Comment 1 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Monty
Last Name: Campbell
Email Address: drcampbell48@gmail.com
Affiliation:

Subject: Carbon credit trading scheme
Comment:

```
Sirs,

I understand that you intend to let market place economies reduce
the cost of reducing carbon emissions by allowing emitters to trade
surplus credits to those who need more credits in order to maintain
their business.

Will there be any provision by which an idividual who pays for
credits (by purchasing taxed, carbon based energy, be it
electricity or fuel) can save/reduce carbon emission & thereby have
reduced carbon emission & have a means of selling his reduced
emission to a company that needs them, as above?

Is there a way that a creative aftermarket company can sell a
product that reduces carbon emission - and that company can
generate credits that can be sold to those who need them?

I noticed that Tesla Motors sold its credits for electric car
production to Honda Motor Company.  Will there be a similar means
by which other innovators can profit from working on "green"
projects - to then be able to sell those credits, as a means to
futher develop new innovations?

Thank you,
Monty
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-23 10:40:49

No Duplicates.

Comment 2 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Douglas
Last Name: Baldwin
Email Address: info@baldwincompliancegroup.com
Affiliation: Baldwin Compliance Group Inc.

Subject: Commercial Diesel Trucks
Comment:

```
How will the scoping plan address commercial diesel truck
emissions?
Will offsets apply to large and small fleets?
Can a fleet buy carbon credits to satisfy compliance?
If a fleet converts to hybrid or affects other dramatic COe
reductions will it gain credits to sell?
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-23 12:06:38

No Duplicates.

Comment 3 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Barry
Last Name: Vesser
Email Address: bvesser@climateprotection.org
Affiliation: Climate Protection Campaign

Subject: EIR needs to consider dividends and price floor
Comment:

```
We believe that the Environmental Impact Report should consider the
following:

-An alternative that auctions 100% of permits and returns all
revenues back to Californians as a per capita dividend.

-An escalating price floor on emission permits and limiting
offsets.

Thanks
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-24 16:12:23

No Duplicates.

Comment 4 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Evan
Last Name: Edgar
Email Address: Evan@edgarinc.org
Affiliation: CRRC

Subject: CEQA Scoping Meeting for the Proposed Cap-and-Trade Program Workshop Comments of August 23
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/6-comment_ltr_carceqa_protocol_inclusion.pdf

Original File Name: comment ltr CARCEQA protocol inclusion.pdf

Date and Time Comment Was Submitted: 2010-09-09 08:56:21

No Duplicates.

Comment 5 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Patti
Last Name: Krebs
Email Address: iea@iea.sdcoxmail.com
Affiliation: Industrial Environmental Association

Subject: CEQA Scoping Meeting Cap-and-Trade Regulation
Comment:

Thank you for holding the California Enviornmental Quality Act Scoping Meeting for the Proposed Can-and-Trade Regulation on August 23, 2010.

I would like to submit the following comments:

*Compliance Instruments:

-Analyze effects of increasing amount of available offsets (beyond the 4% proposed or 8% at certain price point)

-Analyze broader use of offsets to include international resources

-Consider cap-and-trade program impacts based on actual (not potential) Western Clilmate Initiative (WCI) partners who have formally ratified participation at time of analysis

*Leakage:

-Analyze Medium and Low Risk categories of businesses (as required by CEQA to look at projected impacts) and reassess their significant and "high" potential to relocate their operations, or a portion of their operations, to other states or internationally.

*Research and Development:

-Representing an area with significant research and technologoy development activities, analysis needs to be conducted on how these R&D activities will be treated in overall facility emission limitations and whether they will be subject to the cap-and-trade/offset program requirements.

*Localized Impacts:

-Global warming is an international concern, and the cap-and-trade/offsets program should not be considered in the context of localized air quality health-related issues.

-Limitations or restrictions of the cap-and-trade/offsets program should not be linked to local air quality district boundaries, and criteria pollutants should continue to be addressed within only the existing regulatory framework.

Patti Krebs, Executive Director
Industrial Environmental Association
110 West "C" Street, #900
San Diego, CA 92101

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/8-iea_logo-blue_and_white.jpg

Original File Name: IEA Logo-BLUE AND WHITE.JPG

Date and Time Comment Was Submitted: 2010-09-10 15:07:22

No Duplicates.

Comment 6 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Jason
Last Name: Barbose
Email Address: jason@betterworldgroup.com
Affiliation: Global Warming Action Coalition

Subject: Letter regarding scope and content of FED
Comment:

```
I would like to submit the attached letter from three environmental
groups that responds to issues raised at the August 23 workshop on
the scope and content of the FED.
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/9-group_letter_on_scope_and_content_of_fed.pdf

Original File Name: Group letter on scope and content of FED.pdf

Date and Time Comment Was Submitted: 2010-09-10 15:46:25

No Duplicates.

Comment 7 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Brian
Last Name: Nowicki
Email Address: bnowicki@biologicaldiversity.org
Affiliation: Center for Biological Diversity

Subject: Review of the environmental impacts and co-benefits of an AB 32 cap-and-trade program
Comment:

```
comments on behalf of the Center for Biological Diversity with
regard to the California Air Resources Board's (ARB) development of
a cap-and-trade program under California's Global Warming Solutions
Act (AB 32), and the review of the environmental impacts and
co-benefits of that proposal
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/10-center_for_biological_diversity_re_ceqa_and_cobenefits.pdf

Original File Name: Center for Biological Diversity re CEQA and cobenefits.pdf

Date and Time Comment Was Submitted: 2010-09-10 16:19:01

No Duplicates.

Comment 8 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Timothy
Last Name: O'Connor
Email Address: toconnor@edf.org
Affiliation: Environmental Defense Fund

Subject: Transparent process for future env. analysis of emissions reduction project qualification
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/11-edf_comment_letter_on_ab32_ceqa_workshop.pdf

Original File Name: EDF comment letter on AB32 CEQA workshop.pdf

Date and Time Comment Was Submitted: 2010-09-10 16:33:40

No Duplicates.

Comment 9 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Casey
Last Name: Creamer
Email Address: casey@ccgga.org
Affiliation: Ag Coalition

Subject: CEQA Comments
Comment:

```
Attached are comments from several agricultural organizations on
the CEQA Scoping Meeting.
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/12-ceqa_comments.docx

Original File Name: CEQA Comments.docx

Date and Time Comment Was Submitted: 2010-09-10 16:20:13

No Duplicates.

Comment 10 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

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

Subject: SCPPA comments on CEQA analysis of cap and trade regulation
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the ARB workshop "California Environmental
Quality Act Scoping Meeting for the Proposed Cap-and-Trade
Regulation", held on August 23, 2010.
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/13-300226001lmm09101001_ceqa_analysis_of_cap_trade.pdf

Original File Name: 300226001lmm09101001 CEQA analysis of cap&trade.pdf

Date and Time Comment Was Submitted: 2010-09-10 16:46:06

No Duplicates.

Comment 11 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Jason
Last Name: Barbose
Email Address: jason@betterworldgroup.com
Affiliation: Global Warming Action Committee

Subject: Environmental Comments for Scope and Content of the FED
Comment:

```
Please accept the attached letter from Center for Biological
Diversity, Ebbetts Pass Forest Watch and Sierra Club California
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/14-group_letter_to_arb_re_fed.pdf

Original File Name: Group letter to ARB re FED.pdf

Date and Time Comment Was Submitted: 2010-09-11 12:43:28

No Duplicates.

Comment 12 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Kelly
Last Name: O'Donnell
Email Address: kelly.odonnell@sce.com
Affiliation: Southern California Edison

Subject: Resubmittal of 9/10/10 comment letter
Comment:

```
Per a voicemail message I received from CARB staff on 9/13/10, I am
resubmitting the attached 9/10/10 comment letter from Southern
California Edison Company (which apparently did not upload properly
on 9/10/10).  Thank you very much, and please contact me with any
questions.
```

Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/15-sce_comments.pdf

Original File Name: SCE Comments.pdf

Date and Time Comment Was Submitted: 2010-09-13 09:37:18

No Duplicates.

Comment 13 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Harvey
Last Name: Eder
Email Address: harveyederpspc@yahoo.com
Affiliation: Harvey Eder/Public Solar Power Coalition

Subject: StoryofCap&Trade/HistoryDerivatives60Min/SCD GHGEmails
Comment:

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see attached,another submital will follow HEPSPC
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Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/16-9-sub2_story_of_cap_and_trade-history_derivitives_solar.doc

Original File Name: 9-sub2_story_of_cap_and_trade-history_derivitives_solar.doc

Date and Time Comment Was Submitted: 2010-09-13 11:24:56

No Duplicates.

Comment 14 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ombcomm@arb.ca.gov
Affiliation: AB 32 Implementation Group

Subject: Cap-and-Trade FED
Comment:

Thank you for meeting with the AB 32 Implementation Group earlier this week regarding the FED in a cap-and-trade system. Per the California Air Resources Board's request, the AB 32 Implementation Group would like to submit the following points for consideration as you move forward with the FED regulation development.

POINT ONE:

In the FED regulation development we ask you to continue to consider the existing criteria pollutant and air toxics control programs that are currently being complied with in existing law, as well as, recognizing a federal EPA program is on the horizon.

The cap-and-trade regulation must meet the appropriate CEQA standards, yet the outline of the regulation is still under consideration. We recommend that the broadest possible design elements be considered, yet the potential outcomes should be informed by what companies can reasonably be expected to do in response to the program requirements.

POINT TWO:

By design, the cap-and-trade program is a flexible program to allow companies to achieve emission reductions where they are most cost effective. Where emission reductions onsite are very expensive, untimely, or infeasible, the option to comply with trading of allowances or offsets is crucial to avoid economic, as well as environmental failure of the program. This makes it hard to predict exactly how, where and when projects and their environmental impacts will be felt. However, there are many factors besides the cost of allowances that will impact how a company will meet their compliance obligation. Other factors will incline companies to perform on-site reductions rather than purchasing allowances or offsets. Allowance trading and offsets would be used as a bridge during the years before such on-site reductions could be accomplished.

Onsite reductions may be done because:

In the early years, the amount and availability of offsets may be more limited than in the future. A higher price for allowances will encourage on-site reductions, and fears about the potential prices of allowances will spur all reasonable action to reduce emissions

onsite.

In the long term, energy efficiency measures will pay-off in a predictable way, while the risk of uncertain and potentially ever higher allowance prices may be unacceptable.

The company may have a strategic plan that includes on-site solar, wind or other high-technology energy efficiency measures to improve customer or public relations.

The onsite emission reduction strategy is only part of a comprehensive modernization or investment plan and the costs are partly absorbed in the larger project. Federal or other laws require on-site emission reductions, such as may be imposed by the EPA GHG regulations.

Because all offset projects under cap-and-trade must be additional to otherwise occurring emission reductions, it is safe for the FED to assume incremental GHG benefits from offsets, as well as, the mitigation of all other environmental impacts as stated above.

POINT THREE:

The major stationary sources covered by the cap-and-trade program are heavily regulated by regional, state and federal environmental agencies. Any project to reduce GHG emissions will likely require extensive environmental review. This makes it unlikely that this aspect of the cap-and-trade program will have an unmitigated impact on the environment. By the same token, offset projects will be subject to very stringent requirements and their use in the program will have no unmitigated impacts. The US EPA program will add another layer to this process and should considered in the FED. The environment should be indifferent to the choices to be made in the cap-and-trade between these alternatives.

Thank you, again for your consideration of these points. If we can be of further assistance, please feel free to contact us at (916) 858-8686.

Shelly Sullivan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-09-16 08:21:06

No Duplicates.

Comment 15 for Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) - 1st Workshop.

First Name: Michelle
Last Name: Passero
Email Address: ombcomm@arb.ca.gov
Affiliation: The Nature Conservancy

Subject: Additional analysis as background for CAR Forest Protocols
Comment:

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see attached
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Attachment: www.arb.ca.gov/lists/aug-23-fed-ceqa-ws/18-final_report_-_car_wp_analysis1.pdf

Original File Name: Final_Report_-_CAR_WP_Analysis1.pdf

Date and Time Comment Was Submitted: 2010-09-29 12:51:16

No Duplicates.

There are no comments posted to Analysis to Identify Potentially Significant Environmental Effects of Proposed Cap-and-Trade Regulation (aug-23-fed-ceqa-ws) that were presented during the Workshop at this time.