENNETH
Last Name: BIGGS
Email Address: la1940@sbcglobal.net
Affiliation:

Subject: No fees
Comment:

```
It is time to disband CARB. They brought os MTBE High priced
California Reformated Gasoline and other poor thought out ideas.
We do not need to pay for people who do not have the needed
expertize to do the job they are doing poorly at excessive pay.
Now they want to add more fees.
California needs to cut expenses they would do this by getting rid
of an unnecessary agency CARB.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-22 15:21:32

No Duplicates.

Comment 57 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Mel
Last Name: Zeldin
Email Address: melz@capcoa.org
Affiliation: CAPCOA

Subject: Comment Letter from CAPCOA
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/feereg09/159-9-23-09_capcoa_letter_to_mary_nichols_-_ghg_reporting_tools.pdf

Original File Name: 9-23-09 CAPCOA Letter to Mary Nichols - GHG Reporting Tools.pdf

Date and Time Comment Was Submitted: 2009-09-23 07:54:36

No Duplicates.

Comment 58 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Larry
Last Name: Greene
Email Address: lgreene@airquality.org
Affiliation: SMAQMD

Subject: AB 32 - Fee Reg. & Proposed Amend. to Reg. of Mand. Reporting of GHG Emissions
Comment:

```
See attached letter dated 9/23/09.
```

Attachment: www.arb.ca.gov/lists/feereg09/160-mary_nichols_ltr_re_mandatory_reporting_of_ghg_sept._23__09.doc

Original File Name: Mary Nichols Ltr re Mandatory Reporting of GHG Sept. 23, 09.doc

Date and Time Comment Was Submitted: 2009-09-23 11:17:26

No Duplicates.

Comment 59 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Noah
Last Name: Long
Email Address: nlong@nrdc.org
Affiliation: NRDC

Subject: Public Interest Coalition Letter on Administrative Fee
Comment:

```
Please find attached letter from a coaltion of public interest
groups in the proposed administrative fee.
```

Attachment: www.arb.ca.gov/lists/feereg09/161-2009-09-23_letter_to_carb_re_admin_fee.pdf

Original File Name: 2009-09-23_Letter to CARB re Admin Fee.pdf

Date and Time Comment Was Submitted: 2009-09-23 11:33:15

No Duplicates.

Comment 60 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: Southern California Public Power Author

Subject: SCPPA Supplemental Comment on Administrative Fees
Comment:

```
Please find attached the Southern California Public Power Authority
Supplemental Comment on Proposed AB 32 Implementation Fees
```

Attachment: www.arb.ca.gov/lists/feereg09/162-300226001nap09230901.pdf

Original File Name: 300226001nap09230901.pdf

Date and Time Comment Was Submitted: 2009-09-23 11:59:34

No Duplicates.

Comment 61 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: Scott
Last Name: Sommer
Email Address: Non-web submitted comment
Affiliation:

Subject: Pillsbury Winthrop Shaw Pittman LLP
Comment:

```
Attachment to comment available upon request.
```

Attachment: www.arb.ca.gov/lists/feereg09/164-pillsbury_61.pdf

Original File Name: Pillsbury 61.pdf

Date and Time Comment Was Submitted: 2009-10-08 14:58:54

No Duplicates.

Comment 62 for Administrative Fee Regulation (feereg09) - 45 Day.

First Name: John
Last Name: Hansen
Email Address: Non-web submitted comment
Affiliation:

Subject: Pillsbury Winthrop Shaw Pittman LLP
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/feereg09/165-pillsbury62.pdf

Original File Name: Pillsbury62.pdf

Date and Time Comment Was Submitted: 2009-10-08 15:03:16

No Duplicates.

Comment 1 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Norman
Last Name: Pederson
Email Address: Non-web submitted comment
Affiliation:

Subject: Hanna & Morton LLP
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/126-norman_pederson.pdf

Original File Name: Norman Pederson.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:36:53

No Duplicates.

Comment 2 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Jill
Last Name: Whynot
Email Address: Non-web submitted comment
Affiliation:

Subject: SCAQMD
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/127-jill_whynot.pdf

Original File Name: Jill Whynot.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:37:21

No Duplicates.

Comment 3 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Norman
Last Name: Plotkin
Email Address: Non-web submitted comment
Affiliation:

Subject: CIPA
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/128-norman_plotkin.pdf

Original File Name: Norman Plotkin.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:37:47

No Duplicates.

Comment 4 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Bruce
Last Name: McLaughlin
Email Address: Non-web submitted comment
Affiliation:

Subject: CMUA
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/129-bruce_mclaughlin.pdf

Original File Name: Bruce McLaughlin.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:38:27

No Duplicates.

Comment 5 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Patricia
Last Name: French
Email Address: Non-web submitted comment
Affiliation:

Subject: Kern River
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/130-patricia_french.pdf

Original File Name: Patricia French.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:38:51

No Duplicates.

Comment 6 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Michaeleen
Last Name: Mason
Email Address: Non-web submitted comment
Affiliation:

Subject: WSPA
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/131-michaeleen_mason.pdf

Original File Name: Michaeleen Mason.pdf

Date and Time Comment Was Submitted: 2009-06-30 14:39:24

No Duplicates.

Comment 7 for Administrative Fee Regulation (feereg09). (At Hearing)

First Name: Jill
Last Name: Whynot
Email Address: Non-web submitted comment
Affiliation:

Subject: SCAQMD
Comment:

please see attached

Attachment: www.arb.ca.gov/lists/feereg09/163-jill_whynot.pdf

Original File Name: jill whynot.pdf

Date and Time Comment Was Submitted: 2009-10-06 13:43:04

No Duplicates.

Comment 1 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Kirstin
Last Name: Wallace
Email Address: kirsdess555@yahoo.com
Affiliation:

Subject: AB 32 Cost of Implementation Fee Regulation
Comment:

Please note that your attempt to enact the following bill and its fee provisions will further bankrupt this State and cause greater economic turmoil than already exists in California. This attempt by the State government to access fees on producers of carbon emission, and thus "greenhouse gasses" will do no more to protect the health and welfare of this State than it will to create jobs...and that it to say that it will do nothing but drive industry and those that bring jobs and properity to this State away. This is like punching holes in a sinking ship and I would hope you would scrap this bill and its fee arangements and bring some sanity back to how laws are created and enforced on the public. The fact that your reviewers can somehow measure that the consumer will only receive a $4.00 a year surge in utility and fuel costs is nothing more than laughable in that the ripple of affects of this legislation will end up causing the people of California so much more in jobs lost and welfare/unemployment benefits as industry is driven away. Please take in to consideration those that love and take care of this State on a practical day-to-day level because it is those of us that do that realize more and more that our representative do not have this States best interesets in mind in crafting this type of legislation. Please reconsider the implementation of AB 32 and its corresponding amendments and work instead on spending within our means and bringing private industry back to California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-02 16:54:37

No Duplicates.

Comment 2 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Claudio
Last Name: Mariotta
Email Address: C.Mariotta@comcast.net
Affiliation:

Subject: AB 32
Comment:

```
The whole premise of your Agency, global warming is caused by man,
is based on emotions rather than science. Your legislation will
further cripple our economy, which is already burdened by taxes
and regulations.
Cease and desist, you will make a great contribution.
What we need is to promote and help develop nuclear power and off
shore drilling. This will reduce our dependency on foreign oil,
improve the balance of trade and clean the air which should be your
goal.
The ARB should be abolished along with many other government
agencies involved in this effort, That will reduce our deficit,
stimulate businesses and move us toward financial solvency.
Regards,
Claudio Mariotta
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-02 20:49:21

No Duplicates.

Comment 3 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: landrus
Last Name: pfeffinger
Email Address: l.pfeffinger@comcast.net
Affiliation:

Subject: AB 32
Comment:

I am adamantly opposed to this proposed legislation. AB32. At a time that California is "underwater", some of the highest taxes in the country, high unemployment and businesses leaving the state this is the one of the DUMBEST proposals that can be made.

Gestapo tactics of mandatory reporting of "greenhouse gases" smacks of a fascist state mentality/approach to governing.

I believe that the CARB should be disbanded. There is increasing evidence based upon recent discoveries is the scientific community as well as admissions by the scientists themselves who are in the field that the data does NOT support the conclusions and that the data was "cooked". The agency (CARB) with its' plethora of environmentalist should do the people of California a service and RESIGN.

The people of California are FED-UP with high taxes and OVERREGULATION. Please just go away. Stop being so self-righteous.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-03 12:02:20

No Duplicates.

Comment 4 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Craig
Last Name: Stelck
Email Address: cardif03@comcast.net
Affiliation:

Subject: AB 32
Comment:

```
To the people who gave us deadly MTBE, please kill AB 32.

Craig Stelck
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-04 11:12:21

No Duplicates.

Comment 5 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Kyle
Last Name: Davis
Email Address: kyle.l.davis@pacificorp.com
Affiliation: PacifiCorp

Subject: Comments of PacifiCorp Concerning the AB 32 Administrative Fee
Comment:

PacifiCorp, dba Pacific Power (or, the “Company”), respectively submits these comments on the California Air Resources Board’s (“CARB”) proposed administrative fee regulations for sources of greenhouse gas (“GHG”) emissions (“Fee Regulation”) pursuant to Assembly Bill 32 (“AB 32”), as revised and amended, in terms of its applicability to the Company’s multi-state operations. PacifiCorp’s comments are intended to clarify any outstanding questions regarding the impact on multi-jurisdictional retail providers (“MJRP”), like PacifiCorp, and the specific applicability of the Fee Regulation. PacifiCorp appreciates the opportunity to submit comments in this proceeding and Staff’s efforts to address the Company’s particular circumstances.

Attachment: www.arb.ca.gov/lists/feereg09/171-pacificorp_carb_ghgadminfee_cmts__2010march04_.pdf

Original File Name: PacifiCorp_CARB_GHGAdminFee_Cmts__2010March04_.pdf

Date and Time Comment Was Submitted: 2010-03-05 14:54:58

No Duplicates.

Comment 6 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Jim
Last Name: Hancock
Email Address: jimhancock@cox.net
Affiliation:

Subject: AB 32 Bad for California
Comment:

Dear CARB Board,

To hold California hostage in order to decrease global warming is simply irresponsible. This state can't do it alone and certainly cannot afford it. No matter how many penalties you put on Californians, there will be NO measurable decrease in global temperatures. Simply none. But you want Califonians to pay for it. On March 4th, the independent Legislative Analyst's Office said, "California is likely to see modest job losses in the near term from its aggressive climate change policy due to higher energy costs and other factors". Further it said, "We believe that the aggregate net jobs impact in the near term is likely to be negative. Reasons for this include the various economic dislocations, behavioral adjustments, investment requirements, and certain other factors."

California cannot afford further job losses and enforcement of AB32 will be a disaster for California. Fortunately the citizens of California will be able to vote on this in November and finally put this entire disaster to bed, once and for all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-09 19:39:47

No Duplicates.

Comment 7 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Clare
Last Name: Breidenich
Email Address: clare@wptf.org
Affiliation: Western Power Trading Forum

Subject: Comments on modifications to the Administrative Fee Regulation
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/feereg09/173-3-10-10_wptf_on_modifications_to_administrative_fee_regulation.pdf

Original File Name: 3-10-10 WPTF on modifications to Administrative Fee Regulation.pdf

Date and Time Comment Was Submitted: 2010-03-09 21:44:22

No Duplicates.

Comment 8 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Patricia M.
Last Name: French
Email Address: trish.french@kernrivergas.com
Affiliation: Kern River Gas Transmission Company

Subject: AB32 Fee Implementation Final Staff Report
Comment:

```
Please see attached comments in support of the proposed regulations
submitted by Kern River Gas Transmission Company.
```

Attachment: www.arb.ca.gov/lists/feereg09/174-comments_on_fee_regs_to_board_15-day_kern_river_ab_32_final.pdf

Original File Name: Comments on Fee Regs to Board 15-DAY Kern River AB 32 FINAL.pdf

Date and Time Comment Was Submitted: 2010-03-12 16:20:56

No Duplicates.

Comment 9 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Joy
Last Name: Warren
Email Address: joyw@mid.org
Affiliation: Modesto Irrigation District

Subject: Modesto ID's Comments on 15-Day Fee Language
Comment:

```
Please find Modesto Irrigation District Comments on 15-Day
Modifications to the Originally Proposed AB 32 Cost of
Implementation Fee Regulatiion.
```

Attachment: www.arb.ca.gov/lists/feereg09/175-docs_n212950_v1_comments_on_ghg_administrative_fee_15_day_language.pdf

Original File Name: DOCS_n212950_v1_Comments_on_GHG_Administrative_Fee_15_Day_Language.pdf

Date and Time Comment Was Submitted: 2010-03-15 14:41:37

No Duplicates.

Comment 10 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: John
Last Name: Busterud
Email Address: jwbb@pge.com
Affiliation: Pacific Gas and Electric Company

Subject: AB 32 Fee Regulations
Comment:

```
Attached, in PDF format, are PG&E's Comments on the California Air
Resources Board's 15-Day Modifications to the Originally Proposed
Assembly Bill (AB 32) Cost of Implementation Fee Regulation.
```

Attachment: www.arb.ca.gov/lists/feereg09/176-clean_00096383.pdf

Original File Name: clean_00096383.pdf

Date and Time Comment Was Submitted: 2010-03-15 14:50:17

No Duplicates.

Comment 11 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Joe
Last Name: McCawley
Email Address: joseph.mccawley@sce.com
Affiliation: SCE

Subject: SCE's comments on AB32 Admin Fee Regulation (Feb 25 '10 release)
Comment:

```
SCE's comments are provided on the attached. Thank you for the
opportunity to participate.
```

Attachment: www.arb.ca.gov/lists/feereg09/177-sce_comments_on_ab32_admin_fee_regulations_10_03-15.pdf

Original File Name: SCE Comments on AB32 Admin Fee Regulations_10_03-15.pdf

Date and Time Comment Was Submitted: 2010-03-15 15:57:44

No Duplicates.

Comment 12 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Jon
Last Name: Lambeck
Email Address: jlambeck@mwdh2o.com
Affiliation: Metropolitan Water District of So. CA

Subject: Comments
Comment:

```
Attached are comments from the Metropolitan Water District of
Southern California.
```

Attachment: www.arb.ca.gov/lists/feereg09/178-feereg09_mwd_comments_on_fee_regulation_03152010.pdf

Original File Name: feereg09_MWD Comments on Fee Regulation_03152010.PDF

Date and Time Comment Was Submitted: 2010-03-15 15:48:45

No Duplicates.

Comment 13 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Tamara
Last Name: Rasberry
Email Address: trasberry@sempra.com
Affiliation:

Subject: Sempra Comments to AB 32 Fee Regulation
Comment:

```
Please see the attached comments on this subject matter.

Sincerely,
Tamara Rasberry /s/
```

Attachment: www.arb.ca.gov/lists/feereg09/179-sempra_energy_comments_ab_32_admin_fee_03152010.pdf

Original File Name: Sempra Energy Comments_AB 32 Admin Fee 03152010.pdf

Date and Time Comment Was Submitted: 2010-03-15 16:31:40

No Duplicates.

Comment 14 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Susie
Last Name: Berlin
Email Address: sberlin@mccarthylaw.com
Affiliation: Northern California Power Agency

Subject: Comments on 15-Day Language
Comment:

```
Comments of the Northern California Power Agency (NCPA) on
Revised 15-day Language for Proposed AB 32 Cost of Implementation
Fee Regulation.
```

Attachment: www.arb.ca.gov/lists/feereg09/180-ncpa_comments_re_admin_fee_2-26_15-day_language__3-15-10_.pdf

Original File Name: NCPA comments re Admin Fee 2-26 15-day language _3-15-10_.pdf

Date and Time Comment Was Submitted: 2010-03-15 16:24:48

No Duplicates.

Comment 15 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Martin
Last Name: Hopper
Email Address: msr.general.manager@gmail.com
Affiliation: M-S-R Public Power Agency

Subject: AB 32 Cost of Implementation Fee 15-day Language
Comment:

```
COMMENTS OF THE M-S-R PUBLIC POWER AGENCY ON REVISED 15-DAY
LANGUAGE FOR PROPOSED AB 32 COST OF IMPLEMENTATION FEE REGULATION.
```

Attachment: www.arb.ca.gov/lists/feereg09/181-m-s-r_comments_on_admin_fee_15-day_language__3-15-10_.pdf

Original File Name: M-S-R Comments on admin fee 15-day language _3-15-10_.pdf

Date and Time Comment Was Submitted: 2010-03-15 16:46:07

No Duplicates.

Comment 16 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Lily
Last Name: Mitchell
Email Address: lmitchell@hanmor.com
Affiliation: SCPPA

Subject: Southern California Public Power Authority comments on changes to AB 32 Fee Regulation
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the modified text of the proposed AB 32 Cost of
Implementation Fee Regulation and proposed amendment to the
Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.
```

Attachment: www.arb.ca.gov/lists/feereg09/182-300226001lmm03151001_fee_regulation_final.pdf

Original File Name: 300226001lmm03151001 fee regulation final.pdf

Date and Time Comment Was Submitted: 2010-03-15 16:32:00

No Duplicates.

Comment 17 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Michaeleen
Last Name: Mason
Email Address: cathy@wspa.org
Affiliation:

Subject: 15 day package WSPA Comment Letter
Comment:

```
Thank you for your consideration.
```

Attachment: www.arb.ca.gov/lists/feereg09/183-wspa_comments_on_2010_modified_text_ab32_cost.pdf

Original File Name: WSPA Comments on 2010 Modified Text AB32 Cost.pdf

Date and Time Comment Was Submitted: 2010-03-15 17:03:20

No Duplicates.

Comment 18 for Administrative Fee Regulation (feereg09) - 15-1.

First Name: Ralph
Last Name: Moran
Email Address: Non-web submitted comment
Affiliation:

Subject: BP America, Inc.
Comment:

```
Please see attached.
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Attachment: www.arb.ca.gov/lists/feereg09/184-ralphjmoran.pdf

Original File Name: RalphJMoran.pdf

Date and Time Comment Was Submitted: 2010-03-16 16:24:35

No Duplicates.

Comment 1 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: Nils
Last Name: Tellier
Email Address: nils@robertson-bryan.com
Affiliation:

Subject: Inter-agencies report consolidation
Comment:

```
Will ARB consider coordinating efforts with other Agencies (CPUC,
CEC, EPA) to consolidate reports requirements?
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-23 14:34:43

No Duplicates.

Comment 2 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: John
Last Name: Dodds
Email Address: jdoddsgw@sbcglobal.net
Affiliation:

Subject: Greenhouse Emissions
Comment:

Your law is a fraud. Repeal it.

A paper is available at www.scribd.com called Gravity causes Climate Changes.
http://www.scribd.com/doc/27343303/Gravity-Causes-Climate-Change

It claims that the IPCC and GCMs FAIL to properly implement the Greenhouse Effect, by

1. ignoring that the amount of energy photons coming into the Earth limits the GHE, and

2. instead claiming that the simple addition of CO2 without added energy, causes warming in violation of the 2nd Law of Thermodynamics and

3. An additional source of incoming energy in the force of gravity and gravitational potential ennegy has been totally ignored in the IPCC analysis.

In simple terms, Svante Arrhenius in 1896 said that in order to get the GreenHouse warming Effect (GHE), you must add an energy photon to a greenhouse gas (GHG) which delays the photon's transport to space by a few nanosonds thus causing more warming. The GHE results in about 11% (32/287) of the Earths temperature due to the fraction of the spectrum of energy photons that can be absorbed and released a few nanseconds later. The IPCC however claims that you just need to add a GHG to the air to get the GHE.(AR4, WG1, Ch1, p116). Clearly the latter is impossible since you can not increase the temperature witout adding an energy photon without violating the Law of Conservation of Energy.

It is claimed that the IPCC mechanism is only valid as the Earth's atmosphere is coming up to energy equilibrium, when there would exist sufficient excess energy to provide the GHGs with the required absorbable photon of energy. Once the Earth reaches equilibrium when all the energy coming in is equal to the energy going out, and with both the Water Vapor and CO2 absorbtion spectra saturated or absorbing 100% of the absorbable photons, then the addition of any more GHGs will not result in any more GHE warming because there are no longer any absorbable photons available. This then results in an EXCESS of the GHGs in the air. The proof is simple- When you add more WV to the air, as when the humidity goes from a "normal" 33% to 100% when it rains, there is no increase in

the GHE warming of the air. By the IPCC logic you would expect the WV GHE to triple from 32C to 96C. This does not happen because all of the absorbable photons are already in use. ie the absorbtion spectra for WV (& CO_2) are saturated. This is why all of the Water in the oceans has not become water vapor in use by the GHE. The addition of more GHGs just results in more excess GHGs in the air, not more warming.

The idea of excess GHGs is also supported by the fact that whenever the temperature decreases, every night, every winter etc, then the amount of GHGs in use causing the GHE also decreases. This results in more GHGs becoming excess. Since the temperature is below the record highs and since man has added more CO_2, then under normal average conditions today on Earth there is excess GHGs. If there is excess then then any increase is dictated by the energy coming in and out, and it would use the excess first (as it does every morning) rather than waiting until man adds more excess.

Now if there is excess GHGs and no available energy, then the IPCC/Models contention that more CO_2 results in more feedback warming by WV, also is impossible. due to the lack of energy photons. Similarly the contention that more clouds will result in more positive feedbacks is also impossible if there are no available energy photons, even while in the lab more WV/clouds should result in more warming or posotive feedback IF THE PHOTONS WERE AVAILABLE. With the invalidation of the feedback models, then all derivations of forcing functions which depend on the models are also invalid.

The terminology that a Greenhouse Gas "traps" an energy photon to cause the Greenhouse Effect is incorrect and misleading.

The photon is absorbed and released within nanoseconds as the energized GHG molecule collides with other air molecules and returns the energy to the air. The concept that the energy is trapped is absurd. Since the GHE actually causes about an 11% temperature increase or (32C/287C on average), then if the energy photons were trapped for a significant period of time, say 10 days, let alone the 50+ years of disequilibrium claimed by Hansen, the air would have absorbed all of the energy that would have come in in a single day (ie 11% times 10 days=110%) yet the dailytemp increase is on the order of 10 to 15 degrees C, but the increase in the GHE only claims 0.8 degrees per century. Clearly trapping does not happen. You do not see individual GHG molecules at 900C. They are all at air temperature.

In summary, the GISS/HADCRU/IPCC models are so flawed as to be totally worthless. They fail to model the reality of conditions on Earth. They mis-apply the GHE. If more CO_2 does NOT cause more warming, then there is no reason to Cap or reduce emissions. However as Hansen points out, the increasing temperature data is complete enough to document that warming exists, the data on incoming energy , the sole source used in the models, has essentially not increased since the 1960s, so there MUST be some other source of energy, eg gravity, that is causing the very real

warming. see the paper referenced above for further explanation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-24 20:08:00

No Duplicates.

Comment 3 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: Dr. Thomas
Last Name: Battle
Email Address: tombattle1@aol.com
Affiliation:

Subject: AB 32
Comment:

I wish to submit my opposition to AB 32 and all provisions as currently written. It is based on a number of false assumptions and the data are obviously skewed to support political/ideological positions. The subject needs to be reevaluated by independent scientists using objective data. Even if the study were accurate, the ecomomic impact of its provisions should preclude is adoption/enactment at this precarious time. Please be sensible and look at the entire California picture.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-26 20:41:16

No Duplicates.

Comment 4 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: Koji
Last Name: Kawamura
Email Address: kawamura@wapa.gov
Affiliation:

Subject: Comments re: Second Notice of Public Availability of Modified Text for the Proposed AB 32
Comment:

These comments are in response to the California Air Resources Board (CARB) request for comments on its Second 15-Day Notice of Public Availability of Modified Text for the Proposed Regulation AB 32 Cost of Implementation Fee.

Western Area Power Administration (Western), a federal agency, continues to express concerns that the CARB's regulations include Western as a regulated entity. While Western respects the state's initiatives to implement AB32, Western is bound by Federal laws and regulations. The Supremacy Clause of the United States Constitution does not allow a state to directly regulate the Federal government without its consent or within a field regulated entirely by the Federal government. Western understands the CARB believes the Clean Air Act provides a waiver of sovereign immunity for these regulations. While Section 118 of the Clean Air Act, 42 U.S.C. § 7418, provides a limited waiver of sovereign immunity and under certain circumstances requires federal facilities to comply with federal, state, interstate and local requirements for the abatement of air pollution to the same extent as any nongovernmental entity, under the Act, there must be an action by the United States to delegate authority over greenhouse gases to the state before a federal agency may comply with state regulations. There are current initiatives associated with comprehensive greenhouse gas regulations pending before both the U.S. Congress and EPA. However, as of this writing, Western understands neither the U.S. Congress nor the U.S. Environmental Protection Agency (EPA) has promulgated any such comprehensive laws or regulations on greenhouse gases. While Congress or EPA, in the near future, may decide to comprehensively regulate greenhouse gases as air pollutants , until such time, Western does not have authority to bind Congress, EPA or other federal agencies with jurisdiction over such matters. Furthermore, these regulations that CARB is proposing to promulgate directly impact Western's primary mission of marketing federal power, a field regulated entirely by the federal government. Therefore, Western continues to believe the regulations should not include Western as a regulated party in the RES.

In the past, Western has worked with state agencies, including CARB, to provide information that the state needs. For instance, Western voluntarily reports its greenhouse gas emissions to assist the state meet its goals. In the event CARB would like additional information from Western, Western is willing to evaluate the request and will work with CARB. However, Western, at this time, cannot consent to direct state regulation under AB32.

If you have any questions with regard to the above, please feel free to contact me at (720) 962-7017 or kawamura@wapa.gov.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-30 12:12:10

No Duplicates.

Comment 5 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: Paul
Last Name: Ryan
Email Address: enviropablo@sbcglobal.net
Affiliation: California Refuse Recycling Council

Subject: Comments on AB 32 Cost of Implementation Fee Regulation
Comment:

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Letter and Comments on Proposed AB 32 Cost of Implementation Fee
Regulation
```

Attachment: www.arb.ca.gov/lists/feereg09/194-crrc_-_ab32_fees.pdf

Original File Name: CRRC - AB32 fees.pdf

Date and Time Comment Was Submitted: 2010-04-02 11:43:55

No Duplicates.

Comment 6 for Administrative Fee Regulation (feereg09) - 15-2.

First Name: Tamara
Last Name: Rasberry
Email Address: trasberry@sempra.com
Affiliation:

Subject: Sempra Comments to AB 32 Fee Regulation
Comment:

```
Please see attached comments from Sempra Energy Utilities.
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Attachment: www.arb.ca.gov/lists/feereg09/195-sempra_energy_utilities_comment__2nd_15_notice_ab_32_fee_and_mandatory_reporting_regulations.pdf

Original File Name: Sempra Energy Utilities Comment_ 2nd 15 notice AB 32 Fee and Mandatory Reporting Regulations.pdf

Date and Time Comment Was Submitted: 2010-04-02 12:51:46

No Duplicates.